



Supplier Code of Conduct

供应商行为准则

Douglas Dynamics, LLC is committed to maintaining the highest standards of social, ethical and environmental conduct. Together with its operating companies, divisions, related parties and worldwide affiliates, (collectively referred to herein as “Douglas”) we will maintain the highest level of integrity, honesty and business ethics throughout all aspects of our supply chain. Douglas believes that long term, high integrity business relationships are built upon being open, honest and trustworthy; we go beyond simply complying with all local laws and regulations and strive for the highest standards for supplier relationships.

Douglas Dynamics, LLC 致力于保持社会、道德和环境行为的最高标准。我们将与运营公司、部门、关联方和全球分支机构（合称为“Douglas”）共同在供应链整个过程保持最高水平的诚信、诚实和商业道德。Douglas 相信，长期、高度诚信的业务关系建立在开放、诚实和信用的基础上；我们不仅应遵守所有当地法律法规，力求达到供应商关系的最高标准。

In support of this, Douglas provides clear expectations for suppliers globally to follow. Douglas will assess compliance with this Code, and violations may jeopardize the supplier’s business relationship up to and including termination. All purchase orders and order acceptances are made subject to the terms of this Supplier Code of Conduct.

为此，Douglas 提供明确期望，供全球供应商遵循。Douglas 将评估对本守则的遵守情况，违规行为可能危及供应商的业务关系，直至且包括终止关系。所有采购订单和订单接受均须遵守本《供应商行为准则》的条款。

Labor & Human Rights

劳工和人权

Human Dignity

人的尊严

Douglas believes all workers deserve ethical treatment, across our supply chain. All suppliers will treat each employee or contractor with dignity and respect, will not use corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal harassment or abuse. Supplier will make ensure that they are not complicit in human rights abuses.

Douglas 认为，所有员工都应在我方整个供应链上获得人道待遇。所有供应商将以尊严和尊重对待每位员工或承包商，不得使用体罚、暴力威胁或其他形式的身体、性、心理或口头骚扰或虐待行为。供应商将确保其不会共谋侵犯人权。

Anti-Discrimination & Abuse

反歧视和滥用

Supplier will not discriminate in hiring and employment practices, including salary, benefits, advancement, discipline, termination or retirement, on the basis of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, political opinion or disability. Supplier shall not require pregnancy or medical tests, except where required by applicable laws or regulations or prudent for workplace safety, and shall not improperly discriminate based on test results.

供应商不得基于种族、宗教、年龄、国籍、社会或种族出身、性取向、性别、政治见解或残疾等歧视雇佣和就业实践，包括薪金、福利、晋升、纪律、终止或退休。供应商不得要求进行怀孕或医疗检查，但下列情况除外：相关法律法规或审慎工作安全要求，且不得基于测试结果进行不当歧视。

Supplier will use only voluntary labor and will not use any forced, bonded, indentured, or convict labor. Involuntary labor can include transportation, harboring, recruitment, employment or other activity related to persons employed though threat, coercion, or fraud, abduction, or payments to any person having control over another person for the purpose of exploitation. Douglas holds suppliers responsible for the actions of third party recruiting firms hired to provide labor, and suppliers must ensure these firms are in compliance with this Code of Conduct.

供应商将仅使用自愿劳动，不得使用任何强制、抵债、合同或罪犯劳动。非自愿劳动可包括运输、庇护、招聘、就业或与通过威胁、胁迫或欺诈、诱拐雇佣人员相关的其他活动

或为剥削目的付款给 对他人具有控制权的任何人。 Douglas 将使供应商对提供劳动力的第三方招聘公司的行为负责，且供应商必须确保该等公司遵守本《行为准则》。

Suppliers may not withhold government or travel documents from employees or contractors, or impose unreasonable restrictions on employee or contractor freedom of movement.

供应商不得向雇员或承包商扣留政府或旅行证件，或对雇员或承包商的行动自由施加不合理限制。

Child Labor

童工

Supplier will assure that every employee is of working age. Child labor is prohibited. "Child" means a person younger than 15 (or 14 where local law allows, or, if higher, the local legal minimum age for employment or the age for completing compulsory education). Supplier must maintain consistent educational benefit and compliance with Article 6 of the ILO Minimum Age Convention No. 138 or Article 7 of the ILO Minimum Age Convention No. 138. Employees under 18 years of age shall not be required to work overtime or overnight and must only be employed in a manner that does not jeopardize their health, safety or morals.

供应商将确保每个员工均符合就业年龄。禁止使用童工。“儿童”指未满 15 岁的人（或如当地法律允许，未满 14 岁的人，或当地法定最低就业年龄或完成义务教育年龄）。供应商必须保持一致的教育效益，并遵守国际劳工组织第 138 号《最低年龄公约》第 6 条或国际劳工组织第 138 号《最低年龄公约》第 7 条。未满 18 岁的员工不得被要求加班或过夜加班，只能以不危害其健康、安全或道德的方式受雇。

Workplace Conditions

工作场所条件

Supplier will respect the rights of employees to associate, organize and bargain collectively in a lawful and peaceful manner, without penalty and in compliance with applicable legal requirements.

供应商应尊重员工在符合相关法律要求的情况下以合法、和平的方式结社、组织和集体谈判的权利，不得因此而受惩罚。

Supplier will provide employees with a safe and healthy workplace in compliance with all applicable laws and regulations. The welfare of every worker is a top concern for Douglas; we require Supplier's workforce utilize Personal Protective Equipment in accordance all occupational health standards. Where a supplier provides housing it shall be sanitary and safe living facilities with access to clean toilet facilities and potable water.

供应商将根据所有相关法律法规为员工提供安全健康的工作环境。每个工人的福利是 Douglas 的首要担忧；我们要求供应商的员工按照所有职业健康标准使用个人防护装备。如果供应商提供住房，则应具备卫生和安全的生活设施，可使用清洁厕所设施和饮用水。

Wages

工资

Supplier will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation, and provide legally mandated benefits. Except in extraordinary business circumstances, Supplier will not require employees to work more than the limits on regular and overtime hours allowed by local law. Supplier will compensate employees for overtime hours at such premium rate as is legally required or, if there is no legally prescribed premium rate, at a rate at least equal to the regular hourly compensation rate. Where local industry standards are higher than applicable legal requirements, Supplier should meet the higher standards. Any disciplinary wage deductions shall conform to local law.

供应商应在最低限度范围内遵守所有关于工资和工时的法律法规，包括与最低工资、加班费、最高工时、计件工资率和其他薪酬要素有关的法律法规，并提供法律强制要求的福利。除在特殊业务环境下，供应商不得要求员工工作超过当地法律允许的正常和加班时间。供应商将按法律要求的奖金补偿员工的超时工作时间，或如法律未规定奖金，则至少等于正常的小时薪酬率。当地行业标准高于相关法律要求时，供应商应符合更高标准。任何纪律工资扣除应符合当地法律。

Environmental

环境

Douglas is committed to partnering with suppliers who recognize that environmental responsibility is integral to a business relationship. In manufacturing operations, adverse effects to the environment and natural resources should be minimized, while safeguarding the health and safety of employees and the public. Supplier should work to fully integrate environmental stewardship into its business practices.

Douglas 致力于与承认环境责任是商业关系不可或缺的供应商进行合作。在生产经营中，应尽量减少对环境和自然资源的不利影响，同时保障员工和公众的健康和安全。供应商应努力将环境管理纳入其业务实践。

Hazardous and Non-Hazardous Materials

有害和无害材料

Suppliers will maintain a systematic approach to identify and manage hazardous and non-hazardous materials, compliant with local and international law. Supplier shall comply with current recycling and best practices to minimize impact of these materials.

供应商应根据当地和国际法维持系统的方法以识别和管理有害和无害材料。供应商应遵守当前回收利用和最佳实践，以尽量减少该等材料的影响。

Environmental Reporting

环境报告

Supplier shall receive and maintain all required legal permits related to environmental and material handling requirements for their operations.

供应商应获取并维持所有与环境 and 物料搬运要求相关的所有必要法律许可以开展其业务。

Prevention

预防

Douglas expects suppliers, in addition to the legal requirements, to make every effort practical to reduce environmental damage through conservation, recycling and other mutually agreed upon best practices.

Douglas 期望供应商除法律要求外，通过保护、回收利用和其他共同商定的最佳做法，尽量减少环境破坏。

Douglas expects suppliers will maintain, and furnish upon request, plans contingency plans in the event of natural disasters such as fires, floods, and other concerns.

Douglas 期望供应商维持并在遇到自然灾害（如火灾、洪水等自然灾害和其他关注）时应要求提供应急计划。

RoHS

RoHS

Douglas requires all products to confirm to current RoHS & REACH standards as defined by the European Union, unless otherwise agreed in writing.

除非另有书面约定，Douglas 要求所有产品均符合欧盟所制定的 RoHS 和 REACH 标准。

Ethics

道德

Intellectual Property

知识产权

Intellectual property and Douglas product, business or industry information help to provide a competitive advantage for our business. As such, Douglas expects that suppliers will respect these unique advantages and is willing to confirm their acceptance through execution of a Confidentiality Agreement.

知识产权和 Douglas 产品、业务或行业信息有助于为我们的业务提供竞争优势。因此，Douglas 期望供应商尊重该等独特优势，并愿意通过签署保密协议确认其表示接受。

Foreign Corrupt Practices Act (FCPA)

《反海外腐败法》 (FCPA)

Suppliers shall not engage in corruption, extortion, embezzlement or bribery to obtain unfair advantage in any aspects of our business relationship. Suppliers shall abide by all applicable anti-corruption laws including the Foreign Corrupt Practices Act (FCPA).

