



Omya Business Partner Code of Conduct

欧米亚商业伙伴行为准则

1. Introduction

1. 简介

Omya is committed to conducting business in an ethical, legal and socially responsible manner while aiming for high standards and sustainable practices. Our ethical compass, Omya's Code of Conduct, ensures we always do the right thing. We rely on strong business partners who comply with the law, respect the environment and human rights to contribute to our sustainable growth. Our business partners must acknowledge and comply with the Business Partner Code of Conduct or have standards of their own that at a minimum adheres to the principles laid out in the Omya Business Partner Code of Conduct to ensure responsible supply chain management. Adherence to our Business Partner Code of Conduct is a significant part of how we approach Business Partner selection and evaluation.

欧米亚致力于以合乎道德、合法和对社会负责的方式开展业务，同时追求高标准和可持续实践。我们的道德指南针——欧米亚行为准则，确保我们始终做正确的事情。我们依靠遵守法律、尊重环境和人权的强大商业伙伴为我们的可持续发展做出贡献。我们的商业伙伴必须确认并遵守《商业伙伴行为准则》，或有自己的标准，该标准至少符合《欧米亚商业伙伴行为准则》中规定的原则，确保负责的供应链管理。遵守我们的《商业伙伴行为准则》是我们选择和评估商业伙伴的重要部分。

2. Scope

2. 范围

All distributors, suppliers, service providers, agents and other business partners, along with their subsidiaries, employees and subcontractors, who provide Omya with products, materials, expertise, and services worldwide (referred to as "**Business Partner**"), are subject to this Business Partner Code of Conduct. The code establishes the basic mandatory standards that every Business Partner should meet and complements their obligations under contractual agreements and applicable laws. 在全球范围内为欧米亚提供产品、材料、专业知识和服务的所有分销商、供应商、服务提供商、代理商和其他商业伙伴及其子公司、员工和分包商（统称“**商业伙伴**”）均须遵守本《商业伙伴行为准则》。该准则规定了每个商业伙伴均应遵循的基本强制性标准，并补充了他们在合同协议和适用法律下的义务。

3. Business Partners must comply with the law as a "fundamental rule"

3. 商业伙伴必须遵守法律，将法律视为“基本规则”。

Business Partners are required to comply with the law, i.e., to comply with all local, national and international laws applicable to their place of business, place of performance, place of delivery and final destination of products and services, as well as to comply with their internal policies. In addition, Business Partners are expected to go beyond legal compliance and strive to maintain high standards in the areas of social, human and labor rights, environmental protection and anti-corruption.

商业伙伴必须遵守法律，即遵守适用于其营业地、履约地、交货地以及产品和服务最终目的地的所有地方、国家和国际法律，并遵守其内部政策。此外，商业伙伴还应努力在社会、人权和劳工权利、环境保护、反腐败等领域保持高标准。



4. Main Principles

4. 主要原则

4.1 Business Partner – Internal Conduct

4.1 商业伙伴——内部行为

4.1.1. Risk Management

4.1.1. 风险管理

Business Partners are required to have an efficient risk management process that covers all risks addressed by this Business Partner Code of Conduct, and must document their risk management activities. The Business Partners' risk management process must encompass a review and documentation across their entire supply chain.

商业伙伴必须具有有效的风险管理流程，该流程涵盖本《商业伙伴行为准则》涉及的所有风险，并且须记录其风险管理活动。商业伙伴的风险管理流程必须包含整个供应链的审查和文档记录。

4.1.2. Health & Safety

4.1.2. 健康与安全

Business Partners must offer safe and healthy workplaces for their employees while respecting their rights and privacy. They should proactively work on mitigating workplace hazards to prevent injuries and illnesses. They must also have the necessary licenses, permits, and approvals from competent authorities for their operations.

商业伙伴必须为其员工提供安全和健康的工作场所，同时尊重员工权利和隐私。其应积极减少工作场所危害，预防伤害和疾病。他们还必须从主管部门获得必要的执照、许可证和批准以便开展业务。

4.1.3. Labor Practices

4.1.3. 劳动实践

Business Partners uphold workers' human rights by providing secure and fair working conditions, fair payment, and benefits. They do not use forced, involuntary, bonded, indentured or prison labor and commit to complying with all standards prohibiting slavery and oppression in the workplace.

商业伙伴通过提供安全和公平的工作条件、公平报酬和福利来维护劳动者的人权。其不使用强迫、非自愿、奴役、契约或监狱劳动，并承诺遵守所有禁止在工作场所使用奴隶制和压迫的标准。

4.1.4. No Child Labor

4.1.4. 无童工

Business Partners comply with applicable laws and international conventions that prohibit the use of child labor.

商业伙伴遵守禁止使用童工的适用法律和国际公约。

4.1.5. Freedom of Association

4.1.5. 结社自由

Business Partners honor the rights of workers outlined in local laws, particularly their freedom to associate to form unions and engage in collective bargaining.

商业伙伴尊重当地法律规定的工人权利，特别是他们结社成立工会和参与集体谈判的自由。

4.1.6. No Discrimination

4.1.6. 无歧视

Business Partners maintain a workplace that is free of discrimination or harassment, including sexual, racial, religious, and other forms of discrimination, whether verbal, physical or otherwise. They base employment-related decisions solely on relevant and objective criteria.

商业伙伴应使工作场所无歧视和骚扰，包括（无论是口头的、身体的还是其他方面的）性别、种族、宗教和其他形式的歧视。其仅根据有关的客观标准作出与就业有关的决定。



4.1.7. Privacy

4.1.7. 隐私

Business Partners protect the confidentiality and proper use of personal data and confidential information to guarantee compliance with data privacy laws.

商业伙伴保护个人数据和保密信息的保密性及正确使用，确保遵守数据隐私法。

4.1.8. Accounting and Taxation

4.1.8. 会计和税务

Business Partners comply with applicable accounting and taxation principles, ensuring transparent and accurate financial disclosure and proper retention of documents and records in accordance with regulations.

商业伙伴遵守适用的会计和税务准则，确保透明和准确的财务披露，并按照规定恰当保留文件和记录。

4.2 Business Partner – External Conduct

4.2 商业伙伴——外部行为

4.2.1. Environment

4.2.1. 环境

Business Partners prioritize environmentally responsible operations by reducing emissions, energy and water consumption, minimizing waste and avoiding harmful pollution and noise emissions. They also comply with regulations that prohibit unlawful eviction, mercury-added products, and non-environmentally sound handling and disposal of hazardous waste. Appropriate management systems should be in place to prevent spills and waste.

商业伙伴通过减少排放、能源和水的消耗、最大限度地减少浪费、避免有害污染和噪音排放，优先考虑对环境负责的业务。他们还遵守禁止非法驱逐、加汞产品以及非环保处理和处置危险废物的法规。建立适当的管理系统，以防止泄漏和浪费。

4.2.2. Transparency

4.2.2. 透明性

Business Partners ensure transparency and openness in their dealings with Omya by providing information on material flows, origin and production conditions throughout the supply chain. They prove product identity and ensure that no adulteration occurs, with the goal of delivering responsibly produced products.

商业伙伴通过提供整个供应链的物料流动、原产地、生产条件等信息，确保与欧米亚交易的透明度和公开性。其应证明产品标识，确保无掺假，以提供负责任的产品。

4.2.3. Fair Competition

4.2.3. 公平竞争

Business Partners believe that free, fair and open competition ensures high quality and innovative products and services. They avoid improper actions that exclude, restrict or distort competition or could be perceived as being unfair-dealing practices.

商业伙伴认为，自由、公平和公开的竞争确保了高质量和创新的产品和服务。他们避免排除、限制或扭曲竞争和可能被视为不公平交易做法的不当行为。

4.2.4. Anti-Bribery and Corruption

4.2.4. 反贿赂和腐败

Business Partners must abstain from engaging in any form of corruption and bribery. This includes refraining from any direct or indirect acts of bribery or facilitation payments, with the explicit purpose of unjustifiably influencing public officials, the judiciary, and/or representatives involved in a business relationship, including employees of Omya.

商业伙伴必须避免参与任何形式的腐败和贿赂。这包括避免任何直接或间接的贿赂或支付便利费的行为，该行为的明确目的是不合理地影响公职人员、司法机构和/或涉及业务关系的代表，包括欧米亚的员工。

4.2.5. Gift and Entertainment

4.2.5. 礼品和款待

All gifts and entertainment provided shall be modest, reasonable, infrequent and not offered



or received for the purpose of obtaining or retaining business with Omya.

所提供的所有礼品和款待应是适度、合理、不频繁的，且不是为了获得或保持与欧米亚开展业务而提供或接受的。

4.2.6. Sanctions & Money Laundering

4.2.6. 制裁和洗钱

Business Partners must comply with relevant trade and economic sanctions and are prohibited from facilitating money laundering, either directly or indirectly through intermediaries.

商业伙伴必须遵守相关的贸易和经济制裁，禁止通过中介机构直接或间接为洗钱提供便利。

4.2.7. Conflict of Interest

4.2.7. 利益冲突

Business Partners will refrain from any activity or interest that could interfere with their business relationship with Omya. They will promptly disclose to Omya any actual or potential conflict of interest in accordance with applicable laws.

