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大金重工供应商行为准则

Dajin Heavy Industry Supplier Code of Conduct

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一、简介 Introduction

1.1 适用范围 Scope of Application

本行为准则适用于大金重工股份有限公司及其所有子公司，包括蓬莱大金海洋重工有限公司（以下简称“大金重工”）的所有供应商与合作伙伴（以下简称“供应商”）。

This Code of Conduct applies to all suppliers and business partners (hereinafter referred to as the “Suppliers”) of Dajin Heavy Industry Co., Ltd. and its subsidiaries, including Penglai Dajin Offshore Heavy Industry Co., Ltd. (hereinafter collectively referred to as “Dajin Heavy Industry”).

1.2 目的与承诺 Purpose and Commitment

大金重工始终致力于以道德、合规和可持续的方式开展业务，致力于在全球供应链中营造负责任、透明、有韧性的商业环境。本准则体现了大金重工对最高道德标准和可持续发展的承诺，并作为评估和维持与供应商长期合作关系的重要依据。我们期待所有供应商以相同标准履行职责，共同推动环境保护、社会责任和良好治理（ESG）的实践。

Dajin Heavy Industry is committed to conducting its business in an ethical, compliant, and sustainable manner, and to fostering a responsible, transparent, and resilient business environment across the global supply chain. This Code reflects Dajin Heavy Industry’s commitment to the highest ethical standards and sustainable development and serves as an important basis for evaluating and maintaining long-term cooperation with its suppliers. We expect all suppliers to uphold the same standards and work together to promote Environmental, Social, and Governance (ESG) practices, including environmental protection, social responsibility, and good governance.

作为大金重工的供应商，贵方应始终遵守 ESG 相关要求，包括但不限于遵循道德与诚信原则、符合法律法规、履行环境与社会责任的等。若未能遵守，大金

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重工将以书面形式要求贵方在三十天内或通知中所指定的合理期限内予以整改。如整改不到位，公司有权终止与贵方的合作关系。

As a supplier to Dajin Heavy Industry, you are expected to fully comply with ESG-related requirements, including but not limited to adherence to ethical and integrity principles, compliance with laws and regulations, and fulfillment of environmental and social responsibilities. Failure to comply may result in a written request from Dajin Heavy Industry for corrective actions within thirty (30) days or within a reasonable period specified in the notice. If corrective actions are not properly taken, the company reserves the right to terminate its cooperation with you.

请认真阅读本行为准则，并签署确认。如有疑问，请联系大金重工合规邮箱：sjjcb@penglaidajin.cn。

Please read this Code of Conduct carefully and sign to confirm your acceptance. If you have any questions, please contact Dajin Heavy Industry's compliance department at: sjjcb@penglaidajin.cn.

二、一般义务 General Obligations

所有供应商应秉持专业、诚信、透明和道德原则履行职责，避免利益冲突和自利行为。大金重工对涉及欺诈、腐败、不正当竞争、虚假陈述、不道德、洗钱等违反适用性法律的行为及可能损害大金重工诚信的任何不当行为采取“零容忍”政策，并保留终止合作的权利。

All suppliers shall perform their duties with professionalism, integrity, transparency, and ethical principles, avoiding conflicts of interest and self-serving behaviors. Dajin Heavy Industry adopts a zero-tolerance policy toward any misconduct involving fraud, corruption, unfair competition, false representation, unethical behavior, money laundering, or any violation of applicable laws that may damage the integrity of Dajin Heavy Industry. The company reserves the right to terminate cooperation in such

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cases.

大金重工主张公平竞争，我们希望所有供应商不从事反竞争活动，也不参与任何反竞争协议、行为或商业实践。

Dajin Heavy Industry advocates for fair competition and expects all suppliers to refrain from engaging in anti-competitive activities, including participation in any anti-competitive agreements, actions, or business practices.

供应商不得在与大金重工相关的交易中做出任何虚假陈述，包括但不限于，口头虚假陈述、使用虚假文件、虚假客户订单或其他虚假或不准确的记录等。任何此类行为都是不被容忍的，大金重工将依法采取相应的管理措施。

Suppliers must not make any false statements in transactions related to Dajin Heavy Industry, including but not limited to verbal misrepresentations, use of forged documents, false customer orders, or any other false or inaccurate records. Such conduct is strictly prohibited, and Dajin Heavy Industry will take appropriate measures in accordance with the law.

三、人权与劳工权益 Human Rights and Labor Rights

大金重工以合法、透明和道德的方式开展业务，遵守适用法律和国际法规。我们期望所有供应商在开展经营活动时采取相同的标准，遵守《联合国全球契约十项原则》中所列的原则和权利。如果适用法律与国际道德原则和法规冲突，应以更高标准为准。

Dajin Heavy Industry conducts its business in a lawful, transparent, and ethical manner, complying with applicable laws and international regulations. We expect all suppliers to uphold the same standards in their operations and to respect the principles and rights outlined in the *United Nations Global Compact's Ten Principles*. In cases where applicable laws conflict with international ethical principles and regulations, the higher standard shall prevail.

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3.1 禁止童工与未成年工管理 Prohibition of Child Labor and Management of Underage Workers

严禁使用童工（未满 16 周岁/未完成法定义务教育/未达当地最低就业年龄中最大者）。禁止 18 岁以下员工从事高危工作（含夜班和加班）。

The use of child labor is strictly prohibited. Child labor refers to individuals under the age of 16, those who have not completed compulsory education, or those who have not reached the highest applicable minimum employment age defined by local law. Employees under 18 years old are prohibited from engaging in hazardous work, including night shifts and overtime.

