

PAIG Group
宝爱捷集团



Code of Conduct for Business Partners

PAIG Group requirements regarding sustainability
in its relationships with business partners

商业伙伴行为准则

宝爱捷集团在与商业伙伴的关系中对可持续性的要求

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Preamble

The PAIG GROUP's business partners play an integral part in the Group's business success. Partnership creates lasting business relationships which are mutually beneficial. Therefore, the Group is focused on close cooperation with its business partners.

Applying the sustainability requirements, we are aware of our responsibility for the economic, ecological and social impact of our actions. We also expect this of our business partners, particularly where human rights, health and safety at work, environmental protection and combatting corruption are concerned. In the spirit of partnership-based collaboration, the PAIG GROUP offers its business partners a wide range of practical training opportunities, initiatives and other sources of information. It is recommended that all business partners use these offers and information sources actively.

The following requirements define the PAIG Group's expectations regarding the mindset and conduct of business partners in their corporate activities and are considered the basis for successful execution of business relations between the PAIG GROUP and its partners.

前言

宝爱捷集团的商业伙伴在集团的业务成功中发挥着不可或缺的作用。合作伙伴关系能够创造互惠互利的持久业务关系。宝爱捷集团注重与其商业伙伴的密切合作。

根据可持续性要求，我们知悉我们的行为对经济、生态和社会产生的影响由我们负责。我们也希望我们的商业伙伴能够做到这一点，尤其是在人权、健康和工作安全、环境保护以及打击腐败方面。本着以合作伙伴关系为基础的合作精神，宝爱捷集团为其商业伙伴提供了广泛的实用培训机会、计划和其他信息来源。建议所有商业伙伴积极利用这些机会和信息来源。

以下要求说明了宝爱捷集团对商业伙伴在企业活动中的心态和行为的期望，并被视为宝爱捷集团与其商业伙伴之间成功开展业务关系的基础。

1. Objectives and scope

In this Code of Conduct for Business Partners (hereinafter referred to as “Code of Conduct”), the PAIG Group has set out its aspirations and expectations as well as requirements for business partners of the PAIG Group in relation to sustainability (hereinafter referred to as “sustainability requirements”).

Sustainability includes respecting human rights, protecting the environment, conducting business ethically and lawfully and the responsible sourcing of raw materials. The PAIG Group company that uses this Code of Conduct is referred to in general below as the “PAIG Group”. The Code of Conduct is applicable to all suppliers, sales partners and all other B2B business partners (hereinafter referred to as “business partner”) of the PAIG Group that do business with the PAIG Group. The business partners are required to contractually pass on all sustainability requirements to those business partners (especially suppliers) that affect the contractual relationship with the PAIG Group and to ensure, to the extent possible and reasonable, that the sustainability requirements are passed

on to their business partners in the supply chain. The business partners establish appropriate control measures to verify compliance with these sustainability requirements of their own business partners.

In those cases where obligations have been agreed to with business partners under individual contracts that diverge from the principles in this document, such divergent obligations prevail.

The sustainability requirements are based, amongst others, on the 10 Principles of the United Nations (UN) Global Compact, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multi National Enterprises, OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the Conventions of the International Labour Organization (ILO), in particular its fundamental rights at work and the Guiding Principles of the Drive Sustainability Initiative.

Furthermore, this Code of Conduct is based on nationally and internationally agreed standards such as the Universal Declaration of Human Rights, codified in particular in the International Covenant on Civil and Political Rights and in the International Covenant on Economic, Social and Cultural Rights.

1. 目标及范围

在本商业伙伴行为准则（下称“行为准则”）中，宝爱捷集团对其商业伙伴提出了可持续性方面的期望和要求（下称“可持续性要求”）。

可持续性包括尊重人权、保护环境、以合乎道德及合法的方式开展业务以及负责任地采购原材料。

使用本行为准则的宝爱捷集团公司在下文中称为“宝爱捷集团”。

本行为准则适用于与宝爱捷集团有业务往来的所有供应商、销售伙伴和所有其他B2B商业伙伴（下称“商业伙伴”）。

商业伙伴必须以合约方式将所有可持续性要求告知那些影响与宝爱捷集团合约关系的商业伙伴（尤其是供应商），并在可能和合理的范围内确保将可持续性要求告知供应链中的商业伙伴。商业伙伴制定适当的控制措施，以核实其自己的商业伙伴是否遵守了这些可持续性要求。

如果与商业伙伴在个别合约中约定的义务与本文件中的原则不同，以合约中约定的义务为准。

可持续性要求主要基于《联合国（UN）全球契约》十项原则、《联合国工商企业与人权指导原则》、《经合组织跨国企业准则》、《经济合作与发展组织关于来自受冲突影响和高风险区域的矿石的负责任供应链尽职调查指南》以及国际劳工组织（ILO）公约，尤其是其工作中的基本权利和《驱动可持续性计划指导原则》等提出。

此外，本行为准则还基于国内和国际公认的标准，如《世界人权宣言》，尤其是《公民权利和政治权利国际公约》及《经济、社会及文化权利国际公约》。

2. Fundamental sustainability requirements

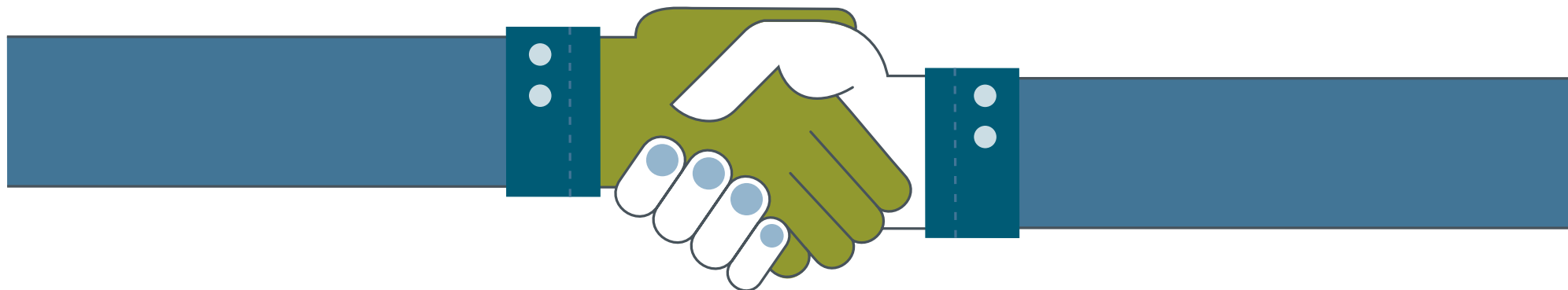
General information

The PAIG Group considers compliance with the sustainability requirements to be essential and fundamental to its business relations.

The PAIG Group expects the business partner to integrate the values anchored in these sustainability requirements in day-to-day business through structured and competent management. Business partner management must identify and assess legal and other requirements and train employees to ensure compliance with the relevant requirements.

Business partners always comply with the applicable law. Insofar as these sustainability requirements go beyond the requirements of the applicable law, these must also be observed.

In addition to the obligatory requirements from this Code of Conduct, further recommendations and hints for business partners are given in extra text boxes.



2. 可持续性的基本要求

基本信息

宝爱捷集团认为，遵守可持续性要求对其业务关系至关重要。

宝爱捷集团希望商业伙伴能够通过有条理、良好的管理，将可持续性要求中的固有价值融入日常业务中。商业伙伴的管理层必须确定和评估法律要求及其他要求，并对员工进行培训，以确保他们遵守相关要求。

商业伙伴始终遵守适用法律。如果可持续性要求超出了适用法律的要求，也必须遵守可持续性要求。

除本行为准则中的强制性要求外，额外的文本框中还为商业伙伴提供了进一步的建议和提示。

Creation and application of management systems

For those business partners that operate production locations with more than 100 employees, it is advised by PAIG Group to conduct certification against them according to the international standard ISO 14001 or the EMAS Regulation of the European Union.

For business partners that have production locations with more than 1000 employees, it is advised by PAIG Group to obtain additional certifications for them under international standard ISO 45001 or a comparable standard.

HINT

For sales partners with more than 100 employees, we likewise recommend the international standard ISO 14001 or alignment with ISO 14001.

Business partners with fewer than 1000 employees in their locations should implement internal management systems or, where available, national/sector specific certifications.

For sales partners with workshops, we likewise recommend the international standard ISO 45001 or alignment with ISO 45001.

管理系统的创建和应用

生产基地员工人数超过100人的商业伙伴，宝爱捷集团建议根据国际标准ISO 14001或欧盟EMAS法规对生产基地进行认证。

生产基地员工人数超过1000人的商业伙伴，宝爱捷集团建议另外获得国际标准ISO 45001或类似标准的认证。

提示

对于员工人数超过100人的销售伙伴，我们同样建议采用国际标准ISO 14001或与ISO 14001一致的标准。

员工人数少于1000人的商业伙伴应实施内部管理系统，或在可能的情况下，实施国家/行业特定认证。

对于设有车间的销售伙伴，我们同样建议采用国际标准ISO 45001或与ISO 45001一致的标准。

Corporate statement

Business partners prepare a corporate statement (e.g. a Code of Conduct), which commits them to social, ethical and environmental standards. This statement should be prepared in languages understood by local employees.

Sustainability officer

Business partners are encouraged to appoint a sustainability officer or a similar officer who reports to the management of the respective business partner. The officer should develop sustainability objectives and measures within the company.

Training

To support its business partners in complying with the sustainability requirements, the PAIG Group offers its business partners different training formats free of charge ([Trainings and Dialogue vwgroupsupply.com](#)). Participation in this training is obligatory depending on the result of a risk analysis for business partners carried out in advance. Business partners may be exempted from mandatory participation in such training if they can prove to have already undergone a similar training offered by third parties.

HINT

Business partners are recommended to develop their own training programs in order to define guidelines to improve implementation of processes and communication of expectations to their employees. Business partners should provide ongoing training for their employees.

企业声明

商业伙伴编制企业声明（如行为准则），承诺遵守社会、道德和环境标准。应以当地员工能够理解的语言编写企业声明。

可持续性官员

鼓励商业伙伴任命一名可持续性官员或类似官员，向各自商业伙伴的管理层报告。该官员应在公司内部制定可持续性目标和措施。

培训

为了帮助商业伙伴遵守可持续性要求，宝爱捷集团免费为商业伙伴提供不同形式的培训（[Trainings and Dialogue vwgroupsupply.com](#)）。根据事先对商业伙伴进行的风险分析结果，参加培训是强制性的。如果商业伙伴能够证明已经接受过第三方提供的类似培训，则可免于强制参加此类培训。

提示

建议商业伙伴制定自己的培训计划，以确定改进流程实施的准则和向员工传达期望的准则。商业伙伴应为其员工提供持续培训。

3. Sustainability requirements in environmental protection

Business partners know and observe the Group environmental policy of the PAIG Group as described in the Group Environmental Policy Statement ([Environment vwgroupsupply.com](#)).

Greenhouse gas emissions

Business partners take appropriate measures to reduce air emissions that pose a risk to the environment and health, including greenhouse gas emissions. In order to improve the environmental performance of products and services, business partners provide for proactive reduction of greenhouse gas emissions along the entire supply chain, for instance through increased use of carbon neutral energy sources. Business partners who supply products to the PAIG Group provide information to the PAIG Group on request at product level in relation to the overall energy consumption in MWh and carbon emissions in tonnes (scope 1, 2 and 3) so that the PAIG Group can improve the environmental performance indicators of its products.

Hint

In addition, we recommend that our business partners set science-based and time-bound emission reduction targets and renewable energy objectives that are aligned to the Paris Agreement and put in place measures that drive forward the decarbonisation along the entire value chain.

Business partners are also encouraged to commit to the Paris Agreement of a CO²-neutral economy by 2050.

3. 环境保护的可持续性要求

商业伙伴了解并遵守《宝爱捷集团环境政策声明》（[Environment vwgroupsupply.com](#)）中所述的宝爱捷集团环境政策文件。

温室气体排放

商业伙伴采取适当措施，减少对环境与健康构成风险的气体排放，包括温室气体排放。为了提高产品和服务的环保性能，商业伙伴在整个供应链中主动减少温室气体排放，例如通过增加碳中和能源的使用。

向宝爱捷集团供应产品的商业伙伴会根据要求在产品层面向宝爱捷集团提供以MWh为单位的总体能源消耗信息和以吨为单位的碳排放（范围1、2和3）信息，以便宝爱捷集团能够改进其产品的环保性能指标。

提示

此外，我们还建议商业伙伴制定科学的、有时限的减排目标以及与《巴黎协定》相一致的可再生能源目标，并采取相应措施，推动整个价值链的“去碳化”进程。

我们还鼓励商业伙伴承诺到2050年实现《巴黎协定》中的碳中和经济。

Efficient use of resources

Business partners take appropriate measures to ensure efficient use of energy, water and raw materials, usage of renewable resources and a minimisation of damage to the environment and health.

