



与SAFIC-ALCAN开展业务

DOING BUSINESS WITH SAFIC-ALCAN

第三方行为准则

Third-Party Code of Conduct

致利益相关者

过去几年来，Safic-Alcan及其分公司（“Safic-Alcan”）始终恪守对联合国全球契约组（United Nations Global Compact，简称UNGC）及负责任关怀计划（Responsible Care Initiative）的承诺，制定了一项以可持续发展为创新动力的发展战略。

基于这些承诺，Safic-Alcan保证在本公司开展的所有业务活动中，都按照相关法律及本公司业务领域的司法标准，建立可持续的、公正的业务关系。

Safic-Alcan致力于和负责任，讲究诚信、诚实与透明的供应商以及为Safic-Alcan制造产品或提供服务的第三方服务商（“第三方”）展开业务合作。

为此，我们多年来坚持实施第三方行为准则（“准则”），针对人权、环保、反腐败、业务操守等重要领域制定了相关原则。

我们通过这部从Safic-Alcan行为准则以及本公司ESG战略中衍生出来的准则，努力保护彼此的利益，也借此希望在整条价值链中践行与推广责任感。

我们要求公司第三方认可这份准则，并通过确认表承诺他们会按照其中规定的原则来进行操作。我们强烈推荐他们保证自己的供应商也遵守这份准则中规定的原则或同等标准。

我们预先感谢每个人为此做出的承诺。我们知道，凭一己之力无法做出重大进步，我们希望能够通过这部准则，加强整条价值链对这些原则的尊重。

Safic-Alcan执行委员会



Letter to our stakeholders

Committed to the United Nations Global Compact (UNGC) and Responsible Care Initiative, over the past several years, Safic-Alcan and its subsidiaries (“Safic-Alcan”) have developed a growth strategy using Sustainable Development as the engine for innovation.

Based on these commitments, Safic-Alcan is committed to conducting all of our business activities to secure a sustainable and ethical business relationship in accordance with the applicable laws and standards in the jurisdictions in which we operate.

At Safic-Alcan, we strive to conduct business with suppliers and third-parties providers (“Third-Parties”) who produce products for, or provide services to Safic-Alcan to conduct business responsibly, with integrity, honesty and transparency.

As such, we have implemented for many years the Third-Party Code of Conduct (“Code”) which defines fundamental principles in essential areas, such as human and labour rights, environmental protection, the fight against corruption and business ethics.

With this Code, derived from Safic-Alcan’s Code of Conduct and our ESG strategy, we aim not only to protect our mutual interests but also aim to ensure and promote responsibility throughout our value chain.

We require our Third-Parties to acknowledge this Code and confirm they will operate in line with its principles by signing the attached ACKNOWLEDGEMENT FORM. We strongly encourage them to ensure that their own supply chain upholds the principles of this Code or similar standards.

We thank everyone in advance for their commitment. We know we cannot make meaningful progresses alone and we hope that this code can reinforce respect for these principles in all our value chain.

Safic-Alcan Executive Committee



需要遵守的主要原则

Safic-Alcan的目标是与第三方建立长期、公正的关系。对Safic-Alcan而言，保持透明，为持续改善业务实践而进行的合作，是我们能够获得成功的关键因素之一。

这部第三方行为准则的制定基础，是在和Safic-Alcan展开业务合作时，需要遵守的五大原则：



尊重劳动者和人权

第三方应尊重所有劳动者的权利和尊严，应致力于维护劳动者的人权，并推动以下雇佣行为：

- 保证遵守员工所在国与工资、工作时间、加班和福利有关的国家法律和法规。
- 保护合法结社的权利，认可集体谈判的权利。
- 保护其基本自由，防止强迫劳动或童工，或使用任何形式的童工或其他强迫、抵押、契约劳动，包括人口贩运和现代奴隶。
- 创造一个没有骚扰、歧视或其他任何形式的虐待行为，没有性骚扰和攻击性行为的工作场所，防止和避免与报酬、雇用和就业有关的任何形式的差别对待。
- 告知Safic-Alcan在所提供的产品中，是否含有任何属于“冲突矿物”的矿物。如出现上诉情况，第三方需提供必要的法律文件，确保其符合国际规定的负责任采矿标准。这对于防止童工、强迫劳动和资助政治不稳定地区的武装团体而言，是极其重要的。

KEY PRINCIPLES TO RESPECT

Safic-Alcan's objective is to build long-term, ethical relationships with its Third-Parties. For Safic-Alcan some of the key success factors are transparency and collaboration for continuous improvement in business practices including ESG areas to align performances, and legal and market needs.

This Third-Party Code of Conduct is based on five key principles to respect when doing business with Safic-Alcan:



Respect Labour and Human Rights

Third-Parties shall respect the rights and dignity of all workers and shall commit to upholding the Human Rights of the workers and encourage the development of employment practices including:

- Guaranteeing compliance with applicable national laws and regulations of the country in which their workers are employed relating to wages, working hours, overtime, and benefits.
- Respecting the rights of lawful association and recognizing the right to collective bargaining.
- Protecting their fundamental freedoms by preventing involuntary or underage labour or use of any form of child labour or other forced, bonded, or indentured labour, including human trafficking and modern slavery.
- Preventing and eliminating any form of difference in compensation, hiring, and employment by creating a workplace free of harassment, discrimination or any other form of abuse, including sexual harassment or offensive behaviour.
- Informing Safic-Alcan if any of the minerals integrated into the products supplied fall into the category known as "conflict minerals". If so, Third-Party are to provide the legally required information to ensure they meet international standards of minerals responsible sourcing. That is of the utmost importance to prevent child labour, forced labour and the financing of armed groups in politically unstable areas.



保障业务操守与合规性

第三方应遵守所有相关和适用的法律、法规和条例，并努力符合其所属业务领域及其员工所在国的常规行业标准。

Safic-Alcan 通过自己的行为准则规定了对员工的要求，期待推动诚实、合法、道德的行为，也借此希望第三方在与 Safic-Alcan 合作时能遵守下列规定：

- **腐败与贿赂：**

第三方须在其展开业务的所有国家遵守所有相关的反腐败（包括商业贿赂）的法律、指令和条例，不得涉入腐败、贿赂、勒索或其他任何形式的不道德或非法行为。

- **利益冲突：**

“利益冲突”往往发生在雇员开展业务时，对其个人直接或间接利益的前景预测可能会对其业务判断或行为造成影响的时候。

希望第三方能保证，不让Safic-Alcan的员工陷入可能发生利益冲突的局面。一旦出现此类情况，Safic-Alcan希望第三方能通知所有相关方面，以便重视风险，采取正确行动。

- **礼品和娱乐：**

Safic-Alcan认可并尊重偶尔发生的，与开展业务有关的娱乐行为，或根据当地文化与法律，与业务合作伙伴之间的礼尚往来。Safic-Alcan期望第三方能遵守规定，本公司员工不得提供或接受过分的或不适当的娱乐活动，只能偶尔提供或接受价值很小的非现金性质的礼品。绝不能借此影响交易过程中的常规业务判断，或影响员工对公司价值观的坚持。

- **竞争与反垄断法：**

第三方决不能从事或支持不公平或掠夺性的业务行为或任何会不适当地限制贸易的活动。其次也很关键的是，第三方应避免任何可能违反竞争法的活动。

- **全球贸易合规性：**

第三方必须遵守得到公认的当局所发布的贸易制裁和类似限制。

第三方必须确保其业务行为符合所有与假冒或进出口产品和技术数据相关的法律、指令和法规，并在必要时提供所需信息，获得出口许可证和/或授权证明。

- **信息保护：财产权与隐私权**

Safic-Alcan致力于保护数据隐私权。详情请见www.safic-alcan.com/privacy-protection。

因此，第三方须确保自己在收集、使用、保留、披露及处理个人数据时，符合其业务所在地所有关于数据保护及隐私权的法律。其中包括与Safic-Alcan及其雇员有关的数据。

同样，第三方必须遵守知识产权，保护业务机密和保密信息，并确保在技术和工艺的转移过程中，对知识产权进行保护。



Ensure Business Ethics and Compliance

Third-Parties are expected to comply with all relevant and applicable laws, rules and regulations and to strive to conform to the usual industry standards of the business in which they are involved and the country in which their workers are employed.

