

## **SCT's Code of Conduct**

The following Code of Conduct applies to our own factory and to our sub-contractors. It outlines the conditions under which our products are being manufactured. We place a huge emphasis on being ethically sound.

This Code of Conduct defines our minimum requirements and gives guidelines thereto. It will be subject to regular improvements and encourages our factory and sub-contractors to improve their labour practices continuously.

### **1. COMPLIANCE WITH LOCAL LAW**

All factories and sub-contractors must operate in full compliance with the laws of the People's Republic of China. Our factory and sub-contractors must comply with environmental rules, regulations and standards applicable to their operations.

### **2. CHILD LABOUR**

Our factory and sub-contractors must not tolerate the use of child labour as defined in ILO Convention C138. Our factory and sub-contractors only employ workers who meet the applicable minimum legal age requirement. All official documentation stating each worker's age must be available for review.

### **3. INVOLUNTARY FORCED LABOUR**

Employment is chosen freely. Our factory and sub-contractors are forbidden to practice forced, bonded or involuntary prison labour. Our workers are not required to lodge "deposits" or their identity papers with us and are free to leave after their 2 week notice, which is stipulated in their contracts.

### **4. HARASSMENT OR ABUSE**

Our factory and sub-contractors shall treat each of their employees with respect and dignity. None of our employees shall be subject to any physical, sexual, psychological or verbal harassment or abuse.

### **5. COMPENSATION**

Our factory and sub-contractors must pay employees at least the minimum wage required by law or the prevailing local industry wage (whichever is higher) and must provide legally mandated benefits. A contract based on local legislation should be established between employee and employer. Workers must be paid regularly and on time. Our factory and sub-contractors must provide annual leave and holidays as required by law.

### **6. HOURS OF WORK/OVERTIME**

Our factories and sub-contractors must practice regular working hours and must make sure overtime does not exceed the legal maximum according to the law. In addition to their compensation for regular hours of work, employees must be compensated for overtime hours at a rate at least equal to their regular hourly compensation rate plus overtime pay.

While it is understood that overtime is required from time to time in production, overtime should be solely voluntary and based on mutual agreement with the workers. Time records for all workers must be available for review.

### **7. NON-DISCRIMINATION**

Our factory and sub-contractors must employ employees on the basis of their ability to perform requisite tasks, and not on the basis of their personal characteristics or beliefs.

### **8. FREEDOM OF ASSOCIATION**

Our factory and sub-contractors must recognize and respect the legal rights of employees to free association and must not threaten, penalize, restrict, or interfere with employees' lawful efforts to organize or join associations of their choosing. Workers should be able to voice their comments/concerns. A suggestion/complaint box must be installed inside the work areas for employees.

### **9. HEALTH AND SAFETY**

Our factory and sub-contractors must provide employees with a safe, clean, and healthy working environment, including living and eating facilities (where applicable), which comply with all relevant laws and regulations as well as complying with all applicable laws regarding working conditions, including worker health and safety, sanitation, fire safety, risk protection and electrical, mechanical and structural safety.

Our factory and sub-contractors must adhere to the following:

- All work areas must have sufficient lighting for the work performed at all times of the day.
- All work areas must have a tolerable temperature.
- All work areas must be well ventilated with windows, fans or heaters.
- Must provide clean drinking water for all workers and allow access throughout the working day.
- Must provide clean and sanitary toilets and allow access throughout the working day.
- Must place at least one well-stocked first aid kit on every factory floor and in every work area.
- Must have procedures in place for dealing with serious injuries.
- Appropriate Personal Protective Equipment (PPE) – such as masks, gloves, goggles, ear plugs and rubber boots – must be made available at no cost to all workers.
- Must make sure all workers are aware of the safety arrangements such as emergency exits, fire extinguishers and first aid equipment.
- Must be an evacuation plan displayed in the factory, the fire alarm should be tested regularly and evacuation drills should be practiced at least once a year.
- Must store hazardous and combustible materials in secure and ventilated areas and dispose of them in a safe and legal manner.

#### **10. DOCUMENTATION, MONITORING AND NON-COMPLIANCE**

##### **Documentation**

Our factory and sub-contractors must maintain on file all documentation needed to demonstrate compliance with our Code of Conduct and required laws.

##### **Monitoring**

As part of the monitoring process, accredited monitors must be allowed to conduct interviews with workers on a confidential basis.

##### **Non-Compliance**

Should we find that a sub-contractor does not comply with our Code of Conduct, we will ask him to take corrective actions in an agreed time limit and if not taken, we will terminate our business agreement and relationship.

I hereby declare that our company will comply with the above written code of conduct and will hold full legal responsibility for failing to do so.