Registration, evaluation and restriction of substances and raw materials

Business partners implement appropriate measures to avoid or refrain from using substances and materials with adverse effects on the environment or health (for example, carcinogenic, mutagenic, reprotoxic substances) within the framework of the respective applicable law and with due regard for applicable regulations of the PAIG Group.

Business partners are obliged to act in conformity with the requirements of the international conventions and other legal instruments pertaining to the production, use, handling and

disposal of certain substances (in particular including the requirements of the Minamata Convention of 10 October 2013 on mercury, the Stockholm Convention of 23 May 2001 on persistent organic pollutants (POPs)) as well as the related applicable implementing legislation at the national and supranational level.

In regard to smelters or refineries of tin, tungsten, tantalum and gold, business partners may only use raw materials from smelters or refineries that meet the requirements of the “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas” as assessed by the Responsible Mineral Initiative (RMI) or similar organisations.

Business partners have to take appropriate and adequate measures to exclude raw materials extracted from deep sea mining from their supply chains.

有效利用资源

商业伙伴采取适当措施，确保有效利用能源、水和原材料，使用可再生资源，并尽量减少对环境和健康的损害。

物质和原材料的登记、评估及限制

商业伙伴在相应的适用法律框架内采取适当措施，避免或不使用对环境或健康有不利影响的物质和材料（例如致癌、致突变、生殖毒性物质），并充分考虑宝爱捷集团的适用法规。

商业伙伴有义务遵守与某些物质的生产、使用、处理和处置相关的国际公约和其他法律文书的要求（尤其包括2013年10月10日关于汞的《水俣公约》和2001年5月23日关于持久性有机污染物（POP）的《斯德哥尔摩公约》的要求），以及国家和超国家层面的相关适用实施法律。

关于锡、钨、钽和金的冶炼厂或精炼厂，商业伙伴只能使用来自冶炼厂或精炼厂的原材料，这些原材料必须符合《经济合作与发展组织关于来自受冲突影响和高风险区域的矿石的负责任供应链尽职调查指南》的要求，并经过负责任矿产开发倡议组织（RMI）或类似组织的评估。

商业伙伴必须采取适当且充分的措施，将深海采矿提取的原材料排除在其供应链之外。

Circular economy and waste management

Business partners take appropriate and adequate measures aimed at avoiding waste, re-using resources, recycling as well as the safe, environmentally friendly disposal of residual waste, chemicals and wastewater. Such measures can be applied in particular in development activities, production, product service life and subsequent end-of-life recycling as well as in other activities. Thereby, the business partners comply with international agreements on the cross-border transport of hazardous waste, in particular the Basel Convention on the Control of Trans-boundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 as well as with the corresponding, applicable implementation rules at national and supranational level.

HINT

Whenever technically possible and economically reasonable, business partners should use secondary materials within their processes. Business partners should know the percentage of recycled content in their products and make this information available to the PAIG Group on request.

Business partners should endeavour to pursue and promote closed loop systems in addition to following these principles.

循环经济和废物管理

商业伙伴采取适当且充分的措施，避免浪费、进行资源再利用、循环利用以及安全、环保地处理残余废物、化学品和废水。这些措施尤其适用于开发活动、生产、产品使用寿命和随后的报废回收以及其他活动。因此，商业伙伴遵守有关危险废物跨境运输的国际协议，尤其是1989年3月22日的《控制危险废物越境转移及其处置巴塞尔公约》以及相应的、适用于国家和超国家层面的实施规则。

提示

只要技术上可行、经济上合理，商业伙伴就应在其生产过程中使用二次材料。商业伙伴应了解其产品可回收成分的比例，并根据要求向宝爱捷集团提供相关信息。

除了遵守这些原则之外，商业伙伴还应努力追求并推广闭环系统。

Water

Business partners take appropriate and adequate measures to minimise water consumption at their sites and/or along their own supply chains with prioritisation for water stressed regions. The right to water is respected at all times.

Business partners that supply products to the PAIG Group provide, upon request, the PAIG Group with information on total fresh water consumption on product level.

HINT

Suitable measures may, in particular, include those aimed at effectively reducing, re-using and recycling water with responsible and effective treatment of wastewater discharges to protect the environment and improve overall water quality.

Business partners shall, where required, seek to ensure that people affected by their operations have access to safe, acceptable and affordable water in sufficient quantities for personal use.

Biodiversity

The protection of the natural ecosystem, especially the protection of endangered habitats of wild animals, and the sustainable usage of natural resources are required to be ensured.

Business partners must strive to ensure supply chains are free of deforestation and conversion in accordance with applicable law and international biodiversity regulations. These international regulations include, for example, the resolutions and recommendations on biodiversity from the Centre for Biological Diversity (CBD) and the World Conservation Union (IUCN).

Ethical Treatment of animals

Business partners should support and promote ethical and humane treatment of animals.

水

商业伙伴采取适当且充分的措施，尽量减少其所在地及/或供应链的用水量，并优先考虑用水紧张的地区。水权在任何时候均受到尊重。

向宝爱捷集团供应产品的商业伙伴会根据要求向宝爱捷集团提供产品层面的淡水总消耗量信息。

提示

为保护环境和改善整体水质，适当的措施可包括旨在有效减少、重复使用和循环利用水资源的措施以及对废水排放进行负责任和有效处理的措施。

在必要时，商业伙伴应设法确保受其业务影响的人们能够获得安全、可接受和负担得起的、足够数量的个人用水。

生物多样性

必须确保对自然生态系统的保护（尤其是对濒危野生动物栖息地的保护）以及对自然资源的可持续利用。

商业伙伴必须根据适用法律和国际生物多样性法规，努力确保供应链中无森林砍伐和转换。这些国际法规包括生物多样性中心（CBD）和世界自然保护联盟（IUCN）关于生物多样性的决议和建议等。

善待动物

商业伙伴应支持和推广善待动物的行为。

4. Sustainability requirements in the area of human rights and employment law of employees

Business partners are required to comply with the conventions of the International Labour Organization (ILO) as amended from time to time, in particular the fundamental rights at work.

Elimination of child labour and the protection of young workers

Business partners must comply with the minimum employment age in their business activities and their supply chain. They ensure that the minimum age for acceptance for employment is determined according to the respective applicable law and that prohibited child labour does not occur.

No modern slavery, no human trafficking and no unethical recruitment

Business partners must take appropriate and adequate measures to eliminate debt bondage, forced and compulsory labour, as well as all forms of modern slavery and human trafficking in their own area of responsibility and/or along the supply chain. Business partners ensure that employment relationships are voluntary and allow employees to give notice of their own volition in observance of a reasonable notice period. Employees of business partners are given a contract at the time of hiring that complies with applicable law and is in a sufficiently documented form (e.g. written or electronic), is written in a language they un-

derstand and in which their rights and obligations are truthfully and clearly set out.

Furthermore, business partners must not mislead or defraud potential employees about the nature of the work, ask employees to pay recruitment fees or inappropriate transportation fees, and/or confiscate, destroy, conceal, and/or deny access to employee passports and other identity documents issued by government and/or restrict the employees' freedom of movement or require employees to involuntarily use accommodation provided by the company for no operational reason.

Protection of bodily integrity, no corporal punishment

Business partners attach the utmost importance to the protection of bodily integrity and introduce appropriate measures to ensure respect for this legally protected right. Business partners ensure in their area of responsibility and along their supply chain that any involvement, including complicity or participation in kidnapping, torture, killing or similar acts, is excluded and that no corporal punishment is applied as part of their disciplinary practices. In addition, business partners ensure in their own area of responsibility and along the supply chain that other serious human rights violations and abuses, such as sexual violence, as well as war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide, are prohibited.

4. 员工人权和就业法方面的可持续性要求

商业伙伴必须遵守国际劳工组织（ILO）不时修订的公约，尤其是工作中的基本权利规定。

消除童工现象，保护青年劳动者

商业伙伴必须在其业务活动和供应链中遵守最低就业年龄的规定。他们应确保根据相关适用法律确定最低就业年龄，并确保不出现被禁止的童工现象。

杜绝现代奴役、人口贩运和不道德的招聘行为

商业伙伴必须采取适当且充分的措施，在其责任范围内及/或供应链上杜绝债役、强迫和强制劳动以及一切形式的现代奴役和人口贩运。商业伙伴应确保劳动关系的自愿性，并允许员工在合理的通知期限内主动通知其劳动意愿。商业伙伴在雇用员工时，应向员工提供一份符合适用法律的合同（该合同应采用充分记录的形式（如书面或电子形式），以员工能够理解的语言编写合同，并在合同中真实、清晰地规定缔约方的权利义务。

此外，商业伙伴不得在工作性质方面误导或欺骗潜在员工，不得要求员工支付招聘费或不适当的交通费，及/或不得没收、销毁、隐藏及/或拒绝员工使用政府颁发的护照和其他身份证件，及/或不得限制员工的行动自由，或不得要求员工在没有业务理由的情况下非自愿使用公司提供的住宿。

保护人身安全，禁止体罚

商业伙伴高度重视保护人身安全，并采取适当措施确保尊重这一受法律保护的权利。商业伙伴确保在其责任范围内及其供应链中，杜绝任何共谋或参与绑架、酷刑、杀戮或类似行为（包括共谋或参与行为），并确保不在纪律处分中使用体罚。此外，商业伙伴确保在其责任范围内和供应链上禁止其他严重侵犯和践踏人权的行为，如性暴力、战争罪或其他严重违反国际人道主义法的行为、危害人类罪或种族灭绝罪。

Compensation and benefits

Business partners pay their employees a reasonable wage. A reasonable wage is at least the minimum wage established under the applicable law and is otherwise measured according to the law of the place of employment. This wage should at least, as far as possible, cover the basic needs of employees and enable a decent standard of living for employees and their families (living wage). Business partners are required to pay employees directly, in full and on time.

Occupational health and safety, fire protection

Business partners comply with the applicable occupational health, safety and fire protection legislation. Business partners establish a process enabling the continuous reduction of work-related health and safety risks and improvement of occupational health, safety and fire protection. All occupational health and safety measures must not involve any expenditure for the employees.

In particular, business partners will:

- Inform employees of identified hazards and the associated preventive and corrective measures put in place to minimise risks. The information must be available in an appropriate language.
- Conduct sufficient training measures on the prevention of work-related health disorders and of accidents at work, as well as first aid, chemicals management and fire protection.

- Provide suitable protective equipment and protective clothing free of charge.
- Provide appropriate fire protection measures (technical, structural or organisational) to reduce damage in the event of fire.
- Monitor and control work-related health and safety hazards (e.g. chemical, biological, physical and physiological dangers) as well as the corresponding protective measures.
- Label chemicals used according to the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) or, in European countries, the Classification, Labelling and Packaging (CLP) regulation. Chemicals must be stored, transported and handled in accordance with the applicable legal and contractual requirements.
- Fully explain appropriate emergency plans and provide the corresponding first aid, fire protection and medical assistance, as well as materials and adequate transport for further treatment.
- Ensure an appropriate number of emergency exits, escape routes and emergency assembly points, all of which are marked with sufficient signage.

In case of an accident, first aid and medical assistance must be provided. In the event of work-related health hazards, such as pandemics, the business partners take all appropriate measures to protect their employees and the company. Thereby, any measures issued by the local authorities have to be fully observed and complied with.

报酬和福利

商业伙伴向员工支付合理工资。合理工资至少是适用法律规定的最低工资，并根据就业所在地的法律进行衡量。该工资至少应尽可能满足员工的基本需求，使员工及其家人能够适当地生活（生活工资）。商业伙伴必须直接、足额、及时地支付员工工资。

职业健康与安全、消防

商业伙伴遵守相关的职业健康、安全和消防法规。商业伙伴建立一个流程，以持续降低与工作相关的健康和安全风险，并改善职业健康、安全和消防。所有职业健康和安全措施均不得涉及员工的任何支出。

尤其是，商业伙伴将进行以下各项：

- 告知员工已识别的危害以及为最大限度降低风险而采取的相关预防纠正措施。必须以适当的语言提供相关信息。
- 采取充分的培训措施预防与工作有关的健康问题和工伤事故，以及进行急救、化学品管理和防火。

- 免费提供合适的防护设备和防护服。
- 提供适当的防火措施（技术措施、结构措施或组织措施），以减少火灾时的损害。
- 监控并控制与工作有关的健康和安全危险（如化学、生物、物理和生理危险）以及采取相应的保护措施。
- 根据《全球化学品统一分类和标签制度》（GHS）或欧洲国家的《分类、标签和包装》（CLP）规定，对所使用的化学品进行贴标。化学品的储存、运输和处理必须符合适用的法律要求和合约要求。
- 充分解释适当的应急计划，并提供相应的急救、消防和医疗援助以及用于进一步治疗的材料和充足的运输工具。
- 确保有适当数量的紧急出口、逃生路线和紧急集合点，所有这些地方均有足够的标志。

发生事故时，必须提供急救和医疗援助。在发生与工作有关的健康危害（如流行病）时，商业伙伴应采取一切适当措施保护其员工和公司。因此，必须完全遵守和执行当地有关机关发布的任何措施。

Working hours

Business partners ensure that working hours comply with national law and/or the national requirements in force in the respective economic sector.

Working and living conditions

Business partners provide their employees with toilet facilities and access to clean drinking water. All facilities for the consumption and preparation of food as well as for food storage comply with applicable minimum hygiene requirements. If the nature of the work requires the provision of dormitories for employees, sufficient space, cleanliness and safety is ensured. Their access must not be restricted inappropriately.

No harm to land, water, air

Business partners ensure that they do not cause harmful soil modification, water pollution, air pollution, harmful noise emission or excessive water consumption, which may lead to significant impairment of the natural foundations for food and drinking water or the health of a person.

No forced eviction

Business partners comply with the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests and waters in the acquisition phase, development or other use of land, forests and waters.



工作时间

商业伙伴确保工作时间符合国家法律及/或相关经济部门的现行国家要求。

工作和生活条件

商业伙伴为员工提供卫生间设施和清洁饮用水。所有用于消费和准备食物以及储存食物的设施均符合适用的最低卫生要求。如果工作性质要求为员工提供宿舍，则应确保足够的空间、清洁和安全。不得不恰当地限制他们的出入。

不损害土地、水和空气

商业伙伴确保不造成有害的土壤改变、水污染、空气污染、有害噪音排放或过度耗水，以免严重损害食物和饮水的自然基础或个人健康。

不强制驱逐

商业伙伴在土地、森林和水域的收购、开发或其他使用阶段，遵守禁止非法驱逐和禁止非法剥夺土地、森林和水域的规定。

Human rights defenders

Business partners must not tolerate or engage in any form of threats, intimidation or attacks against human rights and environment defenders, including those exercising their rights to freedom of expression, association, peaceful assembly and protest against the business activities of the business partner. They guarantee access to their grievance channels without the threat or imposition of retaliatory measures.

Freedom of association and collective bargaining

The business partners recognise the right of all employees to form trade unions and employee representation bodies and to join them. In this context, the business partners commit to safeguarding neutrality. This precludes any form of discrimination or retaliatory measures based on union activities. Business partners recognise the right to collective bargaining and the right of trade unions to be allowed to operate freely and in accordance with the law of the place of employment. This law includes the right to strike and the right to negotiate collectively.

HINT

If this right is constrained by any applicable laws, alternative and lawful possibilities to establish employee representation should be fostered.

Business partners shall promote social and societal dialogue based on collective bargaining, where possible, in order to ensure that work hours are humane and compatible with health.

人权维护者

商业伙伴不得容忍或参与对人权和环境维护者（包括那些行使其言论、结社、和平集会和抗议商业伙伴商业活动的自由权的人）的任何形式的威胁、恐吓或攻击。商业伙伴保证投诉渠道畅通，投诉人不会受到威胁或被报复。

结社自由和集体谈判

商业伙伴同意所有员工均有权组建工会和员工代表机构，还有权加入前述工会和员工代表机构。在这方面，商业伙伴承诺保持中立。这就杜绝了基于工会活动的任何形式的歧视或报复措施。商业伙伴认可集体谈判的权利以及允许工会根据就业地法律自由运作的权利。该法律包括罢工权和集体谈判权。

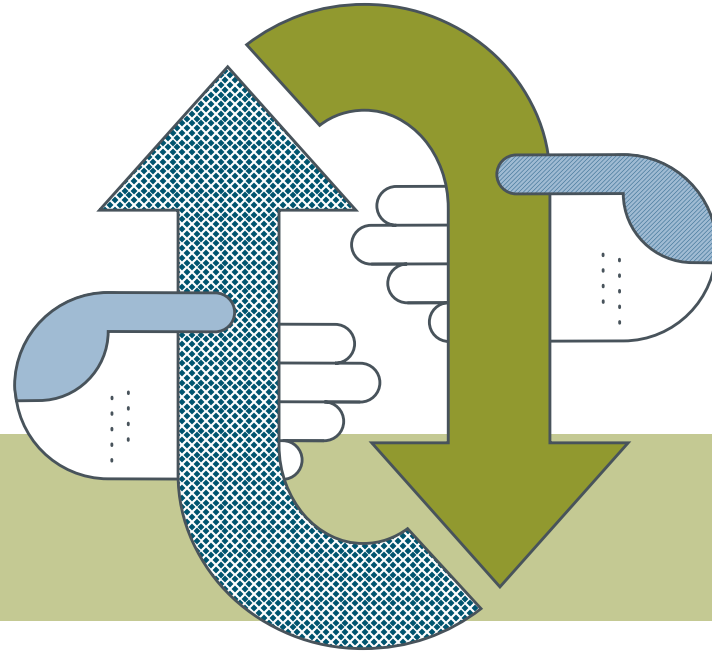
提示

如果这一权利受到任何适用法律的限制，则应促进建立员工代表的其他合法可能性。

在可能的情况下，商业伙伴应促进以集体谈判为基础的社会对话，以确保工作时间是人道的，且符合健康要求。

No discrimination or harassment

Business partners ensure that all forms of discrimination, intimidation, harassment or unwarranted disadvantage towards their employees and in the work environment are avoided. In particular, unequal treatment is prohibited, for example due to ethnic or social origin, skin colour, gender, nationality, language, religion, physical or mental limitations, gender identity, sexual orientation, health status, age, marital status, pregnancy/parenthood, union membership or political persuasion, to the extent that it is based on democratic principles and tolerance of dissent, unless it is justified by the requirements of employment. Unfair treatment shall include, in particular, unequal pay for work of equal value.



禁止歧视或骚扰

商业伙伴确保避免在工作环境中对其员工进行一切形式的歧视、恐吓、骚扰或无理刁难。尤其要禁止不平等待遇（基于民主原则和对异议的容忍），例如基于种族或社会出身、肤色、性别、国籍、语言、宗教、身体或精神限制、性别认同、性取向、健康状况、年龄、婚姻状况、怀孕/生子、工会成员身份或政治信仰的不平等待遇，但出于工作需要的情況除外。不平等待遇尤其包括同工不同酬。

Use of security forces

Business partners ensure that the commissioning or deployment of security forces does not lead to violations of human rights. Business partners ensure not to contribute directly or indirectly to supporting private or public security forces that unlawfully exercise control over mining sites, transportation routes and upstream stakeholders in the supply chain.

HINT

Business partners should apply the Voluntary Principles for Security and Human Rights, if applicable.

Minorities, vulnerable groups and indigenous people

Business partners respect the rights of minorities, vulnerable groups and local communities to decent living conditions.

Diversity and inclusion

Business partners should develop and promote an inclusive culture where diversity is valued. Diversity shall be promoted among all employees at all hierarchical levels, in particular, but not exclusively, cultural, ethnic and religious diversity.

Business partners shall ensure that all employees can contribute fully and realise their full potential and ensure a healthy work-life balance.

Business partners are encouraged to foster working with diverse business partners managed or owned by minority groups and women.

使用安保队伍

商业伙伴确保委托或部署安保队伍不会导致侵犯人权。商业伙伴确保不直接或间接帮助支持非法控制矿区、运输路线和供应链上游利益相关方的私人或公共安保队伍。

提示

如果适用，商业伙伴应采用“安全与人权自愿原则”。

少数群体、弱势群体和原住民

商业伙伴尊重少数群体、弱势群体和当地原住民享有体面生活条件的权利。

多样性和包容性

商业伙伴应发展和促进重视多样性的包容性文化。应在各层级的所有员工中促进多样性，尤其 是（但不限于）文化、种族和宗教多样性。

商业伙伴应确保所有员工均能充分作出贡献，发挥其全部潜能，并确保健康的工作与生活平衡。

鼓励商业伙伴促进与由少数群体和妇女管理或拥有的多元化商业伙伴合作。

5. Sustainability requirements for business ethics

Business partners act with integrity at all times and take adequate and appropriate measures to end violations if they are identified.

Avoiding conflicts of interest

Business partners make their decisions solely on the basis of objective criteria and must not allow themselves to be influenced by extraneous interests or relationships.

Prohibition of corruption

Business partners reject and prevent all forms of corruption, including what are known as facilitation payments (payments to speed up the performance of routine tasks by officials). Business partners ensure that their employees, subcontractors and agents do not grant, offer or accept bribes, kickbacks, improper donations or other improper payments or benefits to or from customers, officials or other third parties.

Free competition

Business partners respect fair and free competition and comply with the applicable competition and antitrust rules. In particular, they must not enter into anti-competitive arrangements or agreements with competitors, suppliers, customers or other third parties nor abuse a possible market dominant position. Business partners ensure that no exchange of competitively sensitive information or any other behaviour that restricts or could potentially restrict competition in an improper manner takes place within their area of responsibility.

Import and export controls

Business partners strictly comply with all applicable laws for the import and export of goods, services and information. Furthermore, the respective applicable sanction lists will be followed.

Business partners ensure that all taxes, duties and royalties levied in connection with the mining, trade and export of minerals in conflict and high-risk areas are remitted in accordance with respective applicable law.

5. 商业道德方面的可持续性要求

商业伙伴在任何时候均要廉正行事，一旦被发现违规行为，要采取充分且适当的措施进行制止。

避免利益冲突

商业伙伴完全根据客观标准作出决策，不得受外部利益或关系的影响。

禁止腐败

商业伙伴拒绝并防止一切形式的腐败，包括所谓的疏通费（为加快官员执行例行任务而支付的费用）。商业伙伴确保其员工、分包商和代理商不向客户、官员或其他第三方提供或收取贿赂、回扣、不当捐赠或其他不当付款或利益。

自由竞争

商业伙伴尊重公平和自由竞争，遵守相关的竞争和反垄断规则。尤其不得与竞争对手、供应商、客户或其他第三方达成反竞争协定或协议，亦不得滥用可能的市场支配地位。商业伙伴确保在其责任范围内不交换竞争敏感信息，也不采取任何其他以不当方式限制或可能限制竞争的行为。

进出口管制

商业伙伴严格遵守所有适用于货物、服务和信息进出口的法律。此外，还将遵守各自适用的处罚清单。

商业伙伴确保根据相应的适用法律，汇出与冲突地区和高风险地区的矿产开采、贸易和出口有关的所有税款、关税和特许权使用费。

Prohibition of money laundering

Business partners ensure compliance with the applicable legal provisions against money laundering within their business operations.

Intellectual property rights

Business partners respect intellectual property rights and protect associated information.

Protection of confidential information

Business partners ensure that sensitive data (trade secrets and personal data) is properly and lawfully collected, processed, saved and deleted. Business partners impose a corresponding obligation on their employees. Sensitive data must not be, transmitted to a third party or made available in any other form without the necessary authorisation and must be protected in this respect.

Usage of artificial intelligence

Data privacy and security are crucial requirements for the use of Artificial Intelligence (AI). Business partners ensure that all developments using AI are subject to applicable laws and regulations.

AI systems are to be created reliable and without any discrimination. Control of AI applications always remains with human beings.

No support for armed groups

Business partners exclude that their business does contribute directly or indirectly to supporting non-state armed groups.

Disclosure and information

Business partners record information regarding their business activities, working methods, health and safety and environmental practices. Such information is disclosed, when requested by the PAIG Group, insofar as the disclosure does not violate legal requirements.

禁止洗钱

商业伙伴确保在其业务运营中遵守适用的反洗钱法律规定。

知识产权

商业伙伴尊重知识产权并保护相关信息。

保护保密信息

商业伙伴确保适当、合法地收集、处理、保存和删除敏感数据（商业秘密和个人数据）。商业伙伴对其员工也规定了相应的义务。在未经必要授权的情况下，不得将敏感数据传送给第三方或不得以任何其他形式提供敏感数据，且敏感数据必须在这方面受到保护。

使用人工智能

数据隐私和安全是使用人工智能（AI）的关键要求。商业伙伴应确保所有使用人工智能的开发项目均符合适用的法律法规。

创建的人工智能系统应可靠且无任何歧视。人工智能应用的控制权始终属于人类。

不支持武装团体

商业伙伴保证其业务不直接或间接支持非国家武装团体。

披露与信息

商业伙伴记录有关其业务活动、工作方法、健康与安全以及环境实践的信息。在宝爱捷集团提出披露要求时，商业伙伴将披露相关信息，但披露行为不得违反法律规定。

6. Sustainability requirements for responsible supply chains

Transparency

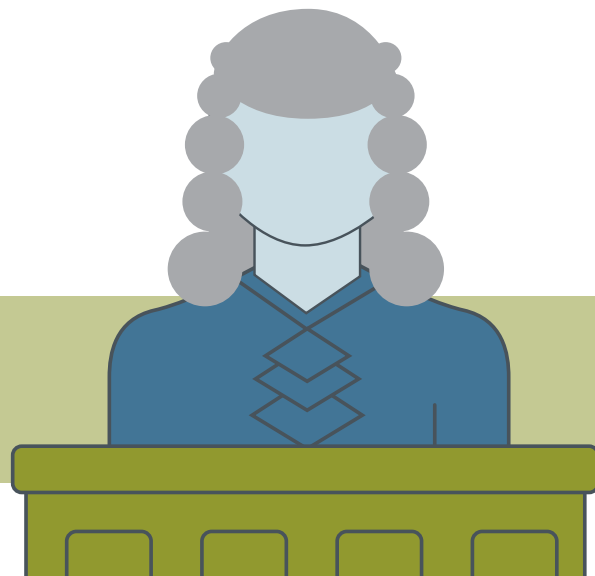
To identify and mitigate sustainability risks in the supply chain, business partners, on request, disclose information on their supply chains to the PAIG Group that are required by the PAIG Group to fulfil its legal obligations. The business partners are also obliged to impose a corresponding disclosure obligation on their suppliers, which they in turn are required to pass on to their suppliers.

This may require in particular that business partners disclose their supply chain to the PAIG Group up to the material origin (including choke points like smelters and refiners) and provide evidence of management systems or third-party verifications demonstrating processes that prevent or mitigate sustainability risks in the supply chain.

Raw material supply chains

Due to their significant impact on people and planet, raw material supply chains, in particular, require special due diligence from all actors along the supply chain both in terms of compliance with human rights and protecting the environment.

Therefore, business partners comply in particular with their due diligence obligations as described in the “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas” regarding relevant raw materials.



6. 负责任供应链的可持续性要求

透明

为了识别和降低供应链中的可持续性风险，商业伙伴会根据宝爱捷集团的要求，宝爱捷众集团披露其履行法律义务所需的供应链信息。商业伙伴也有义务对其供应商施加相应的信息披露义务，而供应商亦必须将该等义务告知其供应商。

这可能会特别要求商业伙伴向宝爱捷集团披露其供应链，甚至材料的原产地（包括冶炼厂和精炼厂等关键点），并提供管理系统或第三方验证的证据，证明其流程能够预防或降低供应链中的可持续性风险。

原材料供应链

由于原材料供应链对人类和地球有重大影响，因此需要供应链上的所有参与者在遵守人权和保护环境方面特别尽责。

因此，商业伙伴尤其要遵守《经济合作与发展组织关于来自受冲突影响和高风险区域的矿石的负责任供应链尽职调查指南》中关于相关原材料的尽职调查义务。

7. Verification of compliance with the sustainability requirements by PAIG Group

General information

The PAIG Group reserves the right to verify compliance with sustainability requirements regularly, randomly or for specific events and using appropriate and adequate means before awarding a new contract and throughout the business relationship.

This can be done, for example, by means of a risk assessment of the relevant business partner's area of responsibility, a self-assessment by the business partner and/or by deploying experts locally (on-site assessment). An on-site assessment of this nature is only carried out in the presence of representatives of the business partner during regular working hours and in accordance with applicable laws, in particular with regard to data protection. The business partners take appropriate and adequate measures that give the PAIG Group the right to carry out similar assessments of their business partners if this is necessary for the fulfillment of legal obligations .

Assessment prior to entering a contract

If sustainability risks are identified during pre-contractual assessments referred to above may also take place before entering a contract or before awarding a new contract, the resulting measures, if any, shall then be binding on the contract to be concluded. In this case, the business partner is obliged upon entering into the contract to assess any determined or imminent violation of the sustainability requirements in its own business area or in its supply chain within a reasonable period and to remedy any such non-compliance at no additional cost to the PAIG Group.

The findings of the pre-contractual assessments for compliance with the sustainability requirements constitute a criterion relevant to the award of contracts.

7. 宝爱捷集团对可持续性要求遵守情况的核查

基本信息

宝爱捷集团保留以下权利：在签订新合同之前以及在整个业务关系期间，定期、随机或针对特定事件，使用适当且充分的手段核查可持续性要求遵守情况。

例如，可对相关商业伙伴的责任范围进行风险评估、商业伙伴进行自我评估及/或在当地派遣专家（现场评估），以行使上述权利。仅能在正常工作时间内根据适用法律（尤其是有关数据保护的法律）开展这种性质的现场评估，并且商业伙伴的代表须在场。商业伙伴采取适当且充分的措施，使宝爱捷集团有权对其商业伙伴进行类似的评估，前提是这是履行法律义务所必需的。

签订合同前的评估

如果在签立合同前或签订新合同前进行上述合同前评估时发现了可持续性风险，所采取的措施（如有）将对即将签订的合同具有约束力。在这种情况下，商业伙伴有义务在签订合同时，在合理的期限内对其业务领域或供应链中已经确定或即将发生的可持续性要求违反行为进行评估，并在不增加宝爱捷集团额外成本的情况下对不合规行为进行补救。

合同前对可持续性要求遵守情况的评估结果是签订合同的相关标准。

Violation of sustainability requirements by business partners

If a violation of the sustainability requirements by the business partner has occurred or is imminent, the PAIG Group is entitled to take prompt and appropriate measures to prevent, stop or minimise the extent of such violation.

The business partner is obligated in this case to take all appropriate measures to prevent, stop or minimise the extent of such violation.

The business partner will participate in one or more training formats of the PAIG Group, provided that participation in the training may lead to the termination or minimization of the violation.

If the nature of the violation is such that it cannot be terminated in the foreseeable future, the business partner prepares and implements a plan (including a specific schedule) to stop or minimise the violation without undue delay. If required by law, the PAIG Group shall be appropriately involved in the preparation of the plan.

Violation of sustainability requirements in the business partner's supply chain

If there are material grounds (substantiated information) for believing that a human rights or environmental obligation may have been violated in the upstream supply chain (with direct suppliers of PAIG Group), the business partner shall, without undue delay:

1. Participate in a risk analysis by the PAIG Group,
2. Embed appropriate prevention measures with respect to respective business partner , and
3. Appropriately support the PAIG Group with the preparation and implementation of a plan to prevent, stop or minimise the violation.

商业伙伴违反可持续性要求

如果商业伙伴违反可持续性要求的行为已经发生或即将发生，宝爱捷集团有权迅速采取适当措施来防止、制止或尽量减少此类违反行为。

在这种情况下，商业伙伴有义务采取一切适当的措施来预防、制止或最大限度地减少此类违反行为。

商业伙伴将参加宝爱捷集团的一次或多次培训，前提是参加培训可能导致违反行为的终止或最小化。

如果违反行为的性质决定了在可预见的将来无法终止，商业伙伴应制定并实施一项计划（包括具体的时间表）停止或最大限度减少违反行为，不得无故拖延。如果法律有所要求，宝爱捷集团应适当参与计划的制定。

商业伙伴供应链中违反可持续性要求

如果有重要理由（经证实的信息）认为上游供应链（宝爱捷集团的直接供应商）中可能存在违反人权或环境义务的行为，商业伙伴应立即采取以下措施，不得无故拖延：

1. 参与宝爱捷集团的风险分析，
2. 对各自的商业伙伴采取适当的预防措施，且
3. 为宝爱捷集团制定和实施预防、制止或最大限度减少违反行为的计划提供适当支持。

Other consequences

If a business partner violates or does not comply with the sustainability requirements, the PAIG Group reserves the right to take appropriate steps to maintain its rights, such as:

- Requesting implementation of improvement measures
- Verifying highlighted improvements/measures
- Excluding the business partner from new orders and
- Terminating the contract up to extraordinary termination

The PAIG Group may waive the exercise of its right of termination if the business partner can credibly affirm and prove that it has immediately initiated countermeasures to prevent future, similar violations.



其他后果

如果商业伙伴违反或不遵守可持续性要求，宝爱捷集团保留采取适当措施维护自身权益的权利，例如：

- 要求实施改进措施
- 核查重点改进/措施
- 将商业伙伴排除在新订单之外，及
- 终止合同，直至特殊终止

如果商业伙伴能够令人信服地确认并证明其已立即采取应对措施以防止今后再发生类似的违反行为，宝爱捷集团可以放弃行使终止权利。

8. Reporting Misconduct

Reporting misconduct

Misconduct must be identified at an early stage, dealt with and remedied without delay in order to protect employees, business partners, third parties and the PAIG Group. This means that everyone needs to be aware of all compliance regulations, and pay attention and be ready to point out potential serious violations of the rules in case of concrete evidence.

Business partner grievance mechanism

Business partners establish a grievance mechanism adequate to their business.

The mechanism allows for concerns related to business ethics, human rights or the environment to be raised by both their own employees as well as other potentially affected people anonymously, confidentially and without fear of retaliation.

Business partners shall not undertake any actions that hinder, block or impede access to the complaints procedure. Business partners undertake to contractually pass on the obligations referred to in the preceding sentence to its suppliers and to ensure, to the extent possible and reasonable, that the obligations are passed on in the supply chain.

HINT

The grievance channel should build upon the effectiveness criteria from UN Guiding Principle 31 on Business and Human Rights and cover the company’s own operations and the supply chain.

举报不当行为

举报不当行为

为了保护员工、商业伙伴、第三方和宝爱捷集团，必须及早发现、处理和纠正不当行为，不得拖延。这意味着每个人均需要了解所有合规条例，并在有具体证据的情况下关注和随时指出潜在的严重违规行为。

商业伙伴申诉机制

商业伙伴建立与其业务相适应的申诉机制。

该机制允许自己的员工以及其他可能受影响的人员匿名、保密地提出与商业道德、人权或环境有关的问题，而不必担心遭到报复。

商业伙伴不得采取任何行动妨碍、阻止或阻碍使用投诉程序。商业伙伴承诺以合约形式将前一句中提到的义务告知其供应商，并在可能和合理的范围内确保该等义务在供应链中予以告知。

提示

申诉渠道应以《联合国企业与人权指导原则》第31条的有效性标准为基础，并涵盖公司自身的运营和供应链。

PAIG Group Whistleblower System

The PAIG Group values confidential, relevant tip-offs from business partners, customers and other third parties.

In the event of specific indications of potential misconduct by employees of the PAIG Group, or of the business partner or its business partners in turn in the context of collaboration with

the PAIG Group, the PAIG Group offers all stakeholders the possibility to report such misconduct to the PAIG Group Whistleblower System.

We can access the whistleblower system through the following channels:
Local Hints Intake Channels - PAIG (China) Investigation Office
E-mail: compliance@paig.com.cn
Hotline:
+86-571 2827 2702
+86-571 2882 1125
Postal address: 2333 Xixing Road Sei Ran Ri, Building No. 4, 19F Binjiang District 310051 Hangzhou P. R. China

Regarding all matters related to the reporting system, you can also contact the compliance department of Porsche Holding Salzburg via email: hinweis@porsche.co.at

宝爱捷集团举报系统

宝爱捷集团重视商业伙伴、客户和其他第三方的相关保密举报。如果有具体迹象表明宝爱捷集团的员工、商业伙伴或其商业伙伴在与宝爱捷集团合作的过程中可能存在不当行为，宝爱捷集团将为所有利益相关者提供向宝爱捷集团举报系统举报不当行为的机会。

我们可以通过以下方式提供举报线索：
本地举报途径--宝爱捷（中国）调查办公室

电子邮箱: compliance@paig.com.cn

热线: +86-571 2827 2702

+86-571 2882 1125

地址: 浙江省杭州市滨江区西兴街道西兴路2333号星澜大厦4幢19层

邮编: 310051

关于举报系统的所有事宜，您还可以通过电子邮件联系萨尔茨堡保时捷控股公司的合规部门: hinweis@porsche.co.at

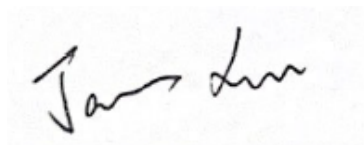
In those cases where obligations have been agreed with the business partner under individual contracts that diverge from the principles in this document, such divergent obligations prevail.

In case of any discrepancy between the international conventions or treaties, customary international law or any other regulations quoted in this Code of Conduct for Business Partners and Chinese laws and regulations, the latter shall prevail.

Hangzhou, February, 2024



Julien Guo
Procurement

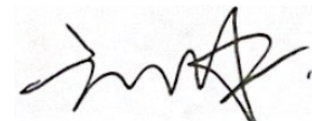


James Xue
Compliance

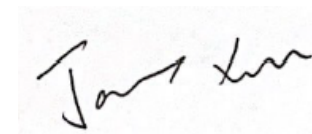
如果与商业伙伴在个别合同中约定的义务与本文件中的原则不同，以约定的义务为准。

如果本商业伙伴行为准则中所述的国际公约或条约、国际习惯法或任何其他规定与中国法律法规不一致，以中国法律法规为准。

杭州，2024年2月



郭晓林
采购部



薛明国
合规部

PAIG (China) Automobile Investment Co., Ltd
Procurement
310051 Hangzhou, China
Email: Purchasing@paig.com.cn

PAIG (China) Automobile Investment Co., Ltd
Compliance
310051 Hangzhou, China
Email: Compliance@paig.com.cn

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宝爱捷（中国）汽车投资有限公司
采购部
中国杭州，邮编：310051
电子邮箱：Purchasing@paig.com.cn

宝爱捷（中国）汽车投资有限公司
合规部
中国杭州，邮编：310051
电子邮箱：Compliance@paig.com.cn

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