

Huawei UK Modern Slavery Statement

2024

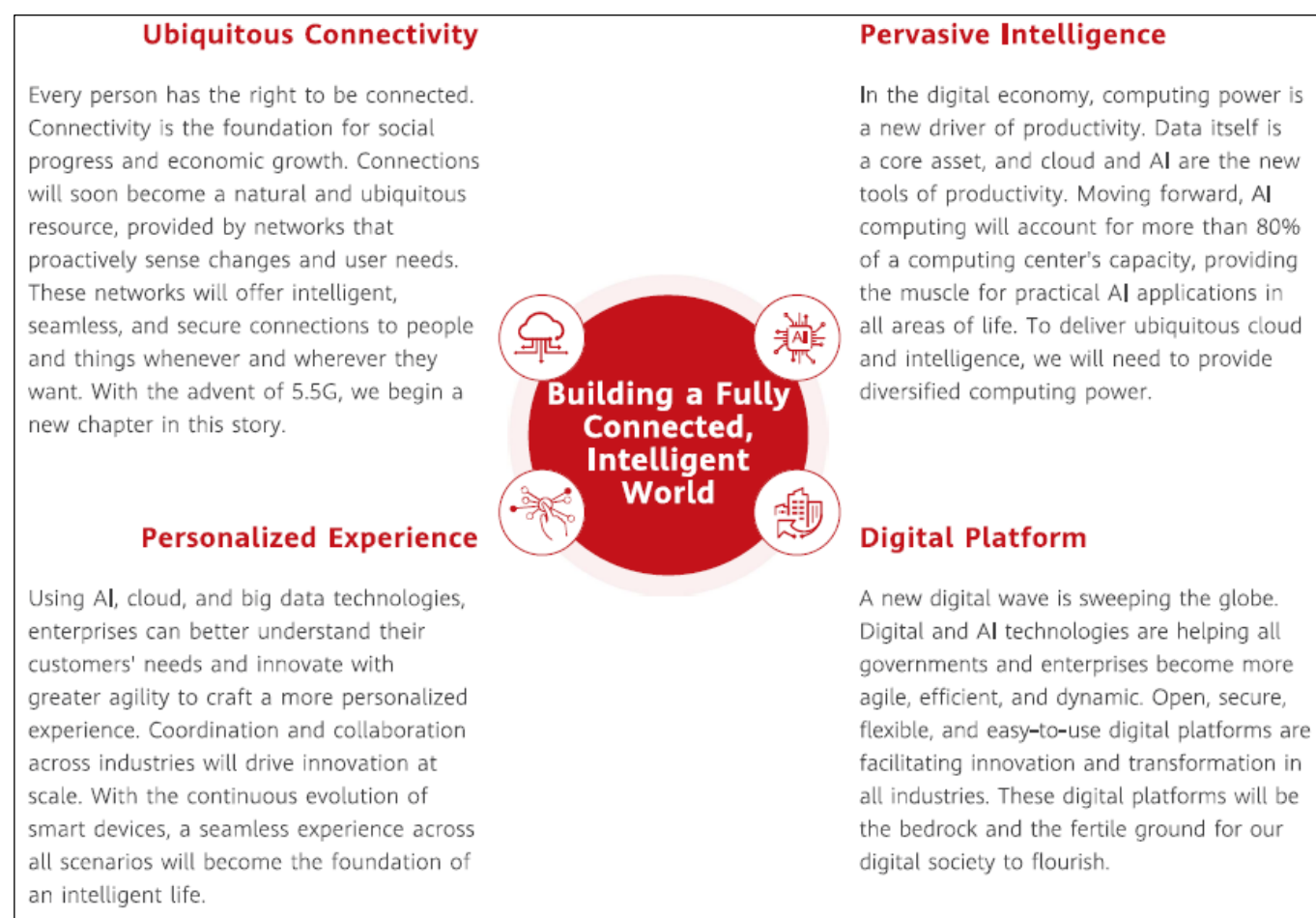


Introduction

This statement is prepared for Huawei Technologies (UK) Co., Ltd. (Company No. 04295981) and Huawei Technologies Research & Development (UK) Limited (Company No. 07371283) (hereinafter together referred to as "Huawei UK") both registered in United Kingdom (hereinafter referred to as "UK"), and both are subsidiaries of Huawei Technologies Co., Ltd, a multinational technology corporation headquartered in China (hereinafter together referred to as "we", "our" or "Huawei").

This is the Huawei Modern Slavery and Human Trafficking Statement for the fiscal year ended 31 December 2024 and is prepared in accordance with the reporting requirements of the UK Modern Slavery Act 2015 (hereinafter referred to as "MSA").

