



供应商行为准则

Suppliers' Code of Conduct

COBCO S. A. (以下简称“COBCO”或“我们”) 是由全球领先的前驱体供应商 CNGR 与非洲最大的私募投资基金之一 Al MADA 共同成立的合资公司，致力于在摩洛哥打造低碳、优质、循环的电池材料制造基地，满足其客户在欧美市场对可持续电池材料和解决方案的多样化需求。。

COBCO S. A. (hereafter "COBCO" or "we" or "us") is a joint venture founded by CNGR, the world's leading precursor supplier, and Al MADA, one of Africa's largest private investment funds. It is committed to building a low carbon, high quality, cyclic battery material manufacturing base in Morocco to meet the diverse needs of its customers for sustainable battery materials and solutions in the European and American markets.

COBCO 坚持可持续发展道路，将经济成功与环境保护和社会责任结合起来，从而满足我们的客户当前以及未来的社会需求。我们的目标是和供应商一起工作，以保证与此《供应商行为准则》条款的完全合规。并且，请供应商把这些条款应用到给你们提供产品和服务的供应商。对于 COBCO，我们将考虑把这些条款作为我们供应商筛选的一部分，我们也将积极地监管供应商的合规性。任何违反本准则的行为可能损害供应商与 COBCO 之间的业务关系，甚至导致终止双方的业务关系。

COBCO is committed to a sustainable development path that combines economic success with environmental protection and social responsibility to meet the current and future social needs of our customers. Our goal is to work with our suppliers to ensure full compliance with these items set in this *Suppliers' Code of Conduct*, as they in turn apply those to their own suppliers who provide goods and services to them. For COBCO, we will consider these items in our selection of suppliers and will actively monitor their compliance. Any violation of the Code of Conduct may damage the business relationships between suppliers and COBCO, and even lead to the termination of business relationship.

本准则借鉴国际公认的标准：

- (a) 联合国全球契约十项准则；
- (b) 联合国环境规划署产品社会声明周期评估准则；



- (c) 《生物多样性公约》，特别是第 COP VIII/28 号决定-关于涵盖生物多样性各个方面的影响评估的自愿性准则；
- (d) 联合国《巴黎协定》；
- (e) 国际劳工组织《工作中基本原则和权利宣言》中定义的八项国际劳工组织基本公约；
- (f) 国际劳工组织《工作中基本原则和权利宣言》
- (g) 《国际人员法案》，包括《公民及政治权利国际公约》和《经济、社会及文化权利国际公约》。
- (h) 《联合国工商企业与人权指导原则》
- (i) 《经合组织跨国企业准则》
- (j) 国际劳工组织《关于多国企业和社会政策的三方原则宣言》
- (k) 经合组织《负责任商业行为尽责调查指南》
- (l) 经合组织《受冲突影响和高风险区域的矿石的负责任供应链尽责调查指南》
- (m) 《儿童权利公约》
- (n) 最低工作年龄公约》
- (o) 《联合国反腐败公约》

等，概述了 COCBO 对供应商行为的期望和要求，以及劳工和人权、健康及安全、环境保护以及道德规范的负责任行为。

This Code of Conduct refers to internationally recognized standards:

- (a) The Ten guidelines of the United Nations Global Compact;
- (b) United Nations Environment Programme guidelines for the assessment of the cycle of social claims for products;
- (c) The Convention on Biological Diversity, in particular decision COP VIII/28 - voluntary guidelines for impact assessments covering all aspects of biological diversity;
- (d) The United Nations Paris Agreement;
- (e) The eight basic conventions of the International Labour Organization, as defined in the Declaration on Fundamental Principles and Rights at Work;
- (f) Declaration on Fundamental Principles and Rights at Work of the International Labour Organization
- (g) The International Persons Bill, including the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.
- (h) United Nations Guiding Principles on Business and Human Rights



- (i) OECD Guidelines for Transnational Enterprises
- (j) International Labour Organization Tripartite Declaration of Principles on
Multinational Enterprises and Social Policies
- (k) OECD Due Diligence Guidelines for Responsible Business Practices
- (l) OECD Due Diligence Guidelines for Responsible Supply Chains for Ores from
conflict-affected and high-risk Regions
- (m) Convention on the Rights of the Child
- (n) Minimum Working Age Convention
- (o) United Nations Convention against Corruption

and etc. It summarizes the expectation and requirement of COBCO on its suppliers' behaviors and responsible behaviors including labor and human rights, health and safety, environment protection and ethics.

第一章：劳工和人权

Provision 1: Labor and Human Rights

1、禁止童工：供应商雇佣员工必须符合当地法律规定的最低法定年龄。符合法律、
法规规定，在合法工作场所的学徒计划是允许的。

1. No Child Labor: the employee hired by the supplier shall meet the minimal age required by the local laws and regulations. Apprenticeship programs at legal workplace conforming to laws and regulations are allowed.

2、强迫或强制劳动：供应商不可以任何形式的强迫或强制劳动（比如强制、抵押、
契约、或非自愿的监狱劳动）。用工是自愿的。

2. Forced or Involuntary Labor: supplier shall not use forced or involuntary labor of any type (e.g., forced, bonded, indentured or involuntary prison labor); employment is voluntary.

3、人道待遇：供应商应该给与所有员工尊严与尊重。供应商不得参与或容忍对员工采取体罚、精神或肉体胁迫以及言语侮辱的行为，不允许以粗暴、非人道的方式对待员工。

3. Humane Treatment: Supplier shall treat all employees with dignity and respect. The supplier shall not engage in or tolerate corporal punishment, mental or physical coercion or verbal abuse of employees, and shall not treat employees in a rude or inhuman manner.



4、工作时间：供应商应当遵守关于工作时间的国际公约和当地的法律法规。除在紧急或异常的情况下，每周工作时间包括加班时间不得超过 60 小时。周工时不得超过当地法律规定的最大限度。员工在每七天中应当至少有一天休息时间。

4. Working hours: Supplier shall obey the international conventions or local laws and regulations applied to working hours. Unless in the case of an emergency or abnormality, the working time per week should not exceed 60 hours, including overtime work. Working hours in a week shall not exceed the limit of local law. Employees should be allowed at least one day off per seven-day week.

5、工资与福利：供应商应遵照地方及国家法律规定，给员工提供合理的工资及福利，包括关于最低工资、加班时间和其它补偿相关的法律。所有员工的工资不得低于法定最低工资。

5. Wage and Benefit: supplier shall provide its employees reasonable wage and benefit according to the local and national laws and regulations, including those relating to minimum wages, overtime hours and other elements of compensation. The wages of all the employees shall not be less than the statutory minimum wage.

6、歧视：供应商在招聘和雇佣员工时，不得因种族、宗教信仰、年龄、国籍、性取向、性别、性别认同和性别表现、婚姻状况、怀孕、政治派别或残障等其它类似因素而歧视他人。不得要求员工或应聘者接受带有歧视性质的医学检查。

6. Discrimination: Supplier shall not discriminate in hiring and employment practices on grounds of race, religion, age, nationality, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, disability and etc. Supplier shall not require its employees or applicants undertake medical examination with discriminatory nature.

7、结社自由：在法律允许范围内，供应商不得干涉、阻扰或禁止员工组建或加入各类组织、选举代表、参与集体谈判以及开展各项合法活动。

7. Freedom of Association: Supplier shall not interfere, obstruct or forbid its employees to establish or join all kinds of organizations, electing representatives, participating in collective bargaining and carrying out any legal activities.

第二章 健康与安全

Provision 2: Health and Safety



1、职业安全：供应商应通过合理的工程设计、过程控制和预防维护来识别、评估、消除安全隐患。应当向员工提供与工作相关且适当的个人防护装备，并开展相关培训和指导。

1. Occupational safety: Supplier shall identify, assess and eliminate safety hazards through reasonable engineering design, process control and preventive maintenance. The supplier shall provide its employee with proper personal protective equipment relevant to the work as well as relevant training and guidance.

2、应急管理：供应商应识别并评估紧急情形和紧急事件，并通过实施应急方案及应对程序将其影响降到最低，包括：紧急报告、员工通知和撤离程序、员工训练与演习、适当的火灾侦测及扑灭设备、充足的出口设施和复原计划。此类计划和程序应尽可能减少对人身、环境和财产的危害。

2. Emergency Preparedness: Suppliers shall identify and assess potential emergency situations and events, and implement emergency plans and response procedures to minimize their impact, including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and extinguishing equipment, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property at the greatest extent.