供应商须采取以下措施：①建立年龄核查机制；②规范管理学生工（含档案、合作方审查及权益保障）；③提供培训及法律合规的实习计划；④确保学生工/实习生薪酬不低于同岗位初级员工的工资水平（如当地无相关规定）；⑤如发现童工，应立即采取补救措施。

Suppliers must take the following measures:

- (1) Establish an age verification system;
- (2) Properly manage student workers, including maintaining records, vetting cooperating partners, and protecting their rights;
- (3) Provide training and legally compliant internship programs;
- (4) Ensure that student workers and interns receive wages not lower than entry-level employees in the same positions (if no local regulations exist);
- (5) Immediately take remedial actions if child labor is found.

3.2 禁止强迫劳动 Prohibition of Forced Labor

不允许任何形式的强迫劳动，包括但不限于债役（包括债务质役）或契约劳动、非自愿或剥削性监狱劳动、奴役或贩卖人口。这包括通过威胁、武力、胁迫、诱拐或欺诈等手段运送、窝藏、招募、转移或接收人员，以获取劳动或服务。对于员工在工厂内的行动自由及进出公司提供的员工宿舍或生活区等场

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所（若适用），不应设立不合理的限制。

All forms of forced labor are strictly prohibited, including but not limited to bonded labor (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, or human trafficking. This includes the recruitment, transportation, harboring, transfer, or receipt of persons through threat, force, coercion, abduction, or fraud for the purpose of labor or services. Unreasonable restrictions on workers' freedom of movement within factory premises or access to company-provided dormitories or living quarters (if applicable) are not permitted.

作为雇佣流程的一部分，必须以工人的母语向所有工人提供清晰说明的书面雇佣协议，其中包括对雇佣的条款和条件的说明，并且包括但不限于员工以合理的条件解除劳动合同的权利。

As part of the hiring process, all workers must be provided with a clearly written employment agreement in their native language, outlining the terms and conditions of employment, including but not limited to the right to terminate the employment relationship under reasonable conditions.

3.3 禁止劳工歧视 Prohibition of Labor Discrimination

1) 供应商禁止在招聘过程中设定限制性条款，需遵循《就业促进法》《妇女权益保障法》关于平等就业的规定，禁止基于种族、性别、宗教、政治立场等进行歧视性对待；

Suppliers shall not impose discriminatory or restrictive conditions during recruitment and shall comply with the principles of equal employment opportunity as stipulated in the *Employment Promotion Law* and the *Law on the Protection of Women's Rights and Interests*. Discrimination based on race, gender, religion, political opinion, or other protected characteristics is strictly prohibited.

2) 供应商要确保同工同酬，消除性别薪资差距；

Suppliers must ensure equal pay for equal work and take measures to eliminate gender-based wage gaps.

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3) 供应商对于弱势群体要有相应的保障措施；如未成年工不得从事高危作业；残疾人按《残疾人保障法》提供适配岗位及设施，落实集中与分散就业政策；对于女性职工落实产假、哺乳假等法定福利，设立防性骚扰投诉通道。

Suppliers shall implement appropriate protections for vulnerable groups. For example:

- Underage workers must not be assigned to hazardous work;
- Persons with disabilities must be provided with suitable positions and facilities in accordance with the *Law on the Protection of Persons with Disabilities*, and both centralized and decentralized employment policies should be implemented;
- Female employees must receive legal entitlements such as maternity leave and breastfeeding breaks, and a formal channel for reporting sexual harassment must be established and maintained.

3.4 劳动关系与薪酬 Labor Relations and Compensation

1) 供应商有责任确保其供应商严格遵守本行为准则及所有适用的法律法规。工人不得因受雇而支付任何招聘费或相关费用。若发现工人已支付此类费用，供应商应立即全额退还。

Suppliers are responsible for ensuring that their own suppliers strictly comply with this Code of Conduct and all applicable laws and regulations. Workers must not be required to pay any recruitment fees or related charges as a condition of employment. If such payments are discovered, the supplier must promptly and fully reimburse the worker.

2) 工作时间不得超过当地法律规定的最高标准。所有加班应基于员工自愿原则，且员工应享有每七天至少休息一天的权利。

Working hours must not exceed the maximum limits established by local laws. All overtime work must be voluntary, and workers are entitled to at least one day of rest every seven days.

3) 供应商须依法支付员工薪酬，确保符合最低工资、加班费及法定福利等

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相关法律要求。所有员工应享有同工同酬的权利，且加班工资应高于正常工作时间工资标准。严禁以扣减工资作为纪律处罚手段。

Suppliers must pay employees in accordance with applicable wage laws, including minimum wage, overtime pay, and statutory benefits. All employees are entitled to equal pay for equal work, and overtime compensation must be paid at a rate higher than regular wages. The use of wage deductions as a form of disciplinary action is strictly prohibited.

4) 每个工资支付周期，供应商应及时向员工发放清晰、详尽且易于理解的工资单，工资单应包含足够信息以便员工核对其劳动所得的准确性。

For each pay period, suppliers must provide employees with a timely, clear, detailed, and understandable wage statement, containing sufficient information to verify the accuracy of compensation received.

5) 临时工、派遣工及外包工的使用应严格遵守当地法律法规的相关限制和要求，确保其合法权益得到保障。

The use of temporary, dispatched, and outsourced labor must comply with local legal restrictions and requirements, and their lawful rights and interests must be fully protected.

3.5 禁止骚扰与体罚 Prohibition of Harassment and Corporal Punishment

供应商应承诺营造一个无骚扰、无非法歧视的工作环境，具体包括以下要求：

Suppliers shall commit to creating a workplace free from harassment and unlawful discrimination. The following requirements must be met:

1) 严禁对员工实施或威胁实施任何形式的暴力，包括性别暴力、性骚扰、性虐待、体罚、精神或身体胁迫、霸凌、公开羞辱及言语侮辱等不人道行为；

It is strictly prohibited to commit or threaten any form of violence against employees, including gender-based violence, sexual harassment, sexual abuse, corporal

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punishment, psychological or physical coercion, bullying, public humiliation, and verbal abuse, or any other inhumane treatment.

2) 在招聘、雇佣、薪酬、晋升、奖励及培训等人事管理过程中，严禁基于种族、肤色、年龄、性别、性取向、性别认同或表达、国籍、身心障碍、怀孕状况、宗教信仰、政治立场、工会会员身份、退伍军人身份、遗传信息、婚姻状况等因素进行任何形式的歧视或骚扰；

In all aspects of employment—such as recruitment, hiring, compensation, promotion, rewards, and training—any form of discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity or expression, nationality, disability, pregnancy, religion, political opinion, union membership, veteran status, genetic information, or marital status is strictly forbidden.

3) 制定并向全体员工传达支持上述反骚扰及反歧视原则的纪律政策和操作规程；

Suppliers must establish and communicate to all employees disciplinary policies and operating procedures that support the principles of anti-harassment and anti-discrimination.

4) 为员工的宗教信仰活动及身心障碍提供合理便利，确保其平等参与工作；Reasonable accommodations must be provided to support employees' religious practices and physical or mental disabilities, ensuring equal participation in the workplace.

5) 严禁强迫员工或应聘者接受任何带有歧视性目的的医学检查，包括但不限于怀孕检查或童贞检查。

It is strictly prohibited to compel employees or job candidates to undergo any medical examinations that serve discriminatory purposes, including but not limited to pregnancy tests or virginity tests.

3.6 自由结社 Freedom of Association

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供应商应尊重所有员工自愿组建和加入工会的权利，支持员工依法开展集体谈判与和平集会，同时尊重员工拒绝参加此类活动的自由。

Suppliers shall respect the right of all employees to voluntarily form and join trade unions, engage in collective bargaining, and participate in peaceful assembly, as well as the freedom to refrain from such activities.

若适用法律法规对结社自由和集体谈判权利有所限制，供应商应确保员工有权选举和加入其他合法认可的员工代表组织，以保障员工的合法权益和表达渠道。

Where local laws or regulations restrict freedom of association and collective bargaining, suppliers shall ensure that employees have the right to elect and join legally recognized alternative forms of worker representation, in order to safeguard their legitimate rights and provide effective channels for expression.

3.7 冲突矿产管理 Conflict Minerals Management

1) 供应商须签署《不使用冲突矿产承诺书》，明确承诺不采购和使用来自刚果（金）及其周边冲突地区（包括卢旺达、乌干达等）受武装势力控制的金属矿产，具体包括金、钽、锡、钨（3TG）等金属原料；

Suppliers must sign a *Conflict Minerals Non-Use Commitment Letter*, explicitly confirming that they do not source or use metal minerals originating from conflict-affected and high-risk areas, including the Democratic Republic of the Congo (DRC) and neighboring regions (such as Rwanda, Uganda, etc.) controlled by armed groups. This includes, but is not limited to, tin, tantalum, tungsten, and gold (commonly known as 3TG).

2) 供应商所使用的金属材料必须严格符合国家相关标准和法规。若发现使用不符合规定的矿产材料，供应商将面临合同解除的风险，并需承担由此产生的全部损失和责任。

All metal materials used by suppliers must strictly comply with relevant national

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standards and regulations. If it is discovered that non-compliant conflict minerals have been used, the supplier may be subject to contract termination and shall bear full responsibility for any resulting losses and liabilities.

四、职业健康、安全与社会保障 Occupational Health, Safety, and Social Protection

供应商应为员工、承包商及其他相关人员提供安全、健康、清洁的工作和生活环境，包括但不限于：

Suppliers shall provide employees, contractors, and other relevant personnel with a safe, healthy, and clean working and living environment. This includes but is not limited to the following:

4.1 职业健康与安全 Occupational Health and Safety

供应商应建立完善的职业健康与安全管理体系，开展系统性风险识别、评估与控制，切实降低员工在工作过程中可能面临的健康与安全风险，包括但不限于化学、电气及其他能源相关风险、火灾、交通及高处坠落等危害。

Suppliers shall establish a comprehensive occupational health and safety (OHS) management system and implement systematic identification, assessment, and control of risks to effectively reduce potential health and safety hazards in the workplace. These may include, but are not limited to, risks associated with chemicals, electricity and other energy sources, fire, vehicle operation, and working at heights.

在风险无法通过工程或管理手段有效控制的情况下，应为员工免费提供维护良好、符合标准的个人防护装备，并开展相应的风险意识和安全操作培训，确保员工正确理解和使用相关防护措施。

Where such risks cannot be adequately controlled through engineering or administrative means, suppliers must provide employees with well-maintained, standard-compliant personal protective equipment (PPE) free of charge, and offer

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relevant training on risk awareness and safe operating procedures to ensure employees understand and properly use protective measures.

此外，应特别关注孕期和哺乳期女性员工的健康与安全，避免其从事可能对自身或胎儿/婴儿造成危害的工作，并根据实际需要提供必要的工作便利与人性化安排，以保障其职业健康权益。

Special attention must be given to the health and safety of pregnant and breastfeeding employees. They must not be assigned to tasks that could pose harm to themselves or their fetus/infant. Reasonable accommodations and supportive working arrangements shall be provided as needed to protect their occupational health rights.

4.2 应急准备 Emergency Preparedness

供应商应识别和评估可能发生的各类紧急情况与突发事件，并建立健全的应急预案与响应机制，以最大限度地减少其对员工生命安全、环境和财产造成的影响。应急机制应涵盖事故报告流程、员工通知与疏散程序、应急响应人员职责分工、培训安排及定期演练。应急演练应至少每年开展一次，或根据当地法律法规的要求执行（以更严格者为准）。

Suppliers shall identify and assess potential emergency situations and unexpected incidents, and establish a robust emergency preparedness and response system to minimize risks to employee safety, the environment, and property. The emergency response system should include procedures for incident reporting, employee notification and evacuation, clearly defined roles and responsibilities for emergency response personnel, training programs, and regular drills. Emergency drills must be conducted at least once a year or in accordance with applicable local laws and regulations, whichever is more stringent.

