



Responsible Sourcing Policy 责任采购政策

June 2023

2023年6月

We Elevate



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Introduction & Framework 引言与框架

Since its founding in 1874, Schindler has adhered to the principle of providing high quality products in a manner that is ethical, responsible, and legally compliant and dealing fairly and openly with its employees, customers and suppliers.

自 1874 年创立以来，迅达始终坚持以合乎道德、负责任且合法合规的方式为客户提供高品质产品，并以公平、公正、透明的态度对待员工、客户和供应商。

Through our Responsible Sourcing Policy (the “Policy”), we hold our vendors and suppliers to the same high standards. This applies to all suppliers, service providers, subcontractors, and other vendors and business partners including their affiliates, officers, directors, agents, employees, representatives, subcontractors, and consultants (the “Suppliers”).

我们以高标准要求自己，同时通过迅达《责任采购政策》（以下简称“政策”），也期望我们的供应商秉承同等的高标准。本政策适用于所有供应商、服务提供商、分包商和其他业务合作伙伴，包括其关联公司、高级管理人员、董事、代理商、员工、代表、分包人和咨询顾问（以下统称“供应商”）。

While the Policy sets forth our minimum expectations for all Suppliers, it is not comprehensive. The aim of this Responsible Sourcing Policy is to reinforce Schindler’s commitment to collaborate with Suppliers towards a long-term and sustainable future. Schindler requires all of its Suppliers to adhere to principles of fair dealing with others, equitable and non-abusive relationships with employees, safe workspaces, and legal compliance, and to conduct business in a way that promotes Schindler’s Core Values: Safety, Create Value for the Customer, Commitment to People Development, Integrity & Trust, Quality, and respect labor rights. This is supported by our Code of Conduct (group.schindler.com/coc) and Schindler’s Human Rights Policy (group.schindler.com/hrp).

本政策阐述了我们对所有供应商的基本要求，但并非详尽无遗。《责任采购政策》旨在强化迅达与供应商之间的合作承诺，共同拥抱长期、可持续发展的未来。迅达要求其所有供应商遵守如下原则，即公平对待与之往来的各方；禁止侮辱虐待员工，确保员工得到公正对待；提供安全的工作场所；遵守法律法规的要求；在业务开展中践行与迅达核心价值观相契合的价值理念：安全、为客户创造价值、促进员工成长、诚实&信任、质量以及尊重劳动权益。这些要求在《迅达行为准则》(group.schindler.com/coc) 和《迅达劳动权益政策》(group.schindler.com/hrp) 中同样有所体现。

Monitoring against our standards 监督标准执行情况

Adherence to the standards contained in this Policy is one of the criteria used in the Schindler Supplier selection and evaluation process.

遵守本政策所包含的各项标准是迅达在供应商选择和评估流程中采用的衡量指标之一。

Supplier shall adhere to applicable laws, regulations and any higher standards contained herein. Where needed Schindler may conduct audits, development and progress monitoring of corrective action plans, and provide recommendations.

供应商应遵守适用的法律、法规以及本政策中所包含的任何更高标准。如有需要，迅达可开展审计、监督制定和跟进纠正措施计划，并提供建议。

Fundamental Principles & Requirements 基本原则与要求

Schindler and all its subsidiaries, representatives and employees are committed to, and require all Suppliers to comply with all applicable legal requirements in the manufacturing and distribution of products and supplies and in the provision of services. Supplier's compliance not only underpins many of the other requirements in this Policy, but it is also essential to Schindler's ability to meet its own high standard of legal compliance and high standards of business conduct. Therefore, in all aspects of its business, Supplier shall adhere to and comply with:

迅达及其所有子公司、代表和员工承诺遵守并要求所有供应商在产品和零部件的制造与分销以及服务的提供过程中同样遵守所有适用的法律要求。供应商的合规性不仅是本政策中诸多其他要求的基础，还对迅达实现高标准的合规性及践行高标准的商业行为准则至关重要。因此，在其业务的所有方面，供应商应坚持并遵守：

- all applicable national or local laws, ordinances, regulations, rulings, orders, and decrees, 国家和地方的一切适用法律、法规、条例、规章、规范性文件、裁决、命令和法令
- the rules, regulations, policies, and procedures of all self-regulatory or industry bodies applicable to the industries in which the Supplier operates, and 适用于供应商所在行业的所有自律组织或行业组织的规则、规章、政策和程序
- the local customs and practices in the jurisdictions where the vendor or supplier operate. If local laws, customs or practices are less stringent than Schindler's policies and internationally recognized labor rights and standards, the Supplier shall seek to follow the highest standards. 供应商业务经营所在管辖区域的地方习俗和惯例。如果迅达的政策和标准，以及国际公认的劳工标准高于地方法规、习俗或惯例，供应商应力求遵循最高标准。

Supplier must maintain compliance systems and be able to demonstrate a satisfactory record of compliance with all applicable legal requirements, including, but not limited to:

供应商必须维护合规体系，并能够证明其对所有适用法律要求的合规记录达到令人满意的程度。这些法律要求包括但不限于：

1- Labor Rights 劳动权益

Schindler is committed to high standards of business ethics and integrity including the support and respect of internationally recognized labor standards as outlined in UN human rights frameworks. Schindler's commitment to respect labor rights is further elaborated in the Schindler Human Rights Policy. Moreover, important aspects of Schindler's commitment to promoting rights of workers are set out in Schindler's Inclusion & Diversity Commitment. Schindler requires its Suppliers to uphold the same values and to introduce labor rights due diligence in their operations and value chains.

迅达恪守在商业道德和诚信方面的高标准，包括支持和尊重联合国人权框架中所述的国际公认劳工标准。《迅达劳动权益政策》进一步详细阐述了迅达在尊重劳动权益方面的承诺。此外，《迅达的包容性和多元化承诺》明确了迅达在促进劳工权利方面的重要承诺。迅达要求其供应商秉持相同的价值观，并在其运营和价值链中开展劳动权益尽职调查。

1.1 Child Labor 童工

Supplier shall not tolerate or use child labor in any stage of its general activities other than in accordance with all applicable laws and regulations.

供应商在其经营活动的任何阶段不得容忍或使用童工，除非符合所有适用法律和法规的要求。

1.2 Conflict Materials 冲突矿产

Schindler requires Supplier to support Schindler's goal of not purchasing or using natural resources extracted from a conflict zone or the trade in which supports conflict, or any products manufactured from such resources. Supplier shall comply with the requirements set forth in all applicable laws and regulations of the European Union (EU) or other countries or regions in this respect. Supplier shall cooperate with Schindler's efforts to perform due diligence on the use of conflict materials, including by providing the access and information required for regulatory reporting.

迅达要求供应商支持其不采购或使用从冲突地区开采的自然资源、不参与助长冲突的贸易活动、不采购和使用任何由此类资源制造的产品目标。供应商应遵守所有应适用的欧盟或其他相关国家和地方的法律法规所规定的此方面的要求。供应商应配合迅达对冲突材料的使用进行尽职调查，包括提供监管报告所需的访问权限和信息。

1.3 Discrimination and Harassment 歧视与骚扰

At Schindler, our mission is to foster and sustain an inclusive culture that welcomes, supports, recognizes, and celebrates employees of all backgrounds. We require our suppliers to uphold the same values. Therefore, Supplier shall treat its employees with fairness, impartiality, awareness, and sensitivity, and shall grant equal opportunity in all aspects of employment to all persons without unlawful discrimination. This includes prohibiting unlawful discrimination on any protected basis under applicable law, including color, race, religion, gender or gender identity, sexual orientation, national origin, citizenship, ethnicity, age, disability, pregnancy, veteran status, genetic information, or other legally protected factors. Supplier shall provide a safe and effective channel for those who have observed unlawful discrimination to disclose their experience to Supplier management without fear of reprisal or retaliation.

在迅达，我们的使命是营造和维持一种包容性文化，欢迎、支持、认可和尊重来自不同背景的员工。我们要求供应商秉持相同的价值观。因此，供应商应以公平、公正、用心和关怀的态度对待员工，并且应在就业的各个方面给予所有人平等的机会，不得有非法歧视。这包括禁止基于任何受适用法律保护因素的非法歧视，例如肤色、种族、宗教、性别或性别认同、性取向、国籍、公民身份、民族、年龄、残疾、怀孕、退伍军人身份、遗传信息或其他受法律保护因素。供应商应提供一个安全有效的渠道，供那些目睹非法歧视的人向供应商管理层披露他们的经历，而不必担心遭到打击报复。

Supplier shall maintain and adopt policies and procedures to provide a work environment free of unlawful harassment. Harassment includes any verbal or other conduct that is offensive, bullying, intimidating, or disparaging to any individual or group and is based on that individual's inclusion or perceived inclusion in a legally protected group. Harassment also includes sexual harassment, sexual abuse, corporal punish-

ment, mental coercion, physical coercion, verbal abuse, and unreasonable restrictions on entering or exiting Supplier's facilities. Supplier's policies and procedures prohibiting harassment must apply to all persons involved in the operation of the company and must prohibit unlawful harassment, whether directed to employees, applicants for employment, outside vendors, contractors, customers, or others.

供应商应维护并采用相关政策和程序，以提供一个没有非法骚扰的工作环境。骚扰包括对任何个人或群体进行冒犯、欺凌、恐吓或诋毁的任何言语或其他行为，并且是基于该个人属于或被认为属于受法律保护群体这个前提。骚扰还包括性骚扰、性虐待、体罚、精神胁迫、身体胁迫、言语虐待，以及不合理地限制进入或离开供应商的设施场所。供应商有关禁止骚扰的政策和程序必须适用于参与公司运营的所有人员，且必须禁止针对员工、求职者、外部供应商、承包商、客户或其他人的非法骚扰行为。

1.4 Employment Practices 雇佣惯例

Supplier shall ensure that compensation paid to its personnel (including employees, contractors, and temporary or part-time employees) complies with at least all applicable wage laws or the local industry rate, whichever is higher, including those relating to fair wages, overtime hours, social security, paid leave and mandatory benefits, and that all employees are provided with employment documents that are agreed and which respect their legal and contractual rights. Working hours are not to exceed the minimum standards set forth in applicable laws and regulations. Supplier will allow its employees legally mandated breaks as well as holiday and vacation days to which they are legally entitled, including time off when ill or for maternity leave. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

供应商应确保向其人员（包括员工、承包商和临时或兼职雇员）支付的报酬至少符合所有适用的工资法或地方行业标准（以较高者为准），其中包括合理工资、加班时间、社会保障、带薪休假和强制性福利等方面的规定并向所有员工提供可商定、尊重其法律和合同权利的雇佣文件。工作时间不得超过适用法律法规规定的标准。供应商将允许员工享有法律规定的休息时间以及法定节假日，包括病假或产假。所有临时工、派遣工和外包工的使用符合当地法律的规定。

1.5 Forced Labor 强迫劳动

Supplier shall not use or profit from any form of labor provided involuntarily und threat of penalty, including, but not limited to: forced overtime, human trafficking, slavery or servitude, bonded labor (including debt bondage), forced prison labor. There shall be no unreasonable restrictions on employees' freedom of movement. Supplier shall not withhold or otherwise destroy or conceal, confiscate, or deny access by its employees to their personal documents (originals). Employees shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per the employee's contract. Employees migrating for the purpose of work shall not be required to pay recruitment fees or other related fees for their employment, as this can lead to situations of debt bondage. Should victims of human trafficking be found in the vendors and supplier's operations, they must be provided with adequate access to remedy.

供应商不得使用以惩罚相威胁而非自愿提供的任何形式的劳动或从中获利，包括但不限于强制加

班、人口贩卖、奴役或劳役、抵债劳动（包括债役）和监狱强迫劳动。员工的行动自由不得受到不合理的限制。供应商不得扣留或以其他方式销毁、隐匿、没收或拒绝其员工获取个人文件（原件）。员工如按照合同规定给予合理通知，则可以随时自由离职或终止雇佣关系，而不会受到任何处罚。不得要求以工作为目的移民的员工为其就业支付招聘费或其他相关费用，因为这可能导致债役情况的发生。如果在供应商的经营活动中发现人口贩卖的受害者，必须为他们提供适当的补救措施。

1.6 Freedom of Association, collective bargaining and non-retaliation 结社自由、集体谈判和无报复政策

The basic right of all employees to form trade unions and employee representations and to join them shall be respected by the Supplier. Employee representatives shall not be subject to discrimination, harassment or termination of contract in retaliation for exercising employee rights, submitting grievances, participating in union activities, or reporting suspected legal violations.

供应商应尊重所有员工组建并加入工会和员工代表组织的基本权利。员工代表不得因行使员工权利、提交申诉、参加工会活动或举报涉嫌违法行为而遭受歧视、骚扰或终止合同的报复。

1.7 Occupational Health and Safety 职业健康与安全

Suppliers shall provide workers with a safe and healthy work environment and to manage their operations to minimize impact to the environment and community. Suppliers shall establish and maintain a management system or program that encourages continual improvement in health and safety performance and includes the following elements and is guided ISO 45001 Occupational Health and Safety Management (OHS) Standard:

供应商应为工人提供安全且健康的工作环境，并对其运营进行管理，以最大限度减少对环境和社区造成的影响。供应商应制定并维护一套管理体系或计划，以促进健康与安全工作环境的持续改进。该体系或计划应包括以下要素，并以 ISO 45001 职业健康与安全管理体系 (OHS) 标准为指导：

- An effective process to protect employees from unsafe noise levels and to provide appropriate lighting and temperatures in the workplace.
保护员工在工作场所免受不安全噪音水平的危害并提供适宜照明和温度条件的有效流程。
- An effective process to provide and maintain operating machinery and equipment with guarding or other protective measures as necessary to prevent injury to workers.
为操作机器设备提供并维护必要防护或其他保护措施，以防工人受伤的有效流程。
- An effective process to identify, evaluate and control workplace exposures to chemical, biological, and physical agents to prevent worker illness and injury.
对工作场所存在的化学、生物和物理因素进行识别、评估和管控，以防工人患病和受伤的有效流程。
- An effective process to identify and control hazards in the workplace (examples include activities such as regular inspections, hazard surveys, job hazard analyses, equipment hazard reviews, and ensuring that employees do not conduct work while under the influence of alcohol or illegal drugs).

- 识别和控制工作场所中的危险因素（例如：进行定期检查、危险调查、工作危害分析和设备危险审查等活动。同时，确保员工不在酒精或非法药物影响下开展工作）的有效流程。
- An effective process to determine the cause of incidents that result or could result in injury, illness, property or environmental damage or business interruption.
确定导致或可能导致伤害、疾病、财产或环境损害或业务中断的事件原因的有效流程。
 - An effective process to encourage employee participation in health and safety programs and to encourage employees to report workplace illnesses and injuries.
促使员工参与职业健康与安全计划，并鼓励员工报告职业疾病和工伤的有效流程。
 - An effective Health & Safety (H&S) training program for new and existing employees.
为新员工和现有员工制定一项有效的健康与安全培训计划。
 - An effective emergency action program for each of its manufacturing locations covering events such as fires, medical emergencies, weather/natural disasters, spills, and air releases.
为每个制造基地制定一项有效的应急行动计划，涵盖火灾、医疗紧急情况、气象或自然灾害、泄漏和气体释放等事件。

In addition, subject to applicable laws and regulations, Supplier shall maintain a workplace environment in the spirit of the UN Universal Declaration of Human Rights and the Conventions of the International Labor Organization.

此外，在符合适用法律法规的前提下，供应商应维护一个符合联合国《世界人权宣言》和国际劳工组织公约所规定原则的工作环境。

1.8 Supplier Diversity 供应商多样性

Schindler is committed to improving diversity among its Suppliers. To this end, if requested by Schindler, Supplier shall provide information relating to any and all of its diversity programs, diversity spend, and other such data as Schindler may reasonably require.

迅达致力于促进供应商的多样性。为此，如果迅达提出要求，供应商应提供与其多样性计划、多样性支出以及迅达可能合理要求的其他数据相关的任何和所有信息。

2- Environmental Impact 环境影响

Schindler is committed to become a net zero business by 2040 and its net-zero targets are aligned to the Science Based Targets initiative (SBTi).

迅达承诺到 2040 年实现净零碳排放，其净零碳排放目标符合“科学碳目标倡议”（SBTi）的要求。

Suppliers are required to minimize air pollution, develop and implement plans to support Schindler to reach its goal of having net zero emissions by 2040. Suppliers are encouraged to assess their own climate related risks and implement adaptation and resilience plans.

迅达要求供应商最大限度减少空气污染，制定并实施计划以支持迅达实现 2040 年净零排放目标。迅达鼓励供应商评估自身的气候相关风险，并实施应对与恢复计划。

Schindler requires that Greenhouse Gases (GHG) emissions are calculated and reported publicly according to the GHG Protocol and reduction targets are aligned with the SBTi.

迅达要求根据温室气体核算体系（GHG Protocol）对温室气体排放进行计算并公开报告，并确保减排目标与“科学碳目标倡议”保持一致。

Supplier shall conduct its operations with awareness of its impact on its physical environment and shall maintain and adopt policies and procedures to improve environmental efficiency (including with regard to consumption of water, energy, raw materials, office materials as well as business travel and transportation mileage), minimize all forms of waste, increase the proportion of its energy consumption from sustainable sources, increase recyclability of products, and strive to continuously reduce the carbon footprint of Supplier's operations. This includes obtaining, maintaining, and complying with all environmental permits, licenses, and registrations necessary for Supplier's operations.

供应商在开展经营活动时应意识到其对自然环境的影响，并且应维护和采用相关政策和程序，以提高环境效率（包括水、能源、原材料、办公材料的消耗以及商务旅行和运输里程的使用），最大限度减少各种形式的浪费，提升可持续能源消耗比例，提高产品的可回收性，并努力持续减少供应商自身经营活动的碳足迹。其中包括获得并维护供应商运营必要的所有环境许可证、执照和注册证，并遵守其规定和要求。

Supplier shall monitor, control, minimize and appropriately treat emissions and pollutants to air, soil, and water, including wastewater, waste, pollution, volatile chemicals, corrosives, particulates, aerosols, and combustion products from Supplier's operations. Supplier shall minimize or eliminate the discharge of byproducts into its environment and waterways and shall maintain and adopt policies and procedures to reduce greenhouse gas and other forms of emissions. To the extent applicable, Supplier shall adhere to ISO 14001 or comparable standards. In addition, Supplier shall comply with all applicable Schindler requirements regarding the prohibition, restriction, labeling for recycling or disposal of specific substances. 供应商应监测、控制、最大限度减少并适当处理其经营活动中对空气、土壤和水体产生的排放物和污染物，包括废水、废弃物、污染物、挥发性化学物质、腐蚀性物质、微粒物质、气溶胶和燃烧产物。供应商应最大限度减少或杜绝向环境和排水道排放副产品，并且应维护和采用相关的政策和程序来降低温室气体和其他形式的排放。在适用范围内，供应商应遵守 ISO 14001 或类似标准。此外，供应商应遵守迅达关于禁用或限用特定物质、对特定物质粘贴回收或处置标签的所有适用要求。

Schindler welcomes opportunities to collaborate with our Suppliers to reduce our environmental impact and to help preserve our environment for future generations; Supplier is encouraged to work with its Schindler Sourcing Category Manager to collaborate on potential opportunities.

迅达愿意与供应商合作，共同努力减少对环境的影响，帮助保护环境、造福子孙后代；鼓励供应商与迅达采购品类经理合作，寻找潜在的合作机会。

At a minimum, Supplier must develop, implement, and maintain:
供应商至少必须制定、实施和维护：

- An effective process to assess that sufficient and qualified resources are assigned to the environmental program.
评估是否为环境计划分配了足够且合格资源的有效流程。
- An effective process for maintaining drums, storage tanks and other storage containers to prevent water or soil contamination or accidental discharge and a process to remedy any existing contamination.

维护桶、储罐和其他储物容器以防止水或土壤污染或意外排放的有效流程；应对任何现有污染的补救流程。

- An effective process to ensure proper treatment of chemical or process wastewater prior to discharge. 确保化工废水或工艺废水在排放前得到适当处理的有效流程。
- An effective process to ensure safe handling and appropriate disposal or recycling of waste. 确保安全处理和适当处置或回收废弃物的有效流程。
- An effective environmental impact training program for new and existing employees 针对新员工和现有员工的有效环境影响培训计划。

3- Corruption & Fraud 腐败与欺诈

Schindler requires its Suppliers to have a zero-tolerance policy toward bribery and corruption. Therefore, Supplier shall provide a workplace free of bribery and corruption by complying with all applicable laws relating to bribery, money laundering and corruption. Supplier shall not engage in any form of extortion, money laundering or embezzlement. Supplier shall prohibit the exchange of anything of value (including money) to or from government officials or any other person (including Schindler employees or any Schindler representative) to influence actions or obtain an improper advantage. Supplier shall comply with all applicable national and local laws and regulations dealing with bribery of government officials or private persons.

迅达要求其供应商对贿赂和腐败采取零容忍政策。因此，供应商应遵守与贿赂、洗钱和腐败相关的所有适用法律，提供无贿赂和腐败的工作场所。供应商不得参与任何形式的勒索、洗钱或挪用公款。供应商应禁止与政府官员或任何其他人员（包括迅达员工或迅达的任何代表）进行任何有价值物品（包括金钱）的交换，以影响其行为或获取不正当利益。供应商应遵守所有适用的国家和地方法律、法规、规章、规范性文件中有有关贿赂政府官员或私人的规定。

Business decisions must be made on the basis of fair and objective criteria. Supplier is prohibited from directly or indirectly providing, soliciting, or accepting improper payments, gifts, bribes, kickbacks, entertainment, or other business gratuities from individuals that contradict Schindler's zero-tolerance policy toward bribery and corruption. Supplier and its personnel shall not directly or indirectly provide any corporate hospitality (including meals & entertainment) or other benefit to, or at the request of, a Schindler employee or members of their households in any situation in which it might influence, or appear to influence, an employee's decision in relation to Supplier. Only occasional gifts of nominal value without business obligations to Supplier, Schindler, or our employees are acceptable.

业务决策必须在公平和客观标准的基础上做出。禁止供应商直接或间接向个人提供、索取或收受与迅达对贿赂和腐败零容忍政策相违背的不当付款、礼品、贿赂、回扣、娱乐活动或其他商业酬劳。供应商及其人员在任何情况下均不得直接或间接向迅达员工或其家庭成员提供任何企业招待（包括餐饮和娱乐）或其他利益，亦不得应迅达员工或其家庭成员的要求而提供，以免影响或看似影响迅达员工针对供应商相关的决定。仅偶尔赠予且于供应商、迅达或员工而言无商业义务的名义价值礼物可以接受。

Supplier shall refrain from and reject any involvement in fraudulent practices to the detriment of Schindler or its customers and business partners. This involves collusion with disloyal employees to artificially increase invoice amounts and sharing of achieved illicit profits. Supplier must report to Schindler (see Speak-up line in cif. 10.4) any hints about or requests to participate in such practices.

供应商应避免并拒绝参与任何损害迅达或其客户和业务伙伴的欺诈行为。其中包括与不忠诚的员工勾结，人为增加发票金额并分享所获得的非法利益。供应商必须向迅达报告（见第 10.4 节中的举报热线）有关此类行为或要求参与此类行为的任何线索。

4- Fair Competition 公平竞争

Supplier shall maintain a high standard of fair business and competition. Supplier shall not enter into any agreements with its competitors to set prices, restrict the availability of products, or allocate customers or markets.

供应商应坚守公平经营和竞争有关的高要求。供应商不得与竞争对手达成任何协议，以约定价格、限制产品供应或分配客户或市场。

5- Trade Sanctions & Export Control 贸易制裁和出口管制

Schindler complies and requires all its Suppliers to identify and comply with applicable trade sanctions and export control laws, including but not limited to US, EU, Chinese and Swiss trade sanctions laws. Suppliers need to know the trade sanctions and export control laws applicable to them and to comply with them. 迅达遵守并要求其所有供应商认同并遵守适用的贸易制裁和出口管制法律，包括但不限于美国、欧盟、中国和瑞士的贸易制裁法律。供应商需要了解并遵守适用于自身的贸易制裁和出口管制法律。

Supplier shall inform Schindler without delay if (i) Supplier, its immediate owner or ultimate beneficial owner, or any director, officer or representative of Supplier is or becomes subject to international trade sanctions or restrictions, or (ii) Supplier becomes subject to a sanctions compliance investigation, or (iii) Supplier is or becomes aware that any of the products, software or technology it supplies to Schindler is subject to any export controls or export license requirements. Supplier shall provide Schindler upon request with all information related to the export-controlled product and its license requirements, where applicable.

如果 (i) 供应商、其直接所有者或最终受益人，或供应商的任何董事、高级职员或代表受到或成为国际贸易制裁或限制的对象；或 (ii) 供应商成为制裁合规调查的对象；或 (iii) 供应商知道或意识到其向迅达提供的任何产品、软件或技术受到任何出口管制或出口许可证要求的约束，则供应商应立即告知迅达，不得拖延。供应商应根据迅达的要求，向其提供与出口管制产品及其许可证要求有关的所有信息（如适用）。

In case some trade sanctions are in conflict with other trade sanctions or laws applicable to you (e.g. anti-sanction laws), our trade sanction and export control experts are pleased to support.

如果某些贸易制裁与适用于贵司的其他贸易制裁或法律（例如：反制裁法）存在冲突，可以向我们的贸易制裁和出口管制专家寻求支持。

6- Conflicts of Interest 利益冲突

Supplier shall avoid any interaction with Schindler personnel that may conflict, or appear to conflict, with the duty of Schindler personnel to act in the best interests of Schindler. Conflict of interest typically occurs when personal interests interfere with or appear to interfere with a Supplier's ability to perform the work/services without bias. Supplier shall disclose to Schindler all conflicts of interest or situations giving the appearance of a conflict of interest in its engagement with Schindler. Further, Supplier shall inform Schindler if any Schindler personnel or members of their family or relatives hold a material financial or other interest in vendor or supplier, holds a managerial position with vendor or supplier, or is directly or indirectly employed by vendor or supplier.

供应商应避免与迅达人员进行任何可能与迅达人员按照迅达最佳利益行事的义务相冲突或看似相冲突的互动。当个人利益干扰或似乎干扰供应商客观开展工作或提供服务的能力时，通常会发生利益冲突。供应商应向迅达披露其与迅达的合作中出现的所有利益冲突或看似存在利益冲突的情况。此外，如果迅达的任何人员或其家庭成员或亲属在供应商处持有重大财务或其他利益、在供应商处担任管理职务或直接或间接受雇于供应商，则供应商应告知迅达。

7- Intellectual Property and Confidentiality 知识产权和保密性

Supplier shall hold Schindler's business, financial and technical data as well as business correspondence confidential and not misappropriate Schindler's or others' tangible or intellectual property. Technology and know-how must be transferred in a manner that protects intellectual property rights.

供应商应对迅达的业务、财务和技术数据以及商业信函保密，并且不得盗用迅达或其他人的有形资产或者知识产权。技术和技术秘密的转让必须以保护知识产权的方式进行。

Supplier must use appropriate means to safeguard Schindler information, internally and externally, by ensuring internal firewalls are in place and that Supplier's organization understands confidentiality requirements. Unless authorized by Schindler in writing, Supplier is not entitled to publicize its cooperation with Schindler or utilize Schindler trademarks without the express prior written consent of Schindler. If you are party to a non-disclosure or confidentiality agreement with Schindler, that agreement is incorporated by reference and your obligations under that agreement are in addition to those set forth in this Section.

供应商必须在内部和外部采用适当的措施保护迅达的信息，确保设置了内部防火墙，并确保供应商内部组织了解保密要求。除非获得迅达书面授权，在未经迅达事先明确书面同意的情况下，供应商无权公布其与迅达的合作或使用迅达的商标。如果贵司与迅达签订了保密协议，则该协议通过引用纳入本节，并且贵司在该协议下的义务是本节规定义务的补充。

8- Privacy, Personal Information and Data Security 隐私、个人信息和数据安全

Supplier shall maintain and adopt reasonable safeguards to secure personal data and confidential information of all with whom Supplier does business or otherwise interacts (e.g., other suppliers, customers, consumers, and employees), including Schindler. Supplier must comply with all applicable privacy and

information security laws and regulatory requirements, including applicable national and local laws, statutes, regulations, rules, and ordinances relating to privacy, data protection, information security or data breach notification.

供应商应维护并采取合理的保障措施，以确保与供应商有业务合作或以其他方式进行往来的所有人（例如：其他供应商、客户、消费者和员工，包括迅达）的个人数据和机密信息的安全。供应商必须遵守所有适用的隐私和信息安全法律和法规要求，以及所有适用的国家和地方的法律、法规、规章、规范性文件、条例和任何国家或管辖区域与隐私、数据保护、信息安全或数据泄露通知有关的法令。

If Supplier believes or has reason to believe that any unauthorized destruction, loss, alteration of or access to personal data of Schindler has occurred (a "Security Incident"), Supplier shall: (a) promptly notify us; (b) promptly, in consultation with us, start an investigation of the Security Incident and take all appropriate actions to remediate the effects of the Security Incident and mitigate any risk that may arise from the Security Incident; (c) preserve all records and other evidence relating to the Security Incident; (d) provide us with a written report on the outcome of its investigation, including any risk to the personal data of Schindler, the corrective action Supplier will take, or has taken, to respond to the Security Incident and such other information as we may reasonably request; and (e) provide us with satisfactory assurance that such Security Incident will not recur. Schindler will not be restricted from disclosing the occurrence of a Security Incident to our customers, potential customers, employees, or governmental authorities.

如果供应商认为或有理由认为发生了任何未经授权的迅达个人数据的破坏、丢失、更改或访问（“安全事件”），供应商应：(a) 立即通知我们；(b) 与我们协商后立即启动对安全事件的调查，并采取一切适当行动，针对安全事件造成的影响进行补救，降低安全事件可能带来的任何风险；(c) 保存与安全事件相关的所有记录和其他证据；(d) 向我们提供一份关于其调查结果的书面报告，包括对迅达个人数据造成的任何风险、供应商为应对安全事件将采取或已采取的纠正措施，以及我们可能合理要求的其他信息；以及(e) 向我们提供令人满意的保证，确保此类安全事件不会再次发生。迅达将不受限制地向我们的客户、潜在客户、员工或政府机关披露所发生的安全事件。

9- Quality Assurance and Product Safety 质量保证和产品安全

Supplier shall maintain a quality assurance program ensuring that its products and services meet or exceed all applicable quality commitments. Schindler's Quality Management System is driven by the international standard: ISO 9001: 2015. Schindler's requirement towards our suppliers is to perform quality assurance measures that include identification and correction of issues and defects before products are shipped, conducting testing to identify issues and defects, and identifying and correcting the root causes of issues and defects. Supplier shall also develop, implement, and maintain methods and processes appropriate to its products to minimize the risk of introducing counterfeit parts and materials into deliverable products.

供应商应维护质量保证计划，确保其产品和服务达到或超过所有适用的质量承诺。迅达的质量管理体系遵循国际标准 ISO 9001: 2015。迅达对供应商的要求是执行质量保证措施，包括在产品发运前发现并纠正问题和缺陷，进行检测以发现问题和缺陷，以及发现并纠正造成问题和缺陷的根本原因。供应商还应开发、实施和维护适合其产品的方法和流程，以最大限度地降低在可交付产品中使用假冒零件和材料的风险。

10- Implementation and Management systems 实施和管理体系

Suppliers are required to establish appropriate management systems that include effective due diligence procedures to detect, prevent, and mitigate any adverse impacts related to corruption, labor rights, occupational health and safety, and the environment. This shall ensure compliance and facilitate continuous improvement on the requirements, also with Suppliers.

供应商必须建立适当的管理体系，其中包括有效的尽职调查程序，以发现、预防和减轻与腐败、劳工权利、职业健康与安全以及环境有关的任何不利影响。这将确保合规性，并推动相关要求的持续改进，以及供应商相关行为的改进。

Suppliers must put in place appropriate and effective reporting mechanisms in all areas addressed by these requirements, to allow for workers and communities (and their organizations, where they exist) to raise concerns. Complaints and incidents must be regularly monitored and incorporated into the vendors' and supplier's risk assessment considerations and mitigation measures, as part of the management system.

供应商必须建立适当且有效的报告机制，涵盖这些要求所涉及的所有领域，以便工人、社区（及其组织（如有））能够提出疑虑。必须定期监测投诉和事件，并将其作为管理体系的一部分，纳入供应商的风险评估考量因素和缓解措施中。

Suppliers must meet all relevant local and national regulations on the environment including the implementation of an effective environmental management system that supports identifying risks, measuring and monitoring performance, and driving continual improvements to mitigate or minimize environmental and social impacts in their operations. Where local laws are less stringent than Schindler's policies and internationally recognized labor standards the vendors or suppliers shall seek to follow the higher standards where possible.

供应商必须遵守所有相关的地方和国家环境法规，包括实施有效的环境管理体系，以支持风险识别、绩效衡量和监测，并推动持续改进，以减轻或最大程度减少其运营对环境和社会的影响。如果当地法律要求低于迅达的政策以及国际公认的劳工标准，供应商应尽可能地遵循更高的标准。

Schindler will review and may terminate its business dealings with any vendors or suppliers who fail to adhere to these principles or violate in any way the terms of this Policy.

对于未能遵守这些原则或以任何方式违反本政策条款的任何供应商，迅达将对其进行审查，并可能终止与其的业务往来。

You and your company as Supplier acknowledge the importance of meeting or exceeding the requirements of this Policy and agree that it is an integral part of each and every contract between Schindler and the Supplier. To the extent that the terms of this Policy conflict with any such contract, you will comply with the more stringent requirement.

贵方及贵司作为供应商认可达到或超过本政策要求的重要性，并同意将本政策作为迅达与供应商之间签署的每份合同的组成部分。在本政策条款与任何此类合同相冲突的情况下，贵方将遵守更为严苛的要求。

10.1- Flow Down 向下传递

Supplier shall ensure that its agents, contractors, vendors, suppliers, and business partners directly or indirectly engaged in the provision of products or services to Schindler comply with this Policy.
供应商应确保其直接或间接参与向迅达提供产品或服务的代理商、承包商、供应商和业务合作伙伴遵守本政策。

10.2- Recording and Monitoring Compliance 记录和监督合规情况

Supplier is required to actively help Schindler in achieving compliance with this Policy. Supplier shall create and maintain accurate books and records regarding the products and services provided to Schindler and Supplier's compliance with this Policy. Such records must be retained based on applicable retention requirements, including all company requirements, relevant laws, regulations, and guidelines. Supplier shall make such records, and all relevant information and documents needed to verify Supplier's compliance with the Policy, available for review by Schindler or its auditors upon request.

迅达要求供应商积极配合，确保本政策得到切实遵守。供应商应针对向迅达提供的产品和服务以及供应商对本政策的遵守情况创建并维护准确无误的账簿和记录。必须根据适用的保留要求保留此类记录，包括所有公司要求、相关法律、法规和准则的要求。供应商应根据要求提供这类记录以及查证供应商是否遵守本政策所需的所有相关信息和文件，供迅达或其审计人员审查。

10.3- Commitment and Accountability 承诺和问责制

Schindler will review and may terminate its business dealings with any Suppliers which fail to adhere to these principles or violate in any way the terms of this Policy.

对于未能遵守这些原则或以任何方式违反本政策条款的任何供应商，迅达将对其进行审查，并可能终止与其的业务往来。

10.4- Reporting of Concerns 举报疑虑

Supplier shall inform Schindler if Supplier becomes aware of any potential violation of this Policy, Reports, questions, or concerns with Supplier's compliance with this policy. This information can be sent to your Schindler Category Manager. In addition, reports can be made (anonymously, where permitted by local law) via the Schindler Speak Up Hotline (<https://schindler.integrityline.com/>) or by email to the relevant Schindler Compliance Officer.

如果供应商意识到有任何可能违反本政策的行为、报告、问题或对供应商遵守本政策的疑虑，则供应商应告知迅达。此类信息可发送给迅达品类经理。此外，可通过迅达举报热线(<https://schindler.integrityline.com/>)或发送电子邮件至相关的迅达合规官进行举报（在当地法律允许的情况下，可匿名举报）。

Supplier shall provide its personnel with adequate systems to raise their concerns and grievances. If permissible by applicable laws, these reporting systems must protect confidentiality and allow anonymity. Supplier shall not directly or indirectly retaliate against personnel who report misconduct or raise an ethical issue in good faith.

供应商应为其人员提供适当的制度，便于他们提出疑虑和申诉不满。在适用法律允许的情况下，这些举报系统必须保密并允许匿名。供应商不得直接或间接报复善意举报不当行为或揭发道德问题的人员。

Schindler or its designees may survey Supplier's relevant premises to validate compliance with this Policy if Schindler has reason to believe that Supplier may be in breach of this Policy.

如果迅达有理由认为供应商可能违反本政策，则迅达或其指定人员可调查供应商的相关营业场所，以证实其是否遵守本政策。

11- Entire Policy and Interpretation 整体政策及其解释

This Responsible Sourcing Policy supersedes and replaces any previous policies of Schindler regarding its subject matter.

本《责任采购政策》取代迅达此前关于这一主题制定的任何政策。

Headings are for reference purposes only and shall not in any manner affect the meaning, interpretation, or effect of any provision hereof. References to specific legal requirements in this policy are not intended to limit the general scope of Supplier's responsibility to comply with all applicable laws.

标题仅供参考，不应以任何方式影响或改变本政策中任何条款的含义、解释或效力。本政策中对特定法律要求的引用并不意味着限制供应商遵守所有适用法律的一般责任。

12- Changes to this Policy 政策变更

Schindler reserves the right, at its sole discretion, to amend or modify this Policy at any time. Schindler will notify Supplier sufficiently in advance of such changes taking effect.

迅达保留不时更新或修订本政策的权利。迅达将在相关变更生效前预留充足时间通知供应商。

Acknowledgement and Agreement 确认及同意

Unless otherwise acknowledged and agreed by Supplier (e.g. as part of an agreement), this Policy must be signed by duly authorized signatories of the respective Supplier company and returned to sender within 15 working days of receipt. Therefore, by signing below, Supplier confirms receipt of a copy of Schindler's Responsible Sourcing Policy and agrees to comply with its terms henceforth.

除非供应商另行确认和同意（例如：作为协议的一部分），本政策必须由各供应商公司的正式授权签署人签署，并在收到后 15 个工作日内返还发件人。因此，通过在下方签字，供应商确认已收到迅达《责任采购政策》的副本，并同意从此以后遵守其条款。

Supplier Company Name:

Supplier Company Address:

Authorized Signatory 1:

Authorized Signatory 2 (if required):

供应商公司名称：

供应商公司地址：

授权签署人 1：

授权签署人 2（如果需要）：

References 参考文献

- Schindler Code of Conduct (group.schindler.com/coc)
《迅达行为准则》 [\[group.schindler.com/coc\]](http://group.schindler.com/coc)
- Schindler CoC Guidelines (group.schindler.com/coc-guidelines)
《迅达行为准则指导方针》 (group.schindler.com/coc-guidelines)
- Schindler Human Rights Policy (group.schindler.com/hrp) and the principles, guidelines and standards referenced therein, including without limitation:
《迅达劳动权益政策》 (group.schindler.com/hrp) 以及其中提到的原则、指导方针和标准，包括但不限于：
 - [Universal Declaration of Human Rights \(UDHR\)](#)
《世界人权宣言》 (UDHR)
 - [International Covenant on Civil and Political Rights \(ICCPR\)](#)
《公民权利和政治权利国际公约》 (ICCPR)
 - [International Covenant on Economic, Social and Cultural Rights \(ICESCR\)](#)
《经济、社会及文化权利国际公约》 (ICESCR)
 - [ILO Core Labor Conventions](#)
国际劳工组织核心劳工公约
 - [ILO-IOE Child Labour Guidance Tool for Business](#)
《国际劳工组织与国际雇主组织针对童工劳动的企业指导工具》
 - [UNICEF's Children's Rights and Business Principles \(CRBP\)](#)
联合国儿童基金会的《儿童权利与企业原则》 (CRBP)
 - [Ten Principles of the UN Global Compact \(UNGCC\)](#)
联合国全球契约十项原则 (UNGCC)
 - [United Nations Guiding Principles on Business and Human Rights \(UNGPs\)](#)
《联合国工商业与人权指导原则》 (UNGPs)
 - [Women's Empowerment Principles \(WEP\)](#)
《赋权予妇女原则》 (WEP)
- Schindler's Inclusion & Diversity Commitment ([Link](#))
《迅达的包容性和多元化承诺》 (链接)