



## CODE OF CONDUCT

### 森根行为准则承诺书

CERGEN hereby undertakes that we shall comply with CODE OF CONDUCT as follows:  
森根科技（苏州）有限公司特此申明遵守《行为准则》并同意如下：

CC consists of standards on labor, health and safety, and the environment, the elements of compliance system, and the standards relating to business ethics. We undertake to operate in full compliance with the laws and regulations of the countries/area in which it operates. In addition to the compliance with the legislations, we also actively move towards the Internationally recognized standards and assume more social and environmental responsibility.

《行为准则》包含了劳工、健康与安全、以及环境的标准、合规管理体系所需的要素以及有关商业道德的标准。我们承诺所有活动都必须遵守经营所在国/地区的法律法规。我们除了遵守法律，更应积极迈向国际公认的标准，以承担更多的社会和环境责任。

CC is aiming for ensuring that the working conditions in the industry supply chain are safe, the workers are treated with respect and dignity, and the business operators are environmentally responsible.

《行为准则》的目的是为了确保行业供应链的工作环境安全。劳工受到尊重并富有尊严，以及企业运营者对环境有所负责。

CERGEN shall publicly support the CC and take the initiative in establishing a management system to align with CC. CERGEN shall ensure that its entire supply chain shall comply with the same. As a minimum, CERGEN shall require its upstream suppliers to acknowledge and implement the CC.

森根会公开支持行为准则，并主动与行为准则提出的管理体系保持一致。森根也会主动将行为准则应用于整个供应链。至少，会要求上游供应商认同并应用行为准则。

CERGEN shall apply CC in the level of management and execution, so as to provide a human, safe and green working environment.

森根将从系统面和执行面来遵循行为准则，以达到提供一个人性化，安全，绿色的工作环境。



## CODE OF CONDUCT V2.0 《行为准则》V2.0

CERGEN's vision is that 'Rooted in the Chinese Culture, strive to be global premier innovative technology corporation, deliver excellent contribution to green energy resolution for mankind, and enrich the spiritual and material wellbeing of our employee. CERGEN is committed to ensuring that working conditions in CERGEN 's supply chain are safe, workers are treated with dignity and respect, manufacturing processes are environmentally responsible, and all business operations are conducted ethically. In all of CERGEN's activities, to operate in full compliance with the laws, rules and regulations of the countries/area in which it operates.

森根的愿景是在中华文化下做世界一流的创新科技公司, 为人类新能源事业做出卓越贡献的同时, 为全体员工的精神和物质的福祉而努力奋斗”。森根承诺确保在供应链中提供安全的工作环境。给予员工尊严和尊重, 采用对环境负责的制造流程, 并在经营中遵守商业道德规范。森根在所有的经营活动中, 都有义务完全遵守其所在国家/地区的法律法规来经营。

CERGEN requires that CC implement this code by adopting the management systems as described below:

森根通过使用下面介绍的管理系统来执行行为准则:

The industry-recognized standards such as the CC of Responsible Business Alliance (RBA), Social Accountability International SA8000 standard, ISO14001 and International Labor Organization's (ILO) standards, as well as Foreign Corrupt Practices Act (FCPA) and the Universal Declaration of Human Rights were used as references in preparing this code. These laws, standards and documents can be used as reference for the CERGEN as well.

《行为准则》效仿了《责任商业联盟(RBA)》,并参考了《社会责任标准(SA8000)》、《ISO14001》以及国际劳动组织(ILO)颁布的一系列标准。以及《海外反腐败法(FCPA)》和《世界人权宣言》等。这些法律、标准和文件等也可作为森根信息的来源。



## A. Labor 劳工

Undertake to protect the human rights of workers, and to treat them with dignity and respect, as per the norms recognized by the international community. This applies to all workers including temporary worker, immigrant, apprentice, contract worker, direct employees, and any other type of worker.