应急预案还应包括但不限于：适当配置火灾探测与灭火设备、确保出口通畅和数量充足、张贴应急联络信息、以及制定事故后的恢复计划。所有应急准备工作应以保护生命安全为首要目标，并兼顾对环境与财产的风险控制。

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Emergency plans should also include, but are not limited to: proper installation of fire detection and suppression systems, ensuring that emergency exits are unobstructed and sufficient in number, clearly posted emergency contact information, and the development of recovery plans following an incident. All emergency preparedness efforts must prioritize the protection of human life, while also addressing environmental and property risk mitigation.

4.3 工伤与疾病 Occupational Injuries and Illnesses

供应商应建立健全的制度和流程，用于预防、管理、跟踪和报告工伤及职业疾病的发生。相关制度应包括以下要素：鼓励员工主动报告工伤与疾病事件；对相关案例进行分类、记录与分析；提供及时、必要的医疗服务；开展事故调查并采取纠正与预防措施，消除事故根源；并为受伤员工提供必要支持，协助其顺利重返工作岗位。

Suppliers shall establish comprehensive systems and procedures for the prevention, management, tracking, and reporting of occupational injuries and work-related illnesses. These systems should include the following key elements:

- Encouraging employees to proactively report incidents of injury or illness;
- Classifying, recording, and analyzing reported cases;
- Providing timely and necessary medical treatment and services;
- Conducting thorough incident investigations and implementing corrective and preventive measures to eliminate root causes;
- Offering appropriate support to injured employees to facilitate their safe and smooth return to work.

员工在面临紧迫或严重的安全威胁时，应有权自主撤离危险区域，并在风险完全解除前不被强迫返回，且不得因此受到任何形式的惩罚或歧视。

Employees shall have the right to evacuate from any area where they face imminent or serious threats to their safety, and must not be required to return until the hazard has been fully mitigated. No punitive or discriminatory action may be taken against

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employees for exercising this right.

4.4 工业卫生 Industrial Hygiene

供应商应依据风险控制措施等级，对工作场所中存在的化学、生物及物理性危害因素进行识别、评估与控制，防止其对员工健康构成威胁。在无法通过工程或管理手段有效控制风险的情况下，应为员工免费提供并确保其正确使用维护良好的个人防护用品。供应商应为员工创造安全、健康的工作环境，并通过对工作环境和员工健康状况的持续、系统性监测，确保健康风险处于可控范围内。应建立职业健康监测机制，定期评估员工是否因职业性暴露而受到健康损害，并持续推进职业健康保护计划。该计划应包括与员工岗位相关的风险识别、预防措施及健康教育材料，增强员工的职业病防护意识和自我保护能力。

Suppliers shall identify, assess, and control chemical, biological, and physical hazards in the workplace according to the hierarchy of control measures, to prevent adverse health impacts on employees. When such hazards cannot be effectively mitigated through engineering or administrative controls, suppliers must provide employees with well-maintained and appropriate personal protective equipment (PPE) free of charge, and ensure it is used correctly.

Suppliers shall create a safe and healthy working environment by conducting continuous and systematic monitoring of both workplace conditions and employees' health status to ensure that health risks remain within controllable limits. A professional health surveillance system shall be established to regularly evaluate whether employees have suffered any health impairment due to occupational exposure.

An ongoing occupational health protection program shall be implemented, which includes hazard identification, preventive measures, and health education materials relevant to the employee's job. The aim is to strengthen awareness of occupational disease prevention and enhance employees' self-protection capabilities.

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4.5 强体力劳动管理 Management of Physically Demanding Work

供应商应识别、评估并有效控制强体力劳动对员工可能造成的身心负担和健康风险。此类劳动包括但不限于人工搬运或装卸物料、反复搬举重物、长时间站立作业，以及高频率或高强度的装配操作等。

Suppliers shall identify, assess, and effectively manage the physical and mental strain as well as health risks associated with physically demanding tasks. Such tasks include, but are not limited to: manual handling or loading/unloading of materials, repetitive lifting of heavy items, prolonged standing, and high-frequency or high-intensity assembly operations.

4.6 机械安全防护 Machine Safety and Safeguarding

供应商应对生产设备及其他相关机械进行全面评估，识别其潜在的安全隐患。对于存在可能对员工造成伤害风险的机械设备，应配备必要的物理防护装置、联锁系统和安全屏障，并确保上述防护措施保持良好状态且定期维护。所有防护设施应符合适用的安全标准和法规要求，以有效防止意外伤害的发生，保障员工在操作过程中的人身安全。

Suppliers shall conduct comprehensive assessments of production equipment and related machinery to identify any potential safety hazards. For machinery that poses a risk of injury to workers, appropriate physical guards, interlocking systems, and protective barriers must be installed. These safety devices shall be regularly maintained and kept in good working condition.

All machine safeguarding measures must comply with applicable safety standards and regulatory requirements to prevent workplace accidents and ensure the personal safety of employees during machine operation.

4.7 公共卫生、饮食和住宿 Public Health, Food, and Accommodation

供应商应为员工提供清洁、卫生的基本生活设施，包括干净的洗手间、充足的饮用水，以及符合卫生标准的食品加工、储存和用餐区域。若为员工提供

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宿舍，应确保住宿环境整洁、安全，配备紧急疏散通道、热水淋浴设施、充足的照明和良好的通风条件。每位员工应拥有独立的安全储物柜，用于存放个人物品和贵重财物，并享有便捷出入和适当的私密空间，以保障其基本生活尊严与个人安全。

Suppliers shall provide employees with clean and hygienic basic living facilities, including sanitary restrooms, adequate drinking water, and food preparation, storage, and dining areas that meet health and safety standards.

If accommodation is provided, the living environment must be kept clean and safe, equipped with emergency evacuation routes, hot water shower facilities, sufficient lighting, and proper ventilation. Each employee should have a personal, secure locker to store personal belongings and valuables, with convenient access and appropriate privacy, ensuring basic living dignity and personal security.

4.8 健康与安全沟通 Health and Safety Communication

供应商应确保所有员工能够充分理解其工作环境中的健康与安全信息和培训内容，应使用员工的母语或其能够理解的其他语言，传达有关已识别的工作场所风险的信息，包括但不限于机械、电气、化学、火灾及其他物理性危害。应在工厂区域或员工能够明显识别并方便进入的区域，清晰张贴健康与安全相关信息，确保信息易于获取和理解。健康与安全培训应覆盖与员工性别、年龄等相关的特定风险（如适用），并在员工上岗前进行初次培训，此后定期开展复训，确保员工持续具备应对健康与安全风险的能力。同时，应建立开放、无惩罚的沟通机制，鼓励员工在无需担忧报复的情况下，主动提出任何关于健康与安全的疑虑或建议。

Suppliers shall ensure that all employees fully understand the health and safety information and training relevant to their work environment. Information must be communicated in the employees' native language or another language they understand, covering identified workplace risks including but not limited to

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mechanical, electrical, chemical, fire, and other physical hazards.

Health and safety information must be clearly posted in factory areas or other easily accessible and clearly visible locations for employees. Training shall address specific risks related to employee demographics such as gender and age (where applicable), and be provided before employees commence work, with regular refresher training thereafter to maintain competency in managing health and safety risks.

An open and non-retaliatory communication system should be established to encourage employees to raise any health and safety concerns or suggestions without fear of reprisal.

若发现任何违反上述健康与安全要求的行为，供应商、其员工或关联方应立即依据本准则向大金重工报告。

Any violations of these health and safety requirements must be promptly reported by suppliers, their employees, or related parties to Dajin Heavy Industries in accordance with this Code.

五、环境保护与可持续发展 Environmental Protection and Sustainability

作为大金重工的供应商，贵方应建立统一的环境管理体系，遵守国际及国内环境标准，持续减少能源资源消耗及对环境的不利影响。主要要求如下：

As a supplier to Dajin Heavy Industries, you are expected to establish a unified environmental management system, comply with applicable international and domestic environmental standards, and continuously reduce energy and resource consumption as well as adverse environmental impacts. The main requirements are as follows:

5.1 环境许可证与报告 Environmental Permits and Reporting

供应商应取得、维护并更新所有必需的环境许可证（如排放监控）、批准

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文书和登记证，并遵循其操作和报告要求。

Suppliers shall obtain, maintain, and renew all necessary environmental permits, approvals, and registrations (such as emission monitoring permits), and comply with all operational and reporting obligations stipulated therein.

5.2 污染预防与资源节约 Pollution Prevention and Resource Conservation

供应商应积极采取有效措施，从源头控制或通过加强污染治理设施，优化生产、维护及运营流程等手段，最大限度地减少或消除污染物的排放、泄漏和废弃物的产生。同时，鼓励供应商通过工艺改进、替代材料的使用、资源的重复利用与回收、节能措施的实施以及其他有效方式，提高自然资源的利用效率。所涵盖的资源包括但不限于水资源、化石能源、矿产资源及原始森林木材，旨在推动资源的可持续利用和生态环境的保护。

Suppliers shall proactively implement effective measures to control pollution at its source or through enhanced pollution control facilities, optimized production, maintenance, and operational processes, thereby minimizing or eliminating pollutant emissions, leaks, and waste generation.

Suppliers are encouraged to improve resource efficiency through process enhancements, substitution of materials, reuse and recycling of resources, energy-saving initiatives, and other effective practices. Covered resources include, but are not limited to, water, fossil fuels, mineral resources, and primary forest timber, with the goal of promoting sustainable resource utilization and ecological environmental protection.

5.3 有害物质管理 Hazardous Substance Management

供应商应识别、标识并妥善管理所有对人类健康或环境构成潜在危害的化学品、废弃物及其他相关材料，确保其在处理、运输、储存、使用、回收再利用及最终处置过程中符合安全规范和环保要求。同时，应建立有害废弃物的跟踪与记录制度，确保相关数据的完整、准确与可追溯，以支持有效的环境管理

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和风险控制。

Suppliers shall identify, label, and properly manage all chemicals, wastes, and other materials that may pose potential risks to human health or the environment. This includes ensuring their safe handling, transportation, storage, use, recycling, and final disposal in compliance with safety standards and environmental regulations. Additionally, suppliers shall establish systems to track and record hazardous waste data, ensuring completeness, accuracy, and traceability to support effective environmental management and risk control.

5.4 固体废弃物管理与循环利用 Solid Waste Management and Circular Utilization

供应商应采用系统化的方法，对固体废弃物（包括无害废弃物）进行识别、管理与减少，推动资源的合理利用与循环利用。鼓励通过对废弃材料的再利用、再制造、资源化等方式，促进循环经济发展，最大限度提升废弃物的再生价值。应确保废弃物得到负责任的处置或回收，符合相关环保法规和标准要求。同时，供应商应建立废弃物数据的跟踪与记录机制，确保信息的准确性和可追溯性，以支持持续改进和合规管理。

Suppliers shall adopt a systematic approach to identify, manage, and reduce solid waste (including non-hazardous waste), promoting both efficient and circular use of resources. The reuse, remanufacturing, and recycling of discarded materials are encouraged to foster circular economy practices and maximize the regenerative value of waste. Suppliers must ensure that waste is responsibly disposed of or recycled in compliance with relevant environmental laws and standards. Furthermore, a waste tracking and recording system shall be established to ensure the accuracy and traceability of information, supporting continuous improvement and regulatory compliance.

5.5 废气排放管理 Air Emission Management



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供应商在经营过程中产生的挥发性有机化合物（VOCs）、喷雾物、腐蚀性物质、悬浮颗粒物、破坏臭氧层物质及燃烧副产品，必须在排放前按照相关法规和标准进行分类、监测、控制和处理。应建立并维持废气排放控制系统的有效运行，定期对其运行状况进行监测与维护，确保排放符合环保要求，最大限度降低对大气环境的影响。

Volatile organic compounds (VOCs), sprays, corrosive substances, particulate matter, ozone-depleting substances, and combustion byproducts generated during operations must be classified, monitored, controlled, and treated prior to discharge in accordance with relevant laws and standards. Suppliers shall establish and maintain effective air emission control systems, conduct regular monitoring and maintenance to ensure compliance with environmental requirements, and minimize atmospheric environmental impacts.

5.6 限用物质 Restricted Substances

供应商应严格遵守所有适用的法律法规及客户要求，确保在产品设计和生产和制造过程中禁止或限制使用特定的有害物质（包括但不限于回收与处置标识要求）。供应商应建立相应的管理体系，持续监控并确保所用物质符合相关限制，保障产品的合规性与环境安全。

Suppliers shall strictly comply with all applicable laws, regulations, and customer requirements that prohibit or restrict the use of certain hazardous substances in product design, production, and manufacturing processes—including but not limited to requirements related to recycling and disposal labeling. Suppliers shall establish management systems to continuously monitor and ensure the compliance of materials used, thereby safeguarding product conformity and environmental safety.

5.7 水源管理 Water Resource Management

供应商应制定并实施全面的水源管理计划，系统记录、分类和监测水资源的使用与排放情况，积极寻找节约用水的机会，严格控制污染排放渠道。所有

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废水在排放或处置前，必须按照相关法规和标准进行分类、监测、有效控制与处理。应定期对废水处理及控制系统的运行状况进行监控与维护，确保系统运行高效，符合监管要求，实现环境保护和资源可持续利用的目标。

Suppliers shall develop and implement comprehensive water management plans, systematically recording, categorizing, and monitoring water use and discharge. Opportunities for water conservation should be actively pursued, and pollution discharge channels strictly controlled. All wastewater must be classified, monitored, effectively controlled, and treated prior to discharge or disposal in accordance with applicable laws and standards. Regular monitoring and maintenance of wastewater treatment and control systems are required to ensure operational efficiency, regulatory compliance, environmental protection, and sustainable resource use.

5.8 碳排放控制 Carbon Emission Control

供应商应积极识别和评估经营活动中产生的温室气体排放，建立科学的碳排放管理体系，明确减排目标和实施路径。

Suppliers shall actively identify and assess greenhouse gas emissions generated from their operations and establish a scientific carbon emission management system with clear reduction targets and implementation plans.

1) 应实施能源管理和节能减排措施，优先采用清洁能源和高效设备，降低能源消耗和碳足迹。

Implement energy management and energy-saving measures, prioritize the use of clean energy and high-efficiency equipment to reduce energy consumption and carbon footprint.

2) 对燃烧过程、运输及生产环节产生的碳排放，应定期监测、记录并报告，确保符合国家及地方的碳排放法规及标准。

Regularly monitor, record, and report carbon emissions from combustion processes, transportation, and production activities to ensure compliance with national and local

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carbon emission laws and standards.

- 3) 鼓励供应商通过技术创新和工艺优化, 实现碳排放持续减少。

Encourage suppliers to achieve continuous carbon emission reductions through technological innovation and process optimization.

- 4) 建立碳排放数据跟踪与审核机制, 确保数据的准确性和透明度, 支持企业碳足迹核算和管理。

Establish carbon emission data tracking and verification mechanisms to ensure accuracy and transparency of data, supporting corporate carbon footprint accounting and management.

5.9 生物多样性保护 Biodiversity Protection

供应商应认识并尊重生物多样性的重要性, 积极采取措施防止其经营活动对生态环境和物种多样性造成负面影响。

Suppliers shall recognize and respect the importance of biodiversity and actively take measures to prevent negative impacts of their operations on ecosystems and species diversity.

- 1) 在选址、施工和运营过程中, 应避免破坏关键生态区域、自然保护区及珍稀濒危物种的栖息地。

During site selection, construction, and operation, avoid damaging critical ecological areas, nature reserves, and habitats of rare and endangered species.

- 2) 加强废弃物和污染物管理, 防止对土壤、水体及空气造成污染, 维护生态系统的健康。

Strengthen waste and pollutant management to prevent contamination of soil, water, and air, maintaining ecosystem health.

- 3) 供应商应遵守相关生物多样性保护法律法规及国际公约, 主动参与生态保护项目, 提升环境责任意识。

Comply with relevant biodiversity protection laws, regulations, and international

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conventions, actively participate in ecological conservation projects, and enhance environmental responsibility awareness.

六、商业诚信 Commercial Integrity

供应商开展商业活动时，应严格遵守其经营所在国家及相关法域所有适用的法律法规。

Suppliers shall strictly comply with all applicable laws and regulations in the countries and jurisdictions where they operate during their business activities.

大金重工坚持所有适用法律优先的原则，若某项法律现行或未来的规定与本行为准则存在冲突，以该法律规定为准。

Dajin Heavy Industry upholds the principle that all applicable laws take precedence. In case of any conflict between the provisions of a current or future law and this Code of Conduct, the legal provisions shall prevail.

供应商须全面遵守适用的竞争法及反腐败法律法规，包括但不限于《中华人民共和国反不正当竞争法》及其他等效的法律法规，确保商业行为合法、公正、透明。

Suppliers must fully comply with applicable competition laws and anti-corruption regulations, including but not limited to the *Anti-Unfair Competition Law of the People's Republic of China* and other equivalent laws, ensuring that all business conduct is lawful, fair, and transparent.

七、反腐败 Anti-Corruption

大金重工严禁任何形式的腐败行为。任何以获取不正当、非法或不公平商业利益为目的，向任何个人提供、承诺、收受或索取金钱、礼品或其他有价物的行为，均被明确禁止。

Dajin Heavy Industry strictly prohibits any form of corruption. Any act of offering,

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promising, receiving, or soliciting money, gifts, or other valuables for the purpose of obtaining improper, illegal, or unfair commercial advantages is explicitly forbidden.

大金重工严格遵守《中华人民共和国反不正当竞争法》以及所有适用于禁止向政府官员行贿或提供“有价物”的国家或地区的反腐败法律法规。

Dajin Heavy Industry fully complies with *the Anti-Unfair Competition Law of the People's Republic of China*, as well as all anti-corruption laws and regulations applicable in countries or regions prohibiting bribery or offering “valuable items” to government officials.

所有供应商及其员工、董事、股东不得向大金重工的员工、董事或股东，或其他任何企业或公司的人员，就与大金重工业务有关的事项提供、承诺、赠与或批准任何形式的贿赂、回扣、佣金或其他不当利益。

All suppliers, including their employees, directors, and shareholders, must not offer, promise, give, or authorize any form of bribes, kickbacks, commissions, or other improper benefits to employees, directors, or shareholders of Dajin Heavy Industry or any other personnel of companies related to Dajin Heavy Industry in connection with business matters.

如大金重工的员工、董事或股东向供应商提出贿赂、勒索、索取任何形式的利益，或从供应商处收受不当利益，供应商应立即通过本准则中规定的举报机制进行报告。

If any employee, director, or shareholder of Dajin Heavy Industry requests, extorts, solicits, or accepts any form of improper benefits from a supplier, the supplier shall immediately report such incidents through the whistleblowing mechanisms stipulated in this Code.

如供应商在为大金重工提供商品或服务，或以大金重工名义开展业务过程中，存在违反反腐败、反贿赂或反商业贿赂法律法规的行为，供应商将承担相应合同违约责任，并可能被立即终止业务合作关系。

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If a supplier engages in any violations of anti-corruption, anti-bribery, or anti-commercial bribery laws and regulations while providing goods or services to Dajin Heavy Industry or acting on its behalf, the supplier shall bear contractual breach responsibilities and may face immediate termination of the business relationship.

即使相关行为未直接涉及大金重工，如大金重工拥有合理证据和充分理由相信供应商涉及向政府官员行贿或其他形式的商业贿赂行为，大金重工亦保留单方面终止与该供应商所有业务往来的权利。

Even if such conduct does not directly involve Dajin Heavy Industry, if Dajin Heavy Industry has reasonable evidence and sufficient grounds to believe that a supplier is involved in bribery of government officials or other forms of commercial bribery, Dajin Heavy Industry reserves the right to unilaterally terminate all business dealings with that supplier.

八、知识产权 Intellectual Property

供应商应尊重并保护包括但不限于大金重工及其关联方、客户、合作伙伴在内的各方的知识产权。不得未经授权使用、披露、复制或传播任何受保护的知识产权内容，包括但不限于专利、商标、版权、商业秘密、技术资料、设计图纸、工艺流程、软件和商业信息等。

Suppliers shall respect and protect the intellectual property rights of all parties, including but not limited to Dajin Heavy Industry, its affiliates, customers, and partners. Suppliers must not use, disclose, copy, or distribute any protected intellectual property without proper authorization. Such intellectual property includes, but is not limited to, patents, trademarks, copyrights, trade secrets, technical data, design drawings, process flows, software, and business information.

供应商应建立健全的知识产权管理机制，确保其员工、分包商及合作方同

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样遵守知识产权保护要求，避免侵犯第三方权利。对于涉及商业秘密的人员，供应商应与其签署保密协议，并对设计图纸及相关敏感信息实施分级访问权限管理，防止信息泄露。

Suppliers shall establish robust intellectual property management systems to ensure that their employees, subcontractors, and partners also comply with intellectual property protection requirements and avoid infringing upon third-party rights. For personnel involved with trade secrets, suppliers must sign confidentiality agreements and implement tiered access controls on design drawings and related sensitive information to prevent unauthorized disclosure.

在与大金重工合作过程中所知悉的任何非公开技术信息、商业计划或其他机密资料，应被视为大金重工的保密信息，未经明确书面授权，不得以任何形式披露、复制或用于与合作无关的目的。

Any non-public technical information, business plans, or other confidential materials obtained during cooperation with Dajin Heavy Industry shall be regarded as confidential information of Dajin Heavy Industry and must not be disclosed, copied, or used for purposes unrelated to the cooperation without explicit written authorization.

如供应商存在侵犯知识产权或泄露机密信息的行为，大金重工有权依据合同及法律法规追究其相应法律责任，并保留终止合作关系的权利。

In the event of any infringement of intellectual property rights or unauthorized disclosure of confidential information by the supplier, Dajin Heavy Industry reserves the right to pursue legal liabilities according to contracts and applicable laws and regulations and to terminate the cooperation.

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九、合规制度的执行 Implementation of Compliance System

本行为准则以大金重工的核心价值观、对最佳商业实践的承诺以及适用法律法规为基础，但行为准则本身并不构成对其遵守的自动保障。

This Code of Conduct is founded on Dajin Heavy Industry's core values, its commitment to best business practices, and applicable laws and regulations. However, the Code itself does not guarantee automatic compliance.

因此，每一家大金重工的供应商都有责任基于自我审查、自我约束和自我负责的原则，建立并持续完善自身的诚信与合规管理体系，推动合规文化在组织内部的贯彻与落实，确保其商业行为符合本准则及所有适用的法律法规要求。Therefore, each supplier of Dajin Heavy Industry is responsible for establishing and continuously improving their own integrity and compliance management system based on principles of self-assessment, self-discipline, and accountability. Suppliers should foster a compliance culture within their organizations to ensure that their business conduct aligns with this Code and all applicable laws and regulations.

十、遵守规定 Compliance Obligations

供应商应充分了解、理解并遵守本《供应商行为准则》以及大金重工告知并经其确认的所有相关制度和合规要求。

Suppliers shall fully understand, comprehend, and comply with this *Supplier Code of Conduct* as well as all relevant systems and compliance requirements notified by Dajin Heavy Industry and acknowledged by the supplier.

所有供应商有义务通过合同条款或其他适当的法律安排，确保其分包商、外包方及业务合作伙伴同样遵守本行为准则中所规定的标准与行为规范，共同构建合规、可持续的供应链体系。

All suppliers have the obligation, through contractual provisions or other appropriate legal arrangements, to ensure that their subcontractors, outsourced parties, and

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business partners likewise comply with the standards and behavioral norms set forth in this Code, collectively building a compliant and sustainable supply chain.

十一、本行为准则的修订 **Amendments to the Code of Conduct**

大金重工有权在必要时对本《供应商行为准则》进行修订或补充。如有任何调整，大金重工将及时通知供应商，并要求供应商签署新版确认书，以重申其对最新版行为准则的理解与遵守承诺。自确认书签署之日起，最新版本的行为准则即对供应商生效。

Dajin Heavy Industry reserves the right to amend or supplement this *Supplier Code of Conduct* as necessary. In the event of any changes, Dajin Heavy Industry will promptly notify the suppliers and require them to sign a new confirmation statement to reaffirm their understanding of and commitment to comply with the latest version of the Code. The latest version of the Code shall take effect for the supplier from the date the confirmation statement is signed.

供应商有持续义务了解并遵守任何经修订的内容，确保其行为始终符合适用法律法规及大金重工的合规要求。

Suppliers have an ongoing obligation to stay informed of and comply with any amended provisions, ensuring their conduct continuously meets applicable laws, regulations, and Dajin Heavy Industry's compliance requirements.

十二、语言 **Language**

本《供应商行为准则》以中文和英文两种语言编写。如中英文版本存在不一致或歧义之处，应以中文版本为准。

This *Supplier Code of Conduct* is drafted in both Chinese and English. In case of any discrepancies or ambiguities between the Chinese and English versions, the Chinese version shall prevail.

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供应商行为准则收悉确认函

Supplier Code of Conduct Acknowledgment Letter

本人/本公司特此确认，已收到并阅读《供应商行为准则》。该准则适用于所有与大金重工合作的供应商。

I / We hereby confirm that I / we have received and read the *Supplier Code of Conduct*, which applies to all suppliers cooperating with Dajin Heavy Industry.

本人/本公司理解并承诺，遵守本行为准则及大金重工制定的所有相关制度，是本人/本公司持续与大金重工开展合作的前提条件。

I / We understand and commit that compliance with this Code of Conduct and all relevant policies established by Dajin Heavy Industry is a prerequisite for the continued cooperation between myself / our company and Dajin Heavy Industry.

本人/本公司知悉，大金重工在采购及服务过程中始终坚持最高水平的商业道德与诚信标准。

I / We acknowledge that Dajin Heavy Industry upholds the highest standards of business ethics and integrity in its procurement and service processes.

本人/本公司理解并承诺，对本人/本公司在作为大金重工供应商期间所获悉的所有信息予以保密，未经授权不得擅自披露或用于与合作无关的目的。

I / We understand and commit to maintaining the confidentiality of all information obtained during the course of our engagement as a supplier to Dajin Heavy Industry and agree not to disclose or use such information for purposes unrelated to our cooperation without proper authorization.

本人/本公司认可，大金重工无法详尽列出所有可能违反本行为准则的行为。对于大金重工认定为不当的行为，大金重工有权采取包括但不限于解除合作关系在内的相应措施。

I / We recognize that Dajin Heavy Industry cannot exhaustively list all behaviors that

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may violate this Code of Conduct. For any behavior deemed inappropriate by Dajin Heavy Industry, it reserves the right to take appropriate measures, including but not limited to termination of the cooperation.

通过签署本确认函，本人/本公司支持并承诺遵守大金重工所要求的专业标准，并将确保我方全体员工、承包商及分包供应商同样遵循该等标准。

By signing this acknowledgment letter, I / we support and commit to abide by the professional standards required by Dajin Heavy Industry and will ensure that all our employees, contractors, and subcontractors similarly comply with these standards.

本人/本公司亦理解并同意，若出现其他情况或新的披露义务，将依据本行为准则的要求向大金重工作出及时、真实、书面的披露。

I / We also understand and agree that should other situations arise or new disclosure obligations occur, I / we will provide timely, truthful, and written disclosure to Dajin Heavy Industry in accordance with the requirements of this Code of Conduct.

签 署 栏

Signature Section

本人/本公司业已阅读并理解上述条件，并签字同意遵守。特此申明，本人具备代表公司签署本确认函的一切必要授权。

I / We have read and understood the above terms and hereby agree to comply. I declare that I have all necessary authority to sign this acknowledgment letter on behalf of the company.

供应商名称:

日期:

公章:

Supplier Name:

Date:

Company Seal:

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