



PCH SUPPLIER CODE OF CONDUCT

PCH 供应商行为准则

At P.C.H. International Unlimited Company (“PCH”), our core values are passion, integrity and teamwork. Our purpose is Developing Partnerships Delivering Peace of Mind and these values stand at the core of every decision we make for the company. We expect all of our business partners and suppliers to operate on the same principles.

在 PCH 国际，深圳注册公司名为普诚华信息科技咨询（深圳）有限公司，我们的核心价值是激情、诚信和团队合作。发展合作关系、彼此信任是我们的宗旨，是我们在为公司作出每一项决策时遵循的最高准则。我们希望所有的商业合作伙伴和供应商能够遵循同样的原则。

PCH designs, creates and delivers products for the world’s leading brands. At every step in the supply chain and associated processes, we not only comply with legal requirements, we ensure that our values and purpose are strictly adhered to and we expect our partners to behave likewise. Wherever we operate around the world we are guided by this Code of Conduct and we bind our contractors to these principles.

PCH 为世界顶尖品牌的产品提供设计、制造及运输服务。在供应链的每一个环节以及相关程序中，我们不仅要遵守相关法律的规定，并且严格遵循我们的价值以及宗旨，我们期望我们的合作伙伴同样能够做到这一点。无论何处，我们都在本行为准则下的指导下运作，我们要求合约商也遵循这些原则。

Labor and Human Rights

劳动和人权

Suppliers are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. Recognized standards such as the Universal Declaration of Human Rights (UDHR), Social Accountability International (SAI) and the Ethical Trading Initiative (ETI) were used as references in preparing the Code and may be a useful source of additional information. The labor standards are:

供应商应保障员工的人权，以国际社会公认的方式维护其尊严，使员工在工作场所受到尊重。本准则在起草时参考了如世界人权宣言（UDHR）、国际社会责任（SAI）以及道德贸易行动（ETI）等公认标准，而这些标准 同时也是一种有用的额外信息来源。劳工标准如下：

1. Freely Chosen Employment

Forced bonded or indentured labor or involuntary prison labor is not to be used. All work will be voluntary, and workers should be free to leave upon reasonable notice. Workers shall not be required to hand over government-issued identification, passports or work permits as a condition of employment.

自由选择职业

不得强迫员工订立劳动合同或以限制其人身自由的方式使员工工作。所有工作应当是自愿的，且员工在发出合理通知的情况下可以自由离职。在招用员工时，不得要求员工上交政府颁发的身份证、护照或其他工作许可证。

2.Child Labor

Child labor is not to be used in any stage of manufacturing. The term “child” refers to any person employed under the age of 16 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 apprenticeship programs, which comply with all laws and regulations, is supported. Workers under the age of 18 should not perform hazardous work and may be restricted from night work with consideration given to educational needs.

童工

在生产任何阶段都不得使用童工。童工是指雇用任何未达到 16 周岁或强制教育年龄，或国家规定的最低就业年龄的员工。符合所有法律、法规规定在合法工作场所的学徒计划是允许的。18 岁以下的员工不得从事有危险性的工作，并且考虑到教育的需要，应限制钙等员工在夜间工作。

3. Working Hours

Workweeks are not to 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 per seven-day week.

工作时间

工作周不得超过当地法律所规定的最高限值。另外，除非在紧急或异常的情况下，每周工作时间包括加班时间不得超过 60 个小时。员工在每周七天中应当至少有一天休息时间。

4.Wages and Benefits

Compensation 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. The basis on which workers are being paid is to be provided in a timely manner via pay stub or similar documentation.

工资与福利

支付给员工的工资应当符合所有适用的包括关于最低工资、加班时间、法定福利等工资法律。按照当地法律的规定，员工在加班时，应当向其支付比正常每小时工资水平更高的工资。禁止以扣除工资作为惩罚的手段。应当及时向员工提供工资支付存根或其他类似的工资支付凭证。

5.Humane Treatment

There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers: nor is there to be the threat of any such treatment.

人道的待遇

不得以粗暴或不人道的方式对待员工，包括任何形式的性骚扰、性虐待、体罚、精神或肉体上的压迫、口头谩骂等，也不得威胁进行任何该等行为。

6.Non-Discrimination

Participants should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices

such as promotions, rewards, and access to training. In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way.

不歧视

参与者应承诺使员工免受骚扰及非法歧视。公司不得因人种、肤色、年龄、性别、性取向、种族、残疾、怀孕、宗教信仰、政治立场、社团成员或婚姻状况在雇用或实际工作（如晋升、报酬以及培训机会）中歧视员工。此外，不得要求员工或应聘者接受带有歧视性质的医学检查。

7. Freedom of Association

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Participants are to respect the rights of workers as established by local law to associate freely on a voluntary basis, seek representation, join or be represented by Works Councils, and join or not join labor unions and bargain collectively as they choose. As provided by law, employees who become worker representatives shall not be the subject of discrimination and shall have access to management and co-workers in order to carry out their representative functions. Workers shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment.

结社自由

员工与管理层之间的公开沟通和直接对话是解决工作场所及赔偿问题的最有效的方式。参与者应尊重当地法律赋予员工的有关自由自愿结社、选举代表、参加工人委员会、自由选择是否参加工会和集体讨论等权利。根据法律的规定，不得歧视员工代表，而应当为员工代表行使代表职务提供与管理层及其合作者沟通的渠道。员工应当可以在不用担心报复、威胁、骚扰的情况下就工作条件与管理层进行公开沟通。

HEALTH and SAFETY

健康及安全

Suppliers recognize that the quality of products and services, consistency of production and workers' morale are enhanced by a safe and healthy work environment. Recognized management systems such as OHSAS 18001 and ILO Guidelines on Occupational Safety and Health, AEO and ISO28000 and C-TPAT security were used as references in preparing the Code and may be a useful source of additional information. The health and safety and security standards are:

供应商应知道一个安全及健康的工作环境可以提高产品和服务的质量、生产的连贯性以及员工的精神状态。本准则在起草时参考了公认的管理体系例如 OHSAS 18001 和 ILO, AEO 和 ISO28000 和 C-TPAT 职业安全与健康指引，而这些体系同时也是一种有用的额外信息来源。健康及安全标准如下：

1. Occupational Safety

Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicle, and fall hazards) are to be controlled through proper design engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout). Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate personal protective equipment. Workers shall not be disciplined for raising safety concerns.

职业安全

员工面临的潜在安全危害应通过合理的设计工程和管理控制、预防维护和安全工作程序（包括停工、锁定）进行控制。如果通过上述方法不足以控制该等危害时，应当向员工提供适当的个人防护装备。不得通过惩罚来提高员工的安全意识。

2. Emergency Preparedness

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.

紧急准备

应当鉴定并评估紧急情况和事件，并通过实施紧急计划及应变程序将紧急情况和事件的影响降到最低，包括：紧急报告、员工通知及撤离步骤、员工培训和演练、适当的火灾探测及灭火装置、足够的出口设施以及恢复计划。

3.Occupational Injury and Illness

Procedures and systems are to be in place to manage, track and report occupational injury and illness, including provisions to: a) encourage worker reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate cases and implement corrective actions to eliminate their causes; and d) facilitate return of workers to work.

职业伤害和疾病

应当制定合适的程序和体系来管理、跟踪和报告职业伤害和疾病，包括以下规定：a) 鼓励员工报告；b) 分类、记录伤害和疾病案例进行；c) 提供必要的治疗；d) 调查案例并执行纠正措施来减少类似情况发生；e) 帮助员工重返工作岗位

4.Industrial Hygiene

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. When hazards cannot be adequately controlled by engineering and administrative means, workers are to be provided with appropriate personal protective equipment.

工业卫生

应当鉴定、评估并控制员工所面临的化学、生物和物理因素给员工带来的影响。当工程及管理手段不足以控制危害时，应当向员工提供适当的个人防护装备。

5.Physically Demanding Work

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

体力要求高的工作

应当鉴定、评估并控制从事体力要求高的工作给员工带来的影响，包括人工搬运材料及提举重物，长时间站立、高度重复性以及强烈的装配工作。

6.Machine Safeguarding

Physical guards, interlocks and barriers are to be provided and properly maintained for machinery used by workers.

机器防护

应当为员工提供物理防护装置、联动装置以及屏障，并对员工使用的机器进行适当地维护。

7.Dormitory and Canteen

Workers are to be provided with clean toilet facilities, access to potable water and sanitary food preparation and storage facilities. Worker dormitories provided by the Participant or a labor agent are to be clean, safe, and provide emergency egress, adequate heat and ventilation and reasonable personal space.

宿舍与餐厅

应当为员工提供干净的卫生间设施、饮用水以及清洁的食物预备及存储设施。参与者或劳动代理机构应当向员工提供干净、安全的宿舍，并提供紧急出口、充足的供暖、通风条件以及合理的个人空间。

8.Security Requirements

Supplier must ensure that their security practices are fully compliant with applicable laws, including all Chinese laws. To this end, Suppliers must fully comply with the AEO trade security standard terms set forth in Notice No. 82 of the General Administration of Customs in addition to all applicable terms of ISO28000 and C-TPAT. Supplier must ensure that all its processes comply with such terms including but not limited to facility physical security, physical access control, procedural security, personnel security, container and trailer security, transportation security and risk management. Suppliers will implement appropriate security training to all relevant employees and business partners to ensure compliance with these security requirements. PCH will arrange an irregular audit of suppliers according to AEO requirements 为使贸易安全工作落到实处，供应商应按 AEO 认证中有关贸易安全标准（海关总署 2014 年第 82 号公告有关企业认证标准细则规定内容）和 ISO28000 和 C-TPAT 条款要求，对自有的场所安全、人员安全、进入安全、信息安全、货物安全，集装箱安全、运输工作安全、危机管理等过程进行安全管控。对人员进行培训，并对商业合作伙伴加以影响。PCH 会按 AEO 要求对供应商进行不定期稽核。

ENVIRONMENTAL

环境

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

Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information. The environmental standards are:

供应商应当知道环境责任是生产世界顶级产品所不可缺少的部分。生产经营过程中在保证公众健康和安全的同时应尽量减少对环境及自然资源造成的不利影响。

本准则在起草时参考了公认的管理体系例如 ISO 14001 和生产管理和审核体系（EMAS），而这些体系同时也是一种有用的额外信息来源。环境标准如下：

1 Environmental Permits and Reporting

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

环境许可和报告

应当取得所有必须的环境许可（例如排放监控）和登记，使之有效并对其进行更新，按规定进行操作及报告。

2 Pollution Prevention and Resource Reduction

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.

防止污染及节约资源

应在源头上减少或在实践中通过改进生产、维护设施工序、替换材料、节约、回收和重复利用资源方式减少和消除各种类型的浪费，包括水和能源。

3.Hazardous Substance

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

有害物质

应当鉴别并管理排放到环境中会造成危害的化学物质及其他物质，保证这些物质得到安全处理、转移、存储、回收或重新利用、处置。

4.Wastewater and Solid Waste

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled and treated as required prior to discharge or disposal.

废水及固体废物

经营、工业加工和清洁设施中产生的废水及固体废物在排放或处置之前，应当按照要求对其进行监测、控制和处理。

5.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, monitored, controlled and treated as required prior to discharge.

气体排放

经营过程中产生的挥发性有机化学物质、气溶胶、腐蚀性气体、微粒、臭氧消耗化学物质以及燃烧副产品等废气在排放之前，应当按照要求对其进行鉴别、监测、控制和处理。

6.Product Content Restrictions

Participants are to adhere to all applicable laws and regulations regarding prohibition or restriction of specific substances including labeling laws and regulations for recycling and disposal. Participants are also to adhere to processes to comply with each agreed-upon customer-specific restricted and hazardous materials list.

产品含量限制

参与者应当遵守所有关于禁止或限制特定物质的法律和法规，包括有关回收、处置标示的法律、法规。参与者同样要遵照客户要求的特定限制和有害物质清单进行加工。

MANAGEMENT SYSTEM

管理体系

Suppliers shall adopt or establish a management system whose scope is related to the content of this Code. The management system shall be designed to ensure (a) compliance with applicable laws, regulations and customer

requirements related to the Suppliers' 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. The management system should contain the following elements:

参与者应当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，应当确保：(a) 符合所有与供应商经营和产品相关的法律、法规和客户要求；(b) 符合本准则；(c) 鉴别并降低与本准则相关的经营风险。管理体系应当有利于持续改进。管理体系应当包括以下要素：

1. Company Commitment

Corporate social and environmental responsibility statements affirming Participant's commitment to compliance and continual improvement

公司承诺

公司关于确定参与者承诺守法并持续改进承诺的社会及环保责任声明。

2. Management Accountability and Responsibility

Clearly identified company representative[s] responsible for ensuring implementation and periodic review of the status of the management systems

管理责任和义务

明确指定公司代表负责保证管理体系的实施并定期检查其实施情况。

3. Legal and Customer Requirements

Identification, monitoring and understanding of applicable laws, regulations and customer requirements

法律和客户要求

识别、追踪并理解相关法律、法规及客户的要求。

4. Risk Assessment and Risk Management

Process to identify the environmental, health and safety¹ and labor practice risks associated with Supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to ensure regulatory compliance to control the identified risks

风险评价和风险管理

应制定一套程序，以识别和供应商经营有关的环境、健康与安全以及员工实际工作风险。应确定每项风险的等级，实施适当的程序和实质控制，以确保对已识别的风险进行控制的合规性。

5. Performance Objectives with Implementation Plan and Measures

Written standards, performance objectives, targets and implementation plans including a periodic assessment of Participant's performance against those objectives.

附有实施计划和措施的绩效目标

应制定书面标准、绩效目标、指标和实施计划，包括依据这些目标对参与者的绩效进行定期评估。

6. Training

Programs for training managers and workers to implement Participant's policies, procedures and improvement objectives

培训

应为管理层及员工制定培训计划，以落实参与者的政策、程序及改善目标。

7.Communication

Process for communicating clear and accurate information about Participant's performance, practices and expectations to workers, suppliers and customers

沟通

应制定一套程序，将参与者的绩效、实际工作和预期目标等信息清晰、准确地传达给员工、供应商和客户。

8.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.

员工的反馈和参与

制定方案持续评估员工对本准则的理解并获取对本准则所覆盖的实践和条件的反馈意见，促使员工不断进步。

9.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.

审核与评估

定期进行自我评估，以确保符合法律、法规的要求、本准则内容以及客户合同中关于社会与环境责任要求。

10.Corrective Action Process

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

纠正措施程序

制定程序，以及时纠正在内部及外部评估、检查、调查和评审中所发现的不足之处。

11Documentation and Records

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

文件和记录

建立文档和记录，以确保符合法规与公司的要求，同时应妥善保护机密。

ETHICS

道德规范

To meet social responsibilities and to achieve success in the marketplace, Suppliers are to uphold the highest standards of ethics including:

为履行社会责任并在市场上获取成功，参与者须遵循最高标准的道德要求，包括：

1.No Corruption, Extortion, or Embezzlement

The highest standards of integrity are to be expected in all business interactions. Any and all forms of corruption, extortion and embezzlement are strictly prohibited resulting in immediate termination and legal actions.

