

## 1. Scope : 范围

This policy applies to all Chaoya employees and contract personnel, hereafter referred to as “field personnel”.

此规范适用于所有超亚雇员和合同员工，以下称为“现场从业人员”。

This policy also applies in it’s entirety and without exception, to all family members of Chaoya’s field personnel.

此规范同样适用于现场从业人员的家属成员。

## 2. Responsibility : 职责

Top management, the highest, most senior level of management, is responsible for setting the standards for COC program.

最高管理层负责制定职业道德规范的纲要。

Operations manager and HR manager are responsible to ensure that all employees in their operations are trained in this policy and that the business of the operation is at all times conducted in accordance with the provisions of this policy. Initial training must be given by Operations manager or HR manager when a new employee begins to work.

运营经理和人力资源部经理负责确保所有员工都已经受过此规范的培训，并且在任何时候所运营的业务都符合此规范所包含的条款。新的员工开始工作之前，必须经受运营经理或人力资源部经理的初次培训。

Operations manager and HR manager are also responsible to ensure that each employee reads, and signs COC statement of compliance.

运营经理和人力资源部经理同时也负责所有雇员都已经阅读并签订了职业道德规范的协议。

Field personnel are responsible to perform their jobs in compliance with this policy.

现场从业人员负责按照此条例来执行工作。

Field personnel are responsible to communicate with operations manager or HR manager if any unexpected situation occurs on site.

在现场遇到异常状况时，现场从业人员负责与运营经理和人力资源部经理沟通。

The HR department is responsible to disseminate Code and collect signed COC statement of compliance.

人力资源部部门负责发放此规范和收集签名的此规范的协议。

### 3. Chaoya Policies for Field Personnel Conduct 超亚员工守则:

This policy outlines the personnel conduct and ethical environment we must maintain. Our actions must meet the spirit as well as the letter of this policy.

此规范列出了我们必须保持的员工操行和道德环境。我们的行为必须遵循此规范的精髓和含义。

#### 3.1 Integrity of services provided: 服务的公正性

All services provided by Chaoya field personnel shall be performed in careful and highly accurate manners, and with the utmost respect for the company's reputation for integrity.

所有超亚现场从业人员提供的服务都须完成得仔细准确，最大限度的维护公司的良好声誉。

#### 3.2 Laws and Regulations: 法规和标准

In the conduct of the business of the company, there shall be strict compliance with all applicable laws and administrative regulations in the country where the work is being performed.

在执行公司工作过程中，应严格遵循相关国家法规和管理标准。

#### 3.3 Improper payments: 非正当报酬

Our policy prohibits any Chaoya field personnel or representatives from making/receiving any inappropriate monetary payments to/from any governmental, political, business, or labor organizations, or any individual.

我们的守则规定超亚所有员工或其亲属不得以任何形式向政府，行政人员，商务伙伴，劳工组织或个人提供或收取货币报酬。

It is strictly prohibited for any Chaoya field personnel to accept cash or other forms of payments directly, or indirectly, from a factory for any services provided by Chaoya. Any charges for services such as re-inspections, holiday inspections, or over-time labor hours must be billed to the client by the

inspection office, and payment must be remitted directly to the inspecting officer as instructed on the invoices. Chaoya field personnel are not authorized, at any time, to accept direct payment of an invoice or make any business or personal transactions with a factory, vendor or representative hereof.

超亚所有从业人员绝不允许直接或间接的接受超亚所服务的工厂提供的现金或其他形式的报酬。比如重新验货费用，节假日验货费用或加班费必须由公司向客户收取，付款直接支付到公司并在发票上注示。超亚所有从业人员任何时候都没有权利直接接受工厂、客户、或其代表的任何有关业务的付款。

### 3.4 Conflicts of interest: 利益关系

The term “conflict of interest” describes any circumstance that could cast doubt on our ability to act with total objectivity with regard to Chaoya’s or its client’s interests. To that end, it is the company’s policy that:

有关利益关系的条款概括了任何可能对超亚或其客户利益造成损害的各种情况。为此，公司规定：

No field personnel shall engage in any business that is in competition or conflict with the business of the company.

任何从业人员不得介入与公司业务有任何竞争或冲突关系的业务。

No field personnel shall participate in any activity in which they have a vested interest that could be interpreted as a conflict of interest.

任何从业人员不得参与可能存在利害关系而获得利益的任何活动。

No field personnel, or members of their immediate family, shall accept any special services, special accommodation, or other favors from any client, vendor, or other party with whom the company does business. It is advisable to follow a “doubt” principle in order to protect oneself. That means whenever anyone is in doubt as to whether or not a conflict exists, he/she should declare its supervisor or direct manager to demonstrate their impartiality.

任何从业人员或他们的直系亲属不得接受与公司有业务往来的客户、供应商或其他团体提供的任何特别服务，特别住宿或礼品。可以采取“质疑”方法来保护自己。也就是说，当任何人感觉任何活动有可能存在利益关系时，应该通知超亚管理部门以证明自己的公正。

### 3.5 Confidential information: 保密性

It is company policy that we must not profit from confidential information obtained by us during our duties on behalf of the company.

公司制度规定员工工作期间或代表公司时不得泄露相关的保密资料获取个人利益。

All info received solely and exclusively from the client is held confidential. It is discussed only with authorized members of the client's organization, and only with those members of our organization who are directly involved with the project. No field personnel shall violate the confidence in this company by our clients.

所有从客户方单独和专门获得的任何资料都是保密的。这些资料只可与相关客户方授权人员以及我公司直接业务相关人员之间共享。任何工作人员不得影响客户对公司的信任。

### 3.6 Bribes, gifts, entertainment, Favors, and gratuities: 贿赂, 礼品, 娱乐, 纪念品及赠品

It is Chaoya's policy that all Chaoya field personnel are prohibited from receiving or soliciting a bribe, gift, entertainment, favor or gratuity of any sort in connection with their representation of Chaoya.

公司制度规定超亚从业人员在代表公司工作过程中不允许收取或要求任何有关业务方面的贿赂, 礼品, 娱乐, 纪念品, 及赠品。

It is not permissible to accept any gift of any product manufactured in the factory where the Chaoya field personnel are providing service.

不允许向被服务的工厂索取任何礼品或产品。

It is not permissible to accept any favor or gratuity offered or extended to Chaoya field personnel where the Chaoya is providing a service.

不允许向被服务的工厂收取任何形式的纪念品或赠品。

It is never permissible for Chaoya field personnel to ask for or accept a gift from a factory, a vendor or any other person associated with them. In this context, "a gift" includes items with a monetary value such as merchandise, ticket, vouchers, hotel accommodations, after-business- hours meals, free meals, airline upgrades, etc.

不允许超亚从业人员向工厂, 客户或其他相关人员索要或收取任何礼品。其中, "礼品"可以

包括有价值的任何物品，比如商品，车票，购物券，酒店住宿,工作时间外的餐饮，免费食物，机票升舱等。

It is not permissible for any Chaoya field personnel to accept a gift of anything, even of minor value. Within the business culture of some companies, it is customary to give visitors small promotional items containing the company name or logo (i.e. pens, mugs, calendar, etc.). These items are intended for visitors. Chaoya field personnel providing a service at the factory are not visitors and shall not accept promotional items or gifts, even of minor value.

不允许超亚从业人员接受任何的礼品，包括价值较小的礼品。有些公司会按惯例向来宾提供一些印有公司名称或标志的促销礼品（比如笔、杯子、挂历等）。这类礼品只是回馈访客。超亚工作人员是向工厂提供服务而不属于来宾范畴，而不应当接受促销物品或礼品，即使价值较低的物品。

Failure to report a bribery attempt immediately is a violation of this policy. If you are offered a bribe by a factory or vendor, or any other person associated with them, report this to Chaoya office as soon as it is safe to do so. The safety of all field personnel is important to Chaoya.

没有及时汇报行贿行为也将被视为违反本制度。如果任何工厂或卖方或相关人员行贿，应在确保安全的情况下立刻通知公司。对于超亚公司来说员工人身安全也是非常重要的。

As part of the fieldwork, Chaoya field personnel may be required to take reference samples as part of the client standard operating procedure. This must be documented in the report accordingly so the factory, Chaoya office and client know that this has happened.

现场工作中，超亚员工可能按照客户的标准抽取相关样品。这类行为需有相关证明，以便工厂，超亚公司和客户了解事态。

### 3.7 Dress code: 服装要求

Field personnel shall dress appropriately to represent Chaoya on their assignments. Business casual attire is an example of acceptable / appropriate dress. Short pants, miniskirts, vest, open- toed shoes, and tank tops are examples of unacceptable / inappropriate dress.

超亚从业人员代表公司时必须穿着得体。便装是较得体的穿着，但不允许着短裤，超短裙，拖鞋。

Field personnel clothing must be clean and client presentable. For safety reasons, open-toed shoes are not preferred footwear for product inspector. However on a case-by-case basis, open toed shoes may be allowed if required by the factory, as in the case of avoiding possible contamination.

从业人员的着装必须干净整洁符合客户要求。为确保安全，不允许穿拖鞋进入生产车间。但是有时由于工厂特殊工作环境要求，更换拖鞋以确保环境清洁，这种情况试为例外。

### 3.8 General policy: 制度概要

Field personnel shall obey all factory safety procedures including the wearing of any required personal protective equipment.

从业人员应遵守工厂有关安全规定，包括穿戴工厂要求的安全服装和保护设备。

Field personnel shall arrive at their assignment at the agreed time, ready to perform the required service and in possession of all tools required to perform the service. When required by the Chaoya coordinating office, field personnel must confirm their appointment with the factory prior to the day of the assignment.

从业人员按照规定时间到达工厂，提前准备好验货工具或文件等。如果公司要求，必须在验货前一天与工厂确认时间。

Field personnel shall not discuss the in-process results or final results of any inspection / audit with a factory representative while the service is in progress.

从业人员在验货工作期间不应与工厂讨论验厂或验货的结果。

Field personnel shall not offer any advice to the factory on improvements without the express knowledge and approval of the local Chaoya coordinating office.

从业人员在没有确定的专业知识和公司的同意情况下，不应向工厂提供任何有关改进工作的建议。

Field personnel shall follow all standard operating procedures as provided when performing the required service.

从业人员在工作过程中应严格按照标准操作程序进行。

Field personnel shall represent Chaoya in a professional manner at all times.

从业人员应一直以专业风格代表超亚。

Field personnel shall be polite and respectful. However, this should not be overdone to the point where the work is compromised.

从业人员应对人礼貌尊重。但是也应适度而不是向被服务方妥协。

Field personnel shall not gamble or fraternize with factory employees.

从业人员不应与工厂工作人员赌博或结交。

Field personnel shall not share factory technology with other factories / vendors / clients.

从业人员不应向工厂，客户，或卖方提及其他工厂的相关技术。

Field personnel shall not inspect any products away from the factory, unless at a client designated remote location, such as a warehouse or distribution center.

从业人员不应在工厂外检验产品，除非客户特别指定的地点，比如仓库。

Field personnel shall not consume any alcoholic beverages, recreational or illegal drugs, controlled substance, prescription medications or any other substances that might impair performance and judgment immediately before or during work hours.

从业人员在工作期间不应食用任何含酒精的饮料，药品，违法毒品，违禁食品，及可能影响判断能力的处方类药物或其他类似食物。

Field personnel shall not solicit any Chaoya clients directly.

从业人员不得向超亚任何客户索取财物。

Field personnel shall not discuss any non-Chaoya business with factories / vendors.

从业人员不应与工厂或客户讨论与业务无关的问题。

Field personnel shall not contact the Chaoya client directly unless it is an emergency and all Chaoya contacts are unavailable and it is specifically allowed

in the client SOP.

从业人员不应与超亚客户直接联系，除非有紧急事件，无法联络到超亚公司，并且符合标准操作程序。

### 3.9 Purchasing products at factory outlets / stores: 在工厂销售处或商店购买产品

Where a factory has a retail outlet adjacent to the facility that is open to the general public, it is permissible for Chaoya field personnel to make a purchase to make purchase under the following caveat: any purchases must be at the same price offered to the general public at the time of sale. At no time shall Chaoya field personnel purchase goods from a factory outlet that offers special prices or prices below what the general public is expected to pay. A receipt or bill of expense must be obtained and presented, which a summary noted on the relevant receipt of bill of expense, upon requested by Chaoya. All receipts should be kept for a period not less than six months.

工厂附近如果有对外的零售店铺，超亚从业人员可以购买产品，但必须遵循以下的制度：购买的产品必须符合当时的公价。从业人员任何时候都不可以以特殊价格或低于公价的价格向工厂销售点购买产品。根据公司要求，需要同时索取发票以及购买产品的消费明细。所有票据至少要保留 6 个月。

Where there is an in-factory store, and not open to the general public, field personnel are prohibited at all times from making any purchase from the in-factory store at any location where Chaoya field personnel are providing any services.

如果是工厂内部非对外的商店，从业人员任何时候都不得在其中购买产品。

### 3.10 Inspections and audits – additional policy requirements: 验厂验货-其他制度要求

➤ Transportation: 交通

In general, field personnel should make their own way to and from the factory, and should not ask the factory or vendor for assistance, especially if the factory is in major town with good roads and good public transportation.

一般情况下，尤其是工厂位于交通相对方便的城镇，从业人员应自己往返工厂，不得要求工厂或客户提供接送。



In situations where local transportation is provided by the factory or vendor, this transportation is to be limited to work related activities only (i.e. transport to/from mass transit or hotel location). If a factory offers to provide such transport, any communications such as faxes or emails, stating this must be kept for reference.

如果工厂提供本地的接送服务, 也**应仅限于**与工作相关的交通路程。(比如来往客运站或宾馆) 如果工厂提供接送服务, 与之有关的**电邮和传真须保留**。

➤ Meals: 餐饮

A simple meal provided in the factory cafeteria similar to what is available for the factory staff or taken-in fast food is preferable.

公司允许**从业人员**接受工厂在食堂提供的**职员标准**的工作餐或者**外卖快餐**。

In case there is no in-factory cafeteria and taken-in fast food is also not available, eating a simple meal of no more than 50rmb/person in an outside restaurant with the factory is acceptable if the factory invites the AQF employees.

在工厂没有食堂并且附近也没有**外卖快餐**的情况下, 如果工厂邀请**超亚员工**外出就餐, 不超过每人50元人民币的便餐是可以接受的。

It's not acceptable for AQF employees to go for long banquet style meal which has value of more than 50RMB per person with factory staff in any case.

任何情况下**AQF职员**都不允许接受**供应商**提供的**超过每人50元人民币标准**的食物款待。

➤ Accommodation: 住宿

Under no circumstance is Chaoya field personnel hotel accommodation to be paid for by the factory, vendor, or their representatives. If the factory or vendor offers accommodations in a guesthouse that they own, you must establish the costs in advance of performing any work, and receive a receipt for payment upon leaving. If the factory advises you that they never charge their guests, or accept payment from their lodging, you must refuse the offer and stay in a convenient hotel.

任何情况下**超亚从业人员**都不得**让工厂, 客户或其代表**支付**住宿费用**。如果工厂提供住宿, 必须**事先询问清楚费用情况**, 并在**离开时索取票据**。如果工厂表示**从不向客人收费**或**一贯为客人支付住宿费用**, **从业人员应谢绝**, 并到**常规宾馆**住宿。

## 4. Administration, responsibilities and sanctions

### 管理、责任和制裁

The primary accountability and responsibility for the code of conduct of field personnel rest with each individual officer, employee, and director. However, each field supervisor and manager has the additional responsibility of ensuring compliance with this policy.

员工职业道德守则的主要责任和义务在于约束每位管理者，员工和主管。但同时业务管理者和监督员更有责任保证制度的实行。

Any violation of the policy by Chaoya field personnel maybe cause for remedial disciplinary action, which may be in addition to any penalty prescribed by law. Disciplinary action may include, but not be limited to, oral or written warning, suspension, or termination. Corrective / preventive action, when appropriate, may include, but not be limited to, divestment of conflicting interest, changes in assigned duties, or disqualification for a particular assignment or position.

如有任何违反超亚从业制度的行为，都可能被处罚或开除，比如可能在法规允许条件下处以罚款。处罚可以包括口头，书面警告，罚款，更换岗位或开除公职。

Any employee who accepts a bribe, or attempts any other fraudulent or corrupt act, will face disciplinary action, and will be dismissed without notice for gross misconduct. Chaoya Company may take necessary actions and take the matter to court as economic crime for any proven bribery case and also inform AOSIQ bureau and other third party inspections companies accordingly.

任何员工接受行贿或者尝试其他任何欺诈或腐败行为，将会受到纪律处分，严重违纪者将立即解雇。超亚公司将采取必要的措施并将以经济犯罪名义起诉员工并通报国家质检局和相关的行业内第三方验货公司。

## 5. Dissemination of policy 政策实施:

The foregoing Code of conduct for field personnel policy maybe amended from time to time, and shall be distributed to all field personnel and supervisor. The HR dept will disseminate the Code to all Chaoya field personnel and contract

field personnel through each Chaoya office.

上述员工道德守则可能随时进行修订，分发给所有从业人员和主管。公司人事部门须向所有员工下发守则。

Each Chaoya office will be responsible for acquiring the signed statement of compliance from their field personnel. The Chaoya office will maintain the original signed statement of compliance on file.

每个超亚办事处负责保存员工签署的道德规范服从申明。公司保存原件。

As a condition of employment, all new Chaoya employees are required to sign a statement of compliance indicating that they have received, read and understand the policy and agree to abide by its contents.

所有现有员工也要求每年签署该协议，每次制度更改时都重新分发，确保员工收到，阅读，了解内容，并同意遵守该守则。

## 6. Related documents: 相关文件

- QF-025 "Code of conduct statement of compliance" 职业道德规范服从申明