

Supplier Code of Conduct

Article 1: AOC & MMD being as brand companies of TPV are committed to support the aim of the International Labor Organization universally accepted labor standards. AOC & MMD are committed to implementing systems and controls aimed at ensuring that modern slavery and human trafficking are not taking place anywhere within the organization or in any of our supply chains. AOC & MMD expect that our suppliers, contractors and business partners to adhere to the principles of TPV Supplier Code of Conduct as link: <https://www.tpv-tech.com/en/duty3.html> or directly refer to the following file: TPV Supplier Code of Conduct.

Article 2: AOC & MMD and its supply chain support and respect the codes as above mentioned. If any concerns for such supplier code of conduct please feedback to Stefan.vanSabben@tpv-tech.com or Marcella.Klinker@tpv-tech.com.

供应商行为准则
Supplier Code
of Conduct←

Issued at: May, 2024←

TPV | **冠捷科技**
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Foreword

引言

Suppliers are one of our most important strategic partners. TPV Technology (hereinafter referred to as “TPV”, “we”, “the company”) is committed to developing and maintaining close partnerships with suppliers, insists on the principle of mutual benefit and working together to create value for customers. By observing, communicating and evaluating the business commitment, performance, and potential for continuous improvement of suppliers, we formulate strategy for cooperation and common development. Hereby, we propose the expectation that suppliers can also communicate and convey the "Supplier Code of Conduct" ("Code") of TPV Technology to their functions and employees.

供应商是我们最为重要的战略伙伴之一。冠捷科技（下称“冠捷”、“我们”、“本公司”）致力于发展和维护健康的供应商合作关系，始终坚持互惠互利、携手共同为客户创造价值的原则。通过观察沟通和评估供应商的商业承诺、绩效和持续改善的潜在能力，我们制定合作和共同发展的决策。在此，希望供应商也向自己的各部门员工沟通传达冠捷科技的《供应商行为准则》（下称“本准则”）。

Our Principles

我们的原则

This Code is formulated in accordance with applicable laws and regulations, and integrates the spirit of international standards and industry initiatives, as well as recognized best practices. The core frameworks referenced include but are not limited to:

本准则依据适用法律法规制定，并融合了国际标准与行业倡议的精神及公认的最佳实践。我们参考的核心框架包括但不限于：

International Human Rights and Labor Standards: Principles defined by the United Nations Guiding Principles on Business and Human Rights (UNGPs)¹, the Ten Principles of the United Nations Global Compact², the International Labour Organization (ILO) core conventions³, as well as other conventions relevant to this Code, such as the Occupational Safety and Health Convention (No. 155)⁴, the Violence and Harassment Convention (No. 190)⁵, the Social Security (Minimum Standards) Convention (No. 102)⁶, and the Minimum Wage Fixing Convention (No. 131)⁷.

国际人权与劳工标准：《联合国商业与人权指导原则》⁸(UNGPs)、《联合国全球契约十项原则》⁹、国际劳工组织 (ILO) 核心公约¹⁰，以及与本准则相关的其他公约，如《职业安全卫生公约》（第 155 号）¹¹、《暴力和骚扰公

¹ For more information, please refer to: https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

² For more information, please refer to: <https://unglobalcompact.org/what-is-gc/mission/principles>

³ For more information, please refer to: <https://www.ilo.org/international-labour-standards/conventions-protocols-and-recommendations>

⁴ For more information, please refer to: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C155

⁵ For more information, please refer to: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190

⁶ For more information, please refer to: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C102

⁷ For more information, please refer to: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C131

⁸ 有关《联合国商业与人权指导原则》具体内容（中文），请访问：

https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_CH.pdf

⁹ 有关《联合国全球契约十项原则》具体内容（中文），请访问：<https://www.un.org/zh/37944>

¹⁰ 有关国际劳工组织 (ILO) 核心公约具体内容，请访问：<https://www.ilo.org/international-labour-standards/conventions-protocols-and-recommendations>

¹¹ 有关《职业安全卫生公约》（第 155 号）具体内容（中文），请访问：

https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_norm/@normes/documents/normativeinstrument/wcms_c155_zh.pdf

约》(第 190 号)¹²、《社会保障(最低标准)公约》(第 102 号)¹³以及《确定最低工资公约》(131 号)¹⁴所定义的原则。

Industry-Specific Codes: The Responsible Business Alliance (RBA) Code of Conduct¹⁵ serves as the primary benchmark for our supply chain responsibility management.