不得贪污、敲诈勒索、挪用公款

所有商业的活动都应遵循最高的诚信标准。任何及所有形式的贪污、敲诈勒索和挪用公款等行为都必须严格禁止，否则将立即被令停业和受到法律制裁。

2.Disclosure of Information

Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.

信息公开

依照适用法规和主要的行业惯例公开有关商业活动、组织结构、财务状况和业绩的信息。

3.No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.

不得有不正当收益

不得提供或接受贿赂或其他形式的不正当收益。

4.Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld. Means to safeguard customer information should be available.

公平交易、广告和竞争

应制定公平交易、广告和竞争的标准，以及保护客户信息的措施。

5.Whistleblowers

Programs that ensure the protection of supplier and employee whistleblower confidentiality are to be maintained.

检举

应制定程序，以保护供应商和员工检举者身份的机密性。

6.Community Engagement

Community engagement is encouraged to help foster social and economic development.

社区参与

鼓励参与社区活动，以推动社会和经济的发展。

7.Protection of Intellectual Property

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.

知识产权保护

应尊重知识产权，技术和生产经验的转让要妥善保护知识产权。

8.Prevention of Conflict metal

Supplier shall not procure or use Conflict Metal. Conflict Metal refers to raw metals used in electronics industry which are sourced from regions of the world known as "conflict regions" such as Eastern region of the Democratic Republic of Congo (DRC). The DRC Eastern region mines are controlled by non- government military groups or unlawful military factions where illegal mine(s) profits have contributed to human rights abuses, severe environmental damage, and the theft from the DRC citizens.

避免使用冲突金属

供应商不得获取或使用冲突金属。冲突金属是指电子行业中所使用的来源于世界上所谓“冲突地区”的地区（例如刚果民主共和国[DRC]东部）的金属原材料。刚果民主共和国东部地区的矿山被非政府军事组织或非法军事集团所控制，利用这些非法矿山获取利润导致了践踏人权、环境恶化、损害刚果民主共和国的公民利益的后果。

References: The following standards were used in preparing this Code and may be a useful source of additional information.

参考资料：本准则在起草过程使用了以下标准，这些标准可作为有用的附加信息来源。

ILO Code of Practice in Safety and Health

国际劳工组织(ILO) 安全与健康实践准则

www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf ILO International Labor Standards

国际劳动组织(ILO) 国际劳工标准

www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm OECD Guidelines for Multinational Enterprises

OECD 跨国企业指南

www.oecd.org

United Nations Convention Against Corruption

联合国反腐败公约 www.unodc.org/unodc/en/crime_convention_corruption.html United Nations Global Compact

联合国全球盟约

www.unglobalcompact.org

Universal Declaration of Human Rights 世界人权宣言 www.un.org/Overview/rights.html Electronic Industry Code of Conduct 电子行业行为准则 <http://eicc.info/Home.html>

SA 8000

www.cepaa.org/ SAI

国际社会责任

www.sa-intl.org

Ethical Trading Initiative 道德贸易行动 www.ethicaltrade.org/ OHSAS 18001

www.bsi-global.com/index.xalter ISO 14001

www.iso.org

www.cbp.gov

SUPPLIER AGREEMENT

供应商协议 It is requested that the owner, president, managing director or chairperson for your company sign and return a copy of this letter thereby confirming your understanding of its contents and agreement to undertake the obligations it sets forth.

本协议由贵公司的股东、总裁、总经理或者主席签署后送回一份文件副本，确认您已理解该协议内容并同意接受该协议所规定的义务。Thank you for your cooperation and we look forward to continually strengthening our relationship for years to come.

感谢您的合作，我们期待在未来几年内继续加强我们的关系。

Supplier : [INSERT REGISTERED NAME HERE]

Name & Title:

姓名及职位

Date:

日期：

Signature :

签名：

Company Chop 公司印章