



Code of Conduct  
for Business Partners  
of Indutrade Group



Indutrade 集团商业伙伴行为准则

## To all Indutrade business partners and suppliers

### 致所有 Indutrade 商业伙伴和供应商

We are committed to high standards when it comes to integrity, sustainability and ethical business conduct. We address corporate responsibility throughout our supply chain and we expect our suppliers and business partners to do the same. We care about our suppliers' and business partners' sustainability performance and we want to develop close relationships with partners that share our approach to doing business.

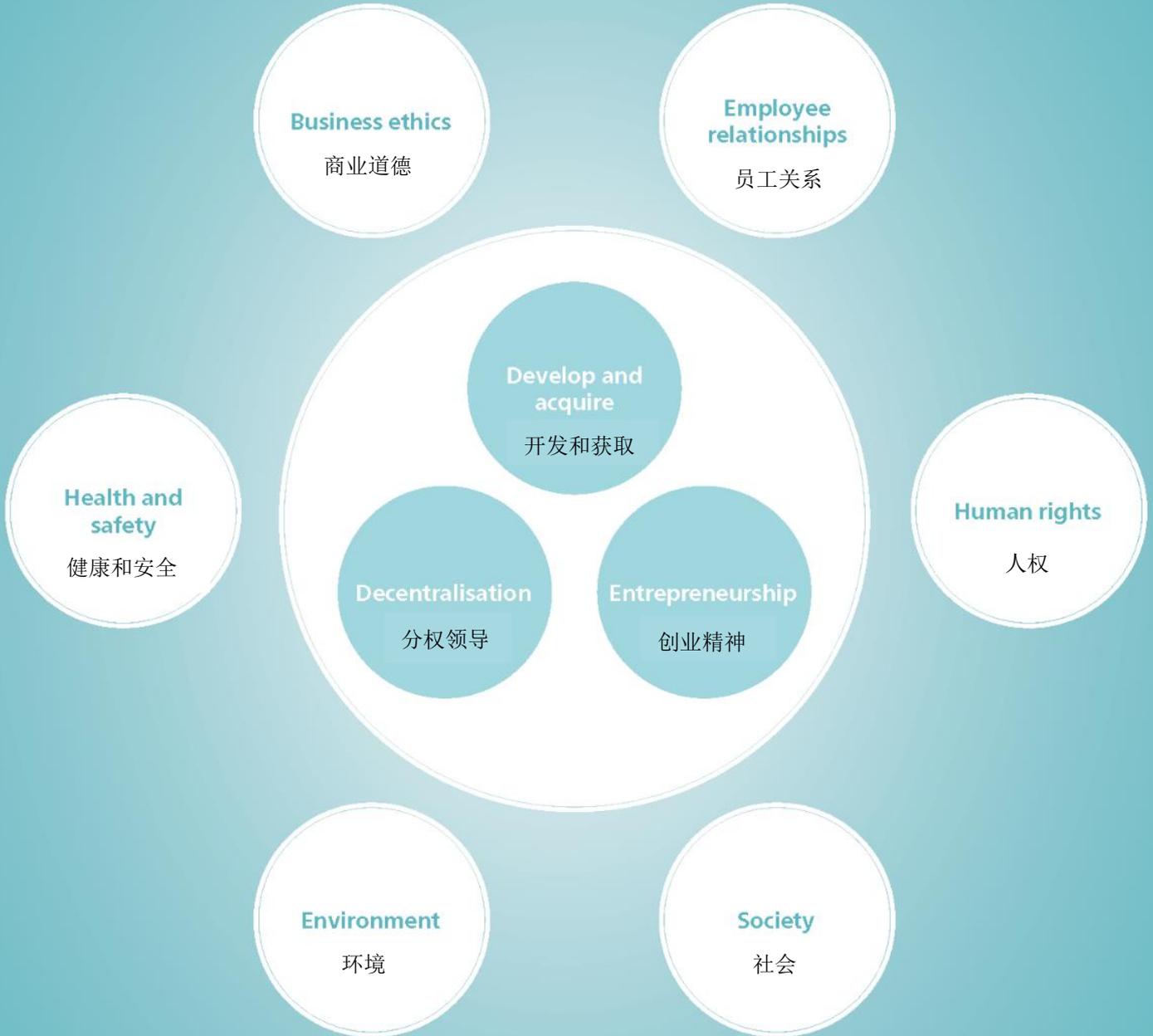
我们致力于诚信、可持续发展及合乎道德规范的高标准的商业行为准则。我们在整个供应链中强调企业社会责任，我们希望我们的供应商和商业伙伴也这样做。我们关注我们的供应商和商业伙伴在可持续发展方面的表现，而且，对于有共同经营理念的商业伙伴，我们愿意与之发展密切的关系。

This Supplier Code of Conduct reflects our ambition to work together with our suppliers and business partners to promote respect for human rights, care for the environment and ethical business conduct. We expect our suppliers and business partners to adhere to the essential and overarching principles and guidelines outlined in this Code of Conduct.

本供应商行为准则体现了我们与供应商和商业伙伴合作的决心：促进尊重人权、保护环境和遵守商业道德。我们期望我们的供应商和商业伙伴遵守本行为准则中概述的基本原则和指导方针。

We realize that achieving a business climate where sustainability is integral to the way we do business requires a team effort. We therefore encourage our suppliers and business partners to implement these principles and guidelines in relation to their partners, suppliers and sub-suppliers.

我们认识到在商业合作的道路上，形成一个以可持续发展为整体观念的商业氛围需要团队的合作。因此我们鼓励我们的供应商和商业伙伴对他们的商业伙伴、供应商及次级供应商实施这些原则和准则。



*Indutrade is a growing group in a changing world. We live in a time in which environmental, social and business ethics issues are taking on increasingly greater significance for how companies are perceived and permitted to conduct their operations.*

*Indutrade 集团成长 于一个在不断变化的世界。在我们生活的时代，环境、社会和商业道德问题对企业怎样才能被认知和被允许开展业务具有越来越重要的意义。*

#### ADMINISTRATION OF THE CODE OF CONDUCT FOR BUSINESS PARTNERS OF INDUTRADE

##### Indutrade 商业伙伴的行为准则管理

- The Code of Conduct for Business Partners of Indutrade Group should be applied during the duration of a business relationship between Indutrade or an Indutrade subsidiary and a business partner or a supplier.

在 Indutrade 或其分支机构与商业伙伴或供应商保持业务关系期间应采用 Indutrade 集团商业伙伴行为准则。

- All business partners, suppliers or other external stakeholders are encouraged to report any deviations from the Code of Conduct.

鼓励所有商业伙伴、供应商或其他外部利益相关者报告任何违反行为准则的行为。

- Business partners, suppliers or other external stakeholders can report anonymously via the Indutrade Group's external whistleblower function:

<https://report.whistleb.com/en/indutrade>

商业伙伴、供应商或其他外部利益相关者可以通过 Indutrade 集团外部举报功能进行匿名举报：

<https://report.whistleb.com/en/indutrade>





## **WHY DO WE HAVE A CODE OF CONDUCT?**

为什么我们需要有行为准则？

The Code of Conduct is an expression of who we are and how we do business at Indutrade.

The purpose of this Code of Conduct is to ensure that our business partners, including our suppliers, operate in adherence with internationally recognised standards on human rights, labour rights, the environment, and anti-corruption.

行为准则体现了我们是谁以及在 Indutrade 我们如何开展业务。

本行为准则的目的是为了确保我们的商业伙伴，包括我们的供应商，在人权、劳工权利、环境和反腐败方面遵守国际公认的标准。

The Code of Conduct has its starting point in the fundamental values expressed in the Global Compact's corporate sustainability principles, the OECD Guidelines for Multinational Enterprises, and other international generally accepted norms. It does not cover all situations that may arise, nor all laws, guidelines and internal rules.

行为准则的出发点是《全球契约》中的企业可持续发展原则、《经合组织跨国企业准则》以及其他国际上公认的准则所表达的基本价值观。它不包括可能出现的所有情况，也不包括所有法律、准则和内部规则。

Indutrade requires that business partners and suppliers follow applicable laws and regulations in countries in which they operate. In certain situations, such as in countries with weak legislation or controls, the requirements of the Code of Conduct may be stricter than local legislation, customs and practice. In case that you experience a discrepancy between local legislation and the Code of Conduct, the most appropriate course of action should be established by cooperation and open dialogue between Indutrade and the business partner.

Indutrade 要求商业合作伙伴和供应商遵守其所在国家的适用法律和法规。在某些情况下，例如在立法或管制薄弱的国家，行为准则的要求可能比地方法规、习俗和惯例更为严格。当你遇到地方法规和行为准则之间存在差异，应通过 Indutrade 和商业伙伴之间的合作和公开对话，制定最适当的行动方针。。

## **WHO IS COVERED BY THE CODE OF CONDUCT?**

谁受到行为准则约束？

The Code of Conduct applies to anyone who has a business relationship to Indutrade Group or Indutrade subsidiaries.

本行为准则适用于与 Indutrade 集团或其分支机构有商业关系的任何人。

## WHAT HAPPENS IF THE CODE OF CONDUCT IS VIOLATED?

### 如果违反了行为准则会有什么后果？

If you see something that worries or troubles you, or that may constitute a violation of the Code of Conduct, you are encouraged to report it immediately. Indutrade takes every reported violation seriously and will investigate the matter and take suitable action.

如果你发现某些令你担心或困扰的事情，或者可能构成违反行为准则的行为，请立即报告。Indutrade 将严肃对待每一个被举报的违规行为，并进行调查，以及采取适当的措施。

The information you provide will be treated confidentially. Apart from violations of law, the information will be provided only to the persons who must be informed in order to be able to deal with the matter.

你提供的信息将被保密。除违法行为外，信息将只提供给为了处理此事而必须通知的人员。

Depending on the severity of the misconduct, if a business partner or supplier is found to have breached the Code, without having notified Indutrade and/or taken appropriate remedial action, business may be reduced, and, ultimately, the business relationship with Indutrade may be ended.

如果发现商业伙伴或供应商违反行为准则，并且没有通知 Indutrade 和/或采取适当的补救措施，Indutrade 会根据不当行为的严重程度，可能采取减少业务，并最终终止与该公司的业务关系的措施。

You should always know that your report is in the best interests of your colleagues and the company, and a person who has reported a justifiable suspicion shall never be subject to any form of reprisal.

你应该知道你的举报符合你同事和公司的最大利益，举报有正当理由怀疑的个人，决不会受到任何形式的报复。

## HOW DO I REPORT A POTENTIAL VIOLATION?

### 我如何报告可能的违规行为？

If you suspect that this Code of Conduct has been violated, you should turn to Indutrade Group's whistleblower function where you can submit an anonymous report via the Group's external whistleblower function:

<https://report.whistleb.com/en/indutrade>

如果你发现有涉嫌违反本行为准则的行为，你可以通过 Indutrade 集团的外部举报功能提交你的匿名举报：

<https://report.whistleb.com/en/indutrade>

If you have reported a suspected violation of the Code of Conduct, you can expect that your report will be investigated confidentially, promptly and professionally. If a violation can be proved to have taken place, Indutrade's management will review the matter and decide on any actions. You will receive feedback on how your report has been handled.

如果你举报了涉嫌违反行为准则的行为，你的报告将被秘密，迅速和专业地调查。如果违规行为得到证实，Indutrade 管理层将对此事进行审查，并决定采取何种行动。你将收到关于如何处理你的报告的反馈。

Business partners and suppliers should ensure that their employees have the right to anonymously raise concerns about potential breaches of the Code without fear of reprisals.

商业伙伴和供应商应确保其雇员有权匿名提出对可能违反准则的担忧，而不必担心遭到报复。



We act with integrity and high ethics in all of our business relationships and expect the same from our business partners.

我们在所有的业务关系中都秉持诚信和高道德的标准，并期望我们的商业伙伴也这样。

Indutrade has multiple business relationships with suppliers, vendors, contractors and subcontractors. To be able to grow and develop, we must maintain high confidence and trust among our business partners and people in their operating environment, and in return be a trusted partner ourselves.

Indutrade 与供应商、承包商和分包商有广泛的业务关系。为了获得成长和发展，我们必须对我们的商业伙伴和在他们经营环境中工作的员工保持高度的信心和信任，作为回报，我们自己也要成为可信赖的合作伙伴。

- Our business partners shall follow applicable laws and regulations in all countries in which they work. If the provisions of this Code of Conduct demand higher standards than what is required under national law, the business

partner or supplier should notify Indutrade and appropriate action shall be determined in dialogue between the business partner and Indutrade.

我们的商业伙伴应遵守他们所在国家的适用的法律和法规。如果本行为准则的规定

要求高于国家法规的要求，商业伙伴或供应商应通知 Indutrade，并通过 Indutrade 与商业伙伴之间的对话以确定适当的行动方案。

- All forms of corrupt conduct are strictly forbidden. Corruption is defined as "the abuse of entrusted power for private gain" and extends to both financial and non-financial gains. Corrupt conduct includes bribery, receipt of improper gifts and entertainment, facilitation and protection payments, extortion, money laundering, and nepotism.