行业特定准则: 《责任商业联盟行为准则》¹⁶, 是我们供应链责任管理的主要基准。

Management System Frameworks: Internationally recognized management system standards such as Environmental Management (ISO 14001)¹⁷, Occupational Health and Safety (ISO 45001)¹⁸, and Quality Management (ISO 9001)¹⁹ provide a reference for our expectations regarding systematic management.

管理体系框架: 环境管理 (ISO 14001)²⁰、职业健康安全 (ISO 45001)²¹及质量管理 (ISO 9001)²²等国际认可的管理体系标准, 为我们对体系化管理的期望提供了参考。

Responsible Sourcing Initiative: The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas²³, as well as relevant industry initiatives such as the Responsible Minerals Initiative (RMI).

负责任采购倡议: 经济合作与发展组织 (OECD) 《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》²⁴, 以及相关行业计划如负责任矿产倡议 (RMI)。

We support and promote Sustainable Development Goals (SDGs)²⁵, regularly reviewing and disclosing progress. For conflict minerals management, we pay attention to the requirements of the *EU Regulation 2017/821*, the *Section 1502, US Dodd Frank Wall Street Reform and Consumer Protection*, and the *LME Responsible Sourcing Requirements* from London Metal Exchange (LME), and actively participate in building a responsible mineral supply chain.

我们支持并持续推动可持续发展目标²⁶ (SDGs) 的实现, 定期回顾并披露目标进展。我们关注欧盟《冲突矿产法规》、美国《多德弗兰克法案》及伦敦金属交易所《负责任采购政策》在冲突矿产领域的相关要求, 积极参与构建负责任

¹² 有关《暴力和骚扰公约》(第 190 号) 具体内容(中文), 请访问:

https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_norm/@relconf/documents/meetingdocument/wcms_713445.pdf

¹³ 有关《社会保障(最低标准)公约》(第 102 号) 具体内容:

https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_norm/@normes/documents/normativeinstrument/wcms_c102_zh.pdf

¹⁴ 有关《确定最低工资公约》(第 131 号) 具体内容, 请访问:

https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_norm/@normes/documents/normativeinstrument/wcms_c131_zh.pdf

¹⁵ For details on the Responsible Business Alliance (RBA) Code of Conduct, please refer to:

https://www.responsiblebusiness.org/media/docs/RBACodeofConduct8.0_English.pdf

¹⁶ 有关《责任商业联盟行为准则》具体内容(中文), 请访问: [https://www.responsiblebusiness.org/media/docs/RBACodeofConduct8.0_Chinese\(Simplified\).pdf](https://www.responsiblebusiness.org/media/docs/RBACodeofConduct8.0_Chinese(Simplified).pdf)

¹⁷ For details on the ISO 14001 Environmental Management System, please refer to: <https://www.iso.org/standards/popular/iso-14000-family>

¹⁸ For details on the ISO 45001 Occupational Health and Safety Management System, please refer to: <https://www.iso.org/standard/63787.html>

¹⁹ For details on the ISO 9001 Quality Management System, please refer to: <https://www.iso.org/standard/62085.html>

²⁰ 有关 ISO14001 环境管理体系具体内容, 请访问: <https://www.iso.org/standards/popular/iso-14000-family>

²¹ 有关 ISO45001 职业健康安全管理体系具体内容, 请访问: <https://www.iso.org/standard/63787.html>

²² 有关 ISO9001 质量管理体系具体内容, 请访问: <https://www.iso.org/standard/62085.html>

²³ For details on the Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, please refer to:

https://www.oecd.org/content/dam/oecd/en/publications/reports/2016/04/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas_g1g65996/9789264252479-en.pdf

²⁴ 有关《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》具体内容(中文), 请访问:

https://www.oecd.org/content/dam/oecd/zh/publications/reports/2016/04/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas_g1g65996/9789264301962-zh.pdf

²⁵ For more information, please refer to: <https://unglobalcompact.org/sdgs/17-global-goals>

²⁶ 有关 17 个目标的具体内容(中文), 请访问: <https://sdgs.un.org/zh/goals>

矿产供应链。

Where national/regional laws and international standards are in conflict, supplier shall respect national/regional law. Where they differ, supplier shall follow the higher standard. Where national/regional laws and this Code are in conflict, supplier shall respect national/regional law. Where they differ, supplier shall follow the higher standard.

