

Business Partner Code of Conduct (“BP CoC”) 业务伙伴商业行为准则(“准则”)

SGL Carbon SE and its affiliates (“SGL Carbon”) are recognized as one of the leading carbon companies. Our aim is to provide our customers with products setting the highest quality standards while performing our work along legal, ethical and sustainable principles. Together with our Business Partners we want to set the standards in our industry.

西格里碳素股份公司及其子公司(简称“西格里”)系受公认的领先碳素公司之一。我们旨在为我们的客户提供符合最高质量标准的产品，且在开展我们的业务之时，遵循合法、道德和可持续的原则。我们希望与我们的业务伙伴共同树立我们所处行业的标准。

Therefore, SGL Carbon has committed to a Code of Conduct that is binding for all its employees. As signatory of the UN Global Compact SGL Carbon commits to its principles and the core labor standards of the International Labor Organization (ILO standards). We expect all our Business Partners, including but not limited to suppliers, subcontractors, consultants, agents, distributors and others, to comply with these principles and ILO standards as well as to commit to legal, ethical and sustainable behavior while cooperating with SGL Carbon.

因此，西格里致力于遵循一套行为准则，约束其所有的员工。作为《联合国全球契约》的签署方，西格里承诺遵守其原则和国际劳工组织的核心劳动标准（ILO标准）。我们希望我们所有的业务伙伴，包括但不限于供应商、分包商、顾问、代理商、分销商及其他，都能遵守这些原则和国际劳工组织的标准，并在与西格里合作的过程中致力于合法、道德和可持续的行为。

Compliance with Laws, Rules and Legal Regulations

遵守法律、法则和规定

We expect our Business Partner to comply with all applicable laws, rules, and regulations in the countries where they operate. This also includes any applicable law with international reach. In this regard, our Business Partner commits to the following:

我们希望我们的业务伙伴遵守他们所在国家的所有适用法律、法规和规定。这也包括任何具有国际影响力的适用法律。我们的业务伙伴为此承诺如下：

Compliance with Antitrust laws

遵守反垄断法

Business Partner strictly complies with all applicable antitrust laws and will not enter into any kind of anti-competitive activities or agreements and stand up against illegal cartels.

业务伙伴严格遵守所有适用的反垄断法，不参与任何形式的反竞争活动或协议，并反对非法卡特尔垄断联盟。

Compliance with Anti-Corruption

遵守反腐败法律

Business Partner commits to actively and vigorously counteracting any criminal or unethical influence on decisions of SGL Carbon employees, employees of other companies or public officials and to fighting any form of corruption in their company, including bribery, extortion and embezzlement.

业务伙伴承诺积极有力地抵制任何犯罪或不道德地影响西格里员工、其他公司员工或政府官员的决策，并打击其公司内任何形式的腐败，包括贿赂、敲诈和贪污行为。

Compliance with Export Control and Customs

遵守出口管制和海关规定

Business Partner commits to providing services and goods on grounds of applicable export controls including without limitation sanctions, embargoes, and other laws, regulations, governmental orders and policies controlling the transmission or shipment of goods, technology and payments. Furthermore, Business Partner follows all customs regulations.

业务伙伴承诺在适用的出口管制的基础上提供服务和货物，包括但不限于制裁、禁运以及其他控制货物、技术和付款的传输或运输的法律、法规、政府命令和政策。此外，业务伙伴遵守所有海关法规。

Compliance with Data Protection, Business Information and Intellectual Property

遵守数据保护、商业信息和知识产权的规定

Business Partner respects the required privacy while using individual data, safeguarding sensitive information in all relevant processes and ensuring compliance with the applicable data protection laws.

Business Partner respects intellectual property rights of third parties and protects entrusted business secrets from unauthorized disclosure. This also includes fighting against plagiarism.

业务伙伴在使用个人数据时尊重所需的隐私，在所有相关流程中保护敏感信息并确保遵守适用的数据保护法。

业务伙伴尊重第三方的知识产权并保护受托的商业机密不被擅自泄露，这也包括打击剽窃行为。

Compliance with Accounting standards and Anti-Money Laundering

遵守会计标准和反洗钱规定

Business Partner commits to financial integrity and to maintaining accurate and complete accounting records. Business Partner observes applicable anti-money laundering laws and has implemented respective measures to prevent any form of Money Laundering.

业务伙伴致力于财务诚信，并保持准确和完整的会计记录。业务伙伴遵守适用的反洗钱法律，并采取了相应的措施来防止任何形式的洗钱。

Avoiding Conflict of Interests

避免利益冲突

Business Partner commits to avoiding all direct or potential conflicts of interest while engaged with SGL Carbon. Private interests and personal consideration shall not affect any business decision. If a private relationship with SGL Carbon employees exists (such as e.g. friendship or family relationship), the respective person should not be involved in a decision-making process.

业务伙伴承诺在与西格里合作时，避免所有直接或潜在的利益冲突。私人利益和个人考量不应影响任何商业决策。如果与西格里的员工存在私人关系（如友谊或家庭关系），相关人员不应参与决策过程。

Good Working Conditions and Human Rights

提供良好的工作条件并尊重人权

We expect our Business Partner to respect Human Rights and provide healthy and fair working conditions throughout their company. The Business Partner must treat all employees with respect and fairness and respect international human rights as set forth in the Universal Declaration of Human Rights and International Labour Organization (ILO) standards. In accordance with local laws these include but are not limited to:

我们期待业务伙伴尊重人权，在全球范围内提供健康、公平的工作条件。因此，业务伙伴必须尊重并公平对待每个个体，并尊重《世界人权宣言》中载列和国际劳工组织（ILO）规定的国际公认人权标准，遵守所有相关的国家法律和国际法规，包括但不限于：

- the prohibition of forced labour, including any forms of modern slavery and human trafficking
- the prohibition of child labour
- the prohibition of hazardous work for young workers under the age of 18 and respecting maximum working hours for young workers
- maintaining an inclusive and cooperative environment with no retaliation, free from violence or harassment
- the rejection of any form of discrimination in recruitment or employment practices, such as compensation, promotion, termination or retirement based upon but not limited to nationality, ethnicity, gender, disability, age, sexual identity or sexual orientation, religion and beliefs, color, maternity, or any other legally protected category
- the provision to fair remuneration and benefits paid in a timely manner, also following minimum wages provisions and in any case a living wage
- reasonable working hours, sufficient resting times and overtime within legally defined limits
- prohibition of violation of regulations in regard to safety at work of the respective place of employment
- respecting the rights of workers to freedom of association with trade unions and collective bargaining also in countries where this is not legally regulated
- responsible plant security practices at the sites
- 禁止强迫劳动，包括任何形式的现代奴隶制和人口贩运
- 禁止使用童工
- 禁止18岁以下的年轻工人从事危险工作，尊重年轻工人的最长工作时间
- 营造一个包容和合作的工作环境，使员工免于报复、暴力威胁及骚扰
- 拒绝在招聘或就业实践中的任何形式的歧视，如基于但不限于国籍、种族、性别、残疾、年龄、性身份或性取向、宗教和信仰、肤色、生育或任何其他受法律保护的类别的补偿、晋升、解雇或退休
- 及时提供公平的报酬和福利，并遵守最低工资规定，在任何情况下都要提供可维持生活工资。
- 合理的工作时间，充足的休息时间和法律规定范围内的加班时间
- 禁止违反有关工作场所的工作安全的规定
- 尊重工人与工会自由结社和集体谈判的权利，在没有法律规定的国家也是如此。
- 在营业场所采取负责的工厂安全做法

Safety and Health

安全和健康

We expect our Business Partner to operate its business in a safe and responsible manner based on systematic management approach including continuous improvement not limited to emergency management, fire prevention and responsible management of chemicals.

我们期待我们的业务伙伴将基于系统管理方法以安全和负责任的方式经营其业务，包括持续改进，不限于应急管理、防火和负责任的化学品管理。

Business Partners are committed to providing a safe, healthy and ergonomic working environment that supports accident prevention and minimizes exposure to health risks by their employees and contractors. To that end, they must in particular: 业务伙伴致力于提供一个安全、健康和符合人体工程学的工作环境，以支持事故预防，并尽量减少其员工和承包商的健康风险。为此，他们必须特别：

- inform employees in the relevant language of identified hazards and the associated preventive and corrective measures put in place to minimize hazards
- conduct sufficient employee training on the prevention of work-related health disorders, prevention of accidents, exposure to heat and working in a hot environment, first aid, chemicals and fire safety
- provide suitable protective equipment and protective clothing free of charge
- install appropriate fire protection equipment such as fire detectors and fire extinguishers
- provide access to sanitary facilities and drinking water
- monitor and control work-related health hazards and the resulting protective measures
- label the chemicals used pursuant to the Globally Harmonized System of Classification
- store chemicals in line with national regulations
- 用相关的语言告知员工已确定的危险以及为尽量减少危险而采取的相关预防和纠正措施
- 对员工进行充分的培训，包括预防与工作有关的健康疾病、预防事故、接触高温和在高温环境下工作、急救、化学品和消防安全等
- 免费提供合适的防护设备和防护服
- 安装适当的防火设备，如火灾探测器和灭火器
- 提供卫生设施和饮水
- 监测和控制与工作有关的健康危害以及由此产生的保护措施
- 根据《全球统一分类制度》对使用的化学品进行标识
- 按照国家规定储存化学品

Environmental and Climate Protection

环境与气候保护

We expect our Business Partners to operate its business with responsibility towards the environment meaning the careful and efficient use of resources and to comply with all applicable national and international environmental standards and laws that apply to your location of business including required permitting.

我们希望我们的商业伙伴在经营其业务时对环境负责，即谨慎和有效地使用资源，并遵守适用于你的业务地点的所有适用的国家和国际环境标准和法律，包括必要的许可。

Hazardous substances and waste

有害物质和废物

In addition, Business Partner commits to the responsible handling of hazardous substances and chemicals, to the sustainable and responsible utilization of resources e.g., water, energy, steam, fuel, to the recycling, reduction of waste and prevention of hazardous releases to the environment and to refrain from harmful noise. Business Partner shall ensure the safe and compliant handling, storage, transportation, disposal, recycling, reuse and management of waste, air emissions and wastewater discharges. Any activity that has the potential to adversely impact human or environmental health shall be appropriately managed, measured and controlled. The release of hazardous substances must be minimized. Business Partner shall prevent or mitigate accidental spills and fugitive emissions of hazardous materials. Business Partner must be committed to reduce waste and shall be able to prove respective counteractions as well as be committed to soil quality and shall ensure with regularly reported counteractions.

此外，业务伙伴承诺负责任地处理有害物质和化学品，可持续和负责任地利用资源，如水、能源、蒸汽、燃料，回收、减少废物和防止向环境排放有害物，并避免有害的噪音。业务伙伴应确保安全和合规地处理、储存、运输、处置、回收、再利用和管理废物、空气排放和废水排放。任何有可能对人类或环境健康产生不利影响的活动都应得到适当的管理、衡量和控制。必须尽量减少危险物质的释放。业务伙伴应防止或减少危险物质的意外泄漏和逃逸排放。业务伙伴必须致力于减少废物，并能证明各自的对策，同时致力于土壤质量，并确保定期报告对策。

Climate protection and resource efficiency

气候保护和资源效率

Business Partner commits to reduce greenhouse gas and communicates about their set targets. Furthermore, our Business Partner drives for the efficient use of energy, water, raw material and with this promote good water, soil and air quality and reduce their degradation to the absolute minimum. The use of renewable resources and energy as well as the minimization of damage to the environment and health are all taken into consideration in the development, raw material extraction, manufacture, product life cycle including recycling.

In order to optimize their carbon footprints and reduce GHG emissions Business Partner shall use all natural resources (e.g., water, sources of energy, raw materials) in an economical way and preserve them. To ensure the conservation of renewable natural resources, Business Partner shall promote the application of broadly recognized sustainability standards and certifications that have been developed by multiple stakeholders. Negative impacts on the environment and climate caused by the suppliers or in their supply chain shall be minimized or eliminated at their source. Practices are encouraged to be in line with circular economy principles such as material reduction, substitution, collection, sharing, maintenance, reuse, redistribution, refurbishment, remanufacturing and recycling. Business Partner shall engage in the development and use of environmentally and climate-friendly products, processes and technologies. Business Partner shall ensure and demonstrate continuous environmental improvements, including a reduction in raw materials, energy, emissions, discharges, noise, waste and reliance on natural resources and hazardous substances by means of clear targets and improvement policies and a sustainable resources management system pursued on corporate level pursued.

业务伙伴承诺减少温室气体，并就其设定的目标进行沟通。此外，我们的业务伙伴推动能源、水和原材料的有效利用，并以此促进良好的水、土壤和空气质量，将其退化降至最低。使用可再生

资源和能源，以及尽量减少对环境和健康的损害，都是在开发、原材料提取、制造、产品生命周期（包括回收）中考虑到的。

为了优化他们的碳足迹和减少温室气体排放，商业伙伴应以经济的方式使用所有的自然资源（如水、能源来源、原材料）并保护它们。为确保对可再生自然资源的保护，业务伙伴应促进应用由多个利益相关方制定的广泛认可的可持续发展标准和认证。由供应商或其供应链对环境和气候造成的负面影响应在源头上被最小化或消除。鼓励采取符合循环经济原则的做法，如减少材料、替代、收集、共享、维护、再利用、再分配、翻新、再制造和回收。业务伙伴应参与开发和使用对环境和气候友好的产品、工艺和技术。业务伙伴应确保并展示持续的环境改善，包括通过明确的目标和改善政策，以及在公司层面推行的可持续资源管理系统，减少原材料、能源、排放物、噪音、废物和对自然资源及有害物质的依赖。

Responsible handling of substances and materials

负责任地处理物质和材料

Business Partner commits to avoid the use of substances and materials with adverse environmental or health impacts and must identify alternative environmental-friendly solutions. Business Partner must register, declare, and if applicable, obtain approval for substances pursuant to legal requirements in the respective countries. The provisions of the following conventions are to be adhered to:

- the Minamata Convention (on the use of mercury)
- the Stockholm Convention (on persistent organic pollutants), and
- the Basel Convention (on the control of transboundary movements of hazardous wastes and their disposal)

Furthermore, all other laws and specifications concerning hazardous materials, chemicals and substances that apply to your business location and/or market in question are fully respected at any time.

业务伙伴承诺避免使用对环境或健康有不利影响的物质和材料，并必须确定替代的环保的解决方案。业务伙伴必须根据相关国家的法律要求，对物质进行登记、申报，并在适用情况下获得批准。应遵守以下公约的规定：

- 《水俣公约》（关于汞的使用）
- 《斯德哥尔摩公约》（关于持久性有机污染物），以及
- 《巴塞尔公约》（关于控制危险废物的越境转移及其处置）。

此外，在任何时候都充分尊重适用于你的业务地点和/或有关市场的所有其他关于危险材料、化学品和物质的法律和规范。

Responsible Sourcing

负责任的采购

We expect our Business Partner to follow due diligence processes in order to identify, prevent and mitigate risk for negative human rights and environment impacts in their supply chain with regard to relevant raw materials – in particular tin, tantalum, tungsten, gold, cobalt and mica.

Business Partner avoids, if applicable, using raw materials from smelter or refineries that do not meet the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. With this Business Partner confirms to not use Conflict Minerals, if applicable.

我们希望我们的业务伙伴遵循尽职调查程序，以识别、预防和减少其供应链中有关原材料--特别是锡、钽、钨、金、钴和云母-的负面的人权和环境影响的风险。

业务伙伴应避免使用来自不符合经合组织《受冲突影响和高风险地区矿产负责任供应链尽职调查指南》要求的冶炼厂或精炼厂的原材料。通过这一点，业务伙伴确认不使用冲突矿物（如适用）。

Rights of Local Communities

当地社区的权利

We expect our Business Partner to acknowledge and respect the existence of land, water and resources use rights in their neighborhood and to respect the rights of indigenous peoples and local communities.

我们期待我们的业务伙伴承认并尊重其周围存在的土地、水和资源使用权，并尊重原住民和当地社区的权利。

Business Partner refrains from excess water consumption that significantly impair the natural foundations for the cultivation and the production of food. Business Partner observes the ban on the unlawful eviction from land, forest and waters when acquiring, building on or otherwise using land or forest that serve as a person's livelihood.

业务伙伴应避免过度耗水，以免严重损害耕种和生产粮食的自然基础。业务伙伴在收购、建造或以其他方式使用作为个人生计的土地或森林时，遵守禁止非法驱逐土地、森林和水域的规定。

Supply Chain Due Diligence

供应链的尽职调查

We expect our Business Partners to address and pass on legally binding requirements in regard to human rights and environments impacts in their supply chain and specifically towards their tier-one suppliers and to conduct audits.