Signed and authorized by  
factory management:

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## 家达国际贸易有限公司行为准则

如下《行为准则》适用于我们自己的工厂及我们的分包商。  
其列出了我们产品的相关生产条件。合乎伦理道德是我们的基本原则。

本《行为准则》界定了相关最低要求，并提出了相应的指导原则。其将定期更新，并且鼓励我们的工厂和分包商继续优化自己的劳动章程。

### 1. 遵守本地法律

所有工厂和分包商的经营均应完全遵守中华人民共和国法律。我们的工厂和分包商必须遵守适用于自己经营的环境法律、法规及标准。

### 2. 童工

严禁我们的工厂和分包商使用《国际劳工组织公约》第 138 条中所界定的童工。我们的工厂和分包商仅能聘用符合可适用的最低法定年龄要求工人。列有各个工人年龄的所有正式文件均应是可供审查的。

### 3. 非强制劳动

聘用关系是自由选择的。严禁我们的工厂和分包商以威胁、或其它强迫方式强制工人劳动。我们的工人无需提交“保证金”或其身份证件，并且可通过提前 2 周发出相应通知的方式离职，这一点应在相关合同中有规定。

### 4. 骚扰或虐待

我们的工厂和分包商应以平等和尊重的方式对待自己的每名雇员。不得对任何雇员进行任何身体、性、心理或言语的骚扰或虐待。

### 5. 薪酬

我们的工厂和分包商至少应向雇员支付达到法律最低要求或本地行业主流标准的工资（以更高者为准），并且必须有相关法定福利。雇员和雇主之间应签订以本地法律为基础的合同。必须定期和按时支付工人薪酬。我们的工厂和分包商必须提供年假和法定假日。

### 6. 工作时/加班

我们的工厂和承包商必须遵守关于正常工时的相关规定，并且必须确保加班时间不超过法律规定的最高标准。除正常工时的薪酬以外，亦必须按照加班时数支付雇员不低于正常工时薪酬与加班费之和的费率报酬。

在生产过程中随时需要加班，这一点可以理解，加班应是完全自愿的，且应是工人之间相互协定为基准。所有工人的时间记录均应可供审查。

### 7. 非歧视

我们的工厂和分包商聘用雇员必须根据雇员执行规定工作的能力，而非根据雇员的个性或信仰。

### 8. 结社自由

我们的工厂和分包商必须承认和尊重雇员自由结社的权利，并且不得对雇员因组织或加入其所选择社团的合法行为进行威胁、惩罚、限制或干扰。工人可自由表达自己的意见/建议。雇员工作区域内必须安装意见/投诉箱。

### 9. 健康与安全

我们的工厂和分包商必须为雇员提供安全、清洁和卫生的工作环境，包括住宿和餐饮设施（如适用），工作环境应符合所有相关法律法规，并且必须符合关于工作条件（包括工人健康和安、环境卫生、防火安全、风险防护以及用电、机械和建筑安全）方面的所有适用法律。

我们的工厂和分包商必须遵守如下要求：

- 工作期间无论在全天任何时候，所有工作区域均必须配备充足的照明。
- 所有工作区域均必须有适当的温度。
- 所有工作区域均必须配备窗户、风机或加热器，以确保良好通风。
- 必须在工作日全天为所有工人配备干净的饮用水及相应的使用通道。
- 必须在工作日全天提供干净卫生的盥洗室及相应的使用通道。
- 必须在每个车间及每个工作区域配备至少一个完备的急救包。
- 必须具备用于处理重伤的适当程序。
- 必须免费为所有工人提供适用的个人防护装备（PPE）– 例如面罩、手套、护目镜、耳塞和橡胶鞋。
- 必须确保所有工人都了解相关的安全措施，例如紧急出口、灭火器和急救设备
- 工厂必须张贴疏散计划，定期测试火警钟，每年应执行至少一次的疏散演习。
- 危险和易燃品必须存放在安全通风的地方，并且应以安全合法的方式处置此等材料。

## 10. 文件分类、监控和违规

### 文件分类

我们的工厂和分包商必须将所有文件分类存档，以证明自己对于本《行为准则》及相关法律法规的遵守情况。

### 监控

作为监控程序的一部分，应允许经认可的监控人员以保密的方式与工人会谈。

### 违规

如发现某分包商不遵守本《行为准则》，我们将要求其在约定的时间期限内采取整改措施，若其未能执行，我们将终止商业协议及关系。

如对本《行为准则》有任何意见或建议，或者希望报告任何违反本《行为准则》的情况，请立即联系我们：

我郑重承诺我司将遵循以上行为准则并享有法律责任解释权

签名盖章

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