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## 1. 目的 Purpose

本 SWA 《行为准则》规定了我们以合乎道德和诚实的方式开展业务的基本承诺。《行为准则》是我们行动的框架，描述了我们对于员工、合作伙伴、公众和社会的责任，确保我们遵守适用的法律、法规和内部标准。

This SWA Code of Conduct sets forth our fundamental commitment to conducting business ethically and honestly. The Code of Conduct is a framework for our actions, describe our responsibilities to employee, partners, public and the society. Ensure we are compliance with applicable laws, regulations, and internal standards.

## 2. 范围 Scope

为了确保基于信任和诚信的 SW 企业文化的持续存在，并确保我们公司的持久成功，本《行为准则》对 SWA 的所有分支机构，职能部门，高管和员工具有约束力，我们希望我们的业务合作伙伴，特别是为我们工作的承包商和供应商，也同样遵守本《行为准则》中的原则，这些原则同样也适用于他们的临时员工、业务合作伙伴和销售代理。公司中没有任何人有权同意违反本《行为准则》的例外情况。

To ensure the continued existence of a corporate culture based on trust and integrity, and to ensure the lasting success of our company, this Code of Conduct is binding upon all bodies, executives, and employees of SWA, and we expect our business partners, and especially the contractors and suppliers who work for us, to adhere to the principles embedded in this Code of Conduct. It also applies to its temporary employees, business partners, and sales agents. No one in the company has the mandate to authorize exceptions from the Code of Conduct.

## 3. 术语 Terms

无 None

## 4. 职责 Responsibilities

SWA 董事会已同意将本《行为准则》作为 SWA 价值观的基础，会定期向 SWA 合规委员会和监事报告。

The Executive Board of SWA has adopted this Code of Conduct as the foundation of a set of values for SWA and reports to the Compliance Committee as well as the Supervisory on a regular basis.

SWA 合规委员会制定合规政策，进行合规培训，解答合规疑问。

The SWA Compliance Committee formulates compliance policies, conducts compliance training, and answers compliance questions.

## 5. 工作流程 Workflow

### 5.1 简介 Introduction:

SWA 致力于践行 SW 集团的核心价值观：责任，可持续性，诚信。我们始终诚信行事，对结果负责，做正确的事。质量和安全是 SWA 的基本承诺，对此我们永不妥协。

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SWA is committed to the core values of SW Group: Responsibility, Sustainability, Integrity. We must always act with integrity, take accountability for results, and do the right thing, even when the right thing is hard to do. Quality and safety are foundational commitments, never compromised.

对自身的行为承担责任对于我们的成功至关重要，所以我们的管理团队敦促您花时间理解并实践本准则。尤其是要了解您需要遵循的政策和准则，并在做出影响公司的决策时将其作为指导。

Taking personal responsibility for our actions is critical to our success, and the senior leadership team urges you to take the time to understand and then live the Code. It is important to know the policies and guidelines you are required to follow and use them as a guide when making decisions that affect the company.

SWA 致力于以诚信取胜。如果您目睹任何形式的不当行为，请及时汇报。我们遵循开放的原则，提供各种汇报方式，包括向合规委员会、独立联系人报告。请注意，SWA 不会容忍因善意汇报而受到报复的情况。SWA 管理团队期待与您合作，使我们的公司做到最好。

We are absolutely committed to winning with integrity. If you witness misconduct in any form, speak up. We offer various ways to let your voice be heard, including the compliance committee as well as an independent contact as well as our own open-door policy. Please know, at SWA we do not tolerate retaliation for making a good faith report. The senior leadership team looks forward to working with you to make our company the best it can be.

为确保所有员工了解《行为准则》的内容及其与日常工作的关系，相关的培训和后续跟进将会逐步提供。

Related training and subsequent follow-up are provided to ensure all employees understand the content of Code of Conduct and how it relates to daily work.

违反本《行为准则》的行为是不能容忍的，可能导致纪律处分，甚至可能受到由国家实施的制裁。

Violations of this Code of Conduct will not be tolerated and may result in disciplinary measures and potentially even state-imposed sanctions.

## 5.2 原则 Principles:

责任、可持续性、诚信 — 这三项核心原则构成我们业务和社会活动的框架。

Responsibility, Sustainability, Integrity — The three core principles form the framework for our business and social activities.