We further expect our Business Partners to cooperate and support us within our audits for ensuring the compliance with human rights and environmental requirements as well as in case of incidents to cooperate and support us in developing and establishing plans to minimize or terminate the violation of these obligations. In case of any incidents or suspicions of violation of data protections law requirements, business information or Intellectual Property Rights you shall report these to us immediately provided there is a connection to our business relationship.

Business Partners are encouraged – if not legally required anyhow - to publicly disclose the sustainable development impact of their operations, their goals, plans for stakeholder engagement, and progress.

我们期待我们的业务伙伴在他们的供应链中，特别是在他们的一级供应商中，处理和传递有关人权和环境影响的具有法律约束力的要求，并进行审计。

我们还期待我们的业务伙伴在我们的审计中给予合作和支持，以确保遵守人权和环境要求，并在发生事故时，合作和支持我们制定和建立计划，以尽量减少或终止违反这些义务的行为。如果发生任何违反数据保护法要求、商业信息或知识产权的事件或怀疑，只要与我们的业务关系有关联，您应立即向我们报告。

我们鼓励业务伙伴--如果不是法律要求的话--公开披露其业务的可持续发展影响、其目标、利益相关者参与的计划和进展。

Grievance and Complaints Mechanism

申诉和投诉机制

SGL Carbon encourages its Business Partner to seek guidance regarding the principles and standards in this Code. Business Partners are expected to report to SGL Carbon any concerns and disclose any violation against this Code, including sharing any information and findings about potential violations or misconduct of their own employees and suppliers and cooperating in any investigation. We will do our utmost to respect and protect any person who reports a potential violation of this Code. Retaliation is prohibited for our Business Partner who report wrongdoing in good faith and confidentiality of their identity will be ensured. For the purpose of disclosure, you should use the SGL Compliance Whistleblowing Channel. Anonymous reports are also accepted and processed to the extent possible.

西格里鼓励其业务伙伴就本守则中的原则和标准寻求指导。业务伙伴应向西格里报告任何关切，并披露任何违反本守则的行为，包括分享有关其员工和供应商的潜在违规或不当行为的任何信息和发现，并在任何调查中予以合作。我们将尽最大努力尊重和保护任何报告潜在违反本守则行为的人。我们禁止对善意举报不法行为的业务伙伴进行报复，并将确保对其身份保密。出于披露的目的，您应使用西格里的合规举报渠道。我们也接受并尽可能地处理匿名举报。

SGL Carbon SE
Group Compliance Office
Söhnleinstrasse 8
65193 Wiesbaden/Germany
Email: confidential-compliance@sglcarbon.com
Phone: +49 (0)611-6029-236

Major violations as well as the failure to disclose such violations or the insufficient efforts to comply with the above principles and standards may lead to the termination of the business relationship on short notice. In such case, SGL Carbon reserves the right to claim compensation for any damage caused due to such violations.

重大违规行为以及未披露此类违规行为或未充分努力遵守上述原则和标准，可能导致在短时间内终止业务关系。在这种情况下，西格里保留对因这些违规行为而造成的任何损失提出赔偿的权利。

Compliance with this Code of Conduct

遵守本行为准则

SGL Carbon expects its Business Partner to work towards implementation of the principles and standards of this Code in the course of their business as well as in all companies working on their behalf. Furthermore, our Business Partner must take appropriate steps to also ensure compliance with these requirements by their own business partners and along their supply chain.

For the purpose of a mutually trustful and compliant business relationship, we expect our Business Partner to actively pursue compliance with this Code and, as a sign of their commitment, declare the following:

We have received SGL Carbon's Business Partners Code of Conduct and, in addition to our contractual obligations, commit to its principles and standards.

西格里希望其业务伙伴在其业务过程中以及代表其工作的所有公司中努力执行本守则的原则和标准。此外，我们的业务伙伴必须采取适当措施，确保其自身的业务伙伴及其供应链遵守这些要求。

为了建立相互信任和合规的业务关系，我们希望我们的业务伙伴积极遵守本守则，并作为其承诺的标志，声明如下：

我们已收到西格里的《业务伙伴商业行为准则》，除合同义务外，我们承诺遵守其原则和标准。

Place, date/地点，日期

Signature (Business Partner) 业务伙伴签名

Company seal 公司印章

Name (in capitals), function 姓名(大写)、职位