当国家/地区法律与国际标准存在冲突时，应遵守国家/地区法律；当二者存在差异时，应遵循更高的标准。当国家/地区法律与本准则存在冲突时，应遵守国家/地区法律；当二者存在差异时，应遵循更高的标准。

The new supplier will sign *Social Responsibility Agreement* as one of the attachment of *Procurement Contract*. During the cooperation, suppliers are required to undergo annual audits/reviews towards labor and human rights, environmental protection, and responsible procurement. If the supplier is determined as failure in the audit and without substantial improvements or corresponding corrective measures implementation after coaching, we will initiate a penalty mechanism. Depending on the severity of the situation, penalties range from reducing orders to canceling supplier admission qualifications.

新准入供应商签订的采购协议中包含《社会责任协议》。在合作过程中，供应商须接受以劳工及人权保障、环境保护、责任采购等主题的年度审核/评估，若供应商被判定为审核不通过，且在辅导后没有实质性提升或未落实相应的纠正改善措施的情况下，本公司将启动处罚机制。根据情节的严重程度，处罚从削减订单到取消供应商准入资格不等。

Under some certain cases, we would carry out audit/review in the following ways:

1. Self-assessment: filling and submitting *Supplier ESG Survey*
2. Certification/statement: the one(s) from supplier demonstrating compliance
3. On-site audit: the one(s) carried out by us or entrusted third party

如有必要，我们可能会通过以下方式审核/评估符合性：

1. 自我评估：填写供应商 ESG 调查问卷
2. 证书/声明：来自供应商的一份可以体现符合性的证书或声明
3. 现场稽核：我们会亲自或者委托第三方进行现场审核

The term "supplier(s)" in this Code applies to suppliers and their subsidiaries, affiliates, as well as all subcontractors and sub suppliers which provide products and services to us.

本准则所称之“供应商”适用于向本公司提供产品及服务的供应商及其子公司、附属机构以及所有分包商和下级供应商。

In case of any ambiguity in the understanding of the contents, the Chinese language shall prevail.

如对内容理解存在任何歧义，应以中文为准。

Our Requirements

准则内容

2.1 Wages and Benefits 薪酬福利

Compensation paid to employees shall comply with all applicable wage laws and regulations, including but not limited to those relevant to minimum wages, overtime hours and legally mandated benefits. Suppliers shall inform all employees of the compensation structure and pay cycle. For each pay period, employees shall be provided with a timely and understandable wage statement. Suppliers or labor agents shall not use wage deductions or waive legally mandated benefits as disciplinary actions.

供应商向员工支付的薪酬应符合所有适用的相关法律法规，包括但不限于有关最低工资标准、加班工资和法定福利的各项管理规定。供应商应告知所有员工工资结构和支付周期，每个计薪周期向员工提供清晰易懂的工资单。供应商或其代理人不应将扣减工资或减免法定福利作为纪律惩处的手段。

2.2 Working Hours 工作时间

Suppliers shall comply with all applicable laws and regulations regarding working hours. The regular workweek, including overtime, should not exceed 60 hours, except in abnormal or emergency situations. Employees should be entitled to at least one day off for every six consecutive working days. Furthermore, suppliers shall ensure that employees are provided with reasonable daily work breaks during continuous working periods to alleviate fatigue and safeguard occupational safety and health. The frequency and duration of such breaks shall comply with local legal requirements. All overtime must be voluntary.

供应商应遵守有关工作时间的所有适用的相关法律法规。普通工作周的工作时间（包括加班）不应超过 60 小时，非正常或紧急状况除外。员工每连续工作六天后应至少有一天休息时间，此外，供应商应确保员工在连续工作期间获得合理的每日工间休息，以缓解疲劳并保障职业安全与健康，此类休息的频率和时长应符合当地法定要求。所有加班必须出于自愿。

2.3 Child Labor and Young Employees 童工和未成年工

【Red Line 1】 No child labor in any form in any stage of manufacturing.

【红线 1】 不得在生产任何阶段使用任何形式的童工。

Suppliers shall prohibit the use of any form of child labor in any stage of manufacturing. Suppliers shall only employ workers who are at least 16 years of age, or have reached the legal minimum age for employment in the country, or have reached the age for completing compulsory education, whichever is greatest.

供应商应禁止在生产任何阶段使用任何形式的童工，只应雇用至少年满 16 周岁，或达到适用法定最低就业年龄，或达到完成义务教育的适用年龄的员工，以其中最高年龄限制为准。

Suppliers shall verify the age of all employees in the process of recruitment. Young employees under the age of 18 (including student workers and interns) shall not perform work that is likely to jeopardize their health or safety, as well as night shifts and overtime. Meanwhile, measures to protect young employees shall be implemented in accordance with local laws and regulations.

供应商应在招聘时施行有效措施以鉴别所有员工的年龄，低于 18 周岁的未成年工（包括学生工、实习生）不得从事可能危及其健康或安全的工作，也不应安排加班或从事夜班工作。同时，应按照当地法律法规执行保护未成年工的相关措施。

2.4 No Discrimination 反歧视

Suppliers shall not engage in discrimination based on age, disability, race, gender, marital status, national origin, political affiliation, ethnicity, religion, sexual orientation or union membership in hiring and other employment practices.

供应商不应基于年龄、残障、民族、性别、婚姻状况、国籍、政治派别、种族、宗教、性取向、工会成员身份，在招聘和其他雇佣活动中歧视任何员工。

2.5 Freely Chosen Employment and Humane Treatment 自由择业和人道待遇

【Red Line 2】 No participation or use of forced labor or bonded labor in any form.

【红线 2】 不参与、不利用任何形式的强迫劳动和抵债劳动。

Under no circumstances shall the suppliers make use of forced or bonded labor, including but not limit to forced labor performed by persons placed in a commercial or social institutions, compulsory labor under threat of violence, political coercion or restriction of personal freedom, or slave, trafficked, or compulsory labor for production. All work shall be voluntary.

供应商应坚持不参与、不利用任何形式的强迫劳动和抵债劳动。强迫劳动可能的形式包括但不限于受制于商业/社会机构的集中安排而从事的强制劳动、以暴力威胁、政治胁迫、限制人身自由等而实现的强制劳动、奴隶和被贩卖群体从事的强制劳动、出于生产需求的强制劳动等等。综上，工作皆须在员工自愿的基础上开展。

Suppliers shall not retain employees' identity documents, such as legally valid passports, travel documents, identity cards, or work permits. Employees shall not be required to pay employers or labor agents recruitment fees or other related fees for their employment. If any such fees are found to have been paid by employees, the supplier shall immediately cease such practices, and ensure that such fees are repaid to the employee.

供应商不得扣押员工身份证明文件，包括本人持有的合法有效的护照、旅行证件或身份证件原件、工作许可证明等。供应商不应要求员工向用人单位或者其代理人缴纳招聘费用。如发现员工正在或已经支付过上述费用，供应商应即刻停止该行为，并及时退还或监督代理人退还所有费用。

Suppliers shall clearly define employment terms with employees, providing each employee with a written employment agreement or labor contract. The contract term shall be simple and easy to understand, avoiding language or specialized content that may create barriers to understanding for employees. The contract shall clearly state the employees' rights and responsibilities. Additionally, subject to local law requirements, employees shall be free to terminate their employment upon reasonable notice.

供应商应与员工明确约定雇佣内容，以书面雇佣或劳动合同形式完成约定。合同内容不应设置因语言、条款内容高度专业而产生的理解障碍，合同条款应简单易懂，并列明员工相应的劳动权利与义务。此外，在符合当地法律法规要求的前提下，供应商应确保员工可通过正常的离职流程完成离职。

Suppliers shall ensure humane treatment of employees, providing a workplace free from verbal abuse, physical or psychological harassment, mental or physical coercion, sexual harassment, or illegal discrimination. All employees shall be treated with dignity.

供应商应给予员工必要的人道待遇，为员工提供免受口头辱骂、行为骚扰、心理骚扰、精神和肉体胁迫、性骚扰和非法歧视的工作场所，确保所有员工都享有尊重及尊严。

2.6 No Human Trafficking 反对人口贩卖

Under no circumstances shall TPV and its suppliers support human trafficking. TPV and its suppliers shall support the *Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplement the United Nations Convention against Transnational Organized Crime*²⁷.