## 5.3 政策 Policies:

### 我们待人的方式 THE WAY WE TREAT PEOPLE:

禁止强迫劳动: 我们不参与并积极反对强迫劳动。员工有权在合理通知 SWA 的情况下终止劳动关系。

No Forced Labour: We do not engage in, and we actively work against, the use of forced labour. Employees have the right to terminate their employment with reasonable notice to SWA.

**禁止使用童工：**SWA 不参与并积极反对使用童工。员工不得低于完成义务教育的年龄，并且在任何情况下不得低于 18 岁。

**No Child Labour:** SWA do not engage in, and we actively work against, the use of child labour. Employees must not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 18 years.

**安全健康：**我们坚持为所有员工提供安全健康的工作场所。我们还支持职业健康和安全措施的持续改进，以保障我们的健康，改善我们的工作环境。我们所有的运营设施和设备均符合相关法律和公司内部政策的规定。

**Safe and Healthy:** We always offer safe and healthy workplaces for all employees. We also support the continuous further development of occupational health and safety measures and health protection to improve our working environment. All our operating facilities and equipment comply with the applicable legal and internal protection provisions.

**公平待遇：**我们确保所有员工都得到平等、公平和尊重的对待。我们为员工提供良好的培训机会，以适应更多的工作机会和承担更广泛的责任。员工有权接受定期绩效考核和能力管理考核，员工具有公平的机会竞争工作机会。

**Fair Treatment:** We ensure that all employees are treated equally, fairly and with respect. We provide employees with good opportunities to train for job enrichment and wider responsibility. Employees are entitled to regular performance review and competency management reviews all employees shall be given a fair chance to compete for job opportunities.

**工资和福利：**我们确保工资和其他相关福利至少符合相关国家/地区的法定行业标准。工资和福利完全符合法律和集体协议。

**Wages and Benefits:** We ensure that wages and other related benefits meet at least the legal on industry minimum standard in the country in question. Wages and benefits are rendered in full compliance with laws and collective agreements.

**工作时间：**我们遵守我们运营所在的每个国家/地区关于工作时间的法律和行业标准。除当地法规外，我们还将确保员工安全不会因超时工作而受到任何影响。

**Working Hours:** We comply with applicable laws and industry standards on working hours in each country in which we operate. In addition to local legislations, we shall ensure that safety is not compromised through excessive working hours.

**结社自由：**我们尊重员工组建或加入自己选择的工会以及以员工集体或个人的立场进行谈判的权利。我们同样尊重员工不加入工会的权利。

**Freedom of Association:** We respect the right of all employees to form and join trade unions of their choice and to bargain collectively and individually. We respect the rights of an employee not to join a trade union.

**沟通/社交媒体：**关于公司的沟通很容易造成误解，所以除非获得授权，员工不得为公司发言。如第三方就公司情况与您联系，请将其转介绍给管理层。这同样适用于代表公司参加演讲活动或发表文章的请求。请遵守政策，避免发送令人困惑的消息或分享有关公司的不准确信息。我们遵守法律，确保员工有权公开谈论公众关注的问题，并参与与雇佣条款和条件相关的协调活动。我们的《行为准则》或其他政策中的任何内容均无意或不应被解释为干扰或限制员工的合法权利。社交媒体提供了建立关系和交流思想的良好途径。我们尊重

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个人使用社交媒体的权利，但请以符合公司的价值观和政策的方式使用社交媒体，遵守法律并意识到您需要对自己发布的内容负责。请运用良好的判断力，了解我们绝不容忍使用社交媒体恐吓、骚扰或歧视同事。

**Communication/Social Media:** It's easy for communications about our company to be misunderstood. That's why you refrain from speaking on our company's behalf unless you're authorized to do so. If you ever are contacted by third parties about our company, refer them to the senior leadership team. The same applies to requests to participate in speaking engagements or to publish articles on behalf of our company. By following our policies, we avoid sending confusing messages or sharing inaccurate information about our company. We comply with laws that ensure the rights of employees to speak publicly about matters of public concern and engage in concerted activities related to the terms and conditions of employment. Nothing in our Code of Conduct or our policies is intended or should be construed to interfere with or limit your legal rights. Social media offers a great way to build relationships and exchange ideas. While we respect your right to use social media, use it in a way that's consistent with our values and policies. Follow the law and be aware that you are responsible for what you publish, so use good judgment. Understand that we never tolerate the use of social media to intimidate, harass, or discriminate against fellow employees.

#### **我们开展业务的方式 THE WAY WE DO BUSINESS:**

**反腐败/反贿赂:** 贿赂涉及交换或提供有价值的东西，不正当地影响商业决策或获得商业优势。贿赂可以采取多种形式，包括提供现金、礼品卡、娱乐、不适当的折扣、雇佣您试图影响的人的家人或朋友，甚至进行某些慈善捐款。反贿赂法禁止任何人，包括政府官员和个人，提供、接受或给予贿赂。在某些国家/地区，疏通费是一种常见的商业惯例，但根据本《行为准则》，这些费用也是被禁止的。违反法律或《行为准则》可能会对您和我们公司造成严重后果，包括损害我们的声誉、被罚款甚至会导致监禁。请遵守法律、《行为准则》和公司政策，避免此类不当行为。

**Anti-corruption/ Anti-Bribery:** Bribery involves exchanging or offering something of value to improperly influence a business decision or obtain a business advantage. Bribes can take many forms and include things like giving cash, gift cards, entertainment, inappropriate discounts, hiring a family member or a friend of someone you seek to influence, or even making certain charitable contributions. Anti-bribery laws prohibit anyone, including government officials and private individuals, from offering, accepting, receiving, or giving bribes. In some countries, facilitation payments are a common business practice, but under our Code of Conduct, these are prohibited too. Violating these laws or our Code of Conduct can have serious consequences for you and our company, including damage to our reputation, fines, and jail time. Follow the law, our Code of Conduct, and our policies and avoid activities that even suggest something improper.

**反洗钱:** 洗钱是犯罪分子和其他人通过合法企业转移从非法活动中获得的资金以使资金看起来合法的过程。我们只与在法律范围内运营的信誉良好的合作伙伴开展业务。我们仔细评估潜在客户、业务合作伙伴和其他第三方，并采取一切合理措施确保业务关系的透明。为防止将我们的活动用于这些目的，请向 SWA 法律顾问或合规委员会报告可疑活动。

**Anti-Money Laundering:** Money laundering is a process criminals and others use to move funds gained from illegal activity through legitimate businesses to make the funds appear legitimate. We only do business with reputable partners who operate within the law. We carefully check the identity and credentials of potential customers, business partners and other 3<sup>rd</sup> parties, and we take all reasonable measures to ensure transparent business relationships. Take action to prevent the use of our activities for these purposes by reporting suspicious activity to the SWA Legal Counsel or Compliance Committee.



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**贸易管制:** 我们严格遵守国际贸易法律和贸易管制法规，以防止我们的产品被用于不正当目的。

**Trade Control:** We strictly adhere to international trade laws and trade control regulations to prevent misuse of our products.

**礼品和娱乐:** 我们认为接受或授予与我们的专业活动无关的任何形式的个人利益都是不恰当的。我们严格遵守公司的礼品政策，不提供或接受现金或现金等价物，如礼品卡或购物券。

**Gifts and Entertainment:** We do not consider it appropriate to accept or grant a personal benefit of any kind in connection with our professional activities. We strictly follow our gift policy and do not offer or accept cash or cash equivalents such as gift cards or shopping vouchers.

**利益冲突:** 我们的个人关系和利益不应影响公司的业务活动或决策。我们应该避免私人和专业之间可能出现冲突的情况。

**Conflicts of Interest:** Our personal relationships and interests should never affect our business activities or influence our decision-making. We should avoid situations where a conflict between private and professional may arise.

**保护信息/网络安全:** 我们非常谨慎地保护我们的机密信息和知识产权，并尊重他人的知识产权。在处理公司和所有业务合作伙伴的机密数据和信息时，我们严格遵守相关的数据保护法规。除非被批准公开发布，否则所有 SWA 信息都默认为机密信息，必须受到保护。我们有责任保护公司信息以及我们的员工、客户和第三方的机密信息。商业秘密和某些商业信息的披露或丢失会对我们的公司、员工、第三方和客户造成重大负面影响。为确保所有 SWA 信息的安全，请仅访问完成工作所需的信息，避免在其他人可以听到的公共场所讨论 SWA 信息，不将 SWA 信息通过电子邮件发送到您的个人电子邮件帐户或从 SWA 服务器中删除机密信息，仅与有合法商业理由了解信息的授权第三方共享 SWA 信息，并将我们的信息安全条款纳入其协议或合同，立即报告可疑的盗窃或滥用机密、专有或商业机密信息行为，并通过仅安装批准的软件并按照 SWA 的指示安装安全软件和更新来保护我们的网络免受病毒和停机的影响。保护 SWA 信息的责任不会在您离开 SWA 时结束，即使您决定离开我们公司，您仍然有义务保护我们的信息。

**Protection of Information / Cybersecurity:** We take greatest care to protect our confidential information and intellectual property and respect the intellectual property of others. We act in accordance with the applicable data protection regulations in processing confidential data and information of the company and all business partners. All SWA information, unless approved for public distribution, is by default considered confidential and must be protected. We all have a responsibility to safeguard SWA information and the confidential information of our employees, customers, and third parties. Trade secrets and certain business information, whose disclosure or loss would result in a substantial negative impact to our company, employees, third parties, and customers. Keep all of SWA information safe by only access the information you need to do your job, avoid discussing SWA information in public places where others can hear, never email SWA information to your personal email account or remove confidential information from the SWA server, share SWA information only with authorized third parties who have a legitimate business reason to know the information and have included our security terms in their agreement or contract, immediately report suspected theft or abuse of confidential, proprietary, or trade secret information and protect our network from viruses and downtime by only installing approved software and installing security software and updates as directed by SWA. Your responsibility to protect SWA information does not end when you leave SWA. Even if you decide to leave our company, you still have an obligation to protect our information.

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在我们开发和提供产品和服务时，我们了解网络安全在保护客户、客户数据和我们公司。在 SWA，我们将网络安全作为设计和开发过程所有阶段的一个组成部分，专注于我们的客户及其数据，因此我们的产品安全可靠，如果发现实际或潜在的网络安全问题，请及时报告，并酌情咨询我们的内部网络安全专家，以便我们了解并遵循安全开发操作。

As we develop and offer products and services, we understand the role of cybersecurity in protecting our customers, their data, and our company. At SWA, we implement cybersecurity by design as an integral part of all phases of the design and development process, focus on our customers and their data, so our products are safe and secure, speak up if we see an actual or potential cybersecurity issue and engage our internal cybersecurity experts as appropriate so we understand and follow security development practices.

### 我们承担的社会责任 OUR SOCIAL RESPONSIVITIES:

个人数据: 我们严格保护在业务活动中收集和处理的员工、客户和业务合作伙伴的个人数据，确保完全符合适用的数据安全法规。我们遵循全球公认的隐私原则，并努力在收集、使用和共享个人信息时实施合理和适当的做法。这些原则和实践确保个人信息只能用于合法的商业目的，并且将隐私设计纳入产品和服务的开发过程。

Personal Data: Personal data of our employee, customers and business partners we collect and handle in our business activities must be treated with confidentiality and in accordance with applicable data privacy regulation. We follow globally recognized privacy principles and strive to implement reasonable and appropriate practices in our collection, use, and sharing of personal information about individuals. These principles and practices ensure that personal information can be used to support legitimate business purposes only and privacy by design is incorporated into the development processes for products and services.

多样性: 我们尊重每个人对团队的贡献，包括背景、教育、性别、种族、民族、工作经历和思维方式、年龄、时代、身体状况、文化专长和技术技能。我们满足日益多元化的全球客户群的需求和期望，确保多样性和包容性。我们致力于营造一个包容的工作环境。我们仅根据个人的资格和能力等相关因素来做出有关合格申请人或员工的雇佣决定，绝不会受年龄、性别、国籍、残疾或受适用法律保护的任何其他特征的影响。

Diversity: We respect what each individual brings to our team, including background, education, gender, race, ethnicity, working and thinking styles, age, generation, disability, cultural expertise, and technical skill. We believe our ability to meet the needs and expectations of an increasingly diverse and global customer base is tied closely to diversity and inclusiveness. We are committed to fostering an accepting and inclusive work environment. We base employment decisions regarding qualified applicants or employees only on relevant considerations, such as the individual's qualifications and abilities and never on the basis of age, sex, national origin, disability, or any other characteristic protected by applicable law.