承诺按照国际社会公认准则维护员工人权，并给予其尊严和尊重。此处的工人包括临时工、移民、学徒、合同工、直接雇员和任何其他类型的员工。

劳工标准如下 **The labor standards are:**

### 1)自由择业 **Freely Chosen Employment**

Forced, bonded (including debt bondage) or indentured labor, Involuntary prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process, workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin. All work must be voluntary and workers shall be free to resign at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to employees' identity or immigration documents, such as government-issued identification, passports or work permits, unless the holding of work permits is required by law. Workers shall not be required to pay employers or agents recruitment fees or other aggregate fees in excess of one month's salary. All fees charged to workers must be announced to the workers and fees in excess of one month's salary must be returned to the worker.

不得雇佣被强迫、抵押（包括债役）或用契约束缚的劳工、非自愿的狱中劳工、奴隶或贩卖人口。包括不得通过威胁、强迫、强制、诱拐或哄骗方式运送、窝藏、招聘、转移或接收此类劳工或服务。除了禁止对进出办公场所进行不合理限制以外，还不得对员工在工作场所中的行动自由设置不合理限制，作为招聘流程的一部分，在员工离开其所在国家/地区之前，必须为其提供以其母语书写的书面雇佣协议，其中应包含对条款与条件的说明。所有工作必须是自愿的，且员工应有自由随时离开工作岗位或终止雇佣。雇主及代理不得保留或以其他方式损毁、隐匿、没收或拒绝员工查看本人的身份或移民文件，例如政府颁发的身份证明、护照或工作许可，除非依据法律要求必须保留工作许可，不得要求员工向雇主或代理支付金额超过一个月工资作为招聘费或其他费用，必须披露向员工收取的任何费用，且金额超过一个月工资的费用必须返还给员工。

### 2)青年员工 **Young Workers**

Child labor shall not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 14, or under the age for completing compulsory education, or under



the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. CC shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. CC shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be paid at least the same wage rate as other entry-level workers performing equivalent or similar tasks.

在制造的任何阶段均不得使用童工。“儿童指未满 14 周岁、低于完成义务教育的年龄或低于国家/地区的最低就业年龄（以最高者为准）的任何人。支持采用遵守所有法律法规的合法工作场所学徒计划。年龄低于 18 岁的员工（青年员工）不得从事可能危及健康或安全的工作，包括夜班和加班。应合理维护学生工记录、对导师搭档进行严格的尽职调查，并按照适用法律和法规保护学生工权利，从而确保对学生工进行恰当的管理。供应商应为所有学生工提供适当的支持和培训。如无当地法律规定，学生工，实习生和学徒的工资率至少应与其他执行相同或相似岗位的初级员工相等，

### 3) 工作时间 **Working Hours**

Studies of business practices demonstrates that worker strain results in the reduced productivity, increased turnover and increased injury and illness. Workweek shall not exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off for every seven days.

商业实践研究表明，员工过劳与生产率下降、人员流动性增强、伤病人数增加等情况明显相关。周工时不得超过当地法律规定的最大限度。而且，除非遇到紧急或异常情况，一周的工作时间包括加班在内不得超过 60 个小时。员工每七天至少休息一天，

### 4) 薪资福利 **Wages and Benefits**

Remuneration paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

向员工支付的报酬应符合所有适用的薪资法律，包括有关最低薪资、加班时间及法定福利的法律。根据当地法律，员工的加班报酬应高于正常的每小时工资水平。禁止以扣减工资作为纪律处分手段。在每个工资结算周期，应及时向员工提供清晰易懂的工资单，有足够的信息来确认付出的劳动所应得的准确报。应按照当地法律的限制规定聘用临时工、派遣员工和外包劳工。



#### 5)人道待遇 Humane Treatment

There shall not be any harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor shall it be any threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers

不得对员工实施性骚扰、性虐、体罚、精神或肉体胁迫或言语侮辱等严苛的非人道待遇：亦不得威胁实施此类行为。支持这些要求的纪律处分政策和程序应清楚地界定并传达给员工。

#### 6)非歧视 **Non-Discrimination**

Committed to the workers a workforce free of harassment and unlawful discrimination. Companies shall not discriminate any employee based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and training opportunities. Workers shall be provided with reasonable arrangement for religious activities. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

承诺员工免受骚扰以及歧视，公司不得因人种、肤色、年龄、性别、性取向、性别认同和性别表现、种族或民族、残疾、怀孕、宗教信仰、政治派别、社团成员身份、受保护的退伍军人身份、受保护的基因信息或婚姻状况在发放工资、升迁、奖励、培训机会等聘用或雇佣行为中歧视员工。应向员工提供合理的宗教活动安排。此外，不得要求员工或准员工接受可能带有歧视性目的的医疗测试或体检。

#### 7)自由结社 **Freedom of Association**

Subject to the local law, respect the right of all workers 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 workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

按照当地法律的要求。尊重所有员工自由结社及加入工会、集体谈判和参与和平集会的权利，并尊重员工不参加此类活动的权利。员工和/或其代表应能与管理层公开沟通和分享有关工作环境和管理的建议与意见，而无需担心歧视、报复、威胁或骚扰。

### B. **Health and Safety** 健康与安全

Recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment improves the quality of products and services, contribute to the maximization of the productivity, retaining the employee and bolstering up their morale. Also understand that continuous training and education of worker is essential for them to identify and solve health and safety issues in the workplace.

了解除了尽量减少与工作相关的伤病事故以外，建立安全健康的工作环境可提高产品和服务



质量，有利于促进生产、提高员工保留率并提升员工士气。还应了解持续的员工投入和教育对于发现和解决工作场所中的健康与安全问题至关重要。

健康与安全标准如下 **The health and safety standards are as following**

#### 1)职业安全 **Occupational Safety**

Worker who is exposed to potential safety risks (e.g., the danger of electrical and other energy sources, fire, vehicles, and falling) has to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers shall be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Workers shall be encouraged to raise safety concerns.

应通过正确的设计、工程和管理控制、预防性维护和安全工作流程（包括上锁/挂牌）以及持续的安全培训来控制员工可能遇到的潜在安全危险（如电器和其他能源、火、车辆及坠落危险）。如果无法通过上述方式有效控制危险，应为员工提供适当的、保养良好的个人防护装备和有关上述危险可能导致风险的教育资料。应鼓励员工提出安全疑虑。

#### 2)应急准备 **Emergency Response**

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, environment and property.

应识别并评估紧急情形和紧急事件，并通过实施应急方案及应对程序将其影响降到最低，包括：紧急报告、员工通知和撤离程序、员工训练与演习、适当的火灾探测及扑灭设备，充足的出口设施和复原计划。此类计划和程序应尽可能减少对人身、环境和财产的危害。

#### 3)工伤和疾病 **Occupational Injury and Illness**

Procedures and systems should be in place to prevent, manage, track and report occupational injury and illness including to the following: encourage worker to report; classify and record injury and illness; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and assist the ill workers back to work.

应制定程序和体系以预防、管理、跟踪和报告工伤和疾病，包括以下规定：鼓励员工报告：对工伤和疾病案例进行分类和记录：提供必要的医疗服务：调查案例并采取纠正措施以消除影响：帮助员工重返工作。

#### 4)工业卫生 **Industrial Hygiene**

Worker who is exposed to chemical, biological and physical agents is to be identified, evaluated, and controlled. Engineering or administrative controls must be used to control





overexposures. When hazards cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs.