供应商应与本公司一道，不支持任何形式的人口贩卖，积极响应以《联合国打击跨国有组织犯罪公约关于预防、禁止和惩治贩运人口特别是妇女和儿童行为的补充议定书》²⁸ 为代表的关于人口贩卖的公约协定。

2.7 Freedom of Association and Collective Bargaining 自由结社与集体协商

Suppliers shall respect the right of all employees to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of employees to refrain from such activities

供应商应尊重员工自愿组建和加入工会、进行集体谈判与和平集会以及拒绝参加此等活动的权利。

Suppliers shall establish effective labor-management communication mechanisms, engaging in regular open communication with employees or their representatives regarding working conditions and management practices. Employees shall be able to openly communicate and share ideas and concerns without fear of discrimination, reprisal, intimidation, or harassment.

供应商应建立有效的劳资沟通机制，定期与员工或员工代表就工作条件和管理实践公开交流沟通，员工应可自由表达看法和疑虑，而无需担心会受到歧视、报复、威胁或骚扰。

2.8 Working and Living Condition 工作和生活条件

Suppliers shall provide employees with clean sanitary facilities and drinking water. Suppliers shall provide employees with meals that meet food hygiene standards and respect employees' specific cultural practices. Dormitories provided by suppliers or third parties shall be clean and safe, with adequate living space, and shall include individual lockers for personal belongings.

供应商应向员工提供清洁的卫浴设施以及饮用水。供应商应向员工提供符合食品卫生标准的餐饮，且尊重员工的特殊民族习惯。供应商或第三方提供的员工宿舍应干净、安全，具备合理适当的起居空间，提供可以存放个人物品的独立置物柜。

2.9 Health and Safety 健康和安全

【Red Line 3】 No working environment with exposure to the risk of fatality, severe injury or health damage.

【红线 3】 不得使员工暴露在任何可能导致死亡、严重人身伤害和健康损害的工作环境中。

Suppliers shall obtain and update necessary health and safety licenses to keep them valid, strictly complying with relevant legislations.

供应商应取得和及时更新必要的健康和安全生产许可，并严格遵守相关要求。

Suppliers shall provide employees with a healthy and safe working environment, with adequate industrial hygiene and safety measures. Suppliers shall develop procedures and systems to manage occupational injuries and illness, including but not

²⁷ For detailed information regarding the Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplement the United Nations Convention against Transnational Organized Crime, please refer to: <https://www.ohchr.org/sites/default/files/ProtocolonTrafficking.pdf>

²⁸ 有关《联合国打击跨国有组织犯罪公约关于预防、禁止和惩治贩运人口特别是妇女和儿童行为的补充议定书》（中文），请访问：<https://www.court.gov.cn/upload/file/2010/03/30/16/P020100330598486942390.pdf>

limited to, the following:

供应商应为员工提供一个健康安全的工作环境，维持相应的职业卫生和安全防护水平。供应商应制定必要的管理程序和体系，来预防和管理职业健康危害以及职业病，具体内容包括但不限于：

- a) Occupational health and safety (OHS) management system to prevent, control and respond to infectious diseases, based on the context of the organizations.
- b) Leadership and employee participation including but not limited to OHS Policy, roles, responsibilities, accountabilities and authorities.
- c) Risk and hazard identification and assessment and determination of applicable OHS legal requirements and other OHS requirements and risks, including related actions and objectives to address them.
- d) Provision of resources competence and awareness, information and communication and documented information.
- e) Operational planning and control including but not limited to operational controls that apply to outsourcing, procurement and contractors, emergency preparedness and response and change management.
- f) Performance evaluation including but not limited to internal audits, monitoring and measurement, analysis and evaluation and management review.
- g) Incidents, nonconformities and corrective action, continual improvement of objectives and processes.

- a) 基于组织背景和具体情况策划并建立的职业健康安全管理体系和旨在预防控制及应对传染病的管理体系
- b) 管理层及员工代表的参与，包括但不限于参与职业健康安全和公共卫生政策、职责分工的制定
- c) 风险及危险源识别评价，适用的法律法规及其具体要求，构成职业健康安全主要管理内容的管理措施、目标指标等
- d) 提供的必要资源，保障健康安全所需的能力和意识，信息和充分的沟通，以及记录信息的文档
- e) 运营策划及控制，包括但不限于对外包、采购、承包商，以及应急准备与响应、变更管理的策划及控制
- f) 绩效评估，包括但不限于内审、监督计量、评估分析和管理评审等等
- g) 事故事件记录、不符合发现项、纠正预防措施、服务于目标指标的持续改善计划、过程管理

2.10 Environment 环境保护

【Red Line 4】 No environmental breaches with potential or existing severe impacts.

【红线 4】 不得发生任何可能或已经造成严重影响的环境污染排放事件。

Suppliers shall obtain and update necessary environmental licenses to keep them valid, strictly complying with relevant legislations. For better management efficiency, suppliers shall implement and maintain corresponding management systems, including but not limited to environmental protection, energy management etc.

供应商应取得和及时更新必要的环保许可，并严格遵守相关要求。为提升管理效率，供应商应实施和维护相应的管理体系，包括但不限于环境、能源等等。

Suppliers shall reduce resources consumption, including but not limited to fossil fuels, water resource, raw materials containing hazardous substances, and natural resources. Suppliers shall monitor and quantify the resources consumption, set corresponding targets, and track the progress. Reducing the use of such resources through energy saving, reuse, recycling, energy replacement, and some other methods is recommended.

供应商应减少资源浪费，资源包括但不限于化石燃料、水资源、含有害物质的生产原料和自然资源。供应商应对使用情况进行监控量化，并设定相应目标和跟进落实进度，通过节能、重复利用、循环使用、替代能源或其他方法减少对此类资源的使用。

Suppliers shall prevent pollution. As for solid waste, wastewater, waste gas, and noise, the effective routine supervision and compliant treatment shall be developed. The illegal discharge and overflow of wastewater into rainwater discharge pipelines, public water supply systems, or public water bodies shall be prohibited.

供应商应预防控制污染，对废弃物、废水、废气、噪声形成有效的日常监督和合法合规的处理处置。供应商应避免违法排放和溢流产生的废水进入雨水排放管道、公共供水系统或公共水域。

Suppliers shall identify, manage, reduce and control greenhouse gas²⁹ (GHG) emissions at the operational level, monitor and quantify GHG emissions, set corresponding targets, and track the progress.

供应商应识别、管理、减少并控制运营过程中的温室气体³⁰ (GHG) 排放，应对温室气体排放情况进行监控量化，并设定相应目标和跟进落实进度。

2.11 Business Ethics 商业道德

【Red Line 5】 No business ethics breaches, including bribery, corruption and dishonesty, with potential or existing severe impacts.

【红线 5】 不得发生任何可能或已经造成严重影响的贿赂、腐败、不诚信等违反商业道德的事件。

2.11.1 Fair competition and conflict interest 公平竞争与利益冲突

Suppliers shall comply with rules and standards on commercial reputation and fair competition, and ensure not to engage in any activities that violate the principles of fair competition and antitrust laws. Suppliers shall avoid potential conflicts of interest in your business dealings with us. Possible scenarios include but are not limited to our employees or their close relatives working for suppliers, or having investment interests. If any potential conflicts of interest are found, the supplier shall immediately notify us. For better management efficiency, suppliers shall implement and maintain corresponding management systems, including but not limited to anti bribery, conflicts of interest, etc.

供应商应遵守有关商业信誉和公平竞争的规则标准，保证不会从事任何违反公平竞争原则和反垄断法的活动。供应商在与本公司的商业往来中应避免可能的利益冲突。可能的情形包括但不限于本公司员工或其近亲在供应商处任职，或有投资利益。若发现可能存在的利益冲突，供应商应立即通报我们。为提升管理效率，供应商应实施和维护相应的管理体系，包括但不限于反贿赂、利益冲突等等。

2.11.2 Intellectual property and information security 知识产权与信息安全

Suppliers shall respect and protect intellectual property and sensitive information. Suppliers shall take measures to protect any intellectual property rights we provide during commercial transactions. Suppliers shall establish a management system to ensure compliance with privacy and data security regulations, when collecting, storing, processing, disseminating and sharing information from customers, employees, suppliers, and other relevant parties.

供应商应尊重并保护知识产权和敏感信息。供应商应采取措施来保护我们在商业交易过程中提供的任何知识产权。供应商应建立管理体系，保障在收集、储存、处理、传播和分享客户、员工、供应商等相关方的信息时遵守隐私和数据安全法律法规及监管要求。

2.11.3 Business integrity 商业诚信

²⁹ See GHG Protocol or ISO 14064 for further information of GHG accounting and reporting.