公司财产: 公司的资产包括实物资产、技术和 SWA 信息。我们始终按照我们的政策高效、负责任地使用公司的资产。我们保护公司资产免遭丢失、盗窃和滥用。公司资产不得用于个人利益、欺诈目的或任何其他不适当的目的。请确保笔记本电脑和移动设备等贵重资产的物理和电子安全。请仅在您的主管授权的情况下使用公司车辆。如我们的任何资产损坏或需要维修，请及时告知您的主管。

Company Property: Our assets include physical assets, technology, and SWA information. We always use our resources efficiently, responsibly, and in accordance with our policies. We safeguard company assets from loss, theft, and misuse. Company assets shall not be used for personal gain, fraudulent purposes or in any other inappropriate manner. Keep valuable assets, such as laptops and mobile devices, physically

and electronically secure. Use company vehicles only as authorized by your supervisor. Let your supervisor know if any of our assets are damaged or in need of repair.

**环境保护：**作为负责任的企业公民，我们致力于保护人类健康、自然资源和全球环境。这种要求超越了遵守法律的范围，还包括将良好的环境实践整合到我们的业务决策中。我们致力于采取行动恢复和保护环境。我们致力于在产品生命周期的每个阶段减少浪费和污染物，节约资源并回收材料。我们将继续积极参与公众环保教育。我们将继续大力开发和实施减少污染物排放的技术。我们将继续与政府合作，制定技术上合理且财务上负责任的环境法律和法规。我们将不断评估我们的工厂和产品对环境以及我们生活和经营所在社区的影响，以实现持续改进的目标。

**Environmental Protection:** As a responsible corporate citizen, we are dedicated to protecting human health, natural resources, and the global environment. This dedication reaches further than compliance with the law to encompass the integration of sound environmental practices into our business decisions. We are committed to actions to restore and preserve the environment. We are committed to reducing waste and pollutants, conserving resources, and recycling materials at every stage of the product life cycle. We will continue to participate actively in educating the public regarding environmental conservation. We will continue to pursue vigorously the development and implementation of technologies for minimizing pollutant emissions. We will continue to work with all government entities for the development of technically sound and financially responsible environmental laws and regulations. We will continually assess the impact of our plants and products on the environment and the communities in which we live and operate with a goal of continuous improvement.

**税务合规：**任何违反纳税义务的行为都可能对我们的公司、员工和声誉造成重大风险。我们支付所有税款，并按照适用的法律和法规提交纳税申报。

**Tax Compliance:** Any violation of tax obligations may result in significant risk to our company, our employees, and our reputation. We pay all taxes and levies as well as submitting tax declarations in compliance with the respective applicable local legislation and other regulations.

#### 5.4 Consulting & Reporting: 咨询和汇报

任何不符合《行为准则》的决定、行为或行动都应报告（如果需要，可以匿名）。

Any decisions, behaviour or actions that are not in line with the Code of Conduct should be reported (anonymously if needed).

在遇到困难和有任何不清楚的情况下，请联系您的经理或 SWA 合规委员会提出您的疑虑。您也可以将相关事项发送到以下电子邮件地址：SW 外部法律顾问：[zhujiewen1220@163.com](mailto:zhujiewen1220@163.com)。

In difficult and unclear situation, please speak up and contact your manager or the SWA Compliance Committee to raise your concerns. The reports also can be made to the following email address: **SW external legal counsel:** [zhujiewen1220@163.com](mailto:zhujiewen1220@163.com).

所有报告都将受到最严格的保密处理，SWA 不允许对任何真诚地提出疑虑或问题的人进行任何报复。相关调查将由没有任何利益冲突的人员独立进行。

All reports will be treated in strictest confidentiality and SWA will not allow any retaliation towards anyone raising concerns or problems in good faith. The following investigation shall be carried out independently and without conflict of interests by competent personnel.



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## 6. 相关文件 Relevant files

本《行为准则》是 SWA《员工手册》的补充，其制定与以下国际标准和指南中包含的原则一致：

This Code of Conduct is a supplement to the SWA Employee Handbook, and its development is consistent with the principles contained in the following international standards and guidelines:

- 联合国全球契约的十项原则
- 劳工组织《关于工作中的基本原则和权利宣言》
- 经合组织多国公司准则
- ISO37301: 2021 合规管理体系—要求及使用指南
- United Nations' global compact's ten principles
- The ILO Declaration on Fundamental Principles and Rights at work
- the OECD guidelines for multinational companies
- ISO37301:2021 Compliance management systems—Requirements with guidance for use

## 7. 相关记录 Relevant records

无 None

审核批准 Approval				
	日期 Date	部门 Department	姓名 Name	签名 Signature
制定 Prepared by		GM office	华桦	
审核 Review				
批准 Approval		GM	Norbert Wiest	