严禁一切形式的腐败行为。腐败的定义为“滥用职权谋取私利”，无论是财务还是非财务利益。腐败行为包括贿赂，收受不正当的礼物和娱乐招待、提供便利和保护费、勒索、洗钱和裙带关系。

We encourage our suppliers and other business partners to impose requirements akin to those in this Code to their suppliers and subcontractors. No one who works under the business partner's name or any of its subsidiaries' names may grant, offer, receive, request, promise, or promote payments, gifts or other improper benefits that could influence or may be perceived to influence the objectivity of a business or governmental decision.

我们鼓励我们的供应商和其他商业伙伴对其供应商和分包商实施类似于本行为准则的要求。任何人不得以商业伙伴的名义或任何其附属公司的名义同意、提供、接收、要求、承诺或提升付款、礼物或其他可能影响或可能被认为影响商业或政府决策的客观性的不当利益。

- Our business partners shall only offer or receive gifts, meals, entertainment, and other forms of hospitality, if they are compatible with applicable laws and generally accepted business practice. It should be noted that higher standards may apply in different countries, in which case such higher standards should be adhered to.

只有在符合适用法律和普遍接受的商业惯例的情况下，我们的商业伙伴才能提供或

接受礼物、用餐、娱乐和其他形式的款待。应当指出，不同的国家可能适用更高的标准，在这种情况下，应当遵守这种较高的标准。

- Our business partners shall not make political contributions, charitable donations and sponsorships in expectation of receiving any advantages.

我们的商业伙伴不应作出政治捐款、慈善捐款和赞助，以期获得任何利益。

- Our business partners shall ensure that its information is open, correct, continuous, fast and of the best quality, and that it is provided in accordance with applicable laws, regulations, accounting standards and norms.

我们的业务伙伴应按照适用的法律、法规、会计准则和规范提供信息，并确保其信息公开、正确、连续、快速和最佳质量。

- Our business partners shall always act in the best interest of Indutrade and their own company, and avoid conflicts of interest. A conflict of interest arises when private interests, personal relationships or external activities affect or give the impression of affecting the performance of the work duties.

我们的商业伙伴应以 Indutrade 和自己公司的最大利益为出发点，避免利益冲突。当个人利益、个人关系或外部活动影响或给人留下影响工作职责履行的印象时，利益冲突就会产生。

- Inside information is non-public information of a precise nature, relating, directly or indirectly, to Indutrade, and which, if made public, would be likely to have a significant effect on the price of financial instruments issued by Indutrade. If a business partner has such information, the business partner may not trade or amend orders regarding Indutrade instruments. Nor may the business partner disclose such information to any other person, or recommend or induce any other person to trade or amend an order regarding Indutrade instruments.

内幕消息是与 Indutrade 相关且确切的、直接或间接的非公开信息。如果公开，将可能对 Indutrade 发布的金融工具的价格产生重大影响。如果商业伙伴有此类内幕消息，则不能交易或修改 Indutrade 的金融工具方面的订单。商业伙伴也不得向其他人披露该信息，或建议诱导任何人交易或修改 Indutrade 金融工具方面的订单。



# We deeply care about health and safety in the workplace.

我们非常关心工作场所的健康和安全。

**Indutrade expects its business partners to eliminate obvious physical risks and positively influence their employees' attitudes and behaviours that counter stress and psychosocial illness. Being aware of health and safety risks contributes to creating workplaces where people are comfortable and can perform well.**

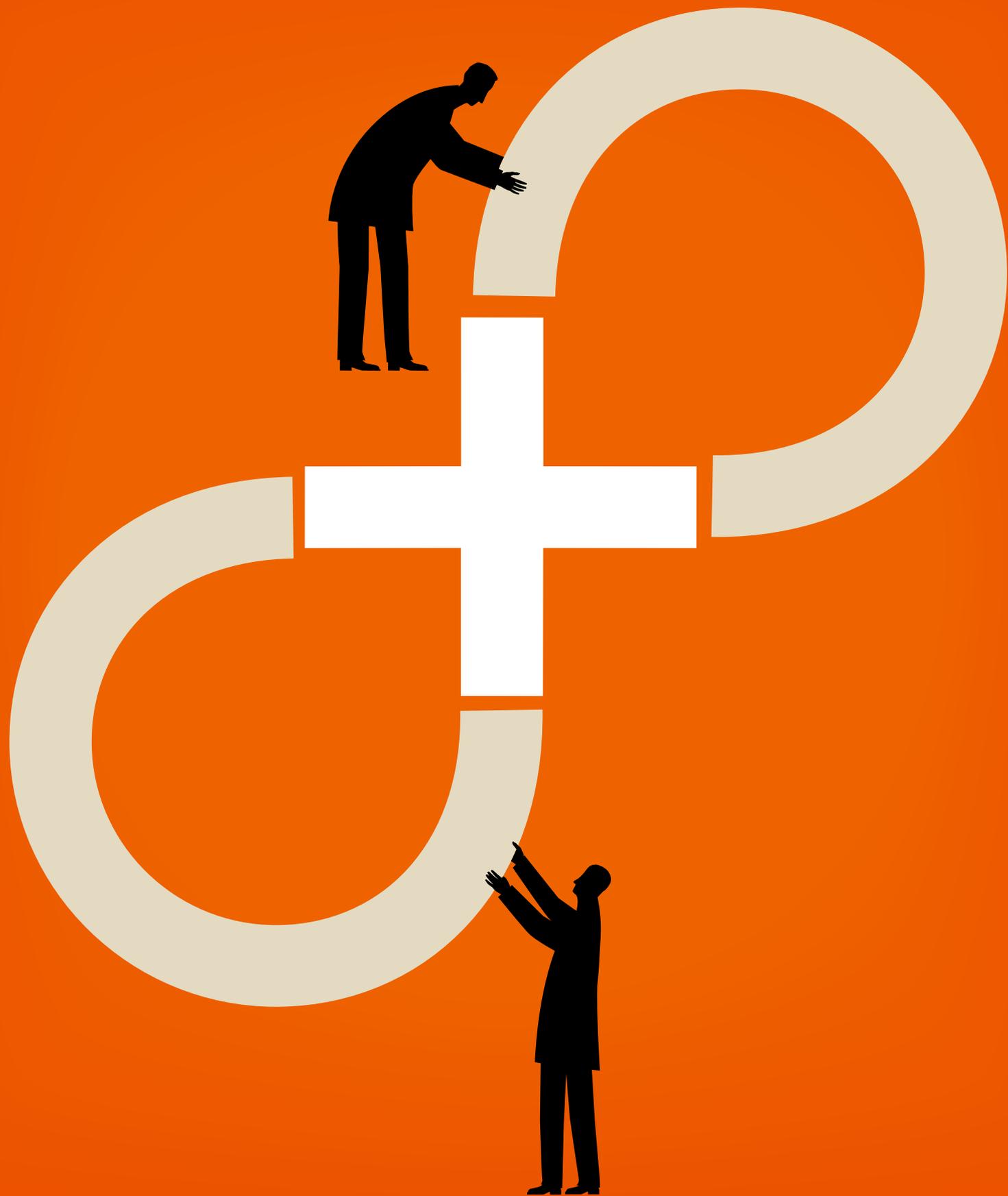
Indutrade 期望商业伙伴消除明显的身体风险，这会在员工应对其压力和心理疾病的态度和行为上产生正面的影响。对健康和安全风险的意识有助于创造让员工感到舒适并有良好表现的工作场所。

- Our business partners shall be aware of and adhere to applicable rules, policies and processes for health and safety in their area of operation.

我们的伙伴应了解并遵守其业务范围内适用的健康和安规则、政策和流程。

- Our business partners shall remedy and report high-risk work conditions, accidents, work-related injuries and illnesses. In addition, business partners shall ensure that all of their employees and contractors receive the training and protective equipment necessary.

我们的商业伙伴应纠正和报告高风险的工作条件、事故、工伤害和疾病。另外，商业伙伴应确保其所有雇员和承包商都获得必要的培训和防护设备。



# We trust that our business partners build relationships with their employees built on openness, respect and influence.

我们相信，我们的商业伙伴会在开放、相互尊重和影响的基础上与其员工建立关系。

**Every workplace is unique – each with its own history. Company culture is not in the walls but in how we treat each other, every day. We have a firm belief that Interaction between employer and employee should be built upon mutual respect, openness to criticism and exchange of good ideas.**

每个工作场所都有其独特的历史。公司文化不在墙上，而是在于我们每天如何对待彼此。我们坚信雇主和员工之间的互动应该建立在相互尊重、接受批评和交流想法的基础上。

- Our business partners shall recognise their employees' fundamental right to decide to freely associate and be represented by labour unions, as well as an employee's right to refrain from joining a labour union. Business partners shall further respect the right of employees and their unions to conduct collective bargaining.
- Our business partners shall strive to develop diversity and equality among their employees.

我们的商业伙伴应努力发展其员工之间的平等和多元化。

我们的商业伙伴应认可其员工决定自由结社或由工会代表的基本权利，以及员工不参加工会的权利。商业伙伴应进一步尊重员工及其所在工会进行集体谈判的权利。

- Our business partners shall pay salaries and benefits in accordance with applicable laws and collective agreements. In cases where no collective agreements exist, business partners shall adhere to applicable industry norms. Business partners shall strive for equal pay for equal work and counter unreasonable differences in pay between men and women.

我们的商业伙伴应根据适用的法律和集体协议支付工资和福利。如果不存在集体协议，商业伙伴应遵守适用的行业规范。商业伙伴应争取同工同酬，反对男女之间不合理的薪酬差别。

- Discrimination in any hiring and employment practices based on race, colour, sex, disability, age, language, religion, political or other opinion, national or social origin, property, birth or any other status shall not be tolerated.

在雇佣实践中不容忍任何基于种族、肤色、性别、残疾、年龄、语言、宗教、政治或政见、国籍或社会出身、财产、出生或任何其他地位的歧视。

- Harassment, threats or other unsuitable conduct in the workplace shall not be permitted.

不允许在工作场所进行骚扰、威胁或其他不当行为。



# Our business partners shall respect and protect fundamental human rights.

我们的商业伙伴应尊重和保护基本人权。

**Indutrade has an expanding value chain that extends across continents. Regardless of where in the world we engage with business partners, it is important for us that people's fundamental liberties and rights are respected and protected.**

Indutrade 有一条跨越各大洲的不断扩张的价值链。无论我们在哪里与商业伙伴合作，人民的基本自由和权利得到尊重和保护对我们来说都是非常重要的。

- Our business partners shall support and respect at a minimum the internationally recognised human rights expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

我们的商业伙伴应支持并尊重《国际人权法案》所表达的国际公认的最基本人权，以及 1998 年《国际劳工组织关于工作中的基本原则与工作权利宣言》所规定的有关基本权利的原则。

- Our business partners shall ensure that they identify potential and actual negative human rights impacts related to their own operations and business relations and always act responsibly and forcefully in cases where human rights risk are identified as such.

我们的商业伙伴应确定与自身业务和业务关系相关的潜在和实际的负面人权影响，并在确定此类风险的情况下始终采取负责任和强有力的行动。

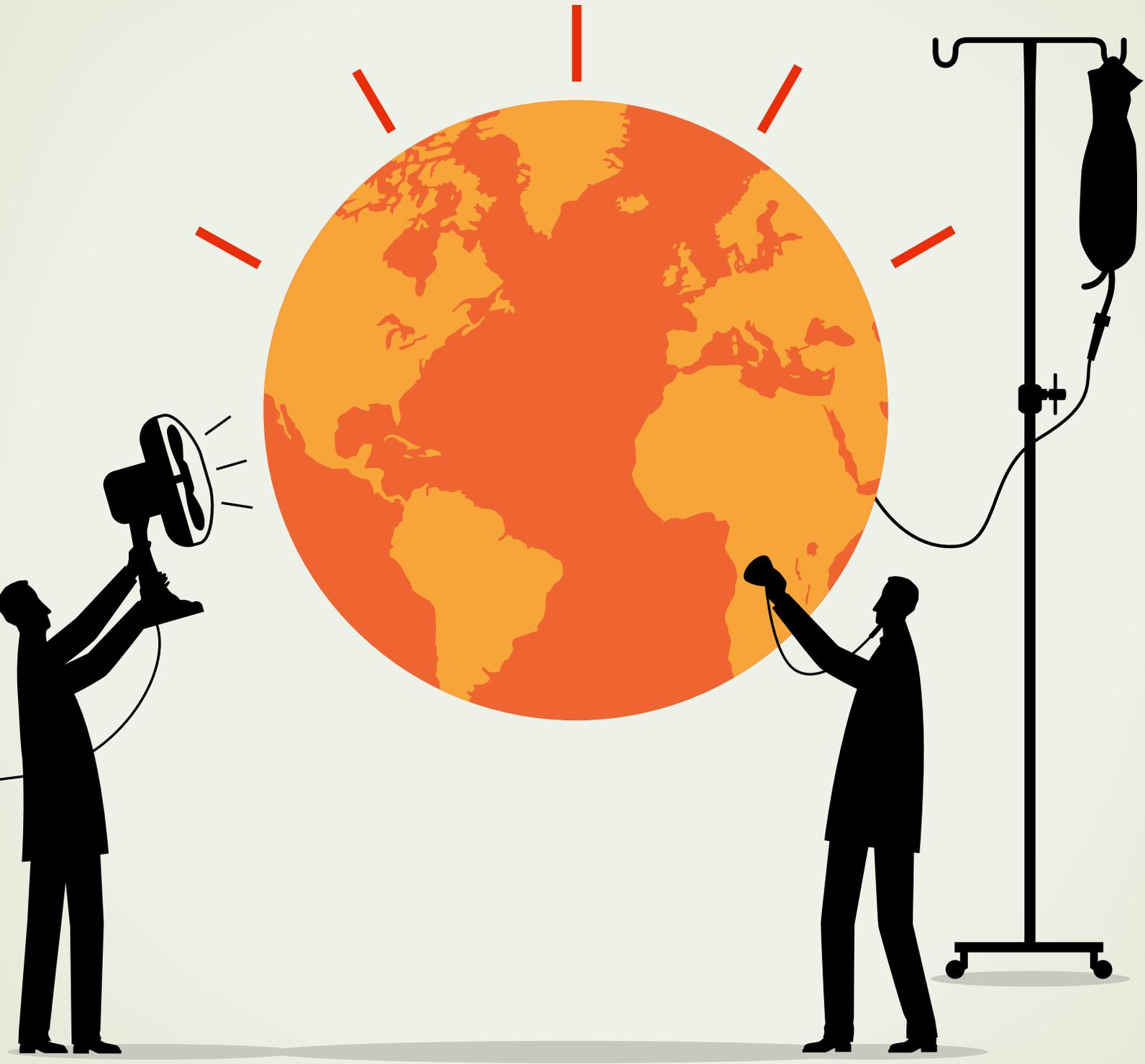
- Our business partners shall not tolerate child labour or any form of forced or compulsory labour in their own operations or among their business partners, including

vendors and suppliers. We expect that our business partners to strictly adhere to national and international minimum age laws in all places where they conduct operations and are particularly cognizant when employing young people. In addition, no employee shall be required to relinquish his or her identification documents or pay a deposit upon the start of employment.

我们的商业伙伴绝不能容忍童工或任何形式的强迫或强制劳动，无论是在他们自己的业务中还是包括其供应商之内的业务伙伴的运营中。我们希望我们的商业伙伴在他们开展业务的所有地方都严格遵守国家和国际关于最低工作年龄法规，尤其是在雇用年轻人时。另外，任何员工在受雇时均不得被要求交出其身份证明文件或缴付押金。

- Our business partners shall safeguard personal integrity and ensure that personal data and disclosures that the company may obtain or use in its operations are handled in accordance with applicable laws and rules.

我们的商业伙伴应维护个人诚信，并确保按照适用的法律和规则处理公司在其业务中可能获得或使用的个人数据和信息披露。



# We are committed to continuously reducing our environmental impact in close collaboration with our business partners.

我们致力与商业伙伴紧密合作，持续减少对环境的影响。

**Indutrade dares promise to always strive to improve operations and customer products from an environmental perspective by applying a precautionary approach. This can only happen, if we continuously collaborate with our business partners and develop our competences and niche areas of expertise together.**

Indutrade 承诺将努力通过采取预防措施的方法，从环境的角度来改善运营和客户的产品。只有我们不断地与商业伙伴合作，共同提升我们的能力和专业领域知识，这才能实现。

- Our business partners shall have good knowledge about and adhere to applicable environmental laws and relevant product standards associated with our respective operations.

我们的商业伙伴必须了解并遵守与我们各自业务有关的适用环境法规和相关产品标准。

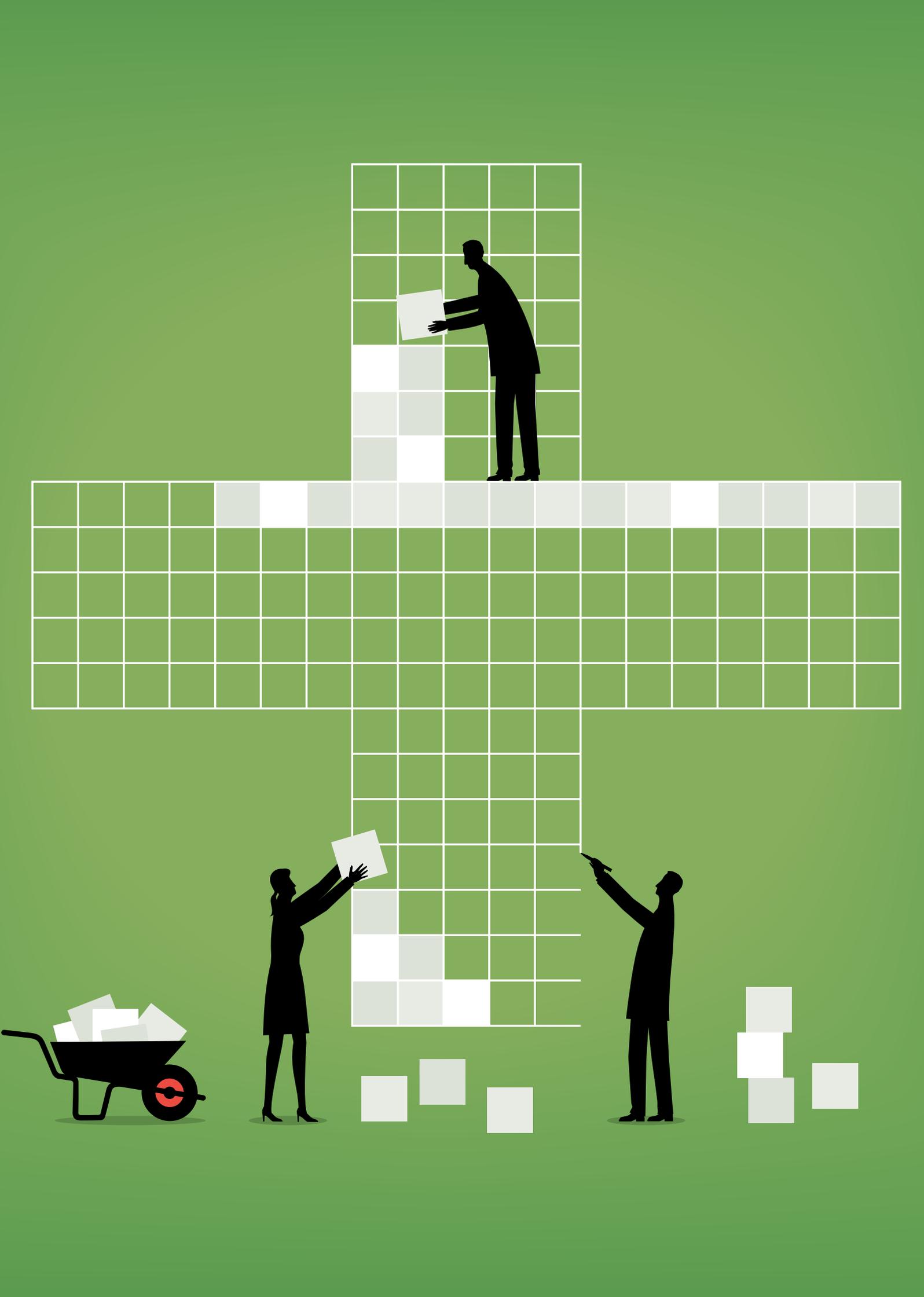
- Our business partners shall work systematically to measure, track and communicate progress on their environmental performance in terms of energy and resource efficiency, emissions, waste management, transports and other relevant environmental aspects.

我们的商业伙伴应系统地衡量、追踪和沟通他们在环境绩效方面的进展，这包括能源及资源效率、排放、废弃物管理、运输及其它与环境相关方面的运作。

- Our business partners shall continuously strive to develop their competence with

the aim of always being able to offer the environmentally best product or solution.

我们的商业伙伴应不断努力提升他们的能力，以期能够提供最环保的产品或解决方案。



# We aim to build long-term relationships with our business partners based on trust and collaborative efforts.

我们的目标是在信任和合作的基础上与我们的商业伙伴建立长期的关系。

**Indutrade Group is growing rapidly, which means that our value chain is expanding just as fast. Trusted relationships based on transparency, dialogue and continuous strive for improvement is a corner stone to our approach of working with our business partners.**

Indutrade 集团发展迅速，这意味着我们的价值链也在以同样的速度扩张。建立在透明、对话和持续努力改进基础上的可信关系是我们与商业伙伴合作的基石。

- We expect that our business partners are at any point willing to cooperate in answering questions, making self-assessments or accepting visits by Indutrade or independent third-parties.
- If there is an instance of non-compliance, we expect our business partners in good faith and in dialogue with Indutrade to take steps at improving systems to manage identified risks or impacts on human rights, labour rights, environmental, and anti-corruption principles.

我们期望我们的商业伙伴在任何时候都愿意合作回答问题，进行自我评估或接受 Indutrade 或独立的第三方的访问。

如果存在不合规的情况，我们希望我们的商业伙伴本着诚信的精神，通过与 Indutrade 的对话，采取措施，改进系统，以管理已识别的在人权、劳工权利、环境和反腐败原则方面的风险或影响。



Do you have questions about the Code of Conduct?

Please contact:

Rosie Mulligan: Sustainability Engineer

[enquiry@crp.co.uk](mailto:enquiry@crp.co.uk)

+44 (0) 1706 756400