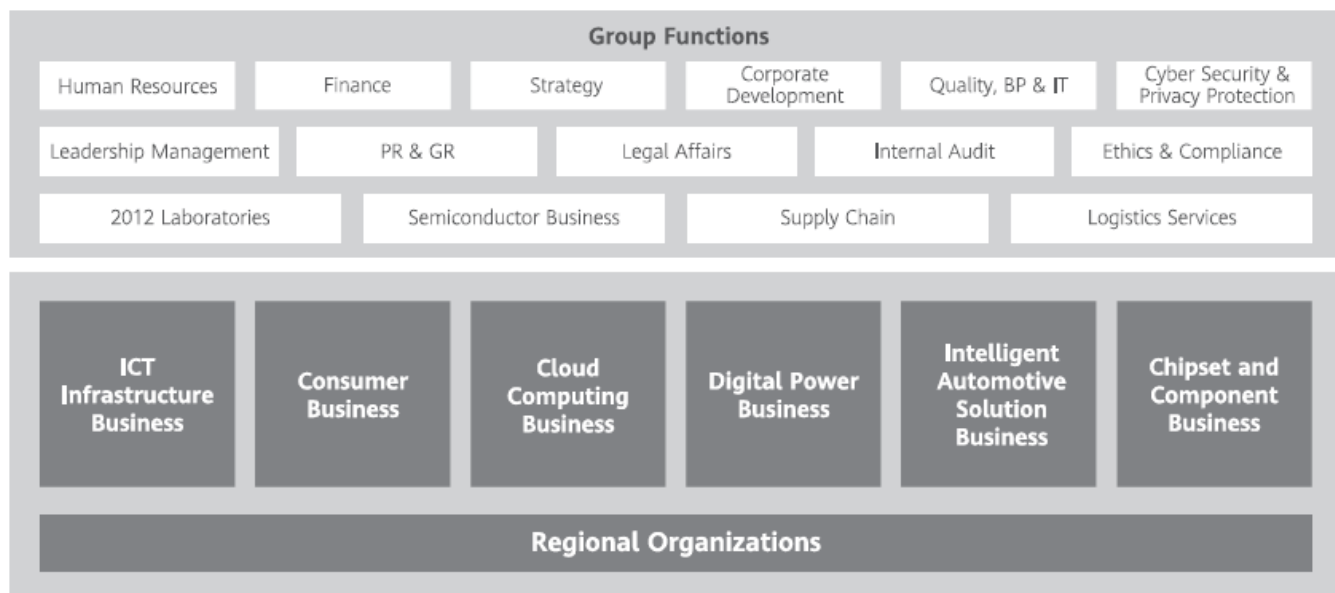
Who we are and what we do



Founded in 1987, Huawei is a leading global provider of information and communications technology (ICT) infrastructure and smart devices. We have approximately 208,000 employees and we operate in over 170 countries and regions, serving more than three billion people around the world. We are committed to bringing digital to every person, home and organisation for a fully connected, intelligent world. Huawei's annual 2024 global revenues were US\$118.16 billion.

Huawei is also a major investor in the UK, supporting thousands of jobs directly and across its UK supply chain.

Structure of The Organisation



Although not all entities in the Huawei group are subject to the requirements of the MSA, we adopt a company-wide approach to policies and procedures on modern slavery and human trafficking. Therefore, this report covers activities and steps that are taken at the group level relevant to the Huawei supply chain and internal operations.

Huawei has implemented a mature governance structure, with clearly defined authorization and accountability mechanisms. The governance structure comprises the Board of Directors (BOD), its committees, group functions, and multi-level management teams. Huawei clearly defines the roles and responsibilities of its organisations to ensure the effective separation of authority and responsibilities as well as checks and balances through mutual oversight. The CFO of Huawei is overall accountable for internal controls. The internal control management department reports to the CFO for any possible defects and improvements already made in terms of internal controls, and assists the CFO in building the internal control environment. The internal audit department independently monitors and assesses the status of internal controls for all business operations.

The Huawei Risk Management System

Huawei uses an Enterprise Risk Management (ERM) system that accounts for our unique organisational structure and operating model, in line with the Committee of Sponsoring Organisations of the

Treadway Commission (COSO) framework and referencing the ISO 31000 risk management standard.

Under this system, we have defined a robust set of ERM policies and processes, continually refined our ERM organisations and operating mechanisms, and ramped up efforts to improve risk management and response.

