

## Code of Conduct for Suppliers and Third-Party Intermediaries

### 普锐特供应商行为准则

This Code of Conduct defines the basic requirements placed by Primetals Technologies group members (Primetals Technologies) on suppliers of goods and services concerning their responsibilities towards their stakeholders and the environment (Corporate Social Responsibility). Looking to the future and thinking of well-being of coming generations, we aim to contribute to the development of society through our passion for engineering, supplies and services for solutions in the iron and steel industry.

本行为准则规定了提供产品和服务至普锐特集团成员（普锐特冶金技术）的供应商应对其利益相关人以及环境（企业社会责任）承担的责任的基本要求。展望未来，为下一代儿童的福祉考虑，我们希望能通过我们对工程的热情、对钢铁行业的供应及服务对社会发展做出贡献。

In the hope that our suppliers share our goal and will join us in committing to Corporate Social Responsibility (CSR), the supplier hereby declares:

在希望供应商能与我们秉持相同目标并与我们一同致力于承担企业社会责任（CSR）的同时，供应商在此声明：

- **Legal compliance**

**遵守法律**

- To comply with the laws of the applicable legal system(s).  
遵守适用法律体系中的一切法律。
- To comply with any boycott clauses, black lists, sanctions imposed or re-imposed by any government or relevant institution or other national or international export restrictions.  
遵守任何联合抵制的条款，黑名单，任何政府或相关机构实施或再实施的制裁，或其它国家或国际的出口限制。

- **Non-disclosure and intellectual property**

**保密和知识产权**

- To manage confidential information, technical information, and personal information without unfair nor improper acquisition, usage nor disclosure, through establishing and using a system.  
通过建立和使用系统管理保密信息、技术信息和个人信息，无不公平或不当获得、使用或披露行为；
- To respect and protect intellectual property rights of Primetals Technologies and other third parties.  
尊重和保护普锐特冶金技术和其它第三方的知识产权；
- To use the intellectual property rights of Primetals Technologies only with prior written consent and solely for the purpose of business activities in collaboration with them.  
使用普锐特冶金技术的知识产权需获得事前书面同意，并且仅用于与其相关的商业活动之目的。

- **Prohibition of corruption, bribery and fraud**

**禁止贪污贿赂 和 诈骗**

- To maintain free and fair competition, without limitation or obstruction; moreover, to prevent unfair activities, and to detect and to deal with them as early as possible.  
保持自由公平竞争，不设限制或阻碍。此外，防止不公平活动，尽早发现，尽早处理；
- To tolerate no form of and not to engage in any form of corruption or bribery, including any payment or other form of benefit conferred on any government official for the purpose of influencing decision making in violation of law.  
不容忍任何形式的贪污贿赂行为，也不从事任何形式的贪污贿赂行为，包括：违反法律为影响决策而向任何政府官员支付任何款项或给予其它形式的好处；

- To share and disclose information related to corruption, bribery and fraud proactively and to ensure accountability to society and corporate transparency.  
分享和披露有关贪污受贿和诈骗的信息，确保对社会的责任以及公司透明度；
  - To neither demand nor provide benefits, gifts, or services.  
不要求也不提供任何利益、礼物或服务；
  - To act with honesty, fairness and integrity and to refrain from any act or omission in connection with fraud or other criminal activities.  
诚信、公平和诚实地行动，避免任何与诈骗或其它犯罪活动有关的作为或不作为。
- **Respect for the basic human rights of employees**  
**尊重员工的基本人权**
    - To promote equal opportunities for and treatment of its employees irrespective of skin color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age.  
为员工提供平等的机会和待遇，而不论其肤色、种族、国籍、社会背景、是否残疾、性取向、政治或宗教信仰、性别或年龄如何；
    - To respect the personal dignity, privacy and rights of each individual.  
尊重员工的人格尊严、隐私及各项个人权利；
    - To refuse to employ or make anyone work against his will.  
拒绝违背员工意愿雇用或安排其工作；
    - To refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination.  
拒绝容忍以任何无法接受的方式对待员工，例如：精神虐待、性骚扰或性别歧视；
    - To prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.  
禁止性别的、强迫性、威胁性、污秽的或剥削性的手势、语言和身体接触等行为；
    - To provide fair remuneration and to guarantee the applicable national statutory minimum wage.  
提供公平的报酬，并保证符合国家法定最低工资标准；
    - To comply with the maximum number of working hours laid down in the applicable laws.  
遵守法律所规定的最长工作时间的要求；
    - To recognize, as far as legally possible, the right of free association of employees and to neither favor nor discriminate against members of employee organizations or trade unions.  
认可员工依法自由结社的权利，不偏袒也不歧视员工组织或工会的成员；
    - To maintain a safe and ergonomic working environment.  
保持安全舒适的工作环境。
  - **Prohibition of child labor**  
**禁止雇用童工**
    - To employ no workers under the age of 16 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14.  
不雇用未满十六（16）周岁的童工；或者在不违背ILO公约第138条规定的发展中国家例外的前提下，在这些国家不雇用未满十四（14）周岁的童工。
  - **Health and Safety of employees**  
**员工健康与安全**
    - To take responsibility for the health and safety of its employee.  
对员工的健康与安全负责；