3、工伤和疾病：供应商应当制定合适的程序和体系以预防、管理、跟踪和报告工伤和疾病，包括以下规定：鼓励员工报告；对工伤和疾病案例进行分类和记录；提供必要的医疗服务；调查案例并采取纠正措施以消除影响；帮助员工重返工作。

3. Occupational Injury and Illness: Supplier shall have procedures and systems in place to prevent, manage, track and report occupational injury and illness, including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

4、生活条件：供应商应当为员工提供干净的卫生间设施、饮用水以及清洁食物准备、储藏与用餐设施。供应商或劳工代理机构提供的员工宿舍应保持洁净安全，并提供适当的紧急出口、洗浴热水、充足的供暖和通风，以及合理的出入方便的私人空间。



4. Living Conditions: Supplier shall provide workers with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the supplier or a labor agent shall be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, and reasonable personal space along with reasonable entry and exit privileges.
5. 健康与安全信息沟通: 供应商应向员工提供以员工主要语言授课的适当的健康安全培训。健康与安全相关信息应张贴在现场醒目处。
5. Health and safety information communication: Supplier shall provide workers with appropriate safety training in their primary language. Health and safety related information shall be clearly posted in the facility.
6. 机器防护: 供应商须对生产设备和其他机械进行安全危害评估, 并为可能导致员工受伤的机械提供物理防护装置、连锁装置及屏障, 并正确进行维护。
6. Safety Guarding: supplier shall evaluate its production and other machinery for safety hazards, provide physical protection devices, interlocks and barriers, where machinery presents an injury hazard, and properly maintain them.

第三章： 环境

Provision: Environment

1、供应商应遵守所有与环保相关的法律法规。

1. Supplier shall comply with all applicable laws and regulations regarding environment.

2、防止污染及节约资源: 应在源头上或通过实践（如改进生产、维护和设施工艺、替换材料、节约资源、材料回收和再利用等）减少和消除所有类型的资源耗费和污染（包括水和能源）。

2. Pollution Prevention and Resource Reduction: The use of resources and generation of waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

3、有害物质: 供应商应当识别和控制释放到环境中会造成危险的化学物质及其他材料, 确保这些物质得到安全处理、运输、存储、使用、回收或再利用和处置。



3. Hazardous Materials: Supplier shall identify and manage chemicals and other materials posing a hazard if released to the environment to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

4、供应商应保护您的员工和邻居的生命及健康，以及由于您的工艺和产品固有的风险所涉及的公众。

4. Supplier shall protect life and health of its employees and neighbors, as well as the public involving from inherent risk from processes and products.

5、控制和处理废水及固体废物：供应商在经营、工业加工和清洁设施中产生的废水及固体废物在排放或处置前，应当按照要求对其进行监测、控制和处理。

5. Control and Disposal of Wastewater and Solid Waste: For the wastewater and solid waste which are generated during the operation, manufacturing, and facility cleaning, supplier shall monitor, control and treat them according to the requirement before being discharged or disposed.

6、气体排放：供应商在经营过程中产生的挥发性有机化学物质、腐蚀性气体、微粒、臭氧消耗化学物质以及燃烧副产品等废气在排放之前，应当按照相关要求对其进行鉴别、监测、控制和处理。

6. Air Emissions: according to relevant requirements, supplier shall identify, monitor, control and treat the VOCs, corrosive gases, particulates, Ozone-depleting chemicals and Combustion by-products which are generated by the manufacturing process before discharging.

7、材料限制：供应商应当遵守有关在产品中以及制造过程中禁用或限用某些特定物质（包括回收和处置标志）的相关法律、法规和客户要求。

7. Materials Restrictions: Suppliers are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

8、能源消耗和温室气体排放：应在工厂和/或公司级跟踪和记录能源消耗以及所有相关的类别 1 和类别 2 温室气体的排放情况。供应商应探索开发有成本效益的方法以提高能源效率，并最大程度地减少能源消耗与温室气体排放。

8. Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. Suppliers are to look for cost- effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.



9. 生物多样性保护：供应商应在其业务活动中遵循“避免”“减少”“恢复”“补偿”的缓解层级原则，管理生物多样性影响，降低对生物多样性的干扰。

9.Biodiversity conservation: Suppliers should follow the mitigation hierarchy principles of "avoid", "reduce", "restore" and "compensate" in their business activities to manage biodiversity impacts and reduce disturbances to biodiversity.

10.噪音和振动：供应商应遵守当地法律法规中对于噪音和振动的要求，定期监测，并采取措施降低噪音和振动对所在厂区和周边社区、居民等造成的影响。

10.Noise and vibration: Suppliers shall comply with local laws and regulations on noise and vibration requirements, regularly monitor, and take measures to reduce the impact of noise and vibration on the site and surrounding communities, residents, etc.