应鉴别、评估并控制由化学、生物及物理试剂给员工带来的影响。必须采取工程技术或管理手段来控制危险源过度暴露。无法通过这些方法有效控制危险源时，须通过适当的个人防护装备方案保护员工健康。

#### 5) 强体力型工作 **Physically Demanding Work**

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

应鉴别、评估并控制从事强体力型工作给员工带来的影响，包括人工搬运材料和重复提举重物、长时间站立、高度重复或强力的装配工作。

#### 6) 机器防护 **Machine Safeguarding**

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

须对生产设备和其他机械进行安全危害评估。应为可能导致员工受伤的机械提供物理防护装置、连锁装置及屏障，并正确进行维护。

#### 7) 公共卫生、饮食和住宿 **Sanitation, Food, and Housing**

Workers shall be provided with ready access to clean sanitation facilities, potable water and clean food. storage, and eating facilities. Worker dormitories provided by the CERGEN are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, and reasonable personal space along with reasonable entry and exit privileges.

应为员工提供干净的卫生间设施、饮用水及洁净的食物准备、储藏与用餐设施。森根提供的员工宿舍应保持洁净安全，并提供适当的紧急出口、洗浴热水、充足的供暖和通风，以及合理的出入方便的私人空间。

#### 8) 健康与安全沟通 **Health and Safety Communication**

Provide workers with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the facility.

向员工提供以员工主要语言授课的适当的工作场所健康与安全培训。应在工作场所清晰张贴健康与安全相关信息。

### C. **Environment** 环境

Recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.



认识到环境责任是生产世界一流产品的重要部分。在制造作业中，应尽可能减少对社区、环境和自然资源的不利影响，同时保护公众的健康和安全，

环境标准如下 **The environmental standards are as following:**

#### 1)环境许可与报告 **Environmental Permits and Reporting**

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

应获取、维护并更新所有必需的环境许可证（如排放监测），批准文书及登记证，并遵守其运营和报告要求，

#### 2)预防污染和节约资源 **Pollution Prevention and Resource Reduction**

The use of resources and generation of waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes. materials substitution, conservation, recycling and re-using materials.

应在源头上或通过实践（如改进生产、维护和设施工艺，替换材料、节约资源、材料回收和再利用）减少和消除所有类型的资源耗费和污染（包括水和能源），

#### 3)有害物质 **Hazardous Substances**

Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

应当识别和控制释放到环境中会造成危险的化学物质及其他材料。确保其得到安全处理、运输、存储、使用、回收或再利用和处置。

#### 4)废水与固体废物 **Wastewater and Solid Waste**

Implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Wastewater generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal. In addition, measures should be implemented to reduce generation of wastewater. Conduct routine monitoring of the performance of its wastewater treatment systems.

采取系统化的方法来鉴别、管理、减少和负责任地处置或回收固体废物（非有害物质）。作业活动、工业流程和卫生设施产生的废水在排放或处置前，需按要求进行性质识别、监测、控制和处理。此外，还应采取措施减少废水产生。对其废水处理系统性能进行常规监测。

#### 5)废气排放 **Air Emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Conduct routine





monitoring of the performance of its air emission control systems.

经营过程中产生的挥发性有机化学物质、气溶胶、腐蚀物、粉尘、消耗臭氧层的化学品和燃烧副产物等废气排放。需在排放前按要求进行性质识别、常规监测、控制及处理。应对其废气排放控制系统性能进行常规监测。

#### 6)材料限制 **Materials Restrictions**

Adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

遵守所有关于禁止或限制在产品 and 制造过程中使用特定物质(包括有关回收和处置的标识)的适用法律法规和客户要求。

#### 7) 暴雨管理 **Storm Water Management**

Implement a systematic approach to prevent contamination of storm water runoff. Prevent illegal discharges and spills from entering storm drains.

采取系统化的方法来预防暴雨径流污染。防止非法的排放和泄漏物质进入排水渠。

#### 8)能源消耗和温室气体排放 **Energy Consumption and Greenhouse Gas Emissions**

Energy consumption and greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. Look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

应在工作场所级和/或企业级对能源消耗和温室气体排放进行跟踪和记录。寻求具有成本效益的方式以提高能源效率并尽可能减少能源消耗和温室气体排放。

### D. **Ethics** 道德规范

To fulfill social responsibilities and to achieve success in the marketplace, CERGEN is to uphold the highest standards of ethics, including:

为履行社会责任并确立市场成功地位，森根应遵循最高标准的道德要求，包括：

#### 1)诚信经营 **Business Integrity**

The highest standards of integrity are to be upheld in all business interactions. Have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. All business dealings should be transparently performed and accurately reflected on CERGEN's business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

在所有商业互动中都应遵循最高的诚信标准。采取零容忍政策，禁止任何形式的贿赂、腐败、敲诈勒索和挪用公款行为。所有业务交易均应确保透明并应在业务账目和记录中准确反映。应推行监督和强化程序以确保符合反腐败相关法律的要求。

#### 2)无不正当利益 **No Improper Advantage**

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering,



authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

不得承诺、提供、授予、给予或接受贿赂或其他形式的不适当或不正当利益。禁止范围涵盖为获取或保面业务、将业务指派给任何人或以其他方式获取不正当利益，以直接方式或通过第三方的间接方式，承诺、提供、授予、给予或接受任何有价值物品。

### 3)信息披露 **Disclosure of Information**

Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

依照适用法规和主要的行业惯例公开有关参与者劳工、健康与安全、环境实践、商业活动、组织结构、财务状况和绩效的信息。不允许伪造记录或虚报供应链中的条件或实践。

### 4)知识产权 **Intellectual Property Right**

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and, customer information is to be safeguarded.

应尊重知识产权：技术或经验知识的转让应以保护知识产权的方式进行：并且应保护客户信息安全，应尊重知识产权：技术或经验知识的转让应以保护知识产权的方式进行：并且应保护客户信息安全。

### 5)公平交易、广告和竞争 **Fair Business, Advertising and Competition**

Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information must be available,

应秉持公平交易、广告和竞争的标准。必须以适当的方式保护客户信息安全，

### 6)身份保护和无报复政策 **Protection of Identity and Non-Retaliation**

Programs that ensure the confidentiality, anonymity and protection of employee whistleblowers are to be maintained, unless prohibited by law. Have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

制定程序以保护员工举报者并确保其身份的机密性和匿名性，除非法律明令禁止。制定沟通程序，让员工能够提出疑虑而无需担心遭到报复。

### 7)负责任的矿物采购 **Responsible Sourcing of Minerals**

Have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.



制定政策以合理确保其制造产品中所含的钽、锡、钨和金不会以直接或间接的方式为刚果民主共和国或周边国家/地区中严重侵犯人权的武装团体提供资金或利益。对这些矿物的来源和产销监管链进行尽职调查，并按照客户要求向客户提供所采取的尽职调查措施。

#### 8) 隐私 **Privacy**

Commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including CCs, customers, consumers and employees. CERGEN has to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

承诺保护所有业务相关人员，包括供应商、客户、消费者和员工的个人信息的合理隐私期望。森根在收集、存储、处理、传输和共享个人信息时应遵守隐私和信息安全法律及法规要求。

#### E. **Management System** 管理体系

Adopt or establish a management system pertaining to this code. The management system shall be designed to ensure:(a) compliance with applicable laws, regulations and customer requirements related to the participant's operations and products;(b) conformance with this code; and (c) identification and mitigation of operational risks related to this code. It should also facilitate continual improvement.

采用或建立范围与本准则内容相关的管理体系。在设计该管理体系时，应确保：(a) 符合经营和产品相关的适用法律、法规及客户要求；(b) 符合本准则；以及 (c) 识别并减低与本准则相关的经营风险。该体系还应推动持续改进。

该管理体系应包含以下要素

The management system should contain the following elements:

##### 1) 公司承诺 **Company Commitment**

A corporate social and environmental responsibility policy statements affirming our commitment to compliance and continual improvement, endorsed by executive management and posted in the facility in the local language.

企业社会和环境责任政策声明，应阐明对合规和持续改进的承诺并由管理层签署，以当地语言印发并张贴于工作场所中。

##### 2) 管理问责与责任 **Management Accountability and Responsibility**

The CC clearly identifies senior executive and company representative responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

行为准则明确指定由高层管理和公司代表负责确保管理体系和相关方案的实施。高层管理应定期审核管理体系状态。

### 3)法律要求与客户要求 **Legal and Customer Requirements**

## **CERGEN**

A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this code.

用以鉴别、监测和理解适用法律法规及客户要求（包括本准则的要求）的程序

### 4)风险评估与风险管理 **Risk Assessment and Risk Management**

A process to identify the legal compliance, environmental, health and safety, and labor practice and ethics risks associated with CERGEN's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

用以识别与经营相关的法律遵从、环境、健康与安全。以及劳动实践和道德风险的程序，确定各风险的相对重要程度，实施适当的程序和实质控制措施，以控制已识别风险并确保合规。

### 5)改进目标 **Improvement Objectives**

Written performance objectives, targets and implementation plans shall be in place to improve the CC's social and environmental performance, including a periodic assessment of CERGEN 's performance in achieving those objectives.

用于提高供应商社会和环境绩效的书面绩效目标、指标和实施计划，包括为达成这些目标所取得的绩效进行定期评估。

### 6)培训 **Training**

Training Programs for managers and workers shall be in place to implement CC's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

培训管理者和员工以实现供应商的政策、程序和改进目标并符合适用法律法规要求的计划。

### 7)沟通 **Communication**

A process for communicating clear and accurate information about CC's policies, practices, expectations and performance to workers and customers.

用以向员工和客户清晰准确地传达有关参与者政策、实践、期望和绩效信息的程序。

### 8)员工反馈和参与 **Worker Feedback and Participation**

Ongoing processes to assess employees' understanding of and obtain feedback on practices and conditions covered by this Code and to foster continuous improvement.

评估员工对本准则中实践和条件的理解并获得反馈。以及促进持续改进的不间断程序。

### 9)审核与评估 **Audits and Assessments**

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the code and customer contractual requirements related to social and environmental responsibility.

定期进行自我评定，确保符合与社会和环境责任相关的法律和法规要求、本准则中的内容以

及客户合同要求。



#### 10)纠正行动程序 Corrective Action Process

A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

用以及时纠正内部或外部评估、检查、调查及审核中发现的缺陷的程序。

#### 11)文档和记录 **Documentation and Records**

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

创建和维护文档和记录，确保遵从法规并符合公司要求和保护隐私的相关保密条款。

#### 12)责任 **Responsibility**

A process to communicate the requirements of this code to customers and to monitor customer compliance to the Code.

用以向客户传达准则要求并监督其遵从情况的程序。



## References 参考资料

### [1]RBA CODE OF CONDUCT

《责任商业联盟行为准则》

<http://www.responsiblebusiness.org/>

### [2]SA 8000

《社会责任标准(SA 8000)》

[www.cepaa.org/](http://www.cepaa.org/)

### [3]Universal Declaration of Human Rights

《世界人权宣言》

<http://www.un.org/zh/documents/udhr/>

### [4]ISO 45001

《ISO 45001》

<http://www.bsigroup.com>

### [5]ISO 14001

ISO 14001

<http://www.iso.org/iso/home.html>

### [6]ILO International Labor Standards

国际劳动组织(ILO)的国际劳工标准

<http://www.ilo.org/global/lang--en/index.htm>

### [7]OECD Due Diligence Guidance for Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas

经合组织关于来自受冲突影响和高风险区域的矿山的负责的供应链尽职调查指南

### [8]Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains

中国负责任矿产供应链尽职管理指南

### [9]ISO 50001:2018 Energy Management Systems

ISO 50001:2018 能源管理体系

### [10]ISO/IEC 27001 Information Security Management System

ISO/IEC27001 信息安全管理体系