供应商不得从事腐败、勒索、盗用公款或贿赂，以在业务关系的任何方面获得不公平优势。 供应商应遵守所有相关反腐败法律，包括《反海外腐败法》 (FCPA)。

Whistleblower Protections

举报人保护

Suppliers shall provide an anonymous mechanism for reporting of violations within their operations, and prohibit retaliation against “whistleblowers” for such reporting. “Whistleblower” is defined as any worker reporting illegal or unethical information.

供应商应在其业务范围内提供违规行为举报匿名制，禁止对该举报的“举报人”实施报复。“举报人”指报告非法或不道德信息的任何工作人员。

Compliance & Obligations

合规和义务

Sub-Contractors

分包商

Supplier will not use subcontractors for the provision of goods or services to Douglas unless the subcontractor has entered into a written commitment with the Supplier to comply with this Code of Conduct. Douglas requires advance notification from Supplier and written approval prior to the start of production if a subcontractor is used to fulfill any portion of a purchase order.

供应商不得使用分包商向 Douglas 提供货物或服务，除非分包商已和供应商签订遵守本《行为准则》的书面承诺。如使用分包商完成采购订单的任何部分，Douglas 应在开始生产前从供应商获得事先通知和书面批准。

Conflict Minerals

冲突矿产

Douglas will require, upon request, Supplier's certify that their supply chain is free of "Conflict Minerals" as defined by US Law.

Douglas 将应请求要求供应商证明其供应链没有美国法律规定的“冲突矿产”。

Compliance

合规

Supplier will exercise due diligence to ensure responsible and compliant sourcing of minerals; compliance with OECD Due Diligence Guidance for Responsible Supply Chain Minerals from Conflict and High Risk Areas is recommended. Suppliers are required to be able to, upon request, certify they are free of conflict minerals.

供应商应尽努力确保负责和合规采购矿产；建议遵守《经合组织对冲突和高风险地区负责供应链矿产的尽职调查指南》。供应商必须能够应要求证明其没有冲突矿产。

Supplier hereby authorizes Douglas to confirm compliance by Supplier with this Code of Conduct, including unannounced on-site inspections of manufacturing facilities and employer-provided housing; reviews of Supplier books and records relating to employment matters; and private interviews with employees. Supplier will maintain at its facilities all documentation that may be needed to demonstrate compliance with this Code of Conduct.

供应商特此授权 Douglas 确认供应商遵守本《行为准则》，包括对制造设施和雇主提供的房屋进行突击现场检查；审查供应商就业相关账簿和记录；及对员工进行私人访谈。供应商应在其设施处维持所有可能需要的文件，以证明其遵守本《行为准则》。

Supplier will comply with all applicable laws and regulations, including those pertaining to the manufacture, pricing, sale and distribution of merchandise. All references to "applicable laws and regulations" in this Code of Conduct include local and national

codes, rules and regulations as well as applicable treaties and voluntary industry standards.

供应商应遵守所有相关法律法规，包括与生产、定价、销售和分销商品有关的法律法规。本《行为准则》中对“相关法律法规”的所有提述包括地方和国家的法典、法规和规章以及相关条约和自愿行业标准。

Supplier will take appropriate steps to ensure that the provisions of this Code of Conduct are communicated to employees and subcontractors as appropriate.

供应商将采取适当措施，确保将本《行为准则》的规定酌情通知员工和分包商。

Failure by any supplier of Douglas or subcontractor of the supplier to comply with this Code of Conduct is grounds for immediate termination with cause, of all purchase orders and any Supplier agreement without liability on the part of Douglas. Upon completion of our business relationship, Douglas requires the return of all documentation and Douglas purchased tooling used by a supplier. All Douglas owned tools will be recorded on a tooling condition report, with location, life expectancy and updated annually to show total usage.

Douglas 的任何供应商或供应商的分包商未能遵守本《行为准则》可成为立即因故终止所有采购订单和任何供应商协议，Douglas 对此均不承担任何责任。在完成业务关系后，道格拉斯要求退还所有文件，以及道格拉斯购买并由供应商使用的工具。Douglas 拥有的所有工具将记录在工具状态报告中，注明位置、预期寿命并每年予以更新以显示总使用量。

Douglas values open and honest communication; in the event a Supplier determines there is any violation of the Code of Conduct immediately report and correct the issue. Douglas will

Douglas 重视公开诚实的沟通；如供应商认定存在任何违反《行为准则》的行为，应立即报告并纠正问题。Douglas 将

Douglas Code of Conduct accepted by Wuxi Junhong Automation Technology Co.,Ltd (name) and current and future compliance certified by the following senior executive of the company.

无锡钧弘自动化科技有限公司 (公司名称) 接受 Douglas 《行为准则》，公司下列高管证明当前和未来合规。

Signed _____

签署 _____

Printed Name _____

印刷体姓名 _____

Title _____

职位 副总经理 _____

Date _____

日期 2022年1月10日 _____