³⁰ 有关温室气体统计和报告标准的详情，可参考 GHG Protocol、ISO 14064。

Suppliers shall work to implement the requirements of business ethics laws and international standards, especially the local and foreign laws and regulations related to anti-corruption and anti-bribery. Suppliers shall ensure compliance with the highest level of integrity and transparency, and will not engage in any form of bribery. Meanwhile, suppliers shall put forward to the equal expectations for their partners.

供应商应致力于践行商业道德法律规范和国际通用准则的各项要求，特别是国内外有关反腐败和反贿赂的法律法规。供应商应保证遵守最高的诚信和透明度，不会从事任何形式的贿赂行为。同时，供应商应对自己的合作伙伴提出同样的期望。

2.11.4 Gift policy 礼品政策

We do not encourage accepting or giving gifts. We do not allow employees to accept any form of gifts, transactions, or other improper benefits directly or indirectly provided by individuals or company who have business dealings with us in their personal name. In rare cases, if gifts or hospitality arrangements are provided, they must comply with the commercial practices of the region, and will not be considered or constitute bribery or improper payments, will not be treated as improperly affecting business relations, and will not violate applicable laws or ethical standards.

我们不鼓励接受或者馈赠礼品。我们不允许员工以个人名义接受任何与公司有业务往来的人士或对方公司直接或者间接提供的任何形式的礼物、交易等不正当利益。在极少数情况下，如果提供礼品或款待安排，则它们必须符合该区域的商业惯例，且不会被视作或构成贿赂或不当付款，不会被视作以不正当的方式影响业务关系，不得违反适用的法律或道德标准。

When receiving business gifts and entertainment expenses exceed the prescribed limit, we require employees to use the personal benefit declaration form for receiving hospitality and gifts to report detailed information and obtain approval from independent regulatory officers of their business units.

当收受商务礼品和招待费用超过规定限额时，我们要求员工必须使用接受款待及馈赠之个人利益申报表以报告详细信息，并获得各自业务单位独立监管专员的批准。

2.12 Responsible Sourcing of Minerals 负责任的矿物采购

Suppliers shall adopt and commit to the minerals procurement policy for identifying upstream mineral sources and the derivatives from conflict-affected and high-risk areas, to ensure that the minerals such as tin, tantalum, tungsten, gold (3TG), cobalt, mica, graphite, nickel, lithium and copper contained in the manufactured products do not originate from conflict-affected areas. Conflict-affected areas are the ones where there is a risk of armed conflict or widespread violence. The upstream mineral sources and the derivatives from high-risk areas shall also be identified. High-risk areas include but are not limited to political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure, widespread violence, and violations of national or international law, such as the worst forms of child labor, forced labor and human trafficking, serious human rights violations (e.g. widespread sexual violence), or other high-risk activities based on reasonable and objective judgments (e.g. severe health and safety risks and negative environmental impacts).

供应商应针对矿物采购制定相应的管理政策，识别上游来自“受冲突影响和高风险区域”³¹的矿产资源及其产品，确保制造的产品中包含的锡、钽、钨、金（3TG）和钴、云母、石墨、镍、锂、铜等矿物不会产自存在武装冲突、大面积暴力活动风险的“受冲突影响”地区。供应商还应判断生产原料是否来自“高风险”区域，高风险包括但不限于政局不稳、存在政治压迫、制度缺陷、不安全因素、民用基础设施崩溃、广泛暴力活动、违反国际国内法律，如最恶劣形式的童工雇佣现象、强迫劳动和贩卖人口、严重侵犯人权的行为（如广泛的性暴力），或根据合理客观的判断存在其他高风险活动（包括严重的健康和安全风险以及不良的环境影响）。

³¹ 参见《中国负责任矿产供应链尽责管理指南》（第二版）第7页，知识框1“受冲突影响和高风险区域”的特征。

We will conduct due diligence on the conflict minerals used, covering the mineral sources and its supply chains. Meanwhile, we require all levels of suppliers handling minerals to provide the documentation and records of supply chain due diligence practices at any time for easy inquiry. Suppliers involved in mineral use shall complete the Conflict Minerals Reporting Template³² (CMRT, EMRT and AMRT) annually. Regardless of whether involving into conflict minerals using at high-risk level or not, suppliers shall sign the *Warranty on the Non-Use of Conflict Minerals*, as one of the *Procurement Contract* attachments.

本公司会开展针对所用冲突矿产的尽职调查，范围包括矿物源头及其制造加工的产业链。同时，本公司要求经手矿物的各级供应商可随时提供尽职调查记录，方便查询确认。涉及矿产使用的供应商应每年完成冲突矿产报告模板³³（CMRT、EMRT 以及 AMRT）的填报，且无论是否属于冲突矿产使用的高风险企业，都应签订采购合同附件中的《不使用冲突矿产保证书》。

If any warnings or risks related to tin, tantalum, tungsten, gold, cobalt, mica, graphite, nickel, lithium, copper or other designated related minerals or materials are found, the supplier shall immediately notify the procurement contact window in writing.

如果发现与锡、钽、钨、金、钴、云母、石墨、镍、锂、铜或其他指定相关矿物或相关材料有关的任何警告风险，供应商应立即以书面形式通知采购联系窗口。

2.13 Commitment and Accountability 承诺和管理责任

Suppliers shall issue policy and statements in the native languages. Suppliers shall commit to complying with laws and regulations, industry standards, customer requirements, and the requirements of this code, and above. Suppliers shall also commit to focusing on their own management performance and continuous improvement.

供应商应采用当地语言发布相关的政策声明，应承诺至少遵守法律法规、行业标准、客户要求及本准则的要求，并承诺关注自身管理绩效、持续改进。

Suppliers shall designate one or more personnel responsible for ESG management, integrate ESG into routine operations, establish internal audit and accountability mechanisms. Suppliers shall accept on-site audits as required, and disclose true and accurate relevant information.

供应商应指定一名或多名管理者负责 ESG 管理，将 ESG 融入日常运营，建立内部稽核和问责机制，根据要求接受现场审核，并披露真实、准确的相关信息。

2.14 Grievance and Whistleblowing 申诉和举报

Suppliers shall establish effective grievance and whistleblowing mechanisms for first-line workers to communicate or report any unreasonable situations encountered in their work. Suppliers shall keep whistleblowers and reported information confidential and shall not interfere, discriminate, retaliate or harass the whistleblowers.

供应商应建立有效的申诉机制和匿名举报投诉机制，供管理人员和一线员工沟通交流，汇报工作中遇到的不合理情况。供应商须对举报者和举报信息保密，不得干涉、歧视、报复或骚扰。

Suppliers shall convey work voice surveys within the company. If any concerns are raised about the supplier during the survey,

³² Developed by RMI, helping convey information about the country/region of mineral origin and currently used smelters and refineries within the supply chain, link: www.responsiblemineralsinitiative.org

³³ 由 RMI 制定的标准化报告模板，可帮助在供应链内传达有关矿物原产国/地区和当前使用的冶炼厂和精炼厂的信息：
www.responsiblemineralsinitiative.org。

the decision on whether to conduct on-site audits or advocate self-declaration will depend on the severity of the situation.

供应商应根据要求在公司范围发布员工心声调查，如在调查中对供应商产生疑虑，将视情节重大程度，决定是否对供应商实行现场稽核或自我声明。

Reporting Violations 违规报告

We encourage all employees of suppliers, especially first-line workers, as well as contractors, to report cases that are suspected to violate this Code. As a reporting window, the Internal Audit department will strictly protect whistleblowers and the reported information, and treat every email and phone call according to the standard operating procedure (SOP).

我们号召鼓励供应商的所有员工，特别是一线员工，以及承包商积极报告可能违反本准则的事件，内部审计部门作为报告窗口将严格保护举报者和举报信息，按照处理流程对待每一封邮件、每一个电话。

Contact email 举报邮箱: tpv.whistleblowing@tpv-tech.com

Contact phone 举报电话: +(852) 2865-4219

TPV reserves the right to interpret this Code. This Code will be updated according to actual situation. To learn more about the latest version of the Code, please visit TPV official website (link: <https://www.tpv-tech.com/duty3.html>).

冠捷科技保留对本准则的解释权。本准则会根据实际需求作出更新，欲了解本准则的最新版本，请供应商访问以下冠捷科技集团网页: <https://www.tpv-tech.com/duty3.html>