

# UNILINK Responsible Business & ESG Policy

APPROVED AND EFFECTIVE

| Field          | Detail                                                        |
|----------------|---------------------------------------------------------------|
| Version        | 1.0                                                           |
| Approval date  | 1 August 2026                                                 |
| Status         | Approved and effective                                        |
| Approver       | Baining Wu, Director                                          |
| Effective date | 1 August 2026                                                 |
| Review cycle   | At least annually and after a material change                 |
| Public URL     | <a href="https://unilink.co/esg/">https://unilink.co/esg/</a> |

Approved by Baining Wu, Director. Effective 1 August 2026. English text is operative; the Chinese text is a reference translation.

# 1. Purpose

UNILINK provides education counselling and application support across Australia and China. This policy sets the minimum environmental, social and governance standards for that work. It is intended to convert broad commitments into practical decisions, records and review points.

UNILINK will describe its ESG performance accurately. A plan, target or certification will not be presented as an achieved result. Where data is incomplete, the limitation and the method used to estimate or improve it will be stated.

# 2. Covered entities and operations

This policy covers:

- **UNILINK EDUCATION PTY. LTD.** — ABN 50 152 187 650;
- 盘否教育科技 ( 北京 ) 有限公司 — unified social credit code 91110105MA01M1Y31U;
- operations in Australia; and
- operations in China, including remote and nationally delivered digital services.

It applies to directors and employees. Contractors and suppliers are expected to meet relevant provisions where UNILINK can reasonably direct or influence their work. “Covered entities” is used as an operational description and does not, by itself, assert a parent, subsidiary or ownership relationship.

# 3. Our operating principles

UNILINK will:

1. comply with applicable laws and contractual requirements in each place where it operates;
2. assign clear responsibility for ESG decisions and keep proportionate evidence;
3. identify higher-risk activities first, rather than treating every supplier or activity as equal;
4. prevent or reduce harm where reasonably practicable and respond when a concern is identified;
5. protect people who raise concerns in good faith from retaliation;
6. use plain, specific and supportable public claims; and
7. review the framework at least annually and improve it as the business, technology and evidence change.

# 4. Accountability

The legally authorised Director approves this policy and remains accountable for its implementation.

The following assignments apply from 1 August 2026:

- **Baining Wu, ESG Owner**, responsible for the risk register, evidence register, training, annual review and progress reporting;
- **Baining Wu, AI Accountable Owner**, retaining responsibility for material AI-use cases, privacy and human-oversight controls unless separately delegated in writing;
- **Mavis Xiaomao Wang, Australia Operations Lead**, responsible for Australia records and escalation; and
- **Baining Wu, China Operations Lead**, responsible for China records and escalation.

One person may hold more than one role in a small organisation, but the assignment and duties must be written down. Significant concerns, policy exceptions and corrective actions are escalated to the Director.

## 5. Environmental responsibility

UNILINK's main environmental impacts arise from office energy, business travel, digital and cloud services, information-technology equipment, purchased goods and waste. The business will manage these impacts proportionately by:

- using digital records and workflows as the default, while retaining paper where law, accessibility or operational need requires it;
- seeking available electricity and energy-use information for the Australia and China operations, including landlord data where premises are leased and direct meter data is unavailable;
- recording work-related flights from the policy effective date and using remote meetings where they can achieve the same business outcome;
- selecting durable, repairable and energy-efficient equipment where reasonably available and fit for purpose;
- extending device life where security, reliability and service quality permit;
- recording the disposal of company-owned electronic equipment and using responsible recycling channels where available;
- reviewing material cloud and AI service providers for available information about energy and emissions practices;
- reducing avoidable purchasing, packaging and waste; and
- considering environmental information when choosing material suppliers.

UNILINK does not currently claim a verified carbon footprint, quantitative emissions-reduction target, carbon-neutral status, net-zero status, SBTi validation or ISO 14001 certification. It intends to prepare a proportionate operational greenhouse-gas baseline for FY2026/27, subject to data availability and management review. Any future target will identify its boundary, baseline, period, method and limitations.

## 6. Social responsibility and human rights

UNILINK respects internationally recognised human rights and does not tolerate forced labour, human trafficking, child labour, debt bondage, unlawful discrimination, harassment, retaliation or other serious exploitation in its operations.

The covered entities will:

- comply with applicable workplace, wage, working-time and health-and-safety requirements;
- provide a workplace free from bullying, harassment and unlawful discrimination;
- make employment and service decisions on relevant, lawful criteria;
- support accessibility and reasonable adjustments where practicable;
- inform staff of the confidential concern and grievance process;
- assess modern-slavery and labour-rights risks in material or higher-risk suppliers;
- include proportionate labour-rights and compliance terms in relevant new supplier or contractor agreements;
- investigate credible concerns and document corrective action; and
- focus remediation on protecting affected people, avoiding further harm and using business leverage to improve practice.

