



**Ever Bright (Zhuhai) Electronic Co.,Ltd.**  
**珠海常辉电子有限公司**

# **行为准则**

# **Code of Conduct**

**Rev 0 版**

## 概要 Summary

本公司及其员工致力维持最高的道德标准。我们每个人都有责任按照本《行为准则》管理我们的行为，并确保本《行为准则》得到遵守。

The Company and its employees are committed to maintaining the highest ethical standards. It is the responsibility of each of us to govern our conduct by this Code of Conduct and to see to it that the Code is followed.

违反本准则的行为，无论是为了个人利益还是公司利益，都是不能容忍的。违反规定的员工将根据公司政策受到适当的纪律处分，直至解雇。此外，违反本准则可能会使您和公司受到制裁，包括罚款、监禁、暂停或禁止与中国政府开展业务。

Violation of the Code, whether for individual or corporate gain, will not be tolerated. Violations will be met with the appropriate discipline, in accordance with Company policy, up to and including dismissal. In addition, violation of the Code may subject you as well as the Company to sanctions including monetary penalties, prison sentences, and suspension or debarment from doing business with the China government.

本行为准则反映了我们认为在道德和法律上正确的商业行为。本守则适用于所有员工，我们期望并鼓励每位员工遵守本守则中所列的行为标准。

This Code of Business Conduct reflects what we believe to be ethically and legally correct business practices. The Code is applicable to all employees, and we expect and encourage every employee to adhere to the standards of conduct set forth in this Code.

## 员工责任 Employee Responsibilities

本行为准则为您代表公司进行业务往来提供了指导，并规定了您作为个人的具体义务：

This Code of Conduct provides a guide for you in your business dealings on behalf of the Company and also imposes specific obligations on you as an individual:

- 每位员工都必须理解并遵守本准则所规定的道德责任。员工如果对自己的职责有疑问，应该向他们的主管、人力资源经理、部门经理寻求额外的咨询。  
Each employee must understand and conform to the ethical responsibilities imposed by this Code. Employees in doubt about their responsibilities should seek additional counsel from their supervisor, from their Human Resources Manager, from their Division Manager.
- 当发现同事的行为可能违反本准则时，每位员工都应告知同事。如果明显的违规行为继续存在，则必须向人力资源和行政部门报告情况。  
Each employee should advise fellow employees when it appears that their actions may be in violation of this Code. If the apparent violation continues, the situation must be reported to HR & Admin. Dept.
- 每位员工都必须避免可能导致本守则规定的不法行为或不当行为的情况。  
Each employee must avoid situations which could result in even the appearance of wrongdoing or impropriety under this Code.

我们都有责任维护我们的道德文化。我们每个人都应该报告不道德的行为和道德问题。

We all have a responsibility to maintain our ethical culture. Each of us should report unethical behavior and ethical concerns.

请**务必**报告合法的道德问题。报告和解决合法问题加强了我们的文化，造福所有人。

Please **do** report legitimate ethics issues. Reporting and resolution of legitimate issues strengthens our culture for the benefit of all.

请**不要**发出没有价值、虚假或出于卑鄙原因的投诉。虚假的投诉会导致成本高昂的审查工作，并有损我们的文化。

Please **do not** issue a complaint that has no merit, is false, or is motivated by mean-spirited reasons. False complaints cause review work that is costly and detracts from our culture.

### 公司责任 **Company Responsibilities**

本公司不会容忍任何在本准则下产生不当行为或不正当行为的情况。任何怀疑违反本守则的行为，应立即向人力资源和行政部门报告。

The Company will not tolerate any situation that creates even an appearance of wrongdoing or impropriety under this Code. Any suspected violations of this Code should be reported immediately to HR & Admin. Dept.

### 法律法规 **Laws and Regulations**

遵守开展业务所在国的适用法律和法规。

It is obliged to comply with the applicable laws and regulations of those countries where they conduct business.

### 强迫劳动 **Forced Labor**

禁止任何形式的强迫劳动。这包括强迫监狱劳动、抵押劳动或其他劳动。

Forced Labor of any form is forbidden. This includes forced prison labor, bonded labor or otherwise.

### 打击现代奴隶制 **Combating Modern Slavery**

在供应链的任何地方或公司业务的部分都严格禁止奴役和贩卖人口。

Slavery and human trafficking are strictly forbidden anywhere in the supply chain or in any part of the Company business.

### 童工 **Child Labor**

禁止使用任何形式的童工。除非当地法律规定更高的年龄限制，否则不得雇用未满完成义务教育年龄或未满15岁的人。未满18岁的工人不得从事危险工作，并可考虑到教育需要，禁止从事夜间工作。

Child labor of any form is forbidden. Unless local law stipulates a higher age limit, **NO** person younger than the age for completing compulsory education or younger than 15 shall be employed. Workers under the age of 18 shall not perform hazardous work and may be restricted from night work with consideration given to educational needs.

### 骚扰 **Harassment**

每个人的人格尊严、隐私和个人权利都必须得到尊重。员工不得受到体罚或身体、性、心理或言语的骚扰或虐待。

The personal dignity, privacy and personal rights of every individual have to be respected. Employees shall not be subject to corporal punishment or to physical, sexual, psychological or verbal harassment or abuse.

### 报酬 **Compensation**

公司的工资，包括加班和福利，应等于或超过适用法律法规要求的水平。公司在招聘或录用员工过程中，不得收取员工任何的押金（物），不扣留员工的身份证、毕业证、技工证等有效证件原件。员工能够在按当地法律或集体协会给出合理提前通知情况下，随时取消雇佣合同而不受财务处罚。

Wages, including overtime and benefits, shall equal or exceed the level required by applicable laws and regulations. In the process of recruiting or employing employees, the company shall not collect any deposit

(material) from employees, and shall not detain the original valid documents such as identity cards, graduation certificates, and technician certificates of employees. Employee can cancel their work contracts at any time with no financial penalty, subject to giving reasonable notice in accordance with local law or a collective agreement.

### **工作时间 Hours of Work**

除非国家规定需要更少的最大工作时间和除了特殊的业务情况下,员工不得在定期的基础上,要求工作超过48小时的标准工作时间,或每周总工作超过60小时(包括加班时间)。除特殊业务情况外,雇员每七天至少有一天休息。

Unless national regulations require less maximum hours of work and except under extraordinary business circumstances, employees shall not, on a regularly scheduled basis, be required to work a standard work week of more than 48 hours per week or a total work week of more than 60 hours (including overtime). Employees shall be provided at least one day off in every seven day period, except in extraordinary business circumstances.

### **非歧视 Non-discrimination**

所有员工,不管他们的肤色、种族、国籍、社会背景、艾滋病感染状况、残疾、性取向、政治或宗教信仰以及他们的性别或年龄,承担家庭责任以及工会会员或参加活动,在任何就业决策时,包括但不限于招聘、晋升、薪酬、福利、培训、裁员和终止,应当严格按照其能力和资格。

All employees, regardless of the color of their skin, race, nationality, social background, HIV/AIDS status, possible disability, sexual orientation, political or religious conviction as well as their gender or age, family responsibilities, and trade union membership or activities, shall be treated strictly according to their abilities and qualifications in any employment decision, including but not limited to hiring, advancement, compensation, benefits, training, layoffs and termination.

以员工能理解的语言向员工提供详细而准确的工作协议或类似的工作文件(如果需要调职到别的地方,在调职前提供相关文件)。

Employees are given detailed and accurate work agreements or similar work papers (prior to relocation if relocation is required) in a language understood by the employee.

### **健康及安全 Health and Safety**

公司有义务提供安全健康的工作环境,以防止事故和伤害,并在适用时提供安全和健康的居住设施,最低限度适用当地法律。必须实施符合ISO 45001或任何平等的作业安全管理体系。

The Company is obliged to provide a safe and healthy working environment to prevent accidents and injury and, when applicable, provide safe and healthy residential facilities, with applicable local law as a minimum. A job safety management system according to ISO 45001 or any equal system has to be implemented.

### **结社自由、集体谈判及和平集会 Freedom of Association, Collective Bargaining and Peaceful Assembly**

公司有义务尊重雇员结社自由、集体谈判及和平集会的合法权利。

The Company is obliged to respect the legal right of employees to freedom of association, collective bargaining, and peaceful assembly.

### **环境 Environmental**

公司应遵守适用于他们的业务的环境法规,包括最新版本的RoHS指令(# 1),REACH指令(# 2),无卤素行动(# 3),无消耗臭氧层化学物质(ODC)行动(# 4),当地环境指示和标准,并在所有运作的地点,遵守注重环保的做法。

The Company will comply with environmental regulations including latest version of RoHS directive(#1), REACH directive(#2), Halogen free initiative(#3), Ozone Depleting Chemicals (ODC) free initiative(#4), local environmental directives and standards applicable to their operations, and will observe environmentally conscious practices in all locations where they operate.

减少环境污染，不断加强环境保护。必须实施符合ISO14001或任何同等标准的环境管理体系  
Environmental pollution shall be minimized and environmental protection shall be improved continuously.  
An environmental management system according to ISO 14001 or any equal system has to be implemented.

#1) RoHS directive - [http://ec.europa.eu/environment/waste/rohs\\_eee/index\\_en.htm](http://ec.europa.eu/environment/waste/rohs_eee/index_en.htm)

#2) REACH directive

- [http://ec.europa.eu/environment/chemicals/reach/reach\\_en.htm](http://ec.europa.eu/environment/chemicals/reach/reach_en.htm)

- Annex XIV: <http://echa.europa.eu/web/guest/addressing-chemicals-of-concern/authorisation/recommendation-for-inclusion-in-the-authorisation-list/authorisation-list>

-Annex XVII: <http://echa.europa.eu/web/guest/addressing-chemicals-of-concern/restrictions/list-of-restrictions>

#3) Halogen free - <https://en.wikipedia.org/wiki/Halogen>

#4) Ozone Depleting Chemicals (ODC) free initiative - <http://www.epa.gov/ozone/science/ods/index.html>

## 业务连续性计划 Business Continuity Planning

公司应保持政策以减少恐怖主义、犯罪、商业威胁、流行病、自然灾害和相关重大事故。

The Company shall maintain policies to mitigate exposures to terrorism, crime, business threats, pandemics, natural disasters and related major accident exposures.

## 腐败和贿赂 Corruption and Bribery

我们的公司政策是严格禁止我们的员工获得任何与常辉电子合同或工作有关的个人利益，包括佣金、付款、贷款、酬金(包括旅游和娱乐)、贿赂、礼物、样品、服务或个人情面。

It is our Corporate Policy to strictly forbid our employees to receive any personal benefit, including commissions, payments, loans, gratuities (including travel and entertainment), bribes, gifts, samples, services, or personal considerations in connection with any Ever Bright's contract or work.

请注意，本公司员工不得接受业务伙伴赠送的任何季节性或节日礼物，如果篮、鲜花、月饼、演艺门票、春节红包等。

Please also note that, our employees are prohibited to accept any seasonal or festival gifts from our business partners, e.g. fruit baskets, flowers, moon cakes, entertainment tickets, Chinese New Year Red Pockets, etc.

如果员工有任何特殊要求或福利，请立即向人力资源和行政部门提出，电话:(+86)756-6233100或电邮至hr001@longsunshine.com。

If there is a request from any of our employees for any special favors or benefits, please bring it to our attention immediately to HR & Admin. Dept. at (+86)756-6233100 or email hr001@longsunshine.com.

## 员工沟通 Employee Communications

公司以一种旨在创造相互尊重和理解的氛围的方式处理与员工的关系。因此，除了正常和常规的员工报告程序外，公司还设立了意见箱，让任何员工都可以匿名报告公司内部发生的任何员工认为不符合公司政策指示的行为，而不必担心遭到报复。

The Company conducts its relations with its employees in a manner intended to create an atmosphere of mutual respect and understanding. Accordingly, in addition to normal and routine employee reporting procedures, the Company has set up a suggestion box for any employee to report, without fear of retaliation, any practice occurring within the Company that the employee believes is not in compliance with the Company's policy directives.

### 无冲突采购倡议 **Conflict-Free Sourcing Initiative (CFSI) (#5)**

公司及其供应链不从刚果民主共和国或任何毗邻国家采购冲突矿物，锡、钨、钽和黄金。公司有责任进行尽职调查，以确保其供应链符合无冲突采购计划。公司已准备好根据要求使用CFSI模板的更新版本提供尽职调查报告(#6)。

The Company and its supply chain **don't** source conflict minerals, Tin / Tungsten / Tantalum / and Gold from Democratic Republic of Congo or any adjoining countries. The Company is responsible to carry out due diligence process to ensure their supply chain comply with the conflict free sourcing initiative. The Company is ready to provide the due diligence report by using update version of CFSI template upon request (#6).

#5 – Conflict-free sourcing initiative / <http://www.conflictreesourcing.org/>

#6 - Conflict-free sourcing initiative template / <http://www.conflictreesourcing.org/conflict-minerals-reporting-template/>

### 供应链 **Supply Chain**

公司应责成其所有下级供应商承认并尊重本行为准则的要求。

The Company shall oblige all his sub suppliers to recognize and respect the requirements of this Code of Conduct.

通过签署本函，签署本协议的供应商理解并遵守本协议中的要求。供应商同意应常辉的要求，提供支持文件以证明其遵守上述条款。

By signing this letter, the undersigned Supplier understood the requirements in this Code and comply with those requirements. The supplier agrees to provide support documents to show their compliance on those clauses upon request by Ever Bright (Zhuhai) Electronic Co.Ltd.

供应商名称:

Supplier Name:

签名:

Signature:

姓名:

Name:

职位:

Title:

日期:

Date: