3CEMS "Child Labor Prohibition Policy"

3CEMS Group in China has a policy against Child Labor as prohibited by international standards and relevant national laws. Child Labor shall not be used in any stage of manufacturing and it should be considered a serious criminal act.

Child Labor is work performed by any person under the age of completion of compulsory education or under the minimum age for employment in the country, whichever is higher. In China, a Child Laborer refers to a worker who is under the age of 16, which is the legal minimum working age. All workers under the age of 18 may not be likely to engage in dangerous work, and shall prohibit any influences of the education needs from night time work. This Child Labor Prohibition Policy applies to all business operations of 3CEMS in China.

- 1. Freely chosen employment: it means that all the employment relationship is based on freewill and any and all form of forced labor is not allowed.
- 2. Child labor: it refers to workers that under the age of 16.
- 3. Human treatment: it means that there is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment.
- 4. All the employees should be above 16 years old and child labor, bonded labor and prison labor will not allowed to be employed.
- 5. Conduct interviews according to job requirements. Minor workers should not to be used in the position that may violate the regulation of Labor Law and they should also not to be arranged working in the night. (The positions which minor workers can't work at please refer to :<source of danger identification and evaluation form on occupational health and safety >)
- 6. Physically checking for minor workers should be conducted as per checking items of the *List of Health Check for Minor Workers* when they begin to work. The second physical check for minor workers should be conducted when they work in the company for a full year. The third physical check for minor workers should be conducted when they are over 18years old and half year interval time from the prior physical check. Prime will bear all physical check cost.
- 7. The identification card of minor workers are marked specially by pink grounding color. The department assistant will pick up the new employee to work finally.
- 8. Workers resign after probation period should notice the company 30 days in advance and fill in the "Application form for workers to quit" taken from the department assistant.
- 9. Department director should ratify the applications that conform to the regulations. Department assistant should send their *application forms for workers to quit* to the undertakers of AD one day ahead of their final working day to go through the process.
- 10. Workers who are about to quit can go through the formalities on the first Tuesday after their final working day and they should get the wages and move out the dormitory on the very Friday. AD will pay the wage through active currency of factory if workers have special requirement to need wage in advance. Person who doesn't go through the formalities within one week will be treated as quit of his or her own accord.

- 11. Company should not take workers' resignation as excuse to deduct their wages.
- 12. Company should give approval to workers who have put forward a written form of resignation in advance and have performed a good handover procedure.
- 13. Child Labor Prevention Program:

3CEMS believes that the preventive work to again using of Child Labor is very important. 3CEMS deals with the minimum age to make specific provisions, and to make a written employment policy. The policy should be as one of the all levels of management to make recruiting decisions with reference files. To the hiring of any candidate, 3CEMS should take effective program to verify its age. 3CEMS should thoroughly examine and apply various archives related to the age, all the proof related file for candidates age should meet the requirements of the relevant Chinese Laws; and, it should have proved the corresponding, for example:

- The legal issued photo ID (latest version)
- Other valid identification issued by the government, such as a birth certificate, driver's license, education certificate or any other valid documents to prove the date of birth.

Proof of Identity Methods:

- To ensure that the ID card photo matches with the candidate looks
- To use face recognition software or testing machine or other electronic equipment to verify the identity of the applicant, the identity certificate issued by the authorized government agency or, 3CEMS needs to verify through local government authorities.
- Applicant signed identity confirmation letter of commitment.

The interview is all candidates must participate in. Such as doubts about the age of the candidate in the interview process, the interviewer will ask the following question:

- What is your date of birth?
- Where is your hometown?
- Your brother or sister?
- What years are you school?
- Which school have you attended to?
- In applying before 3CEMS, where did you work?

3CEMS will document and save all the records of the recruitment process, for example:

- proof of age and identity document copy
- Records of the results that match with the electronic equipment.
- The candidates in the 3CEMS file, including its name, the starting time, the Department, the main job, work schedule, the name of the manager.

3CEMS will aim to the human resource department and carry out Child Labor Prevention Training. Through such training, strengthen the relevant staff to understand "Child Labor Prohibition Policy", preventing from the issues of recruitment process.

3CEMS will launch the "Child Labor Prohibition Policy" in all the factory in order to ensure that employees fully understand the meaning of the policy. In addition, "Child Labor Prohibition Policy" will be posted through the poster form in public area in the factory.

If 3CEMS had to go through professional agencies to recruit new workers, then 3CEMS should be required to comply with the 3CEMS "Child Labor Prohibition Policy" for the recruitment process. Before hiring workers for 3CEMS from the authorized professional agencies, 3CEMS should check the business license, make sure it is followed the violation of Child Labor Prohibition laws. At the same time, the agencies must sign a commitment letter following with the 3CEMS "Child Labor Prohibition Policy".

3CEMS will periodically check with the agencies to ensure the strict compliance with company "Child Labor Prohibition Policy". 3CEMS will irregularly review and update" Child labor Prohibition policy" regulations, in order to ensure that the policies and regulations in China highly consistent. 3CEMS will also be in accordance with all the legal relevant requirements to manage all recruitment documents.

14. No Use of Child Labor and Take Remedial Measures

14.1Child labor identification

Check interviewees' ID card carefully before employing them. Avoid employing child labors under the age of 16 through talking and observation.

13.2Department supervisors should get to know the workers that may be child labor through talks and observations to make sure all the child labor not be identified are identified and protected.

15. Remedial Measures

- 15.1 Stop Working: Prime will stop the child labor's work at the point child labor is found. Management representative and AD personnel will be informed to handle the issue.
- 15.2 Health Check: AD is responsible for sending the child labors to have special labor health

- check to make sure their health are not affected by the work. If affected, all the fees, including medical treatment cost and living cost, are at company's cost.
- 16. Paid annual leave: employees who work in the company for a full year and will continue to work can enjoy paid annual leave. Spring Festival: The first three days of the first month of the Chinese lunar calendar, three days per year.
- 17. Expense: Prime will allowance RMB10/day to the food card of supervisors per attendance days. Regular employees will be allowanced RMB5/day to the food card per attendance days. Workers will be allowanced RMB6/day to the food card per attendance days. The allowance will not be deducted from the salary. The board expense which the employees charge to their food card will be deducted from the salary.