



**Wacker Neuson
Group**

供应商行为准则

Code of Conduct for Suppliers

- 2.0 版——2023 年 4 月

To render this document easy to read, groups of persons (customers, employees) are addressed in a neutral form, always referring to persons of all genders.

为了便于阅读，本文中的人群（客户、员工）均采用中性形式表示
以中性形式表示，始终指代所有性别的人。



Foreword

The values of the Wacker Neuson Group include entrepreneurship as well as expertise, enthusiasm and agility. This means a clear commitment to integrity and honesty and to creating an atmosphere of mutual trust. We act in accordance with the law, adhere to the rules of fair competition and respect human rights. We report truthfully and stand by our word. Satisfied customers and business partners as well as motivated employees who feel connected to the company are for us the benchmark for a sustainable and trusting relationship. As a globally active group, we also feel an obligation to assume social responsibility toward the environment, society and our employees. For us, sustainability is a fundamental component of successful development that contributes to long-term success and is the basis of our policy statement.

We therefore expect all our **suppliers** to comply with all applicable laws and the principles set out in this "Code of Conduct for Suppliers to the Wacker Neuson Group" (hereinafter referred to as the "**Code**"), which applies equally to all Wacker Neuson Group companies, in order to ensure a long-term, sustainable relationship.

Compliance with this Code is an important basis for our business relationship with our suppliers.

前言

威克诺森集团的价值观包括企业家精神、专业知识、热情和敏捷性。这意味着我们明确承诺恪守诚信，营造相互信任的氛围。我们遵守法律，恪守公平竞争规则，尊重人权。我们如实报告，信守承诺。满意的客户和商业伙伴，以及与公司有强烈认同感的积极员工，是我们建立可持续、信任关系的基准。作为一家全球性企业集团，我们也感到有义务对环境、社会和我们的员工承担社会责任。对我们而言，可持续发展是成功发展的重要组成部分，有助于长期成功，也是我们政策声明的基础。

因此，为了确保长期、可持续的关系，我们要求**所有供应商**遵守所有适用法律以及《威克诺森集团供应商行为准则》（以下简称“准则”）中规定的原则，该准则同样适用于威克诺森集团的所有公司。

遵守本准则是我们与供应商建立业务关系的重要基础。

威克诺森集团董事会 / The Executive Board of Wacker Neuson Group

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1. Environmental protection and energy efficiency

Environmental protection is an integral part of the Wacker Neuson Group's sustainable corporate culture. For this reason, all suppliers are also expected to minimize environmental hazards, use natural resources sparingly and comply with the environmental laws and regulations that apply to them. Regardless of their implementation in the respective national law, the rules of the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal must be observed.

Suppliers are also expected to work on the continuous improvement of their energy and environmentally relevant processes and products, ideally by providing evidence of suitable management systems for environmental protection and energy management (e.g. according to DIN EN ISO 14001 or EMAS and/or ISO 50001).

The products and services provided by our suppliers meet the requirements for environmental protection, energy efficiency, quality and safety agreed in the underlying contracts in each case.

2. Protection of livelihoods

Suppliers will avoid soil, water and air pollution, noise emissions and excessive water consumption where these affect people's health, the natural basis for food production or access to safe drinking water and sanitation.

Forced evictions and the unlawful dispossession or conversion of land, forests or waters used for people's livelihoods will be avoided.

3. Human rights, occupational health and safety

Suppliers commit to respecting human rights in accordance with the "United Nations Universal Declaration of Human Rights" and respect and support the principles of the "United Nations Global Com-

1. 环境保护与能源效率

环境保护是威克诺森集团可持续企业文化的重要组成部分。因此，所有供应商都应尽量减少对环境的危害，节约使用自然资源，并遵守适用的环境法律法规。无论这些法规是否已纳入各国国内法，都必须遵守《水俣汞公约》、《斯德哥尔摩持久性有机污染物公约》和《控制危险废物越境转移及其处置巴塞尔公约》的规定。

供应商还应不断改进其能源和环境相关流程及产品，理想情况下应提供环境保护和能源管理方面的适当管理体系证明（例如符合 DIN EN ISO 14001 或 EMAS 和/或 ISO 50001 标准）。

我们的供应商提供的产品和服务符合相关合同中约定的环境保护、能源效率、质量和安全要求。

2. 保护民生

供应商应避免造成土壤、水和空气污染、噪音排放和过度用水，以免影响人们的健康、食物生产的自然基础或获得安全饮用水和卫生设施的机会。

应避免强制迁离以及非法剥夺或转换用于人们生计的土地、森林或水域。

3. 人权、职业健康与安全

供应商承诺遵守《联合国世界人权宣言》规定的人权，并尊重和支持《联合国全球契约》的原则。这些原则要求企业在自身影响范围内承认、支持并实践一系列核心价值观。

pact". These require companies to recognize, support and put into practice a set of core values within their sphere of influence.

Security personnel entrusted with protecting suppliers' operations must also be instructed and supervised in such a way that they do not violate any of the rights mentioned in this Code.

The Wacker Neuson Group expects compliance with the respective applicable national employee rights and recognition of the core labor standards of the International Labor Organization (ILO) as well as the rights established by the Organization for Economic Cooperation and Development (OECD).

The Wacker Neuson Group respects the freedom of association and also expects its suppliers, to the extent permitted by applicable law, to allow their employees to freely associate or join trade unions and employee representatives, to respect the right to strike and collective bargaining and not to discriminate against anyone because of their commitment to a trade union.

Suppliers will pay their employees at least the legal minimum wage and, if this is not sufficient to provide a living in the case of full-time employment, an appropriately higher wage.

Suppliers shall comply with the applicable rules on occupational safety and health protection. In the course of this, suppliers shall avoid excessive fatigue of employees through their work organization and take measures – for example, enabling sufficient breaks, protection against hazardous substances and training – to improve occupational safety, prevent occupational illnesses and minimize health and accident risks as far as possible.

4. Prohibition of discrimination

The Wacker Neuson Group is opposed to any form of discrimination and also expects its suppliers to refrain from any form of unequal treatment of employees based on national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or ideology that is not justified in the requirements of the employment itself. Equal pay must be paid for work of equal value.

受委托保护供应商业务的安全人员也必须接受培训和监督，以确保他们不违反本准则中提到的任何权利。

威克诺森集团要求遵守各国家适用的员工权利，承认国际劳工组织（ILO）的核心劳动标准以及经济合作与发展组织（OECD）确立的权利。

威克诺森集团尊重结社自由，并要求其供应商在适用法律允许的范围内，允许其雇员自由结社或加入工会和员工代表组织，尊重罢工权和集体谈判权，不得因任何人参与工会活动而对其进行歧视。

供应商应至少向其雇员支付法定最低工资，如果该工资不足以保障全职雇员的生活，则应支付相应更高的工资。

供应商应遵守适用的职业安全 and 健康保护规则。在此过程中，供应商应通过其工作组织避免员工过度疲劳，并采取措施（例如，提供足够的休息时间、防范有害物质和培训）来提高职业安全、预防职业病，并尽可能降低健康和事故风险。

4. 禁止歧视

威克诺森集团反对任何形式的歧视，并要求其供应商避免基于国籍和种族、社会出身、健康状况、残疾、性取向、年龄、性别、政治观点、宗教或意识形态对员工进行任何形式的不平等待遇，除非这些待遇是就业本身所必需的。同工同酬。



5. Prohibition of child labor , forced labor and slavery

The Wacker Neuson Group does not employ children and also requires its suppliers to refrain from any form of child labor. Suppliers undertake in any case to ensure that no workers are employed below the age at which compulsory schooling ends at the place of employment, whereby a minimum age of 15 years must be observed. In countries classified as developing countries under ILO Convention 138, the minimum age may be reduced to 14 years. In addition, the prohibition of the worst forms of child labor as set out in ILO Convention 182 must be observed for all children under the age of 18.

Suppliers also agree not to permit any form of forced labor. This includes any work or service that is required of a person under threat of punishment and for which he or she has not voluntarily made himself or herself available. Slavery and similar practices of domination and oppression shall not be used in the workplace environment.

6. Responsible raw material procurement

The Wacker Neuson Group expects its suppliers to fulfill their due diligence obligations to promote responsible raw material supply chains and to comply with all applicable legal regulations on conflict minerals. This includes, where applicable, improving transparency within the supplier's own supply chain back to the point of raw material extraction and initiating appropriate measures to identify and mitigate risks associated with, among other things, direct or indirect financing of armed conflicts and serious human rights violations, including child and forced labor and slavery.

7. Fair market behaviour

The Wacker Neuson Group is committed to free and undistorted competition. It therefore also expects its suppliers to behave fairly in competition and to comply with all applicable laws of antitrust and competition laws. In particular, suppliers do not make any anti-competitive agreements regarding prices, conditions or other market strate-

5. 禁止童工、强迫劳动和奴役

威克诺森集团不雇用儿童，并要求其供应商避免任何形式的童工现象。供应商必须确保不雇用低于工作地点义务教育结束年龄的工人，且最低年龄不得低于 15 岁。根据国际劳工组织第 138 号公约，在属于发展中国家的国家，最低年龄可降低至 14 岁。此外，对于所有 18 岁以下儿童，必须遵守 ILO 第 182 号公约规定的禁止最恶劣形式的童工劳动的规定。

供应商还承诺不允许任何形式的强迫劳动。这包括任何在威胁惩罚下要求某人提供且该人并非自愿提供的劳动或服务。工作场所环境中不得使用奴役和类似的统治与压迫行为。

6. 负责任的原材料采购

威克诺森集团要求其供应商履行尽职调查义务，以促进负责任的原材料供应链，并遵守所有适用的冲突矿产相关法律法规。这包括在适用情况下，提高供应商自身供应链的透明度，直至原材料开采点，并采取适当措施，以识别和减轻与直接或间接资助武装冲突和严重侵犯人权行为（包括童工、强迫劳动和奴役）相关的风险。

7. 公平的市场行为

威克诺森集团致力于自由、公正的竞争。因此，它也要求供应商在竞争中保持公平，遵守所有适用的反垄断和竞争法律。特别是，供应商不得就价格、条件或其他市场策略达成任何反竞争协议，不得与竞争对手交换敏感的竞争信息，不得滥用任何可能存在的市场支配地位。

gies, shall not exchange competitively sensitive information with competitors and shall not abuse any existing dominant market position.

8. Fight against corruption

The Wacker Neuson Group rejects any kind of corruption and other white-collar crime. It requires its suppliers to actively combat and take appropriate measures to prevent corruption, bribery, including bribery abroad, theft, embezzlement, misappropriation and extortion. In particular, suppliers shall ensure that their employees, agents and subcontractors do not grant, offer or accept bribes, kickbacks, improper donations and payments or other improper benefits of value to public officials, customers or other third parties.

As a general rule, no donations or invitations may be given to public officials. This includes all employees of government agencies (e.g. all civil servants as well as employees of the police, customs, military, courts, authorities, schools, state hospitals, etc.). It also includes employees of companies that are under the influence of the state (in some countries, therefore, the status of public officials is very broad!). In case of doubt, the supplier must ask the beneficiary whether the latter falls under the definition of "public official".

9. Contributions and invitations

Any gifts, invitations and other benefits from suppliers or their representatives to employees of the Wacker Neuson Group must remain within a socially acceptable, reasonable and transparent limit. Suppliers or their agents must not offer, promise or grant any personal benefits (invitations, gifts and other advantages) to employees of the Wacker Neuson Group which, when viewed objectively, are likely to have an unfair influence on the business conduct. Even the appearance of such impropriety must be avoided.

10. Avoiding conflicts of interest

The Wacker Neuson Group makes all business-related decisions based on objective criteria and not on private interests or relationships. It expects its suppliers to do the same.

8. 打击腐败

威克诺森集团拒绝任何形式的腐败和其他白领犯罪。它要求其供应商积极打击并采取适当措施，防止腐败、贿赂（包括国外贿赂）、盗窃、贪污、挪用公款和敲诈勒索。供应商应确保其员工、代理商和分包商不得向公职人员、客户或其他第三方提供、承诺或接受贿赂、回扣、不当捐赠和付款或其他不当有利利益。

一般而言，不得向公职人员提供任何捐赠或邀请。这包括政府机构的所有雇员（例如，所有公务员以及警察、海关、军队、法院、政府机构、学校、公立医院等的雇员）。这也包括受国家影响的企业雇员（因此，在某些国家，公职人员的范围非常广泛！）。如有疑问，供应商必须询问受益人是否属于“公职人员”的定义范围。

9. 捐赠和邀请

供应商或其代表向威克诺森集团员工提供的任何礼物、邀请和其他福利必须保持在社会可接受、合理且透明的范围内。供应商或其代理人不得向威克诺森集团员工提供、承诺或给予任何个人福利（邀请、礼物和其他好处），这些福利在客观上可能会对商业行为产生不公平的影响。甚至必须避免出现此类不当行为。

10. 避免利益冲突

威克诺森集团根据客观标准，而非私人利益或关系，做出所有与业务相关的决策。该集团要求其供应商也做到这一点。

11. Import and export control

Suppliers shall comply with all applicable laws and regulations governing the import and export of goods, services and information.

11. 进口和出口管制

供应商应遵守所有适用于商品、服务和信息进出口的法律法规。

12. Sanctions, money laundering, terrorist financing

The Wacker Neuson Group adheres to the requirements of applicable sanctions regimes and acts in accordance with legal requirements to prevent money laundering and combating the financing of terrorism. It expects its suppliers to act in the same way by taking appropriate measures to ensure compliance with the relevant national and international standards and laws.

12. 制裁、洗钱、恐怖主义融资

威克诺森集团遵守适用的制裁制度要求，并按照预防洗钱和打击恐怖主义融资的法律要求行事。该集团要求其供应商采取适当措施，确保遵守相关的国家和国际标准及法律，以同样的方式行事。

13. Protection of confidential information

Suppliers shall use and protect confidential business information received in the course of their business activities with the Wacker Neuson Group in a technically and organizationally appropriate manner. They ensure that sensitive business data is properly collected, processed, stored and deleted. Suppliers shall oblige their employees to protect confidential business information; such information may not be published or disclosed to third parties without authorization.

13. 保护机密信息

供应商应在与威克诺森集团开展业务活动过程中，以技术上和组织上适当的方式使用和保护所获得的机密商业信息。他们应确保敏感商业数据得到适当收集、处理、存储和删除。供应商应要求其员工保护机密商业信息；未经授权，不得发布或向第三方披露此类信息。

14. Data security and data protection

The Wacker Neuson Group has taken appropriate measures to ensure the integrity, confidentiality and availability of electronically stored information. Our suppliers also ensure the protection of their IT systems and electronically stored information. In particular, they shall take all necessary measures to prevent internal or external misuse of their IT systems and electronically stored information.

14. 数据安全和数据保护

威克诺森集团已采取适当措施，以确保电子存储信息的完整性、保密性和可用性。我们的供应商也确保保护其 IT 系统和电子存储信息。特别是，他们应采取一切必要措施，防止内部或外部滥用其 IT 系统和电子存储信息。

Suppliers shall comply with all applicable laws regarding the protection of personal data, in particular that of employees, customers and suppliers.

供应商应遵守所有适用的个人数据保护法律，特别是关于员工、客户和供应商的数据保护法律。

15. Monitoring and compliance with the Code as well as consequences of misconduct

In addition to complying with all applicable laws, the Wacker Neuson Group expects its suppliers to adhere to the principles set out in this Code.

The Wacker Neuson Group aims to sustainably implement this Code throughout its entire supply chain. It therefore expects its suppliers to pass on the principles and requirements of this Code to their own suppliers and subcontractors and to work towards, promote and monitor compliance with the agreed content.

Suppliers are obliged to inform the Wacker Neuson Group without being asked about their own violations of this Code (or similar violations of their own suppliers of which they are aware), if and insofar as these violations have been committed in direct or indirect connection with their business relationship with the Wacker Neuson Group.

In the event of suspected violations of the requirements of this Code (e.g. negative media reports, information provided by employees, etc.), the Wacker Neuson Group reserves the right, in individual cases, to have its own auditors or auditors commissioned by the Wacker Neuson Group inspect compliance with the requirements of this Code at the supplier's premises during normal business hours and in the presence of the supplier's representatives. The supplier agrees to allow the auditors to interview its employees if necessary.

If a suspicion of a violation of the Code is substantiated or confirmed, the supplier must implement suitable corrective measures within a reasonable period of time in coordination with the Wacker Neuson Group.

If such measures are not implemented within the agreed timeframe or if the supplier generally fails to comply with the provisions of this Code, this will be considered by the Wacker Neuson Group as a significant impairment of the contractual relationship and the contractual basis. In such cases, the Wacker Neuson Group or the respective Group company reserves the right to terminate the contract with the supplier without notice. The Wacker Neuson Group or the respective Group company also reserves the right to claim damages from the

15. 监督与遵守本准则以及不当行为的后果

除了遵守所有适用法律外，威克诺森集团还要求其供应商遵守本准则中规定的原则。

威克诺森集团致力于在其整个供应链中可持续地实施本准则。因此，集团要求其供应商将本准则的原则和要求传达给其供应商和分包商，并努力促进和监督协议内容的遵守。

供应商有义务主动向威克诺森集团报告其违反本准则的行为（或其供应商的类似违规行为），前提是这些违规行为与威克诺森集团的业务关系直接或间接相关。

如果怀疑存在违反本准则要求的情况（例如负面媒体报道、员工提供的信息等），威克诺森集团保留在个别情况下，在正常营业时间内，在供应商代表在场的情况下，由其自有审计师或威克诺森集团委托的审计师检查供应商是否遵守本准则要求。供应商同意在必要时允许审计员采访其员工。

如果违反本准则的嫌疑得到证实或确认，供应商必须在合理期限内与威克诺森集团协商，实施适当的改进措施。

如果未在约定期限内实施此类措施，或者供应商普遍未遵守本准则的规定，威克诺森集团将认为这严重损害了合同关系和合同基础。在这种情况下，威克诺森集团或其各集团公司保留立即终止与供应商合同的权利。如果供应商违反本准则的规定并造成损失，威克诺森集团或相关集团公司保留向供应商索赔的权利。

supplier in the event of culpable violation of the provisions of this Code resulting in damage.

16. Whistleblower system

The Wacker Neuson Group enables not only its employees, but also its suppliers and their employees and subcontractors to confidentially report indications of criminal acts or serious misconduct that could have an impact on the Wacker Neuson Group, as well as indications of environmental or human rights-related obligations arising from the economic activities of the Wacker Neuson Group or its suppliers, using a web-based whistleblower system at <https://www.bkms-system.net/wackerneuson>, also anonymously. Suppliers must inform their employees and subcontractors of this possibility.

Furthermore, the Wacker Neuson Group expects that its suppliers to set up suitable whistleblower and complaint systems within their organizational structure. Suppliers must conduct investigations based on the information received there and, if necessary, take remedial action.

Neither the Wacker Neuson Group nor its suppliers accept any form of discrimination against persons who, to the best of their knowledge and belief, have made a justified report or complaint to the Wacker Neuson Group or the respective supplier.

Questions or comments regarding compliance at the Wacker Neuson Group should be sent to the following Group Compliance address:

Corporate Compliance Office

✉ compliance@wackerneuson.com

☎ +49 - 89 - 354 02 2222

16. 举报系统

威克诺森 集团不仅允许其员工，还允许其供应商及其员工和分包商通过基于网络的举报系统（网址：<https://www.bkms-system.net/wackerneuson>）秘密举报可能影响威克诺森集团的犯罪行为或严重不当行为，以及威克诺森集团或其供应商的经济活动所产生的与环境或人权相关的义务，即匿名举报。供应商必须将其员工和分包商告知此项可能性。

此外，威克诺森 集团希望其供应商在其组织结构内建立适当的举报和投诉系统。供应商必须根据收到的信息进行调查，并在必要时采取补救措施。

威克诺森集团及其供应商均不接受任何形式的歧视，这些歧视针对的是那些据其了解和相信已向威克诺森 集团或相关供应商提出合理报告或投诉的人士。

有关威克诺森集团合规性的问题或意见，请发送至以下集团合规性地址：

企业合规办公室

✉ compliance@wackerneuson.com

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Declaration of Compliance

We are aware that the "Code of Conduct for Suppliers of the Wacker Neuson Group" applies to the Wacker Neuson Group and all Group companies. This is published on the Internet at <https://wackerneusongroup.com/en/suppliers/forms-policies/> (hereinafter referred to in the respective current version of the "Code"). We have received a current version of the Code.

We hereby declare that, in addition to our obligations and agreements in other contracts with companies of the Wacker Neuson Group, we will act in accordance with all principles and rules contained/explained in the Code and also will commit our employees accordingly.

We confirm that we understand the importance of the principles and rules contained/explained in the Code and our obligation to act accordingly in our business with and for the Wacker Neuson Group.

Within the scope of the Code, we will provide the Wacker Neuson Group with relevant information upon request within a reasonable period of time and, after consultation, allow audits in accordance with Section 15 of the Code.

合规声明

我们了解，“威克诺森集团供应商行为准则”适用于威克诺森集团及其所有集团公司。该准则已在互联网 <https://wackerneusongroup.com/en/suppliers/forms-policies/> 上发布（以下称“准则”）。我们已收到该准则的最新版本。

我们在此声明，除了与威克诺森集团各公司签订的其他合同中的义务和协议外，我们将遵守《准则》中包含/阐述的所有原则和规则，并要求我们的员工也遵守这些原则和规则。

我们确认，我们理解《准则》中包含/解释的原则和规则的重要性，以及我们在与威克诺森集团开展业务时遵守这些原则和规则的义务。

在《准则》范围内，我们将根据要求在合理期限内向威克诺森集团提供相关信息，并在协商后允许根据《准则》第 15 条进行审计。

公司名称 / *Company name:*

完整地址 / *Full address:*

联系人 / *Contact person:*

职位 / *Position:*

电话号码 / *Phone number:*

电子邮件地址 / *Email address:*

地点、日期
Place, date

签名和公司印章
Signature & company stamp

签署人姓名
Name of the signatory