商业伙伴应避免任何可能影响其与欧米亚业务关系的活动或利益。他们应根据适用法律及时向欧米亚披露任何实际或潜在的利益冲突。

4.2.8. Intellectual Property

4.2.8. 知识产权

Business Partners respect the intellectual property rights of Omya and other entities and refrain from any actions that could cause harm to them.

商业伙伴应尊重欧米亚和其他实体的知识产权，避免采取任何可能对其造成损害的行动。

4.2.9. Conflict minerals

4.2.9. 冲突矿产法

Business Partners shall ensure that they do not supply materials and products containing minerals that contribute to conflict by applying the due diligence procedures in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or laws of a similar nature.

商业伙伴应遵循经合组织《来自冲突及高风险地区矿产的负责任供应链尽职调查指南》或类似性质法律中的尽职调查程序，确保不提供含有导致冲突的矿物的材料和产品。

4.2.10. Whistleblowing System

4.2.10. 举报系统

Business Partners must establish a comprehensive internal or external complaints procedure throughout their supply chain that allows individuals to report any compliance issues, including human rights and environmental risks. The complaints procedure should be easily accessible, maintain confidentiality, and protect complainants from any adverse actions. Business Partners must provide clear and accessible information on the complaints procedure's accessibility and implementation. The procedure's effectiveness must be reviewed annually.

商业伙伴必须在整个供应链中建立全面的内部或外部投诉程序，允许个人报告任何合规问题，包括人权和环境风险。投诉程序应易于获取，予以保密，并保护投诉人免受任何不利行动影响。商业伙伴必须提供关于投诉程序的可访问性和实施的清晰易懂的信息。该程序的有效性须每年审查一次。

4.3 Due Diligence, Concerns and Non-Compliance

4.3 尽职调查、担忧和不合规

4.3.1. Due Diligence

4.3.1. 尽职调查

Omya reserves the right to conduct periodic or unscheduled reviews and assessments of both current and prospective Business Partners to ensure their compliance with this Business Partner Code of Conduct. Alternatively, and at Omya's sole discretion, these reviews may also be conducted by specialized independent third parties.

欧米亚有权定期或不定期对当前和潜在商业伙伴进行审查和评估，确保其遵守本《商业伙伴



行为准则》。或者，由欧米亚自行决定，这些审查也可以由专业的独立第三方进行。

4.3.2. Concerns

4.3.2. 担忧

Any concern or actual or potential non-compliance discovered by any Business Partner or an employee or a third person can be reported to the publicly open Integrity Line via Omya | Home (integrityline.io).

任何商业伙伴、员工或第三方发现的任何担忧或者实际或潜在的违规行为，都可以通过欧米亚|主页 (integrityline.io) 向公开开放的诚信热线报告。

4.3.3. Non-Compliance

4.3.3. 不合规

If Omya finds a severe or potential violation of the Business Partner Code of Conduct, it will take corrective action promptly. If the Business Partner cannot fix the issue in a reasonable timeframe, Omya will create a plan with specific actions and a timeline to resolve the violation. Omya will monitor progress and can suspend or terminate the relationship for a fundamental principle breach. Legal action and damages may also be pursued if necessary.

如果欧米亚发现严重违反或可能违反本《商业伙伴行为准则》的行为，其将立即采取纠正措施。如果商业伙伴无法在合理时间范围内解决问题，欧米亚将制定一项计划，其中包含解决违规行为的具体行动和时间表。欧米亚将监督进展，并可以因商业伙伴违反基本原则而暂停或终止关系。如有必要，也会提起法律诉讼和要求损害赔偿。



The Business Partner acknowledges by its signature that it understands and accepts the Omya Business Partner Code of Conduct and hereby agrees to the following:

商业伙伴通过签名确认其理解和接受《欧米亚商业伙伴行为准则》，并在此同意以下内容：

(please tick the appropriate box)

(请在适当方格内打钩)

- To comply with the Omya Business Partner Code of Conduct.
遵守《欧米亚商业伙伴行为准则》。

- 1. Agrees to Section 4.3
1.同意第 4.3 条规定
2. To have its own Code of Conduct that is at least equal to the principles set forth in the Omya Business Partner Code of Conduct. A copy of the Code of Conduct is attached to this document.
2.拥有自己的行为准则，该准则至少相当于《欧米亚商业伙伴行为准则》中规定的原则。本文件附有商业伙伴自己的行为准则的副本。

Name:

姓名:

Job Title:

职务:

Company:

公司:

Date:

日期:

Signature:

签名: