

玲珑轮胎
供应商行为守则
Linglong Tyre
Supplier Code of Conduct
面向为玲珑轮胎提供支持的第三方
For Third Parties Supporting Linglong Tyre



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行为守则宗旨

Purpose of Code of Conduct

山东玲珑轮胎股份有限公司（以下简称“玲珑轮胎”）的《供应商可持续发展管理规定》政策针对我们有关人权、环境等方面采取的业务经营方式进行了规范。因此本《供应商行为守则》（“守则”）概述了我们在供应商管理、负责任的采购以及与这些原则相关的实施方面对供应商关系的要求和期望。

Supplier Sustainability Management Regulation of Shandong Linglong Tyre Co., Ltd. (referred to as “Linglong Tyre”) is Committed to Supplier Sustainability Development Requirement policy establishes how we conduct our business regarding human rights and the environment. Accordingly, this Supplier Code of Conduct (“Code”) outlines both our requirements and our expectations for supplier relationships in areas related to supplier management, responsible sourcing, and the associated implementation of this Code.

本守则适用于为玲珑轮胎提供支持的第三方的全体成员。玲珑轮胎的要求和期望体现了适用的法律、广泛认可的国际人权框架和宪章，以及玲珑轮胎自身的内部政策和规程。我们要求供应商遵守所有适用的玲珑轮胎政策并达到或充分实现所有适用的法律法规要求。

This Code applies to each member of third party supporting Linglong Tyre. Linglong Tyre’ s requirements and expectations reflect applicable laws, widely accepted international human rights frameworks and charters, and Linglong Tyre’ s own internal policies and procedures. We require suppliers to follow all applicable Linglong Tyre policies and comply with or exceed all applicable laws and regulations.

供应商义务 Supplier Obligations

所有供应商应：

All suppliers shall:

- 了解并遵守本守则。
- Know and follow this Code.
- 按照要求说明采取适当的内部控制措施，并持续改进。
- Demonstrate appropriate internal controls upon request , and continuous improvement
- 发现问题后，应报告并纠正所有不合规的行为，并坦诚地报告纠正进度。
- Report and remediate any non-compliance and, when issues are identified, transparently report their remediation progress.
- 实施类似的业务守则，并要求分包商也同样执行。
- Enforce a similar Code of practice and require that subcontractors do the same.
- 识别并使用遵守本守则要求的分包商，监控分包商的合规情况。
- Identify and use subcontractors who adhere to the requirements of this Code and monitor subcontractor compliance.
- 定期报告并记录可持续发展的实施情况。
- Report and document the implementation of sustainable development regularly.

行为守则实施内容

Implementation Content of Code of Conduct

第 1 节 供应商管理

Article VI Supplier Management

所有供应商与次级供应商建立紧密的关系非常重要，因为这将使他们能够理解并随后减轻供应链风险。每个供应商都应采取措施确保次级供应商的社会、环境和商业行为以及合规性。

It is important for all supplies and sub-suppliers to establish strong relationships with suppliers, enabling them to understand and subsequently mitigate supply chain risks. Supplies and sub-suppliers should be aware of industry requirements and international standards regarding sustainability. Every supplier should take steps to ensure the social, environmental and business practices and compliance of suppliers.

我们的供应商应：

Our suppliers shall:

1.1 建立供应商可持续发展管理体系，包括将本准则纳入采购流程，各级供应商有责任将可持续发展的要求在整个供应链上进行传递并推进落实。

Establish a supplier sustainability management system, including embedding this Code into sourcing procedure. Suppliers at all levels are responsible for transmitting and promoting the implementation of sustainability requirements throughout the supply chain.

1.2 供应商与次级供应商应了解有关公司管理、工作条件与人权、健康和安全、商业道德、环境、相关的法规，遵守其经营所在国家/地区的所有适用的法律法规，确保业务操作合法合规。

Suppliers and sub-suppliers shall understand of company management, working conditions and human rights, health and safety, business ethics, environment and relevant regulations, comply with all applicable laws and regulations in the country/region where they operate, and ensure that their business operations are lawful and compliant .

1.3 明确原材料/服务来源、流通路径，以确保供应链的透明度和可追溯性。禁止使用违反人权、贿赂、违反道德或对环境造成负面影响的原材料/服务。

Specify raw material/service sources and distribution routes, to ensure transparency and traceability in the supply chain. Use of raw materials/service that violate human rights, bribery, ethics, or have a negative impact on the environment is prohibited.

1.4 定期对供应商的可持续发展进行风险评价，确保上游供应商持续合规、改进并降低风险。

Evaluate regularly risk on the sustainability of suppliers to ensure the continuous compliance, improvement of upstream suppliers and reduce risk.

1.5 对小型和本地供应商的培训和支​​持。供应商承诺为其所有员工提供适当的技能和能力发展工具。通过提供技术支持，为员工制定培训计划，以提高他们的专业技能水平。

Training & support to small & local suppliers. Supplier undertakes to provide appropriate tools for the development of skills and capabilities to all its employees. Through the offer of technical support, establish training programs for their employees to enhance the level of their professional skills.

1.6 在处理裁员时，供应商应采取负责任的行为，以便在可能的情况下，在适用的法律框架内，减轻影响。每个受影响的员工都将根据当地法律获得适当的信息和帮助。

In dealing with redundancies, Supplier's responsible behavior is expected so that, where possible and within the applicable legal framework, the effects are mitigated. Each employee affected is to receive appropriate information and assistance in line with local legislation.

1.7 在特定情况下，致力于支持小型和本地供应商，帮助促进技术升级和长期资产收购。

In specific circumstances, committed to supporting small and local suppliers, helping to facilitate technological upgrades and acquisition of long-term assets.

第 2 节 负责任的采购

Article VII Responsible Sourcing

公司应定期进行尽职调查，以了解其产品供应链的来源。不故意提供包含原材料/服务的产品，这些原材料/服务可能会导致侵犯人权、贿赂和违反道德的行为，或对环境造成负面影响。这扩展到冲突矿物的尽职调查。

Company shall conduct due diligence and increase transparency. Not knowingly supply products containing raw materials/service that may lead to human right violations, bribery and unethical practices, or have a negative impact on the environment.

我们的供应商应：

Our suppliers shall:

2.1 要求采购负责任原材料/服务，以保障其供应链具有充分的透明性和可追溯性，并且必须促使次级供应商协助其证实透明性。

Procure raw materials/service under responsible production to ensure adequate transparency and traceability in the supply chain, and assist sub-suppliers to demonstrate its transparency.

2.2 识别风险并采取适当措施尽可能地降低该等风险，包括有关如下风险：直接或间接为武装冲突的参与方提供资金、严重侵犯人权（例如，童工、强制劳动和奴隶）、不道德的经营行为或环境损害，冲突矿物等。

Identify risks and take appropriate measures to minimize such risks, including direct or indirect financing of parties to armed conflict, serious violations of human rights (e.g. child labor, forced

labor and slavery), unethical business practices or environmental damage, conflict minerals, etc.

2.3 禁止与被制裁的国家/地区、区域、实体、个人或领域直接或间接开展商业活动。

It is prohibited to conduct commercial activities directly or indirectly with the sanctioned country/region, area, entity, person or domain.

2.4 进行适当的尽职调查以符合制裁、出口管制和反抵制要求。

Conduct appropriate due diligence to cope with sanctions, export control and anti-boycott requirements.

2.5 遵守所有适用的海关法规和业务规则，维护海关活动相关记录的准确性和完整性。

Comply with all applicable customs regulations and operational rules, and maintain the accuracy and completeness of records related to customs activities.

2.6 必须遵守有关有害物质的所有适用的法律法规及客户要求，应适当识别有害物质并向客户披露，同时确保以安全的方式处理、使用、运输、储存、回收和处置。

Must comply with all applicable laws and regulations and customer requirements regarding hazardous substances, properly identify and disclose the substances to customers, and ensuring that they are handled, used, transported, stored, recycled and disposed in a safely way.

2.7 制定、实施和维护适合产品的有效方法和流程，从而将交付假冒伪劣零件和材料的风险降至最低。建立能够有效检测、报告及检定假冒伪劣零件和材料并防止该等零件和材料进入供应链的流程。如果检测到或怀疑存在假冒伪劣零件和材料，供应商应当立即通知接收方。

Develop, implement and maintain effective methods and processes appropriate to the product to minimize the risk of delivery of counterfeit or inferior parts and materials. Establish processes that effectively detect, report, and verify counterfeit or inferior parts and materials and prevent them from entering the supply chain. The Supplier shall immediately notify the receiving party if the presence of fake or inferior parts and materials is detected or suspected.

行为守则实施方式

Implementation Method of Code of Conduct

所有供应商均必须遵守本守则，尽力预防、缓解和纠正问题，在被询问时证实合规性。

我们的目标是建立一个更加强大和可持续的供应商基础。如果供应商无法遵守本守则，我们保留寻找替代供应源的权利。因证实或整顿不符合本守则要求的任何纠正措施计划将按照双方商定的时间表进行，产生的所有费用由供应商承担。

All suppliers must abide by this Code and do their best to prevent, mitigate and correct problems and demonstrate its compliance. Our goal is to build a stronger and more sustainable supply base. We reserve the right to seek alternative sources of supply if you are unable to comply with it. Any corrective action plan to confirm or rectify non-compliance with the requirements of this Code will be carried out in accordance with agreed schedule and all costs incurred shall be borne by suppliers.

我们的供应商应：

Our suppliers shall:

- 落实合规性要求并记录合规情况。

Implement the compliance requests and record compliance circumstances.

- 指定一名高级管理人员负责监督、管理、实施和遵循本守则。

Designate a senior executive, responsible for monitoring, managing, implementing and complying with this Code.

- 根据要求完成调查问卷并接受现场审核。

Finish questionnaire and accept on-site audit as required.

对于供应商违反商业道德和保密的侵权行为，按照《合规承诺函》进行处理；对于其他违反供应商行为守则的侵权行为，供应商管理部门以《社会责任问题处理记录》的形式通知供应商进行改进并跟踪验证。有证据表明严重不遵守本政策或拒绝制定恢复计划，或未能执行商定的恢复计划，可能导致公司与相关供应商的业务关系暂停或终止。如果公司供应链中的任何二级供应商与严重违规的证据有关，公司将与所涉及的一级供应商讨论最适当的行动方式。

The supplier's infringement of business ethics and confidentiality shall be dealt with in accordance with the Compliance Commitment Letter; For other violations of the supplier Code of conduct, the supplier management Office notifies the supplier in the form of the " Social Responsibility Question Handling Record " to improvement and follow-up verification. Evidence of serious non-compliance with this Policy or refusal to set a recovery plan, or failure to implement an

agreed recovery plan, may lead to the suspension or termination of business relations with the supplier in question. Should any tier 2 supplier in our supply chain be implicated with evidence of serious non-compliance, company will discuss the most proper way to act with the tier 1 supplier involved.

公司提供一个保密手段让所有员工和其他利益相关方向公司管理层和工人代表对违反本政策作出举报。举报可以采用实名举报和匿名举报两种方式。保密协议中体现该保密手段，确保员工和其他利益相关方获取举报渠道。任何形式的威胁、报复、制裁或歧视都不允许针对举报人或被报告的对象，或那些在报告的是非性的后续活动中提供合作的人。

Company provides confidentiality measures for employees and other interested party to report violation of such policy to company management team and labor representative. Real-name reporting and anonymous reporting can be adopted. Such confidentiality measures shall be reflected in the confidentiality agreement, ensure that employees and other interested party have access to reporting channels. No kind of threat, retaliation, sanction or discrimination will be tolerated against the whistleblower or reported subject, or those who have collaborated in the follow-up activities as to the merits of the report.

举报渠道向全公司和所有相关方公开，这些渠道包括：

Reporting channels are open to the entire company and all relevant parties and include:

举报 APP: (该平台可选择实名举报，也可选择匿名举报，举报信息由后台管理员一人负责并做好信息保护)

Reporting APP: (The platform accepts real-name or anonymous reports. All reporting information is managed and protected by a single background administrator.)



a) 举报邮箱: jiwei@linglong.cn(全球)、llie_admin@linglong.cn(欧洲玲珑)

a) Reporting email: jiwei@linglong.cn (global), llie_admin@linglong.cn (European Linglong)_

b) 举报网站链接: (该平台可选择实名举报，也可选择匿名举报，举报信息由后台管理员负责记录并做好信息保护)

b) Reporting website link: (On this platform, you can choose to report under your real name or anonymously. The reporting information will be recorded by the backend administrator and protected)

1、中文版地址: Chinese URL link:

<https://coach-vehicle-uat-1313990257.cos.ap-beijing.myqcloud.com/Questionnaire/index.html#/>

2、英文版地址：English URL link:

<https://coach-vehicle-uat-1313990257.cos.ap-beijing.myqcloud.com/Questionnaire-en/index.html>

c)举报电话：00865358252643(或 05358242643)(全球);0668169476(欧洲)

(号码能否接通可能受到来电者供应商的限制)。

c)Reporting hotline: 00865358252643 (or 05358242643) (global); 0668169476 (Europe)

(Availability of numbers may be restricted by the caller's provider).

d)书面邮寄：地址山东省烟台招远市金龙路 777 号 纪委办公室收 电话 0535-3600285

d)Written mail: the address is Office of the Discipline Inspection Committee, 0535-3600285, No. 777 Jinlong Road, Zhaoyuan City, Yantai, Shandong Province.

e) 举报信箱：举报信箱设在各单位，由专人定期开锁处理。

Reporting mailbox: Reporting mailboxes are located in each department and are regularly checked by appropriate personnel.

举报人可以书面、网络举报平台、电子邮箱、当面、电话、短信等形式匿名或实名向公司举报，特殊情况下可以直接向欧洲玲珑总经理进行举报。公司可以接收各种语言的文本形式举报，并在必要时将其翻译为投诉程序的工作语言（汉语、英语和塞尔维亚语），这也适用于与举报人的通信。举报人可以在任何时间提交举报，也可以选择匿名的方式提交举报。

Persons who report violation of regulations may submit a report to the Company anonymously or under their real name in writing, on the online reporting platform, by email, in person, by phone, text message, etc. Under special circumstances, reporting persons can report directly to the General Manager of LLIE. The company can receive reports in text form in various languages and, if necessary, translate them into the working languages of the complaints procedure (Chinese, English and Serbian). This also applies to communications with reporting persons. Reporting persons can submit a report at any time or choose to submit a report anonymously.

举报人在举报过程中请详细描述事件(含事件、地点、人物或其他可识别的信息)、知晓方式，相关人员或事件参考。

During the reporting process, the reporting person should describe the incident in detail (including the incident, location, person or other identifiable information), how it became known and relevant personnel or incident references.

供应商行为守则承诺书

Supplier Code of Conduct Commitment

本公司及全体管理层已充分了解《供应商行为守则》的要求，接受并遵守《供应商行为守则》。本公司认识到保护员工的基本权益是消费者、客户、公众和政府等利益相关者的期望，为员工提供健康、安全、环保的工作和生活条件是一个负责任的公司的基本目标。

Our company (supplier) is fully aware of the requirements of the Supplier Code of Conduct, accept and comply with the supplier Code of Conduct. Our company understands that it is the hope of interested parties including customers, clients, government to protect the basic rights and interests of employees. It is a basic target of a responsible company to provide safe, healthy and environmental working and living environments for employees.

公司名称（盖章）：

Company name (seal)

法人或委托代理人：

Corporate juridical person

日期： 年 月 日

Date :