Safic-Alcan has defined expectations for its employees in its Code of Conduct to promote honest, legal and ethical conduct and expects its Third-Parties to respect the following provisions when doing business with Safic-Alcan:

- **Corruption & Bribery :**

Third-Parties shall comply with all applicable anti-corruption laws, directives and regulations including commercial bribery in all countries in which they operate and shall not engage in corruption, bribery, extortion, or other unethical or illegal practices of any form.

- **Conflicts of interests :**

A “*conflict of interest*” occurs whenever the prospect of direct or indirect personal gain may influence the business judgment or actions of an employee when conducting business.

Third-Parties are expected to ensure that Safic-Alcan employees avoid a situation where a conflict of interest may occur. Should such a situation arise, Safic-Alcan expects its Third-Parties to provide notification to all affected parties so the risk can be properly considered, and the right action taken.

- **Gifts and Entertainment :**

Safic-Alcan recognizes and respects that occasional business-related entertainment or exchanges of gifts with its business partners can be exchanged depending on local cultures and their laws. Safic-Alcan expects its Third-Parties to respect that its employees must not provide or accept excessive or inappropriate entertainment and may only offer or accept non-cash gifts of modest value occasionally.

It must not be perceived as an alteration of normal business judgment concerning any transaction or impair the employee’s loyalty to its values.

- **Competition & Antitrust Laws :**

Third parties must never engage in or support unfair or predatory business practices or any activities that would improperly restrain trade. It is also critical that Third-Parties avoid any activity that could violate competition laws.

- **Global trade compliance :**

Third-Parties must comply with trade sanctions and similar restrictions issued by recognized authorities.

Third-Parties must ensure that their business practices are in accordance with all applicable laws, directives and regulations governing counterfeit or the import and export of products, and technical data, and shall provide required information, and obtain export licences and/or consents where necessary.



保护健康与安全

第三方必须承诺通过以下方式提供一个安全健康的工作场地和条件：

- 为其员工提供合适的劳动保护措施；
- 遵守过程安全流程以防止或减轻灾难性事件的发生，其中包括但不限于火灾、事故和自然灾害；
- 进行风险评估，实施应急准备计划和回应程序；
- 提供安全和危险信息，以确保其产品使用安全。



以尊重环境和产品责任的方式行事

根据UNGC承诺，Safic-Alcan始终把环境管理铭记于心。它清楚表明，维持安全、可持续的运营不仅会影响公司，也会影响社区、环境和我们共同的未来。

因此，Safic-Alcan希望第三方尽量通过以下方式减少其业务活动对环境的影响，制定有助于保护和节约水、资源和能源的解决方案：

- 取得并遵守所有必要的环境许可证、执照、信息登记和限制措施。
- 通过避免、再利用和/或回收生产废物，有害气体、土壤及水的排放及意外泄漏，并确保安全处理、移动、储存和处置，预防和最大限度地减少其业务活动造成的污染。
- 避免使用有害物质。在没有替代物的情况下，供应商应确保对其进行安全处理和处置。
- 通过测量、承诺和部署减少温室气体（GHG）排放的行动计划，为减少气候变化的影响作出贡献。
- 保护自然资源、能源和生物多样性，包括在可能的情况下保护动物福祉。

- **Information protection : property rights and privacy**

Safic-Alcan commits to protecting data privacy. More information can be found at www.safic-alcan.com/privacy-protection.

As such, Third-Parties shall ensure that they collect, use, retain, disclose, and dispose of personal data in conformity with all data protection and privacy laws relevant to the locations in which they operate. This shall include data relating to Safic-Alcan and its employees.

As well, Third-Parties must respect intellectual property rights, protect trade secrets and confidential information, and ensure that the transfer of technology and know-how is conducted in a manner that protects intellectual property rights.



Protect Health and Safety

Third-Parties must be committed to providing a safe and healthy workplace and working conditions by:

- Providing appropriate worker protections for their employees;
- Maintaining process safety programs to prevent or mitigate catastrophic events including but not limited to fire, accidents, and natural disasters;
- Conducting risk assessments and implementing emergency preparedness plans and response procedures;
- Providing safety and hazard information to ensure the safe use of their products.



Act with Respect for the Environment and Product Responsibility

Following its UNGC commitment, Safic-Alcan takes environmental stewardship to heart. It makes it clear that maintaining safe, sustainable operations not only impacts companies but communities, the environment and our collective future.

As such, Safic-Alcan expects its Third-Parties to minimize the impact on the environment of their activities and develop solutions that contribute to preserving and saving water, resources and energy by:

- Obtaining and complying with all required environmental permits, licenses, information registrations and restrictions.
- Avoiding the use of hazardous substances. In the event no alternative is available, suppliers shall ensure their safe handling and disposal.



报告不当行为

强烈鼓励Safic-Alcan所有员工和与之有业务往来的第三方报告他们认为可能不符合公司准则、价值观或任何相关法律的一切行为，哪怕他们不确定所有事实或不掌握所有信息。

Safic-Alcan会认真对待所有关于不当行为的报告，并对所有此类报告进行保密。对于善意向公司提出报告的个人，公司不会采取任何纪律处分或报复。

任何潜在的问题都可以直接报告给Safic-Alcan在当地的**管理层**。如果不方便与当地管理层联系，可通过下列方式将报告提交给Safic-Alcan：

- 电子邮件：reporting.concern@safic-alcan.com
- 网上：[Report concern form](#)
- 电话：+33 1 46 92 63 46
- 邮寄地址：13, Cours Valmy - Tour Pacific, 92977 Paris La Defense Cedex, France（法国）

- Preventing and minimizing the pollution caused by their activities through avoidance, reuse and/or recycling procedures for generation of waste, hazardous air, soil and water releases, as well as accidental spills and ensuring safe handling, movement, storage and disposal.
- Contributing to reducing the impact of climate change by measuring, committing and deploying an action plan to reduce greenhouse gas (GHG) emissions.
- Preserving natural resources, energy and biodiversity, including respecting animal welfare when applicable.



Report Concerns

All Safic-Alcan employees and Third-Parties with whom it does business are strongly encouraged to report any conduct they believe may be inconsistent with its codes, values or any applicable laws, even if they are unsure of all the facts or do not have all the information.

Safic-Alcan takes all reports of misconduct seriously and treats all such reports confidentially. No disciplinary action or retaliation will be taken against an individual bringing a concern to the Company's attention in good faith.

Any potential concerns may be reported directly to Safic-Alcan's local Management. If contact with local Management is not appropriate, reports can be addressed to Safic-Alcan to the following:

- Email: reporting.concernesafic-alcan.com
- Online: [Report Concerns form](#)
- Telephone: +33 1 46 92 63 46
- Mail: 13, Cours Valmy - Tour Pacific, 92977 Paris La Defense Cedex, France



协同合作，持续改进

CONTINUOUS IMPROVEMENT

Safic-Alcan邀请第三方通过提高绩效、拓展经济发展机遇和开发创新技术，以及其他应对社会和环境挑战的解决办法，为可持续发展目标作出贡献。Safic-Alcan还鼓励在其采购/供应链中实行负责任和可持续的运营。

Safic-Alcan invites its Third-Parties to contribute to sustainable development goals through improved performance, expanded economic opportunities and the development of innovative technologies and other solutions to societal and environmental challenges. Safic-Alcan also encourages responsible and sustainable operations in their procurement/supply chains.

Discover our commitment



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