

全球商业伙伴行为准则
Code of Conduct for Global Business Partners

中国一冶集团有限公司
China First Metallurgical Group Co., Ltd.

解释与声明

Interpretation and declaration

针对全球商业伙伴管理¹，中国一冶集团有限公司（以下简称“一冶”或“公司”）已在《诚信合规手册》中做了原则性规定，并在《合规管理制度》“第四节商业伙伴政策”中规定了针对商业伙伴的管理事项范围、管理操作流程和与商业伙伴冲突纠纷处理等政策制度。

For the management of global business partners, China First Metallurgical Group Co., Ltd. (hereinafter referred to as "**First Metallurgical Group**" or "**the Company**") has made principled provisions in the Integrity Compliance Manual, and stipulated policies and systems such as the scope of management matters, management operation procedures and conflict and dispute handling with business partners specific to business partners in Section IV Business Partner Policy of the Compliance Management System.

公司的《诚信合规手册》和《合规管理制度》侧重于从公司视角出发指引公司如何管理商业伙伴；《中国一冶集团有限公司全球商业伙伴行为准则》（以下简称“《商业伙伴准则》”）则侧重于从商业伙伴视角出发，指引公司的商业伙伴在与一冶开展业务过程中需遵守的一般行为准则。

The Company's Integrity Compliance Manual and Compliance Management System focus on guiding the Company to manage business partners from the perspective of the Company; The Codes of Conduct for Global Business Partners of China First Metallurgical Group Co., Ltd. (hereinafter referred to as "**Guidelines of Business Partners**") focus on guiding the general code of conduct that the Company's business partners should abide by in the process of doing business with China First Metallurgical Group Co., Ltd. from the perspective of business partners.

公司相信按道德标准和负责任的方式开展业务不仅正确，而且符合公司“百年一冶，基业常青”的美好愿景。本《商业伙伴准则》以实现前述愿景为目标，阐明了公司的全球商业伙伴在与公司开展业务时（包括但不限于诚信和反腐败、劳工实践、健康与安全以及环境管理等领域）需遵循的一般行为准则。

The Company believes that conducting business in an ethical and responsible manner is not only correct, but also consistent with the Company's vision of "**A Century of Glory, Everlasting Success of Business**". The Guidelines of Business Partners, which aim to achieve the foregoing vision, set out the general code of conduct to be followed by the Company's global business partners when conducting business with the Company, including but not limited to the areas of integrity and anti-corruption, labor practices, health and safety, and environmental management.

公司郑重声明：

The Company solemnly declares:

1、遵守本《商业伙伴准则》是公司商业伙伴合作的前提条件。商业伙伴应在与公司业务合作全流程中（包括但不限于事前的接洽磋商流程、事中的合约履行流程、事后的维保甚至争议

¹ 公司商业伙伴的范围见公司的《合规管理制度》第七十七条规定，包括：

(1) 公司的承包商、分包商、供应商、服务商、项目业主；

(2) 公司的税务、环境、业务或其他代理；

(3) 公司的咨询顾问、外部律师或者合资伙伴。任何员工对某一合作方是否属于商业伙伴范畴存有疑问的，请咨询公司首席合规官与法律与合规管理部。

¹ The scope of the Company's business partners is stipulated in Article 77 of the Company's Compliance Management System, including:

(1) Contractors, subcontractors, suppliers, service providers and project owners of the Company;

(2) Tax, environmental, business or other agents of the Company;

(3) Consultant, external lawyer or joint venture partner of the Company. Any employee who has questions about whether a partner is a business partner should consult the Company's Chief Compliance Officer and Legal and Compliance Management Department. For the specific investigation and evaluation process of this pair of business partners, please refer to Article 79 of the Compliance Management System of the Company.

解决流程) 严格遵守《商业伙伴准则》。

1. Compliance with the Guidelines of Business Partners is a prerequisite for cooperation between the Company and business partners. Business partners should strictly abide by the Guidelines of Business Partners in the whole process of business cooperation with the company (including but not limited to the beforehand contact and negotiation, in-process contract performance, and afterward maintenance and dispute resolution if any).

2、商业伙伴还应在其整个供应链中传达《商业伙伴准则》的内容并号召供应链全体成员遵守《商业伙伴准则》。

2. Business partners should also convey the contents of the Guidelines of Business Partners throughout their supply chain and call on all members of the supply chain to abide by the Guidelines of Business Partners.

本准则自发布之日起实施。公司法律与合规管理部负责解释与修订本准则。公司员工对本准则由有任何疑问，可咨询公司法律与合规管理部。

The Guidelines shall be implemented as of the date of promulgation. The Legal and Compliance Management Department of the Company shall interpret and amend the Guidelines from time to time. Employees of the Company may consult the Legal and Compliance Management Department of the Company if they have any questions about the Guidelines.

商业伙伴准则要点指引

Guidance on Key Points of the Guidelines of Business Partners

公司期望商业伙伴以诚信、诚实和透明的态度负责任地开展业务，并遵循以下行为准则：

The Company expects business partners to conduct their business responsibly in good faith, honesty and transparency, and follow the following codes of conduct:

1、保持知晓并持续遵守适用于商业伙伴的法律法规，包括但不限于商业伙伴注册地、业务所在地等国家和地区的生效法律法规。

1. Keep aware of and continuously abide by the laws and regulations applicable to business partners, including but not limited to the effective laws and regulations of host countries and regions where business partners are registered and where they operate.

2、维持一冶及其合作伙伴信息的保密性。

2. Maintain the confidentiality of information of China First Metallurgical Group Co., Ltd. and its partners.

商业伙伴应按照法律法规或协议要求，采取一切合理和必要的预防措施，以维持其获得的公司及其合作伙伴信息的保密性，不得向一冶内部非业务相关方或外部的任何人披露，除非法律另外要求或得到权利主体明确授权。

Business partners shall, in accordance with the requirements of laws, regulations or agreements, take all reasonable and necessary precautions to maintain the confidentiality of the information obtained by them about the Company and its partners, and shall not disclose it to any non-business related party or anyone outside the Company, unless otherwise required by law or explicitly authorized by the subject of right.

3、通过公平竞争的方式与公司展开业务合作，禁止采取腐败、欺诈、串通、胁迫等不当行为与公司开展业务合作。

3. Cooperate with the Company through fair competition, and prohibit corrupt practice, fraudulent practice, collusive practice, coercive practice and other improper behaviors in business cooperation with the Company.

公司致力于在市场经济与法治环境内合法合规地开展业务，严格禁止与商业伙伴、政府官员或其他第三方之间的腐败、欺诈、串通、胁迫等不当行为。

The Company is committed to conducting business legally and compliantly in a market economy and rule of law environment, and strictly prohibits corrupt practice, fraudulent practice, collusive practice, coercive practice and other improper behaviors with business partners, government officials or other third parties.

因此，公司禁止其商业伙伴参与任何形式的腐败、欺诈、串通、胁迫等不当行为。一经发现公司商业伙伴可能或实际存在前述行为，应立即报告公司法律与合规管理部、纪检部等归口职能部门。

Therefore, the Company prohibits its business partners from participating in any form of corrupt practice, fraudulent practice, collusive practice, coercive practice and other improper acts. Once it is found that the business partners of the Company may or actually have the aforesaid behaviors, immediately report to the centralized functional departments such as the Legal and Compliance Management Department and the Discipline Inspection Department of the Company.

针对不当行为的预防和禁止，商业伙伴应根据自身及其业务性质、项目属性，严格遵守其应当遵守的国际国内法律法规准则（包括但不限于《世界银行集团诚信合规指南》《美国反海外腐败法》《英国贿赂法案》《中华人民共和国刑法》等）。

For the prevention and prohibition of misconduct, business partners should strictly abide by the international and domestic laws and regulations (including but not limited to the World Bank Group Integrity Compliance Guidelines, the US Foreign Corrupt Practices Act, the UK Bribery Act, the Criminal Law of the People's Republic of China, etc.) according to themselves, their business nature and project attributes.

4、支持员工的多元化，并确保工作场所没有任何歧视、骚扰或任何其他形式的伤害。

4. Support the diversity of employees and ensure that there is no discrimination, harassment or any other form of harm in the workplace.

公司商业伙伴应创造一种工作环境，让身处其中的员工和业务合作伙伴感受到付出的努力得到了重视和尊重。不容忍任何骚扰，包括不受欢迎的言语、视觉、身体或其他造成恐吓、冒犯或敌对工作环境的行为。

Business partners of the Company should create a working environment in which employees and business partners feel that their efforts are valued and respected. No harassment, including unwelcome verbal, visual, physical or other acts that intimidate, offending or hostile to the working environment, will be tolerated.

商业伙伴的雇佣决定必须基于资质、技能、表现和经验等与劳动能力相关的标准和条件，商业伙伴与员工建立或解除劳动关系时，禁止适用任何歧视性标准（性别、种族、肤色等）。

The employment decision of a business partner must be based on criteria and conditions related to the ability to work, such as qualifications, skills, performance and experience, and it is forbidden to apply any discriminatory criteria (gender, race, skin color, etc.) when a business partner establishes or terminates a labor relationship with an employee.

5、公平公正地对待员工，包括在薪酬、工作时间和福利方面。

5. Treat employees equally and fairly, including in terms of salary, working hours and benefits.

公司商业伙伴应遵守所有适用的工资、工作时间、福利等法律法规和监管要求。

Business partners of the Company shall comply with all applicable laws, regulations and regulatory requirements such as wages, working hours and benefits.

商业伙伴还应努力至少达到工作时间和休息时间的国际标准，其中包括：

Business partners should also strive to meet at least international standards for working hours and rest time, including:

(1) 每周工作时间不超过 48 个定期安排的工作小时和 12 个自愿加班小时；

(1) The weekly working hours shall not exceed 48 regularly arranged working hours and 12 voluntary overtime hours;

(2) 加班时间会得到额外的报酬；

(2) Overtime will be paid extra;

(3) 工人每 7 天休息一天，紧急情况或不寻常的情况除外，以及

(3) The worker shall have one day off every seven days, except in case of emergency or unusual circumstances, and

(4) 在一直没有获得休息日的情况下不得连续工作 21 天以上。

(4) It is not allowed to work continuously for more than 21 days without getting a rest day.

如果商业伙伴的做法不符合此类国际标准，商业伙伴应查明根本原因并努力改进做法。

If a business partner's practices do not meet such international standards, the business partner should identify the root causes and make efforts to improve the practices.

6、禁止一切形式的强制性或强迫性劳动。

6. All forms of forced or compulsory labor are prohibited.

公司商业伙伴应维护和促进基本人权，包括工人的自由流动权利。雇佣决定必须基于自由选择，禁止强迫或监禁劳动，不得使用体罚或暴力威胁或其他形式的身体、性、心理或言语虐待作为纪律或控制的方法。

Corporate business partners should safeguard and promote basic human rights, including workers' right to free movement. Employment decisions must be based on free choice, forced or incarcerated labor is prohibited, and corporal punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse may not be used as a method of discipline or control.

雇佣合同必须明确规定雇佣条款，不得通过保留身份证件、存款或其他企图防止工人停工的行为来限制工人的流动。

The employment contract must specify the terms of employment, and the movement of workers must not be restricted by keeping identity documents, saving money or other acts that attempt to prevent workers from stopping work.

此外，不得要求工人支付招聘费或其他类似费用以获得或保留工作机会，商业伙伴应确保任何第三方招聘机构遵守这些准则。

In addition, workers should not be required to pay recruitment fees or other similar fees to obtain or retain job opportunities, and business partners should ensure that any third-party recruitment agency complies with these guidelines.

7、禁止使用童工。

7. Employment of child labor is prohibited.

商业伙伴应遵守国家法律或法规规定的最低雇佣年龄限制，并遵守国际劳工组织(ILO)的相关标准。此外，公司禁止雇用年龄在 16 周岁以下、当地法定最低工作年龄或义务教育年龄（以较低者为准）以下的个人。

Business partners should comply with the minimum age limit for employment stipulated by national laws or regulations, and comply with relevant standards of the International Labour Organization (ILO). In addition, the Company prohibit the employment of individuals under the age of 16, the local legal minimum working age or the compulsory education age, whichever is lower.

在任何情况下，商业伙伴不得允许儿童从事可能招致损害其身体、精神或情绪发展或干扰其教育或职业需要的身体风险的工作。

Under no circumstances shall a business partner allow a child to perform work that may incur a physical risk of impairing his or her physical, mental or emotional development or interfering with his or her educational or professional needs.

8、提供安全和健康的工作条件。

8. Provide safe and healthy working conditions.

公司商业伙伴应积极管理健康和安全风险，以提供避免职业伤害和疾病的无事故环境。商业伙伴必须实施识别危害的管理体系和控制措施，并评估和控制与其特定行业相关的风险。

Company business partners should actively manage health and safety risks to provide an accident-free environment to avoid occupational injuries and diseases. Business partners must implement management systems and controls to identify hazards and assess and control risks associated with their specific industries.

此外，商业伙伴应提供安全饮用水、包括足够的卫生间和洗手设施的卫生设备；消防通道和必要的防火安全设备；紧急救援工具包；以及获得包括环境、消防和医疗在内的紧急响应服务的权限。

In addition, business partners should provide safe drinking water, including adequate sanitation facilities with toilets and hand washing facilities; Fire exits and necessary fire safety equipment; Emergency rescue kit; And access to emergency response services including environmental, fire and medical services.

9、进行业务运营时，爱护环境并遵守所有适用的环境法律法规。

9. Take care of the environment and abide by all applicable environmental laws and regulations when conducting business operations.

商业伙伴应考虑日常业务决策过程对环境的潜在影响，并考虑自然资源保护、资源减少、材料回收和污染控制的机会，以确保空气和水更清洁，并减少填埋废物。

Business partners should consider the potential impact of day-to-day business decision-making processes on the environment, and consider opportunities for natural resource conservation, resource reduction, material recovery and pollution control to ensure cleaner air and water and reduce landfill waste.

公司鼓励其商业伙伴确定并制定目标，实施行动计划，以减少水、废水、能源、温室气体排放、废料、废物等领域对环境的不利影响。

The Company encourages its business partners to identify and set targets and implement action plans to reduce adverse environmental impacts in the areas of water, wastewater, energy, greenhouse gas emissions, scrape material, garbage, etc.

10、根据所有适用的法律和监管要求以及公认的会计惯例，保持准确的财务账簿和业务记录（包括提交给公司的支付或报销的所有发票）。

10. Maintain accurate financial books and business records (including all invoices submitted to the Company for payment or reimbursement) in accordance with all applicable legal and regulatory requirements and generally accepted accounting practices.

11、提供的产品和服务符合适用的质量、安全、环保等国际国内、行业标准。

11. The products and services provided should meet the applicable international, domestic and industry standards such as quality, safety and environmental protection.

公司致力于保证集团内所有主体都生产和提供高品质和安全的產品（项目交付成果）和服务。涉及我们产品和服务的设计、开发、物资设备运输或储存、施工、监理、维保等任何业务合作的商业伙伴应当：

The Company is committed to ensuring that all entities within the Group produce and provide high-quality and safe products (project deliverables) and services. Business partners involved in any business cooperation involving the design, development, transportation or storage of materials and equipment, construction, supervision and maintenance of our products and services shall:

(1) 了解并遵守适用于您所在地产品和服务的质量、安全和环保等方面的标准、政策、规范和程序；

(1) Understand and abide by the standards, policies, norms and procedures applicable to the quality, safety and environmental protection of products and services in your location;

(2) 对外签订的产品、服务相关协议符合上述标准、政策、规范和程序并符合应当适用的国际国内法律法规准则和监管政策；

(2) The relevant agreements on products and services signed with foreign countries conform to the above standards, policies, norms and procedures, and conform to the applicable international and domestic laws, regulations and regulatory policies;

(3) 遵守按上述标准对外签署的协议并严格履行；

(3) Abide by the agreements signed according to the above standards and ensure strict performance;

(4) 出现违反协议或可能对公司及其提供的产品和服务造成不利影响的事项，应立即向公司归口管理部门报告。

(4) Any violation of the Agreement or any matter that may adversely affect the Company and the products and services it provides shall be immediately reported to the centralized management department of the Company.

12、建立相应的管理程序，并配合公司所要求的合理调查评估程序²，以遵守《商业伙伴准则》。

12. Establish corresponding management procedures and cooperate with reasonable investigation and evaluation procedures required by the company to comply with the Guidelines of Business Partners.

