

**北京飞机维修工程有限公司  
供应商行为准则  
Ameco Beijing  
Supplier Code of Conduct**



## 供应商行为准则

### Supplier Code of Conduct

作为中国领先的民航维修企业，北京飞机维修工程有限公司（以下简称公司）为客户提供高质量、高效率的服务，努力朝着中国领先，世界一流的目标迈进。为实现这一目标，需要与供应商开展可靠的合作。

As one of China's leading civil aviation maintenance enterprises, Beijing aircraft maintenance engineering co., LTD. (hereinafter referred to as the company) provides customers with high-quality and efficient services, striving for China's leading, world-class goal. To achieve this goal, reliable cooperation with suppliers is required.

为此，公司制定了《供应商行为准则》，描述了对供应商的法律要求和企业责任要求。这些原则适用于所有供应商及其员工、子公司以及分包商。

For this reason, the company has formulated the Supplier Code of Conduct of Ameco, which describes the legal requirements and corporate responsibility requirements for suppliers. These principles apply to all suppliers and their employees, subsidiaries and subcontractors.

## 第1章 遵守法律、法规和规定

### Chapter 1 Compliance with Laws, Rules and Regulations

供应商的所有业务活动都应符合其经营所在国/地区的法律、法规和规定。此外，供应商应确保其为公司提供的产品、服务和运输符合所有适用的法律、法规和规定。包括但不限于：

All supplier's business activities shall comply with the laws, regulations and regulations of the country/region where the supplier operates. In addition, supplier shall ensure that the products, services and shipments it provides to the company comply with all applicable laws, regulations and regulations. Including but not limited to:

**竞争：**遵守对开展业务有约束力的反不正当竞争和反垄断法律、法规和规定。

**Competition:** compliance with laws, regulations and provisions of the anti-unfair competition and anti-monopoly law that are binding on the conduct of business.

**进出口：**遵守所有适用的贸易管制规定，以及所有适用的出口、再出口和进口法律、法规和规

定。

**Import and export:** comply with all applicable trade control regulations and all applicable export, re-export and import laws, regulations and regulations.

**反腐败和反洗钱:** 遵守所有适用的反腐败和反洗钱法律、法规和规定。

**Anti-corruption and anti-money laundering:** comply with all applicable anti-corruption and anti-money laundering laws, regulations and regulations.

**业务记录:** 诚实、准确地记录并报告所有业务信息，并遵守与这些信息的完整性和准确性有关的所有适用法律、法规和规定，按照要求来创建、保留和处置业务记录。

**Business records:** record and report all business information honestly and accurately, and comply with all applicable laws, regulations and regulations related to the integrity and accuracy of such information, and create, retain and dispose of business records as required.

## 第2章 商业道德

### Chapter 2 Business Ethics

#### 1. 利益冲突 Conflict of interest

避免不恰当的行为或利益冲突。如果公司的员工、员工的配偶、其他家庭成员或亲戚，在供应商处拥有重要的经济利益，供应商则不能直接与该员工打交道。在协商供应商协议或履行供应商义务期间，供应商也不得直接与公司雇佣的供应商人员的配偶、其他家庭成员或亲戚打交道。

Avoid inappropriate behavior or conflicts of interest. If the employee, spouse, other family member or relative of the company has significant financial interest in the supplier, the supplier cannot directly deal with the employee. The supplier shall not directly deal with the spouse, other family members or relatives of the supplier's personnel employed by the company during the negotiation of the supplier agreement or performance of the supplier's obligations.

#### 2. 礼物、娱乐活动和贿赂 Gifts, entertainment and bribes

禁止任何形式的贿赂、腐败（涵盖允诺、提供、给予或接受任何贿赂），所有交易应透明，并准确反映在交易账目和记录中，供应商应执行监控和履程序，确保符合反商业贿赂的要求。

Any form of bribery, corruption (covering the promise, offer, give or receive of any bribe) shall be prohibited, all transactions shall be transparent and accurately reflected in the transaction accounts and records, and the supplier shall carry out monitoring and performance procedures to ensure compliance with the requirements of anti-commercial bribery.

