

SUZHOU U.P. WEAR RESISTANCE COMPOUND MATERIALS CO., LTD. ESTABLISHED

苏州优霹耐磨复合材料有限公司

SUPPLIER CODE OF CONDUCT / 供货商行为准则

1. Overview and Commitment / 概述与承诺

Suzhou U.P. Wear Resistance Compound Materials Co., Ltd. (hereinafter "Suzhou U.P.") is committed to the highest standards of integrity, sustainability, and corporate governance. We require our suppliers and sub-contractors to operate in full compliance with the principles set forth in this Code, which align with the UN Global Compact, the Responsible Business Alliance (RBA) Code of Conduct, and global mining industry compliance standards.

苏州优霹耐磨复合材料有限公司 (以下简称「苏州优霹」) 致力于落实最高标准的诚信、永续发展与企业治理。我们要求所有供货商及分包商必须完全遵守本准则所列原则; 本准则与联合国全球盟约、负责任商业联盟 (RBA) 行为准则及全球矿业合规标准保持一致。

2. Labor and Human Rights / 劳工与人权

Suppliers must treat all workers with dignity and respect as understood by the international community:

供货商必须依据国际社会共识, 以尊严与尊重之态度对待劳工:

Freely Chosen Employment: No forced, bonded, or involuntary labor. Suppliers shall implement a "Zero Recruitment Fee" policy and must not withhold original identification documents or work permits.

自愿就业: 严禁强迫、债役或非自愿劳动。供货商应执行「零招募费」政策, 且不得扣押身份证件或工作许可证正本。

Child Labor: Minimum age for employment shall not be younger than 15 years of age. If child labor is discovered, a remediation procedure focused on the child's best interest must be implemented.

禁止童工: 入职最低年龄不得低于 15 岁。若发现童工, 必须执行以该儿童最佳利益为核心的补救程序。

Zero Tolerance for Sexual Harassment: Suppliers must provide a work environment free from harassment, establish confidential reporting channels, and cooperate with investigations as required.

性骚扰零容忍：供货商必须提供无性骚扰的工作环境，建立保密举报管道，并根据要求配合合规调查。

3. Health, Safety, and Environment (HSE) / 健康、安全与环境

Occupational Health and Safety: Suppliers shall provide safe facilities and conduct regular, documented safety training for all employees.

职业健康与安全：供货商应提供安全的设施与工作环境，并定期为全体员工举办安全培训且完整记录。

Environmental Protection: Suppliers must ensure that no materials are sourced from World Heritage sites or IUCN Protected Areas.

环境保护：供货商必须确保所有原物料均非源自世界遗产名录所在地或 IUCN (世界自然保护联盟) 自然保护区。

Decarbonization and Emissions: Suppliers may be required to measure and provide GHG Emissions related information (Scope 1, 2, and 3) to support global carbon reduction goals.

减碳与排放：供货商可能被要求测量并提供温室气体 (GHG) 排放相关信息 (范围 1、2 及 3)，以支持全球减碳目标。

4. Business Ethics and Anti-Corruption / 商业道德与反贪腐

Anti-Corruption: Zero tolerance for bribery or extortion. Suppliers must comply with all applicable anti-corruption laws.

反贪腐：对于贿赂或勒索采零容忍政策。供货商必须遵守所有适用的反贪腐法律。

No Facilitation Payments: Suppliers are strictly prohibited from making "facilitation payments" (small payments to expedite routine government actions) when undertaking work for Suzhou U.P.

禁止疏通费：代表苏州优霹执行工作时，供货商严禁支付「疏通费」(为加速例行公务程序而支付给官员的小额款项)。

Sanctions Compliance: Suppliers must ensure no engagement with Sanctioned Persons or entities in connection with their business with Suzhou U.P.

制裁合规：供货商须确保在与苏州优露的业务往来中，不与受制裁实体或个人有所关联。

5. Responsible Sourcing / 负责任采购

Conflict Minerals (3TGs): Suppliers procuring bulk volumes of Tin, Tungsten, Tantalum, and Gold must ensure products are deemed free from conflict mineral sources that finance armed groups.

冲突矿产 (3TGs)：采购大宗锡、钨、钽、金的供货商，必须确保产品不含来自资助武装组织之冲突来源矿产。

Input Provenance: Transparency of material origin must be maintained; valid Mill Test Certificates (MTC) must be provided upon request.

投入来源：必须保持材料来源透明化，并在要求时提供有效的材质证明 (MTC)。

6. Cybersecurity and Data Protection / 网络安全与数据保护

Suppliers must manage cybersecurity and personal data according to good industry practice and relevant privacy laws, including identifying and remediating system weaknesses.

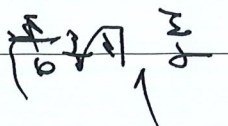
供货商必须依据产业良好实务与个资法规管理网络安全与数据保护，包括识别并修复系统弱点。

7. Grievance Mechanisms / 申诉机制

Suppliers should provide a functional mechanism for employees to report concerns anonymously without fear of retaliation. Suzhou U.P.'s dedicated channel: info@upplate.com.cn

供货商应提供完善机制，让员工能匿名反映疑虑且免于报复。苏州优露专用管道：
info@upplate.com.cn。

核准人 (Approved by):



职称 (Title): 总经理

日期 (Date):

0525 2026