若要与公司开展业务，商业伙伴必须在通过公司尽职调查程序调查评估后，与公司签订包括《廉洁从业责任书》、包括一系列诚信合规条款在内的正式合同。

In order to conduct business with the Company, the business partner must sign a formal contract with the Company, including the Letter of Responsibility for Integrity Employment and a series of integrity and compliance clauses, after passing the investigation and evaluation of the Company's due diligence procedures.

出现违约事项或违反诚信合规条款的情况时，经事先通知，公司可进行合理的审核以验证商业伙伴是否遵守《商业伙伴准则》。

In the event of a breach of contract or integrity compliance, the Company may, upon prior notice, conduct reasonable audits to verify compliance with the Guidelines of Business Partners by the business partner.

13、处理公司员工事务时，遵守公司关于礼品、招待及利益冲突方面的政策。

13. When dealing with employees, abide by the Company's policies on gifts, hospitality and conflicts of interest.

公司的商业伙伴或代表公司的任何主体禁止向公司员工提供可能不适当影响公司业务决策或获得不公平优势的礼品、招待或其他利益。

Business partners of the Company or any subject acting on behalf of the Company are prohibited

²具体的这对商业伙伴的调查评估流程可参见公司的《合规管理制度》第七十九条。

² For the specific investigation and evaluation process of this pair of business partners, please refer to Article 79 of the Compliance Management System of the Company.

from offering gifts, hospitality or other benefits to employees of the Company that may unduly influence business decisions of the Company or obtain unfair advantages.

一冶的商业伙伴与一冶开展业务时，发现自身或其员工与一冶存在利益冲突的，应立即向一冶的业务对接人员或一冶法律与合规管理部披露。

When the business partners of China First Metallurgical Group Co., Ltd. (the Company) conduct business with the Company, if they find that there is a conflict of interest between themselves or their employees and the Company, they shall immediately disclose it to the business docking personnel of the Company or the Legal and Compliance Management Department of the Company.

14、举报涉嫌违法违规及违反本准则的行为。

14. Report suspected violations of laws and regulations and violations of these Guidelines.

公司期望商业伙伴有一套有效的申诉管理制度，对商业伙伴所属员工在其经营活动中提出的申诉或第三方提出的申诉，将申诉涉及的潜在的违法违规行为提交到商业伙伴的管理层。

The Company expects business partners to establish an effective complaint management system, and submit potential violations of laws and regulations to the management of business partners for complaints made by employees of business partners in their business activities or complaints made by third parties.

潜在的违法违规行为与一冶的合作业务相关或是本《商业伙伴准则》约束的行为，一冶鼓励商业伙伴的员工或供应商直接向一冶举报。

In case that potential violations of laws and regulations are related to the cooperative business of China First Metallurgical Group Co., Ltd. (the Company) or are bound by this Guidelines of Business Partner, and the Company encourages employees or suppliers of business partners to report them directly to the Company.

举报可采取实名或匿名方式。

Reporting can be done by real name or anonymity.

一冶承诺：所有此类举报，一冶对举报人做好保密和保护工作。

China First Metallurgical Group Co., Ltd. promises to keep confidential and protect all such reports.

公司举报热线一：

Company reporting hotline one:

举报平台：公司纪检监察部

Report platform: Discipline Inspection and Supervision Department of the Company

举报电话：027-68868891

Report telephone number: 027-68868891

举报邮箱：yytjjiwei@sina.com

Report email: yytjjiwei@sina.com

纸质举报信件收件地址：武汉市青山区工业大道三号一冶纪委

Address of paper report letter: Commission for Discipline Inspection of China First Metallurgical Group Co., Ltd., No.3, Gongye Avenue, Qingshan District, Wuhan

纸质举报信件收件人：一冶纪委

Paper report letter recipient: Commission for Discipline Inspection of China First Metallurgical Group Co., Ltd.

公司举报热线二：

Company reporting hotline two:

举报部门：公司法律与合规管理部

Report department: Legal and Compliance Management Department of the Company

电话：027-68868394

Tel: 027-68868394

电子信箱：flswb@cfmcc.com

E-mail: flswb@cfmcc.com