UNILINK uses a direct-delivery model for its core education counselling and application-processing services and does not currently use sub-agents for that work. If this changes, the appointment must be approved, documented and reviewed before the third party delivers services.

## 7. Student protection, accessibility and service integrity

UNILINK will not promise guaranteed admission outcomes or misrepresent its relationship with an education provider. Student information and documents must be assessed on their merits and escalated when authenticity, consent or welfare is uncertain.

Where facial verification, online notarisation or similar identity and document-integrity controls are used, they must be:

- lawful and reasonably necessary for the stated purpose;
- explained to the person affected;
- limited to the information needed for that purpose;
- protected by appropriate access and security controls; and
- supported by a meaningful manual-review route when technology cannot reliably establish an outcome.

No person will be denied service or subjected to a significant adverse decision solely because of an automated output without meaningful human review.

## 8. Governance and Code of Conduct

### 8.1 Integrity and conflicts

Directors, employees and contractors acting for UNILINK must act honestly, keep accurate records, disclose actual, potential or perceived conflicts of interest, and avoid conduct that could improperly influence an institution, student, supplier or public official.

### 8.2 Bribery, fraud, gifts and sanctions

UNILINK prohibits bribery, facilitation payments, kickbacks, fraudulent documents and improper commissions. Gifts or hospitality must not be offered or accepted where they could influence, or appear to influence, a decision. Relevant sanctions and counterparty risks must be escalated before proceeding.

### 8.3 Privacy, security and records

Personal information must be collected, used, shared, retained and deleted only for lawful and authorised purposes. Access is limited according to role and business need. Material incidents are recorded, contained, assessed and escalated.

### 8.4 Responsible AI

AI may support research, drafting, translation, document review, service operations and fraud-risk controls. It does not remove professional accountability.

For material AI uses, UNILINK will:

- identify an accountable owner and intended purpose;
- assess privacy, security, accuracy, bias and foreseeable impact before use;
- use approved tools and avoid entering personal or sensitive information into public generative-AI services;
- disclose when a person is interacting directly with an AI system;
- require human review for student-facing advice and significant decisions;
- provide a route to question or contest an AI-supported outcome; and
- retain enough information to review the tool, inputs, limitations and decision process.

## 8.5 Suppliers and subcontractors

Supplier checks are proportionate to risk. Higher-risk indicators include labour-intensive outsourced services, recruitment, cleaning or facilities services, promotional merchandise, electronics and hardware, offshore data handling, and contractors with access to student information.

The review may include business registration, identity, capability, labour practices, privacy and security controls, subcontracting, adverse information, contractual commitments and a plan to address identified concerns. A risk finding does not automatically require termination; the decision will consider severity, leverage, worker impact and whether remediation is credible.

## 9. Speaking up and non-retaliation

Employees, contractors, suppliers, students and other stakeholders may raise an ESG, human-rights, integrity, privacy or AI-governance concern confidentially by emailing [ben@unilink.co](mailto:ben@unilink.co) with the subject “**Confidential ESG concern**”.

UNILINK will acknowledge a concern within five business days where contact details are available. It will restrict information to people who need it, assess the issue fairly, document material actions and prohibit retaliation against a person who raises a concern in good faith. An acknowledgement target is not a promise that every investigation can be completed within five days.

Where a concern relates to goods or services supplied to a client, the person may also use that client's applicable complaints or speak-up channel.

## 10. Monitoring, evidence and public reporting

The ESG Owner will maintain a proportionate register of actions, evidence, risks, concerns and corrective measures. Performance will be reviewed at least annually against the ESG Action Plan.

The first public progress update is proposed by 30 September 2027. It will distinguish completed actions from planned actions, explain material data gaps and state whether any disclosed information has been independently assured.

## 11. Approval

This policy was approved by the legally authorised Director and took effect on 1 August 2026.

**Approved by:** Baining Wu **Position:** Director **Signature:** Not included in this published copy **Effective date:** 1 August 2026 **Next review date:** 1 August 2027

## Reference framework

The policy is informed by:

- [Australian Government Modern Slavery Register resources](#)
- [ACCC guide to environmental claims](#)
- [GHG Protocol standards and guidance](#)
- [Australian Government Guidance for AI Adoption: Foundations](#)
- [OAIC guidance on privacy and commercially available AI](#)

# UNILINK 负责任经营与 ESG 政策 ( 中文对照稿 )

## 文件状态

| 项目   | 内容                                                            |
|------|---------------------------------------------------------------|
| 版本   | 1.0                                                           |
| 批准日期 | 2026 年 8 月 1 日                                                |
| 状态   | 已批准并生效                                                        |
| 批准人  | Baining Wu , Director                                         |
| 生效日期 | 2026 年 8 月 1 日                                                |
| 复核周期 | 至少每年一次；重大变化后另行复核                                              |
| 公开网址 | <a href="https://unilink.co/esg/">https://unilink.co/esg/</a> |

## 一、目的

UNILINK 在澳大利亚和中国提供教育咨询与申请支持。本政策用于明确相关业务在环境、社会责任和公司治理方面的最低标准，并把原则落实为负责人、记录和复核机制。

UNILINK 将如实说明 ESG 进展。计划、目标或认证不得被表述为已经实现的成果；数据不完整时，应说明缺口、估算方法及改进安排。

## 二、适用主体与运营范围

本政策适用于：

- UNILINK EDUCATION PTY. LTD. , ABN 50 152 187 650 ；
- 盘否教育科技 ( 北京 ) 有限公司，统一社会信用代码 91110105MA01M1Y31U ；
- 澳大利亚境内的运营；
- 中国境内的运营，包括面向全国开展的远程和数字化服务。

政策适用于董事和员工；对于 UNILINK 能够合理管理或影响的工作，相关承包商和供应商也应遵守适用条款。“适用主体”仅描述本政策覆盖范围，并不单独构成母子公司或股权关系声明。

## 三、经营原则

UNILINK 将：

1. 遵守各运营地适用的法律及合同要求；
2. 明确 ESG 责任并保留与企业规模相称的证据；
3. 优先识别和管理高风险事项，不对所有供应商和活动机械地采取同一做法；
4. 在合理可行范围内预防或减少损害，并在发现问题后采取行动；
5. 保护善意反映问题的人，禁止打击报复；
6. 对外只使用清楚、具体且有依据的表述；
7. 至少每年复核一次，并根据业务、技术和证据变化持续改进。

## 四、责任安排

依法有权批准的董事负责批准本政策，并对实施承担最终责任。

下列任命自 2026 年 8 月 1 日起生效：

- Baining Wu，ESG 负责人：管理风险登记、证据登记、培训、年度复核和进展报告；
- Baining Wu，AI 责任人：管理重要 AI 使用场景、隐私保护和人工监督，另有书面委派的除外；
- Mavis Xiaomao Wang，澳大利亚运营负责人：管理澳大利亚记录和问题上报；
- Baining Wu，中国运营负责人：管理中国记录和问题上报。

小型企业可以由同一人兼任多个岗位，但任命和职责必须有书面记录。重大问题、政策例外和整改事项应上报董事。

## 五、环境责任

UNILINK 的主要环境影响来自办公室能源、商务旅行、数字与云服务、信息技术设备、采购和废弃物。公司将采取与实际规模相称的措施：

- 默认使用数字化文件和流程；法律、无障碍或实际运营需要纸质文件时予以保留；
- 获取澳大利亚和中国运营可取得的用电及能源数据；租赁场所没有独立电表时，向物业或房东索取可用数据；
- 从政策生效日起记录公务航班；能够取得同等业务效果时优先使用远程会议；
- 在合理可得并满足业务要求的情况下，选择耐用、可维修、能效较好的设备；
- 在不影响安全、可靠性和服务质量的前提下延长设备使用寿命；
- 记录公司设备报废情况，并在当地条件允许时使用负责任的回收渠道；
- 对重要云服务和 AI 服务供应商公开的能源与排放信息进行复核；
- 减少不必要的采购、包装和废弃物；
- 选择重要供应商时考虑其环境信息。

UNILINK 目前不声称拥有经核证的碳足迹、量化减排目标、碳中和或净零状态，也不声称获得 SBTi、ISO 14001 等认证。公司拟在数据可得并经管理层复核的前提下，为 2026/27

财年建立与业务规模相称的运营排放基线。未来任何目标都应明确核算边界、基准期、时间范围、计算方法和局限。

## 六、社会责任与人权

UNILINK 尊重国际认可的人权，不容忍强迫劳动、人口贩运、童工、债役、非法歧视、骚扰、打击报复及其他严重剥削。

适用主体将：

- 遵守适用的劳动报酬、工时和职业健康安全要求；
- 提供免受霸凌、骚扰和非法歧视的工作环境；
- 依据与事项相关且合法的标准作出聘用及服务决定；
- 在合理可行范围内提供无障碍支持和合理便利；
- 向员工说明保密投诉和申诉渠道；
- 对重要或较高风险供应商进行现代奴役及劳动权利风险评估；
- 在相关新合同中加入与风险相称的劳动权利和合规条款；
- 调查可信问题并记录整改；
- 整改时优先保护受影响人员、避免扩大伤害，并运用商业影响力推动改善。

UNILINK 的核心教育咨询与申请处理采用直接交付模式，目前不使用分代理。如日后发生变化，必须在第三方开始提供服务前完成批准、书面约定和审查。

## 七、学生保护、无障碍与服务诚信

UNILINK 不承诺“保证录取”，也不歪曲与教育机构的关系。学生资料应按其真实情况审查；对真实性、授权或学生福祉存在疑问时，应转交人工复核。

使用人脸核验、线上公证或类似身份和材料完整性措施时，必须：

- 符合法律要求，且对于说明的目的确有合理必要；
- 向受影响的人说明用途；
- 只处理实现该目的所需的信息；
- 配置适当的访问和安全控制；
- 技术无法可靠得出结论时，提供有实际意义的人工复核途径。

任何人不得仅因自动化输出而被拒绝服务或受到重大不利决定，除非已经进行有实际意义的人工复核。

## 八、公司治理与行为准则

### 8.1 诚信与利益冲突

代表 UNILINK 行事的董事、员工和承包商必须诚实行事、保留准确记录、披露实际、潜在或表面上的利益冲突，不得不良影响学校、学生、供应商或公职人员。

### 8.2 反贿赂、反欺诈、礼品与制裁风险

UNILINK 禁止贿赂、疏通费、回扣、虚假材料和不正当佣金。礼品或招待不得影响或看似影响有关决定。发现相关制裁或交易对象风险时，必须在继续办理前上报。

### 8.3 隐私、安全与记录

个人信息只能基于合法和获授权的目的收集、使用、共享、保存和删除，并按岗位及业务需要控制访问权限。重大事件应及时记录、控制、评估和上报。

### 8.4 负责任使用 AI

AI 可以用于辅助研究、起草、翻译、材料审查、业务运营和欺诈风险控制，但不能取代专业人员的责任。

对重要 AI 使用场景，UNILINK 将：

- 明确责任人和使用目的；
- 使用前评估隐私、安全、准确性、偏差和可预见影响；
- 只使用获准工具，不把个人信息或敏感信息输入面向公众的生成式 AI 服务；
- 当用户直接与 AI 交互时进行明确说明；
- 对学生咨询和重大决定实行人工复核；
- 提供质疑或申诉 AI 辅助结果的渠道；
- 保留足以复核工具、输入、局限和决定过程的信息。

### 8.5 供应商与承包商

供应商审查按风险程度实施。较高风险指标包括劳动密集型外包、招聘、保洁及物业服务、宣传品、电子设备和硬件、跨境数据处理，以及能够接触学生信息的承包商。

审查内容可包括主体登记、身份、履约能力、劳动实践、隐私和安全控制、再分包、负面信息、合同承诺和整改计划。发现风险不等于必须立即终止合作；公司应结合问题严重程度、影响力、对劳动者的影响及整改可信度作出决定。

## 九、反映问题与禁止报复

员工、承包商、供应商、学生及其他相关人员可发送邮件至 [ben@unilink.co](mailto:ben@unilink.co)，主题注明“Confidential ESG concern”，保密反映 ESG、人权、诚信、隐私或 AI 治理问题。

在留有联系方式的情况下，UNILINK 将在五个工作日内确认收到。信息只提供给确有需要的人员；公司将公平评估问题、记录重大处置，并禁止对善意反映问题的人进行报复。五个工作日是确认收悉的目标，不代表每项调查都能在五日内完成。

如问题涉及向客户提供的商品或服务，反映人也可使用该客户适用的投诉或问题反映渠道。

## 十、监督、证据与公开报告

ESG 负责人将维护与公司规模相称的行动、证据、风险、问题及整改记录，并至少每年按照 ESG 行动计划复核一次。

首份公开进展更新拟于 2027 年 9 月 30

日前发布。报告应区分已完成与计划中的工作，说明重要数据缺口，并明确披露数据是否经过独立鉴证。

## 十一、批准

本政策已由依法有权批准的董事批准，并于 2026 年 8 月 1 日生效。

批准人：Baining Wu 职务：Director 签名：本公开版本不含签名 生效日期：2026 年 8 月 1 日 下次复核日期：2027 年 8 月 1 日