商业交往中的礼物和招待不能影响员工的业务判断，或者造成可能影响这种判断的印象。在与公司洽谈业务或代表公司开展业务时，供应商可以出于合法的商业目的提供礼物或招待，但前提条件是：

Gifts and hospitality in a business relationship should not affect an employee's business judgment or create the impression that it might. When negotiating with the company or conducting business on behalf of the company, the supplier may offer gifts or hospitality for legitimate commercial purposes, provided that:

- 这些礼物或招待都是主动提供的并且是适度的；  
the gift or hospitality is unsolicited and be modest;
- 须符合适用法律、法规和规定；  
shall conform to the applicable laws, regulations and provisions;
- 不具备贿赂、回扣或其它非法或非法支付的性质；  
don't bribes, kickbacks or other illegal or illegal payment properties;
- 不以影响他人决策为目的；  
decision not to influence others for the purpose;
- 不会在被公开后给公司带来麻烦；  
will not bring trouble after being open to the company;
- 不会让人觉得送礼人有权受到优待、赢得业务、获得更优的价格或销售条件，更不会造成这样的实际或默示义务。  
won't let a person feel the giver shall have the right to being pampered, win business, get a better price or sales conditions, more won't cause such actual or implied obligations.

### 3. 无不正当获利 Avoiding unjust enrichment

不行贿不受贿，不通过任何形式获取不适当或不正当的利益。

Neither offer nor take bribes, nor obtain improper or improper benefits in any form.

### 4. 信息披露 Information disclosure

依据适用的法规和行业惯例，披露相关商业活动、组织结构、财务状况和绩效的信息，禁止伪造记录或虚假表述供应链的状态或活动。

Disclosure of information relating to business activities, organizational structure, financial status and performance in accordance with applicable regulations and industry practices, and forgery of records or false representation of supply chain status or activities are prohibited.

5. 知识产权 Intellectual property rights

尊重知识产权，技术和技术知识的转让应以保护知识产权的方式进行。

Respect for intellectual property rights, transfer of technology and technical knowledge shall be conducted in a manner that protects intellectual property rights.

6. 公平交易 A fair deal

广告和竞争应倡导公平交易，同时采取适当方式保护客户信息。

Advertising and competition should promote fair trading while taking appropriate measures to protect customer information.

7. 隐私保护 Privacy protection

供应商承诺对与其开展交易的任何人（包括其供应商、客户和员工等）的个人信息给予合理的隐私保护。供应商在收集、存储、处理、传播和分享上述个人信息时，应遵守隐私和信息安全法律和监管要求。

Supplier undertakes to give reasonable privacy protection to the personal information of any person who transacts with it, including its supplier, customer and employee. The supplier shall comply with the privacy and information security laws and regulatory requirements when collecting, storing, processing, disseminating and sharing the above personal information.

8. 不打击报复 No revenge

供应商应建立一套沟通反馈机制，使其员工能够对任何关注的问题放心地提出意见而不必担心受到打击报复。

Suppliers should establish a communication and feedback mechanism so that their employees can safely comment on any concerns without fear of retaliation.

## 第3章 员工

## Chapter 3 Employees

供应商应与员工签订劳动合同，应尊重每位员工，维护员工的合法权益，包括正式工、合同工、实习生等任何其他类型的员工。

The supplier shall sign the labor contract with the employee, respect each employee, and safeguard the legitimate rights and interests of the employee, including the regular employee, contract worker, intern and any other type of employee.

- 供应商应仅雇用符合最低法定年龄要求的工作人。

Suppliers shall employ only workers to meet the minimum legal age requirement.

- 供应商工厂的工时、工资及加班费规定应遵守适用的法律。

Supplier factory working hours, wages and overtime pay provisions shall comply with the applicable laws.

- 供应商应尊重和尊敬员工，不得参与或允许体罚、以暴力相威胁或其它形式的骚扰行为（无论是基于性别、种族、肤色、宗教、族裔、年龄、原国籍、残疾，还是任何其它受法律保护的特征）。

Suppliers should respect and respect for employees, shall not participate in or allow corporal punishment, to the threat of violence or other forms of harassment, whether it is based on gender, race, color, religion, ethnicity, age, national origin, disability, or any other characteristic protected by law).

- 供应商在雇佣工人时应以其工作能力为考量依据，而非基于其个人特征或信仰（包括种族、肤色、性别、国籍、宗教、年龄、生育或婚姻状况等）。

Suppliers when hiring workers should be defined by the ability to work to provide the basis, rather than on their personal characteristics or beliefs, including race, color, gender, nationality, religion, age, maternity or marital status, etc.).

## 第4章 健康与安全

### Chapter 4 Health and Safety

#### 1. 职业安全 Occupational safety

供应商应通过正确的设计、工程和管理控制、预防性维护、安全工作程序以及持续的安全培训来控制员工在工作场所会遇到的潜在的安全危险。

Supplier shall control potential safety hazards to employees in the workplace through proper design, engineering and management control, preventative maintenance, safe work procedures and ongoing safety training.

## 2. 职业健康 Occupational health

员工的身体健康状况应符合《职业病防治法》的要求。应按照职业健康监护技术规范的要求对接触职业病危害作业的员工进行职业健康体检，不得安排职业禁忌的员工从事所禁忌的职业病危害作业。

The employee's physical health should meet the requirements of the Occupational Disease Prevention and Control Act. Employees exposed to occupational-disease-inductive work shall be subject to occupational health physical examination in accordance with the requirements of occupational health monitoring technical specifications, and no prohibited occupational-disease-inductive work shall be arranged for prohibited employees.

## 3. 工伤与职业病 Work-related injuries and occupational diseases

应落实防止、控制、跟踪和报告工伤与职业病的程序和机制。

Procedures and mechanisms for prevention, control, follow-up and reporting of work-related and occupational diseases should be implemented.

## 4. 工业卫生 Industrial hygiene

鉴别、评估并控制员工接触化学、生物和物理物质带来的危害。

Identify, evaluate and control hazards from employee exposure to chemical, biological and physical substances.

产生尘、毒、噪声等危害的生产作业或设备（含露天作业），应采取有效的控制措施，以防止污染周围环境及对周围人员造成影响。

Production operations or equipment (including outdoor operations) that produce dust, poison, noise and other hazards shall take effective control measures to prevent pollution of the surrounding environment and the impact on the surrounding personnel.

## 5. 应急预案 Emergency plan

针对存在的风险，制定应急预案。执行应急方案与响应程序，包括：紧急报告、通知员工与疏散程序、员工训练与演习，配备适当的火警探测和灭火设备，充足的逃逸设施与恢复计划。

According to the risk, make emergency plan. Implement emergency plans and response procedures, including: emergency reporting, notification of staff and evacuation procedures, staff training and drills, proper fire detection and extinguishing equipment, adequate escape facilities and recovery plans.

在公司厂区施工的供应商应了解公司相关应急预案并培训员工熟悉公司应急响应措施，保证在必要时行为符合公司应急响应要求。

The supplier who works in the company's factory area should know about the company's emergency plans and train the employees to be familiar with the company's emergency response measures, so as to ensure that the behavior conforms to the company's emergency response requirements when necessary.

#### 6. 安保 Security

进入公司，必须遵守公司所有安保规定，未经批准和授权不得进入机库，所有供应商在厂区的活动均需接受安保人员的检查和监督。

Entering the company must comply with all security regulations of the company, and do not enter the hangar without approval and authorization. All activities of suppliers in the factory area shall be subject to inspection and supervision by security personnel.

#### 7. 消防安全 Fire safety

进入公司必须严格遵守公司的消防安全管理规定。

Entering the company must strictly observe the company's fire safety management regulations.

#### 8. 交通 Traffic

机动车进入公司时，应遵守公司《交通安全管理规定》。

When a motor vehicle enters a company, it shall comply with the company's traffic safety management regulations.

## 第5章 保护环境善用资源

### Chapter 5 Environmental Protection and Utilization of Resources

供应商应认识到，保护环境和自然资源对生存至关重要。所有决策在保证公共健康和安全的同时，应充分考虑对环境的保护和对自然资源的合理利用，将生产经营活动对环境和自然资源的不利影响（以及潜在不利影响）降低到最小程度。

Suppliers should recognize that protecting the environment and natural resources is essential to survival. While ensuring public health and safety, all decisions should take due account of the protection of the environment and the rational use of natural resources to minimize the adverse (and potentially adverse) impacts of production and operation activities on the environment and natural resources.



1. 环境许可和报告 Environmental licensing and reporting

获得并保有所有必要的环境许可（例如：排放监测、批准和登记证明），保持有效并遵守相关的管理与上报要求。

Obtain and maintain all necessary environmental permits (e.g., emission monitoring station approval and registration certificates), remain valid and comply with relevant management and reporting requirements.

2. 防止污染和节约资源 Prevent pollution and save resources

供应商应在源头或以实践的方式（如：调整生产、维护和设施处理、材料替代、节约以及材料的循环和重复使用）减少或消除各种类型的污染物（水、气、噪声、废物和辐射）和节约能源。

Supplier shall reduce or eliminate various types of contaminants (water, gas, noise, waste and radiation) and conserve energy at source or in a practical manner (e.g.

3. 有害物质 Hazardous substances

应当识别和控制释放到环境中会造成危害的化学物质和其它物质，以确保这些物质得到安全地处理、转移、储存、使用、回收或重复使用和处置。

Hazardous chemicals and other substances released into the environment should be identified and controlled to ensure that they are safely treated, transferred, stored, used, recovered or reused.

4. 废水 Waste water

在排放和处置所产生的废水前，应按要求进行分类、监控、管理和处置。在公司厂区施工时，如有废水或污水排放，应提前告知公司并由公司指定排放位置。

The discharge and disposal of waste water should be classified, monitored, managed and disposed as required. If there is any waste water or sewage discharge during the construction of the company's factory, the company shall inform the company in advance and specify the discharge location.

5. 固体废弃物 Solid waste

应按要求进行分类收集和存放。在公司厂区施工时，工业垃圾、危险废物和建筑垃圾应及时清运，并按法律要求进行处置。

Collection and storage shall be classified as required. Industrial waste, hazardous waste and construction waste shall be cleaned and transported in time and disposed according to legal

requirements.

## 6. 气体排放 Gas emission

在排放气体排放物之前，应按要求分类、监控、管理和处理经营过程中产生的气体。产生粉尘的工作应有收集装置。施工应采取措施防止扬尘污染。

Prior to the discharge of gas emissions, the gas generated in the operation process shall be classified, monitored, managed and treated as required. Dust producing work should have collecting device. Measures should be taken to prevent dust pollution during construction.

## 7. 噪声控制 Noise control

应采取有效措施控制噪声，产生噪声的工作应在批准的区域和时间进行，减少噪声影响。

Effective measures should be taken to control noise, and noise production should be carried out in approved areas and time to reduce noise impact.

## 8. 辐射 Radiation

进行辐射工作的单位和人员应具备相应资质。辐射作业应按要求设置防护和控制措施。

Units and personnel engaged in radiation work shall have corresponding qualifications. Protection and control measures shall be set up for radiation work as required.

供应商在公司范围内的作业和工作，应使用符合安全和环保要求的运输工具和设备及聘用合格的人员，严禁从事与资质不相符的工作。应遵守国家法律法规及公司关于安全与环境保护方面的要求及管理，并对此负全责，同时承担法律法规要求的其它安全责任。上述责任不因与公司协议中的任何条款而改变。

The supplier shall use transportation tools and equipment in conformity with safety and environmental protection requirements and hire qualified personnel within the scope of the company, and shall be strictly prohibited from doing any work inconsistent with the qualification. Party b shall comply with the national laws and regulations and the requirements and management of the company in respect of safety and environmental protection, and shall take full responsibility for this, and bear other safety responsibilities as required by laws and regulations. Such liability shall not be altered by any provision of the agreement with the company.

# 第6章 管理体系

## Chapter 6 Management System

供应商应采纳或建立一套与《北京飞机维修工程有限公司供应商行为准则》内容相关的管理体系，该管理体系旨在确保：

The supplier shall adopt or establish a management system related to the Supplier Code of Conduct of Ameco, which is designed to ensure that:

- 符合与供应商经营和产品相关的所有适用法律法规；  
meet with suppliers and products related to all applicable laws and regulations;
- 符合《北京飞机维修工程有限公司供应商行为准则》；  
conforms to the Supplier Code of Conduct of Ameco;
- 发现并减少与《北京飞机维修工程有限公司供应商行为准则》相关的经营风险；  
found and reduce with the Supplier Code of Conduct of Ameco related to the management risk;
- 促进持续改进和完善。  
promote continuous improvement and perfect.

供应商的管理体系应包含以下要素：

Supplier management system shall include the following elements:

### 1. 公司承诺 Company commitment

一份由公司管理层签署的公司政策声明，确认供应商承诺遵守并持续完善管理体系。

A company policy statement signed by the company's management confirming the supplier's commitment to compliance and continuing improvement of the management system.

### 2. 管理层责任及负责机制 Management responsibility and responsible mechanism

明确并公布负责执行管理体系和相关方案的公司代表，高层管理人员应定期审查管理体系的状态。

Clarify and publish company representatives who are responsible for implementing the management system and related programs. Senior management should review the status of the management system regularly.

### 3. 法律和顾客要求 Legal and customer requirements

建立一套确认、监控和了解适用法律、法规和客户要求（包括《北京飞机维修工程有限公司供应商行为准则》的要求）的流程。

Establish a process for identifying, monitoring and understanding applicable laws, regulations, and customer requirements, including the Supplier Code of Conduct of Ameco.

#### 4. 风险评估与管理 Risk assessment and management

建立一套确认与供应商经营相关的环境、健康、安全、劳动用工及商业道德风险的流程。此外，供应商的管理体系应包括确定上述每一风险相对重要程度的方法，并对确认的风险采取适当程序并进行控制，以确保符合监管要求。

Establish a set of procedures to identify environmental, health, safety, labor and business ethics risks associated with supplier operations. In addition, the supplier's management system should include methods to determine the relative importance of each of the above risks, and appropriate procedures and controls for identified risks to ensure compliance with regulatory requirements.

#### 5. 完善目标 Improve goals

以书面形式设定绩效目标、目的和执行计划。

Set performance goals, objectives, and action plans in writing.

#### 6. 培训 Training

确保管理人员与员工执行公司的供应商政策和程序。

Ensure that management and staff implement the company's supplier policies and procedures.

#### 7. 沟通 Communication

落实沟通机制，公司应清晰而准确的告知其供应商、员工《北京飞机维修工程有限公司供应商行为准则》的内容和要求。

To implement the communication mechanism, the company should clearly and accurately inform its suppliers and employees of the content and requirements of the Supplier Code of Conduct of Ameco.

#### 8. 员工的反馈和参与 Employee feedback and participation

落实员工对《北京飞机维修工程有限公司供应商行为准则》中实践和理解的持续评估机制以及获得员工反馈的机制。

Implement the continuous assessment mechanism for employees' practice and understanding of the Supplier Code of Conduct of Ameco and the mechanism for obtaining employee feedback.

## 9. 审计和评估 Audit and evaluation

落实定期自我评估，确保《北京飞机维修工程有限公司供应商行为准则》内容以及客户合同要求符合法律和监管要求。

Implement regular self-assessment to ensure compliance with the code of conduct for suppliers and customer contract requirements.

## 10. 纠正流程 Correction process

落实纠正流程，及时纠正在内部或外部评估、检查、调查和审查中所发现的缺陷。

Implement corrective procedures to correct defects found in internal or external evaluations, inspections, investigations and reviews in a timely manner.

## 11. 文件和记录 Documents and records

创建并保存确保符合监管和公司要求的文件与记录，以及符合《北京飞机维修工程有限公司供应商行为准则》和为保护隐私所采取的适当保密措施的证据。

Create and maintain documents and records that ensure compliance with regulatory and corporate requirements, as well as evidence of compliance with Supplier Code of Conduct of Ameco and appropriate confidentiality measures for privacy protection.

# 第7章 供应商评估与改进要求

## Chapter 7 Supplier Evaluation and Improvement Requirements

**评估：** 公司采用统一的评估工具，有效地评估和管理供应商风险。

**Assessment:** the company uses a unified assessment tool to effectively assess and manage supplier risk.

**审计：** 公司可能会自行或聘请第三方开展现场审计或针对供应商对《北京飞机维修工程有限公司供应商行为准则》及相关法律、法规与条例的合规性开展评估。这种审计可以未经通知而进行，与供应商和公司协议中的任何条款无关。

**Audit:** the company may conduct on-site audit by itself or engage a third party or evaluate the compliance of suppliers to the Supplier Code of Conduct of Ameco and related laws, regulations and

regulations. Such audits can be conducted without notice, irrespective of any provision in the supplier's and company's agreement.

**问题改进:** 如果审计中确认了某一或一些存在问题, 则供应商应及时进行改进。如果供应商拒绝进行审计或不予配合、未满足《北京飞机维修工程有限公司供应商行为准则》的要求, 则公司可能做出不再给予新业务的决定或终止从该供应商处采购相关商品或服务。

**Problem improvement:** if one or more problems are identified in the audit, the supplier should make improvements in a timely manner. If the supplier refuses to conduct an audit or fails to comply with the Supplier Code of Conduct of Ameco, the company may decide not to grant new business or terminate the procurement of related goods or services from the supplier.

附件：反商业贿赂承诺书

**Annex: Anti-Commercial Bribery Undertaking**

致：北京飞机维修工程有限公司

To: Ameco Beijing,

为维护公平、公正、公开的竞争环境，预防出现商业贿赂行为，我公司在此郑重承诺：

In order to maintain a fair, just and open competitive environment and prevent commercial bribery, our company hereby solemnly promises:

1. 我公司将严格遵守中华人民共和国相关的反商业贿赂法律法规，合法竞争；

Our company will strictly abide by the commercial bribery laws and regulations of the People's Republic of China and compete legally;

2. 我司与贵公司工作人员保持正常的商业交往，不以任何形式给予不正当利益，包括但不限于回扣、手续费、中介费、有价证券、免费旅游或度假、房屋装修、高档宴席和娱乐活动、报销各种消费凭证、赠送昂贵礼品等一切受益报偿等；

Our company keep normal commercial contacts with your company's staff, and shall not to give any form of illegitimate interests to our staff, including but not limited to the brokerage, service fees, agency fees, negotiable securities, free to travel or vacation, home decoration, and recreational activities, reimbursement of all kinds of consumption vouchers and expensive gifts, all benefit compensation, etc.;

3. 不给予“相关人员”（包括但不限于：贵公司员工的近亲属及关系密切的其他亲属和朋友、评标人员、贵公司聘请的招标代理机构及其工作人员等）上述不正当利益；

Don't give relevant personnel (including but not limited to: your company employee of close relatives and other close relatives and friends, bid assessment staff, your company hired tender agencies and their staff, etc.) the illegitimate interests;

4. 不接受贵公司员工和“相关人员”在我公司做兼职、顾问等；

We do not accept your employees and "relevant personnel" to work as part-time or consultant in our company;

5. 若贵公司员工和“相关人员”向我公司索要不正当利益，我公司将立刻拒绝该不当要求，并立即将情况据实通知贵公司；

If your employees and "relevant personnel" claim improper benefits from our company, our company will immediately reject such improper demands and inform your company of the situation as soon as possible.

6. 在贵公司提出要求下，我司将积极配合贵公司对有关商业贿赂情况的调查；

If you request, our company will actively cooperate with your company in the investigation of commercial bribery;

7. 上述承诺事项均为本公司真实意思表示，若我公司违反上述承诺，自愿接受以下处罚：

All the above promises are true intentions of the company. If our company violates the above promises, we will voluntarily accept the following punishment:

- 1) 贵公司有权中止与我司的合作；

Your company has the right to terminate the cooperation with our company;

- 2) 给贵公司造成的经济损失我司将予以赔偿；

We will compensate you for the economic loss caused to your company;

- 3) 构成犯罪的可提请司法机关调查处理，依法追究刑事责任。

Those who constitute a crime may be referred to a judicial organ for investigation.

授权代表（盖章）：

Authorized representative (seal):

授权代表（签字）：

Authorized representative (signature):

年 月 日

Date: