

Supplier Code of Conduct

供应商行为准则

Gemak, a business of Umbr AB, and subsidiaries
Umbr AB 旗下业务 Gemak 及其子公司

Both language versions are equally valid. In case of discrepancy, the Chinese version prevails.
两种语言版本同等有效，如有歧义，以中文版本为准。

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1. Purpose and scope

目的与适用范围

This Supplier Code of Conduct (the "Code") describes what Gemak, a business of Umbr AB (Sweden), and its subsidiary in China (together "Gemak" or "the Buyer") expect from every company that produces goods, materials or services for Gemak ("the Supplier").

本供应商行为准则（以下简称“本准则”）阐明了 Umbr AB（瑞典）旗下业务 Gemak 及其在华子公司（以下合称“Gemak”或“买方”）对所有为 Gemak 生产产品、材料或提供服务的企业（以下简称“供应商”）的要求。

The Code is based on the ILO Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights. It is written for the realities of manufacturing in China: some requirements are absolute, others are goals we work towards together with the Supplier.

本准则以国际劳工组织《关于工作中基本原则和权利宣言》及联合国《工商企业与人权指导原则》为基础，并结合中国制造业的实际情况制定：部分要求为必须遵守的底线，其他要求为买方与供应商共同努力实现的目标。

1.1 Applicability

适用性

The Code applies to all work performed for Gemak, at the Supplier's own sites and at any subcontractor approved by Gemak. The Supplier is responsible for communicating the Code to its approved subcontractors and for their compliance.

本准则适用于为 Gemak 开展的所有工作，包括在供应商自有场所及经 Gemak 批准的任何分包商处开展的工作。供应商负责向其经批准的分包商传达本准则，并对其遵守情况负责。

1.2 How to read this Code

如何理解本准则

Requirements marked ♦ are zero-tolerance requirements. A breach can lead to immediate suspension of orders and termination of the cooperation. All other requirements are improvement requirements, handled through a corrective action plan as described in section 4.

标有♦的要求为零容忍要求，一旦违反，可能导致立即暂停订单并终止合作。其他所有要求为改进要求，按第 4 节所述通过整改计划处理。

Where this Code and applicable law differ, the Supplier follows whichever sets the higher standard.

如本准则与适用法律存在差异，供应商应遵循标准较高者。

1.3 Speak up

举报渠道

Questions about the Code can be directed to your Gemak contact. Suspected breaches can be reported confidentially, and anonymously if preferred, through Gemak's reporting channel at gemak.se/rapportera or by e-mail to

speakup@gemak.se. Reports can be made in Chinese or English by suppliers, workers or anyone else.

有关本准则的问题可联系您的 Gemak 对接人。涉嫌违规的情况可通过 Gemak 举报渠道 gemak.se/rapportera 或发送电子邮件至 speakup@gemak.se 进行保密举报，如有需要可匿名举报。供应商、工人或任何其他人均可使用中文或英文举报。

Reports are read only by Gemak management in Sweden and are never passed on to the factory concerned. No one may be punished, dismissed or otherwise disadvantaged for reporting in good faith ♦. The Supplier displays Gemak's reporting poster in a place accessible to all workers.

举报仅由 Gemak 在瑞典的管理层阅读，绝不会转交给相关工厂。任何人不得因善意举报而受到惩罚、解雇或其他不利对待 ♦。供应商须在所有工人均可到达的地方张贴 Gemak 的举报海报。

2. Requirements

具体要求

2.1 Labour conditions

劳动条件

2.1.1 Forced labour ♦

强迫劳动 ♦

No forced, bonded, involuntary or prison labour of any kind. Workers are free to resign with legal notice. The Supplier does not retain identity documents, wages or deposits, and workers pay no recruitment fees.

不得使用任何形式的强迫劳动、抵债劳动、非自愿劳动或监狱劳动。工人可依法提前通知后自由辞职。供应商不得扣留工人的身份证件、工资或押金，工人无需支付任何招聘费用。

2.1.2 Child labour and young workers ♦

童工与未成年工 ♦

No person under 16 years of age is employed. Workers aged 16 to 18 are not assigned to night work or hazardous work. The Supplier keeps records verifying the age of every worker.

不得雇用未满 16 周岁的人员。16 至 18 周岁的未成年工不得安排夜班或危险作业。供应商须保存核实每名工人年龄的记录。

2.1.3 Fair treatment

公平对待

All workers are treated with dignity and respect. Physical punishment, threats, abuse and harassment are not tolerated ♦. There is no discrimination in hiring, pay or promotion.

所有工人均应受到尊重和有尊严的对待。不得有体罚、威胁、虐待和骚扰行为 ♦。在招聘、薪酬和晋升方面不得有任何歧视。

2.1.4 Wages and benefits

工资与福利

Wages are at least the legal minimum, paid in full and on time, with a clear written payslip. Wage deductions are not used as a disciplinary measure.

工资不得低于法定最低标准，须按时足额支付，并提供清晰的书面工资单。不得以扣减工资作为惩罚手段。

Social insurance is provided for all workers as required by law. Where coverage is incomplete, the Supplier agrees a plan with Gemak to reach full coverage.

须依法为所有工人缴纳社会保险。如未全面覆盖，供应商应与 Gemak 商定实现全面覆盖的计划。

2.1.5 Working hours

工作时间

Overtime is voluntary and paid at the legal premium rate. Workers have at least one day off in every seven days. Accurate time records are kept, and falsified time records are a zero-tolerance breach ♦.

加班须出于自愿，并按法定标准支付加班工资。工人每七天至少休息一天。须保存准确的考勤记录，伪造考勤记录属于零容忍违规 ♦。

Gemak recognises that overtime in peak periods may exceed legal limits in the industry. The Supplier works towards compliance with legal working hours and shares its hours data with Gemak, so that progress can be followed over time.

Gemak 了解行业内旺季加班时间可能超出法定限制。供应商应努力使工作时间符合法律规定，并与 Gemak 共享工时数据，以便持续跟进改进情况。

2.1.6 Worker voice

员工沟通

Workers can raise concerns without fear of retaliation, through a grievance channel known to all workers, and may be represented in accordance with the law.

工人可通过所有员工均知晓的申诉渠道反映问题，不必担心遭到报复，并可依法享有代表权。

2.2 Health and safety

健康与安全

2.2.1 Fire safety and emergency exits ♦

消防安全与紧急出口 ♦

Emergency exits are clearly marked, unlocked and unobstructed during working hours. Fire extinguishers are in place and maintained, and fire drills are held regularly. Locked or blocked emergency exits are a zero-tolerance breach.

工作时间内紧急出口须有清晰标识、不得上锁且保持畅通。须配备并维护灭火器，并定期组织消防演练。紧急出口上锁或堵塞属于零容忍违规。

2.2.2 Workplace safety

作业安全

Machines are guarded. Dust extraction and ventilation are adequate in sanding, cutting and spraying areas. Personal protective equipment is provided free of charge and used. Chemicals are labelled, stored and handled safely, and workers are trained in the risks of their work.

机器须有安全防护。打磨、切割和喷涂区域须有足够的除尘和通风设施。须免费提供并正确使用个人防护用品。化学品须正确标识、储存和使用，工人须接受岗位风险培训。

2.2.3 Dormitories

宿舍

Where dormitories are provided, they are separate from production and storage areas, have safe exits, adequate space, ventilation and sanitary facilities, and workers can come and go freely.

如提供宿舍，宿舍须与生产和仓储区域分开，并具备安全出口、充足空间、通风及卫生设施，工人可自由出入。

2.3 Environment

环境

The Supplier complies with environmental laws and permits, and handles waste, emissions, wastewater and chemicals responsibly. The Supplier is encouraged to work with recognised environmental management, such as ISO 14001.

供应商遵守环境法律法规并持有相关许可，以负责任的方式处理废弃物、废气、废水和化学品。鼓励供应商采用公认的环境管理体系，例如 ISO 14001。

2.4 Products and materials

产品与材料

Materials used in Gemak's products meet the chemical, emission and safety requirements specified by Gemak for each order, including test reports from accredited laboratories where requested.

用于 Gemak 产品的材料须符合 Gemak 针对每份订单规定的化学品、排放及安全要求，并要求提供经认可实验室出具的检测报告。

Timber is legally harvested. Upon request, the Supplier provides information on the origin of wood, fibres and textile raw materials, including the supply chain tiers behind them, as far as this information is available.

所用木材必须合法采伐。应买方要求，供应商须在可获得的范围内提供木材、纤维及纺织原材料的来源信息，包括其上游各级供应链。

2.5 Business integrity

商业诚信

No bribery, kickbacks or improper payments in any form, to Gemak's staff or to anyone else ♦. Possible conflicts of interest between the Supplier and anyone at Gemak are reported to Gemak.

不得以任何形式向 Gemak 员工或任何其他人行贿、给予回扣或进行不正当支付 ♦。供应商与 Gemak 任何人员之间可能存在的利益冲突须向 Gemak 报告。

Records and documents provided to Gemak, including test reports, certificates, time and payroll records, are accurate and complete. Falsified documents are a zero-tolerance breach ♦.

向 Gemak 提供的记录和文件，包括检测报告、证书、考勤及工资记录，必须真实、完整。伪造文件属于零容忍违规 ♦。

2.6 Subcontracting ♦

分包 ◆

No part of Gemak's orders may be subcontracted without Gemak's prior written approval. Approved subcontractors follow this Code. Unauthorised subcontracting is a zero-tolerance breach.

未经 Gemak 事先书面批准，Gemak 订单的任何部分均不得分包。经批准的分包商须遵守本准则。未经授权的分包属于零容忍违规。

3. Visits and audits

访问与审核

Gemak has its own staff in China and may at any time carry out both announced and unannounced visits to production areas, factory premises, warehouses, dormitories and offices of the Supplier and its approved subcontractors. Gemak may also appoint independent third parties to carry out audits.

Gemak 在中国拥有自己的员工，可随时对供应商及其经批准的分包商的生产区域、厂区、仓库、宿舍和办公场所进行事先通知或不事先通知的访问。Gemak 亦可委托独立第三方进行审核。

The Supplier gives access to relevant records and allows workers to be interviewed in private. Where the Supplier already holds a recent third-party social audit, such as amfori BSCI or SMETA, it shares the report with Gemak.

供应商须提供相关记录，并允许与工人进行私下面谈。如供应商已持有近期的第三方社会责任审核报告（例如 amfori BSCI 或 SMETA），应与 Gemak 共享该报告。

4. Breaches and follow-up

违规处理与跟进

4.1 Zero-tolerance breaches

零容忍违规

A breach of a requirement marked ◆ gives Gemak the right to immediately suspend orders and terminate the cooperation. Gemak may, at its own discretion, instead require immediate remediation.

违反标有◆的要求时，Gemak 有权立即暂停订单并终止合作。Gemak 亦可自行决定要求供应商立即整改。

4.2 Improvement requirements

改进要求

Other deviations are handled through a written corrective action plan with agreed actions and deadlines. Gemak follows up the plan at visits. Progress, not perfection, is the expectation, but repeated failure to carry out agreed actions is treated as a serious breach.

其他不符合项通过书面整改计划处理，明确约定的措施和期限，Gemak 将在访问时跟进。买方期望的是持续改进而非一步到位，但如多次未能落实约定措施，将被视为严重违规。

4.3 Duty to inform

告知义务

If the Supplier becomes aware of a breach of this Code in its own operations or at a subcontractor, it informs Gemak without delay and proposes corrective actions.

如供应商发现其自身运营或分包商存在违反本准则的情况，应立即告知 Gemak 并提出整改措施。

5. Acknowledgement and signature

确认与签署

We have read and understood this Code of Conduct, commit to comply with it, and will ensure that our approved subcontractors do the same.

我方已阅读并理解本行为准则，承诺遵守本准则，并确保经批准的分包商同样遵守。

Supplier company name
供应商公司名称

Address
地址

Legal representative
法定代表人

Signature
签字

Date
日期

Company chop
公司盖章

6. Revision history

Version	Date	Description	Owner
1.0	2026-10-01	Created	David Rutström