- To control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases.  
控制危险，并采取最为合理的、可能的预防措施以防止事故及职业病的发生；
  - To provide training and ensure that employees are educated in health and safety issues.  
提供培训并确保员工受到健康与安全问题的教育；
  - To set up or use an occupational health & safety management system according to OHSAS 18001 or equivalent.  
按照 OHSAS18001 或类似标准，建立或采用职业健康及安全管理体系。
- **Environmental protection**  
环境保护
    - To act in accordance with the applicable statutory and international standards regarding environmental protection.  
按照适用的环境保护法定标准和国际标准行事；
    - To minimize environmental pollution and make continuous improvements in environmental protection.  
将环境污染减至最小，在环境保护方面取得持续改善；
    - To use resources and energy effectively and economically.  
以高效和经济方式使用资源和能源；
    - To set up or use an environmental management system according to ISO 14001 or equivalent.  
根据ISO14001或类似标准，建立或采用环境管理体系。
- **Prohibition on slavery, human trafficking and conflict minerals**  
禁止奴役和贩卖人口
    - To ensure that there is no modern slavery and human trafficking in the supply chains or in any part of its supplier's business.  
确保在供应链或供应商经营过程的任何部分不存在现代奴役或贩卖人口的现象；
    - To have an appropriate anti-slavery policy in place which similarly reflects the commitment to acting ethically and with integrity in all business relationships.  
制定适当的反奴役政策，使其同样能反映我们对遵守行为道德的承诺以及在所有商业关系方面的诚实守信原则；
    - To ensure that no conflict minerals, including, but not limited to, cassiterite, wolframite, coltan and gold, get sourced in the supply chains.  
确保在供应链中获取的资源无矿物争端，包括但不限于锡石、钨锰铁矿、钶钽铁矿和黄金。
- **Supply Chain**  
供应链
    - To use best efforts to promote among its suppliers compliance with this Code of Conduct;  
尽最大努力促使其供应商亦遵守本行为准则；
    - To comply with the principles of non discrimination with regard to supplier selection and treatment.  
在选择及对待供应商方面，遵守非歧视原则。
    - To produce, store, prepare and load in secure business premises and secure loading and shipping areas which are protected against unauthorized interference during production, storage, preparation, loading and transport.  
在安全的经营场所中进行生产、仓储、准备和装载活动，确保装载和运输区域在生产、仓储、准备、装载和运输的过程中不受未经许可的干扰。

- To employ reliable staff for the production, storage, preparation, loading and transport of these goods.  
雇佣可靠的员工进行产品的生产、仓储、准备、装载和运输。
- That business partners who are acting on its behalf are informed that they also need to ensure the supply chain security as mentioned above.  
商业伙伴已被告知他们进行业务时也需要依上述要求确保其供应链的安全。

- **Cyber Security**  
网络安全

- To have a reasonable Information Security Management System (ISMS) or similar in place to manage business partner information.  
拥有合理的信息安全管理系统（ISMS）或类似系统管理商业合作伙伴信息；
- To provide trainings for common Information Security aspects to employees, but at least with special focus on e-mail attacks (CEO fraud, bank account changes, etc.).  
给员工提供基本信息安全培训，至少提供有关邮件攻击的培训(CEO欺诈方式，银行信息变更等)。
- To have a set of Information Security policies in place (e.g. password policy, antivirus, device authentication...).  
有一套适当的信息安全政策(如：秘密政策、反病毒程序、设备验证...)

- **Internal procedures and controls**  
内部程序和控制制度

- To implement appropriate internal procedures and controls to maintain and improve compliance for each of the above goals.  
实施适当的内部程序和控制制度，改进并保持合规，从而实现上述目标。

Primetals Technologies reserve the right to reasonably change the requirements of this Code of Conduct due to changes of the Primetals Technologies Compliance Program. In such event Primetals Technologies expect the supplier to accept such reasonable changes.

普锐特冶金技术保留因为普锐特冶金技术合规计划变更而合理变更本行为准则要求的权利。在这种情况下，普锐特冶金技术希望供应商能接受此类合理变更。

### **Whistleblower-Hotline „Speak Up“**

Any potential compliance violation can be reported via the whistleblower-hotline “Speak Up” offered by Primetals Technologies. Reports can be made anonymously. All reports will be treated as strictly confidential. The program can be accessed at [primetals.ethicspoint.com](https://primetals.ethicspoint.com) or via the QR-code.



#### **举报人热线 "说出来"**

任何潜在的违规行为都可以通过 Primetals Technologies 举报热线 "Speak Up "进行举报。举报可以是匿名的。所有举报内容将被严格保密。该程序可通过网址 [primetals.ethicspoint.com](https://primetals.ethicspoint.com) 或二维码访问。