第四章：道德规范

Provision 4: Ethics

1、商业诚信：供应商应采取零容忍政策，禁止任何形式的贿赂、洗钱、恐怖主义融资、腐败、敲诈勒索和挪用公款行为。所有业务交易均应确保透明并应在参与者业务账目和记录中准确反映。应推行监督和强化程序以确保符合反腐败法的要求。

1. Business Integrity: Supplier shall have a zero tolerance policy to prohibit any and all forms of bribery, money laundering, terrorist financing, corruption, extortion and embezzlement. All business dealings should be transparently performed and accurately reflected on Participant's business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

2、信息公开：供应商应依照适用法规和主要的行业惯例公开有关商业活动、组织结构、财务状况、劳工、健康与安全和环境的信息。

2. Disclosure of Information: Supplier shall disclose the information regarding its business activities, structure, financial status, labor, health and safety, and environmental practices according to applicable laws and prevailing industry practices.

3、社区参与：鼓励供应商参与社区活动，以推动社区的社会和经济发展。



3. Community Engagement: Supplier is encouraged to join the community activities to promote social and economic development.
4. 身份保护和无报复政策: 供应商须建立匿名投诉机制, 确保举报者身份的机密性和匿名性, 禁止报复行为。
4. Identity Protection and Non-retaliation: Supplier shall establish an anonymous complaint mechanism to ensure the confidentiality, anonymity of whistleblower is protected, and prohibit retaliation.
5. 知识产权保护: 供应商应尊重知识产权, 保护客户信息的安全。
5. Protection of Intellectual Property: Supplier shall respect intellectual property rights and safeguard customer's information.
6. 反垄断及反不正当竞争: 供应商应遵守所有适用的国家和国际反垄断和贸易控制的法规。合作伙伴不得独自或伙同其他合作伙伴进行垄断市场或不正当竞争的行为。
6. Anti-Trust and Unfair Competition: Supplier shall comply with all applicable national and international regulations of anti-trust and trade control. Partner is prohibited to have monopoly or unfair competition alone or with other partners.
7. 负责任的矿物采购: 具体要求请参照此行为准则的补充《负责任全球矿产供应链尽责管理政策》, 这个政策的补充是完全按照《经济合作与发展组织关于来自受冲突影响和高风险区域的矿石的负责任供应链尽责管理指南》而制定的。
7. Responsible Sourcing of Minerals: Regarding detailed requirement, please refer to the supplement of this Code of Conduct, "Supplier Standard for Responsible Sourcing of Mineral" which is fully aligned with *Mineral Supply Chains and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* .

第五章：公司治理

Provision 5: Company Management

- 1、 管理责任和义务: 供应商应设有 ESG 部门或类似岗位, 直接向行政管理层报告, 承担并拥有管理企业的社会和环境合规要求的责任及权力。
1. Management Responsibilities and Obligations: supplier shall set up a ESG Department or similar position that reports directly to executive management who has the



responsibility and authority to manage social and environmental compliance requirements for the business.

2、 风险评估与管理：供应商应制定并维护和识别与业务相关的劳工权利与人权、

健康与安全、环境、商业道德及法律合规风险的制度，并执行适当的程序和控制措施来缓解已识别的风险。

2. Risk Assessment and Management: Supplier shall develop and maintain a procedure to identify the risks in labor and human rights, health and safety, environmental, business ethics, and legal compliance associated with its operations; implement appropriate procedures and controls to mitigate the identified risks.

3、 信息沟通：供应商应拥有向员工、下级供应商和客户清晰、准确传达其绩效、实践、政策和期望等相关信息的流程。

3. Information Communication: Supplier shall have processes to accurately communicate with employees, vendors and customers about the practices, policies and expectations.

4、 纠正措施流程：对于通过内部和外部审核、评估、检查、调查或评审等发现的不足或违规行为，供应商应拥有及时开展纠正措施的流程。

4. Corrective Action Process: Supplier shall have a process to correct any deficiencies or violations timely identified by an internal or external audit, assessment, inspection, investigation, or audit.

我们期待您的承诺，并携手一起为企业供应链的可持续发展做出贡献。

We expect your commitment and we hold on together to contribute to the sustainable development of the corporate supply chain.

COBCO

December, 4th, 2023

2024 年 12 月 4 日