Huawei's ERM system ensures the following:

- The Board of Directors approves company plans for managing major risks and crises and handles unexpected major incidents.
- Business managers, as the primary risk owners in their respective business domains, proactively identify and manage risks to ensure they remain at an acceptable level.

At Huawei, risk management is incorporated into both strategic planning and business planning processes. During strategic planning, we systematically identify and manage strategic risks. During business planning we formulate appropriate countermeasures and monitor and report on risks as part of performance management during routine operations. Huawei ensures uninterrupted business operations by identifying major risk factors during strategic decision-making and business planning, and taking necessary measures to control risks during operations and execution.

Preventing Modern Slavery - The Huawei Strategy

The Huawei Regulatory Compliance System

Huawei works hard to conduct its business with integrity and conform to business ethics standards and all applicable laws and regulations. We have worked for years to build a compliance management system that aligns with industry best practice and embed compliance management into every aspect of our business activities and processes. These efforts continued through 2024.

Huawei emphasises a culture of integrity and invests heavily to make it a reality. As such, every Huawei employee is required to strictly adhere to our Business Conduct Guidelines (BCG).

The Huawei Chief Compliance Officer manages the company's operational compliance. Every one of the company's business departments and subsidiaries has also established its own compliance team, taking responsibility for the management of its own operational compliance.

We identify and assess risk according to applicable laws and regulations and business scenarios. In addition, we have formulated control measures that have been incorporated into our business activities and processes. We also continually optimize our management system through root cause analysis and targeted corrective action.

The Huawei Internal Control System

Huawei continued to design, implement and improve its internal control system through 2024, based on our organisational structure and operating model. The internal control framework and its management system apply to all business operations and financial processes of Huawei. The internal control system is based on the five components of the COSO framework: Control Environment, Risk Assessment, Control Activities, Information & Communication, and Monitoring. It also covers internal controls of financial statements to ensure their truthfulness, integrity, and accuracy.

A control environment is the foundation of an internal control system. Huawei is committed to a corporate culture of integrity, business ethics, and compliance with laws and regulations. Huawei has issued the BCGs to identify acceptable business conduct and they must be observed by all employees, including senior executives. Regular training programmes are offered, and all employees are required to sign the BCGs to ensure that the BCGs have been read, understood, and observed.

The Huawei Position on Modern Slavery

Respecting Human Rights

Huawei believes that connectivity is a basic right for every human being. We want to build better network connectivity and provide convenient and affordable information and communications services to billions of people around the world using our innovative technologies. Ubiquitous broadband and connectivity will create jobs, promote development, decrease poverty and improve quality of life. In addition, connectivity will help us respond to global challenges, reduce the human impact on the environment, and provide essential communications services to support rescue and relief efforts during natural disasters.

Huawei is committed to adhering to all applicable conventions and national laws and policies, and respects all basic human rights as promoted by the Universal Declaration of Human Rights. We develop products and services in compliance with international standards and certifications. We strive to prevent our business activities from causing or contributing to any adverse impacts on human rights. Huawei has been a member of the United Nations Global Compact (UNGC) since 2004, and a member of the Responsible Business Alliance (RBA) since 2018. In addition, Huawei is committed to the UN Guiding Principles on Business and Human Rights (UNGPs) and standards released by the International Labour Organization.

Safeguarding Labour Rights

Huawei supports and protects the rights of its employees through detailed, equitable regulations that cover all stages of an employee's relationship with the company, including recruitment, employment and exit. We are committed to providing equal opportunities to all employees. When it comes to employee recruitment, promotion, and compensation, we do not discriminate against anyone on the basis of race, religion, gender, sexual orientation, nationality, age or disability.

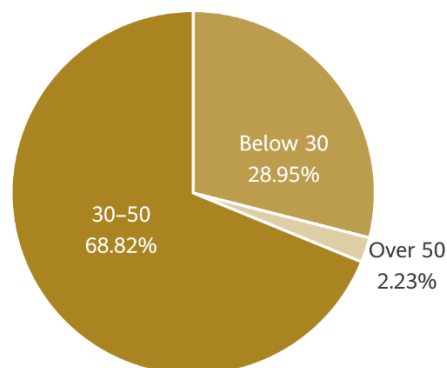
We prohibit all use of forced labour, whether overt or covert, and all use of child labour.

At Huawei, employees are the heart of our organization. We have established a talent management mechanism that fosters mutual growth and shared success between the company and

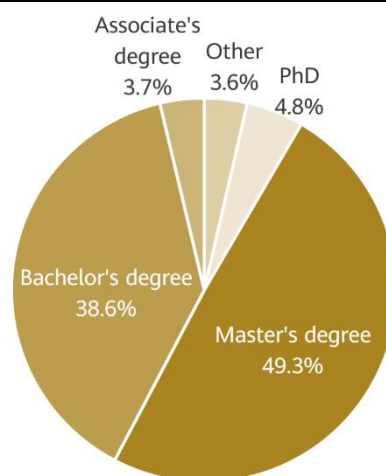
employees. We continuously work to improve our workplace environment and have developed a comprehensive employee health and safety assurance system. When it comes to employment, working hours, compensation, and benefits, we are committed to complying with applicable laws, regulations, and international standards. We value diversity in our workforce and provide opportunities for employees to learn and grow.

Diversity and Inclusion

At Huawei, we consider our employees to be outstanding talent when they are qualified for their positions. Employees can choose to become professionals if they want to take on challenges that tackle uncertainty and constantly push their limits. They can also take up specialist positions if they want to pursue excellence in one position for an extended period of time. Regardless of their chosen positions, everyone is valued and their contributions will be respected.

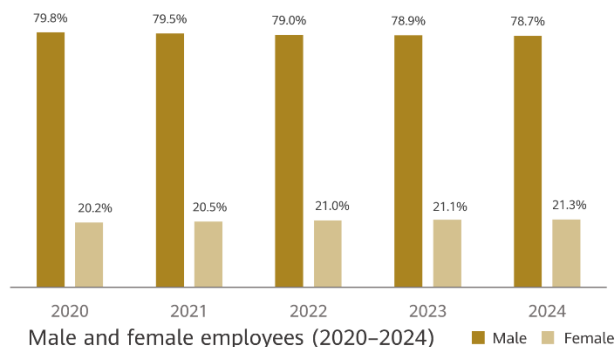


Employee age (2024)



Level of education (2024)

Huawei values diversity and inclusion within its workforce and is committed to creating a positive, open, and diverse workplace in which all employees enjoy equal opportunities. By the end of 2024, Huawei had about 208,000 employees from 166 different countries and regions, and 54.1% of them were in R&D.



Huawei is committed to complying with applicable regulations such as the Universal Declaration of Human Rights. Our Caring for Employees Policy lays out the principles and requirements that cover areas like child labour, forced or involuntary labour, health and safety, diversity, non-discrimination, humane treatment, working hours, compensation and benefits, freedom of association, privacy protection, and learning and development. We never engage in or support any form of discrimination based on race, social origin, caste, religion, disability, gender, sexual orientation, marital status, political opinions, age, or any other condition that could give rise to discrimination. When it comes to important matters such as hiring, remuneration, access to training, promotion, and termination or retirement, we have well-designed measures in place to prevent such discrimination.

We require every employee to study, understand, and sign the Huawei Business Conduct Guidelines (BCGs). These Guidelines describe the legal and ethical requirements that employees must comply with when engaging in business activities. This means that in addition to abiding by applicable laws and regulations, employees should also have a strong sense of social responsibility. Anyone who is found to have violated the BCGs will be subject to disciplinary action, including termination of employment and legal action if necessary.

We value diversity within our workforce and respect the lifestyles of all of our employees. We aim to create an environment that makes it easy for everyone to practice and follow their beliefs and customs, whatever they may be. For example, we have prayer rooms on our campuses, and halal food

is available in our cafeterias. For nursing mothers, we provide lactation rooms.

We also provide facilities like cafes, gyms, and libraries. These facilities help us provide quality services that meet the diverse needs of our employees.

We have also established employee communication mechanisms as part of our efforts to create an open, inclusive workplace that encourages mutual respect and diversity. Every year, we gather our employees' opinions and suggestions through our organizational climate survey, Manager Feedback Program (MFP), the manager open day program, and more. Employees can also report violations, file complaints, and seek assistance through multiple channels such as the dedicated complaint mailbox of our Committee of Ethics and Compliance (CEC) and our HR service hotline. Huawei keeps the source of all reported information strictly confidential and prohibits any attempts to threaten or retaliate against those who report issues within the company.

In 2024, we carried out a wide range of training activities. Employees across the company spent an average of 65.5 hours in training delivered by more than 27,000 trainers. Our smart classroom solution 2.0, which was upgraded with AI and the latest digital technologies, supports hybrid teaching to boost efficiency and quality. The solution features a digital class coordinator, offers a diverse array of teaching tools, and migrates teaching resources to the cloud, delivering an immersive learning experience.

Sustainable Supply Chain Management, Monitoring and Compliance

Huawei is committed to the UN Guiding Principles on Business and Human Rights and is serious about the societal and environmental impact of our global procurement and supply chain. We have teamed up with customers and suppliers to further the sustainable development of our supply chain.

We have incorporated CSR requirements into both our Quality First strategy and activities that take place across the entire value chain. We offer premium prices to suppliers that offer higher quality in a bid to encourage them to improve their CSR performance. We have also integrated CSR requirements into our global procurement processes, from material and supplier qualification, selection, and appraisal to performance management and procurement fulfilment.

Procurement CSR Management System

Huawei has established its procurement CSR management system based on the OECD Due Diligence Guidance for Responsible Business Conduct and the IPC-1401 Corporate Social Responsibility Management System Standard. We require all of our suppliers to comply with all applicable laws and regulations. We also encourage them to adopt globally recognized industry standards and promote diversity so as to improve their own CSR management.



Procurement CSR Management System

In order to strengthen our management requirements for forced labour and due diligence, in 2024 Huawei updated its Supplier Social Responsibility Code of Conduct and the supplier CSR agreement in accordance with the latest RBA Code of Conduct v8.0 and the Joint Alliance for CSR (JAC) Supply Chain Sustainability Guidelines, which must be followed by all Huawei suppliers. These documents cover labour standards, health and safety, environmental protection, business ethics, and management systems. Huawei also requires its suppliers to convey the same requirements to their own suppliers. We see the use of child labour or forced labour as red-line issues, and have zero tolerance for any behaviour that crosses CSR red lines.

In 2024, none of our suppliers were found to have crossed any CSR red lines regarding the use of child labour or forced labour.

To support the strategic goal of sustainable procurement, we regularly deliver CSR training to all procurement members. This training covers the agreements, red lines, processes, and audit practices related to CSR in procurement. CSR requirements are incorporated into the performance indicators of all teams in our procurement department.

Huawei's CSR Red Lines in Procurement

Huawei's procurement CSR red lines include:

1. Use of child labour.
2. Use of prison labour (including using prisons as suppliers or subcontractors) or forced labour (including restricting personal freedom or detaining personal identity documents).
3. Violence, physical punishment, sexual harassment, illegal body searches, cross-gender body searches, and other similar behaviour.
4. Salary payments below local minimum wage.
5. Negligence that leads to major fires or explosions.
6. Working conditions that seriously endanger personal health and safety or lead to fatal field incidents.

7. Illegal emissions of any hazardous or toxic wastes, including waste water, gas, and residue.
8. Negligence that leads to media crises or serious mass disturbances, such as collective labour disputes, mass brawls, mass poisoning, unnatural deaths, or other incidents causing casualties.
9. Unsafe and unhealthy working environments that lack effective measures to prevent potential health and safety accidents, or diseases that may be caused due to exposure in workplaces (e.g., collective infections).
10. Corruption or dishonest acts that violate the requirements of "no bribery, no gifts, no conflicts of interest, no falsification, no cutting corners, no fraud, and keeping promises".

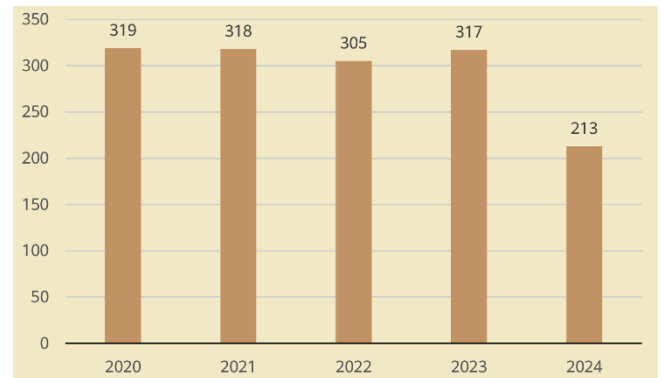
Supplier Risk Rating and Auditing



Huawei continually conducts supply chain due diligence using a risk-based approach. We work with suppliers to identify CSR impacts, risks, and opportunities, and take actions to prevent and mitigate CSR risks and reduce negative impacts. Every year, we assess our major suppliers, which represent 90% or more of our procurement spending, and assign each supplier one of three risk ratings (high, medium, or low). We develop an annual sustainability audit plan to deal with suppliers that are assessed as posing medium or high risk. In addition, we perform onsite assessments on all potential suppliers to examine their sustainability systems. Companies that fail the assessment are not eligible for consideration to become Huawei suppliers.

We have developed our supplier CSR risk rating methodology based on suppliers' CSR performance and the effectiveness of their risk prevention and management system by focusing on five criteria: CSR performance rating, health and safety risk,

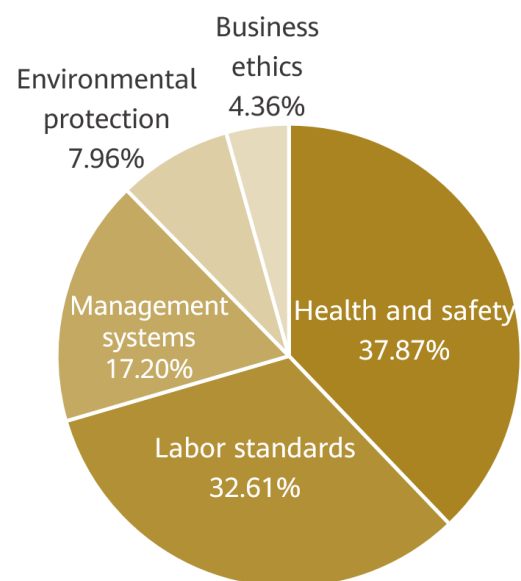
environmental risk, labour risk, and audit results. We pay special attention to the progress of medium- and high-risk suppliers in these areas.



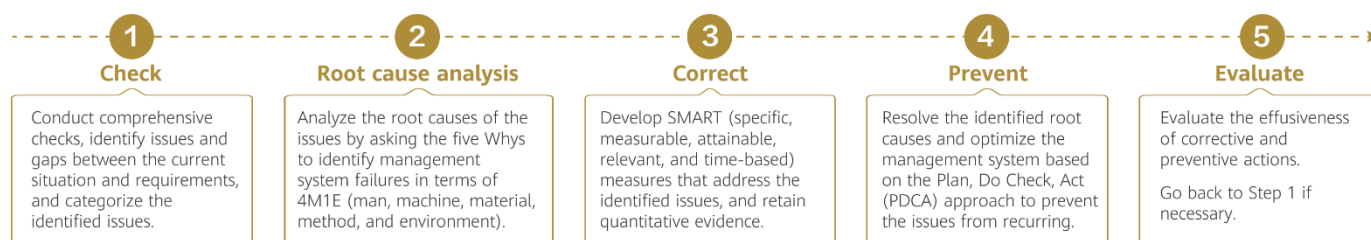
Supplier CSR on-site audits 2020-2024

We have prepared and continue to update our Supplier CSR Audit Checklist in accordance with industry best practice. We conduct supplier CSR audits using internationally recognized methods such as onsite inspections, employee interviews, management interviews, documentation review and online searches. We also use the Blue Map database developed by the Institute of Public and Environmental Affairs (IPE) to assess supplier compliance with environmental and safety requirements.

In 2024, we assigned CSR risk ratings to more than 1,600 major suppliers and organized 213 onsite CSR audits and more than 1,000 onsite EHS audits on engineering subcontractors.



Supplier CSR risks identified in 2024 audits



If we find an issue during an onsite audit, we help the supplier resolve the issue through the CRCPE methodology (check, root cause analysis, correct, prevent, and evaluate) as shown above. This methodology helps suppliers identify common problems and develop targeted solutions. In 2024, we worked with 14 suppliers to drive the resolution of identified environmental and safety compliance issues within a specified timeframe.

Supplier Performance Management

Every year, Huawei appraises suppliers' sustainability performance as part of their overall performance appraisals. During this process, we also consider how they manage the sustainability of their own suppliers. Suppliers are classified into four grades (A, B, C, or D) based on their sustainability performance. In 2024, we appraised the sustainability performance of more than 1,600 major suppliers by looking at 5 criteria: carbon emissions reduction, environmental protection, labour management, EHS incidents, and management systems.

The amount of business we do with each supplier depends partly on their sustainability performance, which is also a factor considered in our tendering, supplier selection, portfolio management, and other processes. When suppliers are equally matched in other factors, those that perform better in sustainability are given priority in terms of the share of business or business opportunities. The reverse is true for low-performing suppliers. Depending on the situation, we may instruct suppliers with poor sustainability performance to resolve existing issues within a specified timeframe, reduce their share of business, offer them fewer business opportunities, or even terminate our business relationship.

Supplier Capability Improvement

As part of our efforts to help suppliers improve their sustainability performance, we regularly provide them with sustainability training and coaching. We also encourage our suppliers to adopt industry best practices and embed sustainability requirements into their business strategies to reduce operational risk and boost efficiency.

In 2024, we provided six CSR training sessions for our suppliers, which covered a wide variety of topics including CSR standards, due diligence, EHS and production safety, environmental protection, and carbon emissions management. We also required supplier representatives who participated in the training to go on and train their own staff engaged in CSR management. This tiered training covered over 30,000 people.

To improve our suppliers' ability to identify and manage CSR risks, we provided dedicated CSR coaching to 19 major suppliers. This helped them increase their sustainability score by 11% on average.

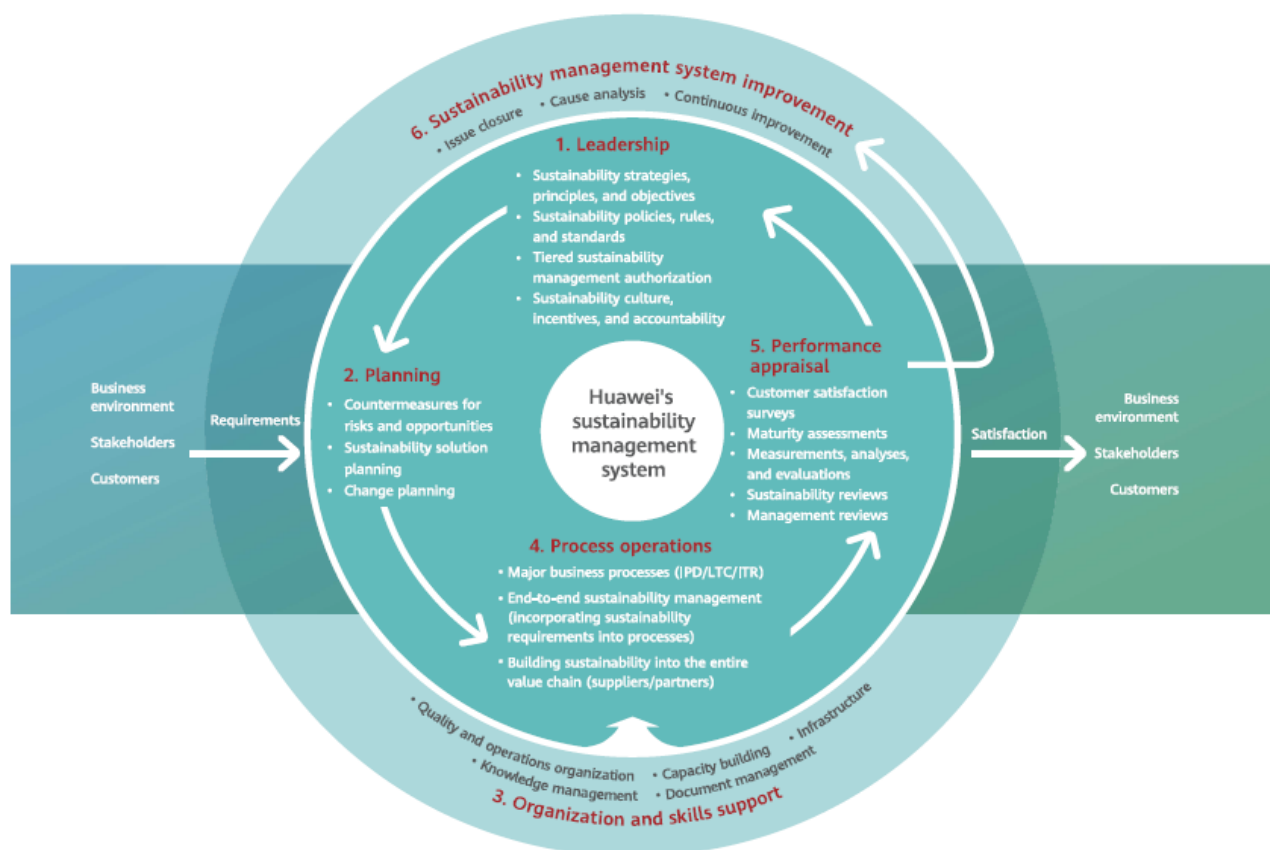
Stakeholder Engagement and Cooperation

Huawei maintains close engagement and collaboration with industry stakeholders. Together with the upstream and downstream partners in our supply chain, we drive CSR standardization, perform CSR due diligence, and make continued efforts to improve CSR management and supply resilience. We work hand-in-hand with our partners to build a responsible supply chain.

In 2024, Huawei shared information on supply chain due diligence with several customers, including that related to supply chain traceability, forced labour, and due diligence on conflict minerals. We also recommended six suppliers for joint audits organized by the Joint Alliance for CSR (JAC).

Sustainability Management

Huawei has established a systematic sustainability management system based on international standards such as ISO 26000 and the Responsible Business Alliance (RBA) Code of Conduct. We fully consider both our internal and external environments to promptly identify and assess sustainability impacts, risks and opportunities. We are also working to align with external regulations and pursue digital operations to continually improve our management system. Our goal is to support the closed-loop management of our sustainability strategies, ensure operational compliance, and continually improve stakeholder satisfaction.



Framework of Huawei's sustainability management system

Huawei's Corporate Sustainable Development (CSD) Committee works under the authorization of the Board of Directors. The Committee develops sustainability strategies and guides the CSD sub-committees of functional domains, business domains, and regional offices as they develop sustainability goals and solutions, and monitors their implementation. The committee meets each quarter, convenes special meetings as necessary to discuss and decide on sustainability topics, and escalates important topics to the Board of Directors for discussion and decision-making. In 2024, major topics discussed included compliance with the EUs Corporate Sustainable Reporting Directive (CSRD), plastic reduction and elimination, supplier carbon emissions management, digital carbon management, community responsibilities, and digital inclusion.

For more details visit:
www.huawei.com/en/sustainability/management

Responsible Management of Minerals

Huawei is committed to and works to drive the responsible procurement of products containing raw materials, including tin, tantalum, tungsten, gold (3TG), cobalt, and mica. We have established a risk-based responsible mineral management system in

accordance with the OECD Due Diligence Guidance for Responsible Business Conduct and the Chinese Due Diligence Guidelines for Mineral Supply Chain. The responsible management of minerals is an integral part of our procurement CSR management system, and has been embedded to supplier qualification, supervision, and auditing processes. As a downstream company in the mineral supply chain, Huawei does not directly purchase any minerals, and there are at least seven tiers between Huawei and mining companies. We require that our suppliers do not purchase conflict minerals, and ask them to cascade this requirement to their own suppliers, in order to prevent or reduce the risk that minerals contained in their products may directly or indirectly support human rights abuses, harm the environment or personal health and safety, or breed corruption. Huawei also actively works with global industry peers through industry initiatives like the Responsible Minerals Initiative (RMI) and the Responsible Critical Mineral Initiative (RCI). Together with partners up and down the supply chain, we conduct supply chain surveys, create a complete list of all related smelters, and push these smelters to apply for or maintain the Responsible Minerals Assurance Process (RMAP) certification.

In response to the RMI's call, we now identify suppliers of six conflict minerals: tin, tantalum, tungsten, gold (3TG), cobalt, and mica. According to the Conflict Minerals Reporting Template (CMRT) and the Extended Mineral Report Template (EMRT), we urge suppliers to identify and investigate all smelters within their supply chains, and our suppliers must require that no identified smelters purchase minerals from conflict-affected and high-risk areas (CAHRAs), and urge smelters that have not obtained the RMAP certification to get the certification within a specified timeframe when necessary.

Further details

Huawei Responsible Management of Minerals:
<https://www.huawei.com/en/sustainability/the-latest/stories/responsible-management-of-minerals>

Huawei Statement on Responsible Mineral Supply Chain Due Diligence Management:
<https://www.huawei.com/en/declarations/huawei-statement-on-responsible-mineral-supply-chain>

Selected Sustainability Targets and Metrics

No.	Category	Metric	Unit	Target	Actual Value		
					2024	2023	2022
10	Social	Average hours of training per year per employee	hours	/	65.5	63	66
12	Social	Security personnel receiving training in human rights policies or procedures	%	100%	100%	100%	100%
14	Social	Occupational health check coverage	%	100%	100%	100%	100%
15	Social	Violations of CSR red lines (such as child labor and forced labor)	count	0	0	0	0
16	Social	High- and medium-risk suppliers subjected to CSR audits	%	≥ 90%	100%	100%	100%
17	Social	Suppliers passing customer CSR audits	%	100%	100%	100%	100%
42	Governance	EcoVadis sustainability score	points	/	81	68	64

Approval & Signature

In accordance with the Modern Slavery Act 2015, Section 54(1) and published guidance, this Statement for the financial year ended 31 December 2024 on our efforts to combat human trafficking and modern-day slavery in our business and supply chains was approved by the boards of directors for the following Huawei entities that fall under the reporting requirements within UK law, and has been signed by the undersigned director for and on behalf of Huawei Technologies (UK) Co., Ltd. and Huawei Technologies Research & Development (UK) Limited.

Signed:



Name:

zhang zhe

Director of Huawei Technologies (UK) Co., Ltd.

Director of Huawei Technologies Research & Development (UK) Limited.

Dated:

2025/6/24