

VOLKSWAGEN

AKTIENGESELLSCHAFT



Code of Conduct for Business Partners

Volkswagen Group requirements regarding sustainability
in its relationships with business partners

商业伙伴 行为准则

大众汽车集团关于商业伙伴关系
可持续发展管理之要求

Content

Preamble	4
1. Objectives and scope	6
2. Fundamental sustainability requirements	8
3. Sustainability requirements in environmental protection	14
4. Sustainability requirements in the area of human rights and employment law of employees	22
5. Sustainability requirements for business ethics	34
6. Sustainability requirements for responsible supply chains	38
7. Verification of compliance with the sustainability requirements by Volkswagen Group	40
8. Reporting Misconduct	46

目录

序言	5
1. 目标与适用范围	7
2. 可持续性基本要求	9
3. 环境保护的可持续要求	15
4. 人权领域及雇员人权和劳动权利的可持续要求	23
5. 商业道德的可持续性要求	35
6. 对负责任供应链的可持续性要求	39
7. 根据大众汽车集团要求对可持续性合规情况的验证	41
8. 举报不当行为	47

Preamble

The Volkswagen Group's business partners play an integral part in the Group's business success. Partnership creates lasting business relationships which are mutually beneficial. Therefore, the Group is focused on close cooperation with its business partners.

Applying the sustainability requirements, we are aware of our responsibility for the economic, ecological and social impact of our actions. We also expect this of our business partners, particularly where human rights, health and safety at work, environmental protection and combatting corruption are concerned. In the spirit of partnership-based collaboration, the Volkswagen Group offers its business partners a wide range of practical training opportunities, initiatives and other sources of information. It is recommended that all business partners use these offers and information sources actively.

The following requirements define the Volkswagen Group's expectations regarding the mindset and conduct of business partners in their corporate activities and are considered the basis for successful execution of business relations between the Volkswagen Group and its partners.

序言

大众汽车集团的商业合作伙伴在塑造其企业成功方面发挥着关键作用。基于伙伴关系的行为创造了以互利为特征的持久的商业关系。为此，大众汽车集团依靠与商业合作伙伴的紧密合作。

根据可持续发展的原则，大众汽车集团意识到自己对其行为的经济、生态和社会影响的责任。集团也希望其商业合作伙伴能做到这一点，并支持他们落实这些要求。因此，本着伙伴关系和合作的精神，集团为其商业合作伙伴提供了广泛的实用培训课程、倡议和其他信息来源。我们建议所有的商业合作伙伴深入利用这些服务和信息来源。

以下要求规定了大众汽车集团对商业合作伙伴在企业活动中的态度与其行为的期望，并构成了成功和负责的商业关系的基础。

1. Objectives and scope

In this Code of Conduct for Business Partners (hereinafter referred to as “Code of Conduct”), the Volkswagen Group has set out its aspirations and expectations as well as requirements for business partners of the Volkswagen Group in relation to sustainability (hereinafter referred to as “sustainability requirements”).

Sustainability includes respecting human rights, protecting the environment, conducting business ethically and lawfully and the responsible sourcing of raw materials.

The Volkswagen Group company that uses this Code of Conduct is referred to in general below as the “Volkswagen Group”.

The Code of Conduct is applicable to all suppliers, sales partners and all other B2B business partners (hereinafter referred to as “business partner”) of the Volkswagen Group that do business with the Volkswagen Group.

The business partners are required to contractually pass on all sustainability requirements to those business partners (especially suppliers) that affect the contractual relationship with the Volkswagen Group and to ensure, to the extent possible and reasonable, that the sustainability requirements are passed

on to their business partners in the supply chain. The business partners establish appropriate control measures to verify compliance with these sustainability requirements of their own business partners.

In those cases where obligations have been agreed to with business partners under individual contracts that diverge from the principles in this document, such divergent obligations prevail.

The sustainability requirements are based, amongst others, on the 10 Principles of the United Nations (UN) Global Compact, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multi National Enterprises, OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the Conventions of the International Labour Organization (ILO), in particular its fundamental rights at work and the Guiding Principles of the Drive Sustainability Initiative.

Furthermore, this Code of Conduct is based on nationally and internationally agreed standards such as the Universal Declaration of Human Rights, codified in particular in the International Covenant on Civil and Political Rights and in the International Covenant on Economic, Social and Cultural Rights, and is in full compliance with all applicable PRC laws and regulations.

1. 目标与适用范围

在本《商业伙伴行为准则》（以下简称“行为准则”）中，大众汽车集团制定了其标准以及对大众汽车集团各公司商业合作伙伴在可持续性方面的期望和要求（以下简称“可持续性要求”）。

可持续性包括对人权和环境保护的尊重、符合道德和法律的商业行为以及对原材料的负责任的采购。

在下文中，使用本行为准则的大众汽车集团旗下公司一般被称为“大众汽车集团”。

本行为准则对大众汽车集团的所有供应商、销售伙伴和所有其他与大众汽车集团保持业务关系的B2B商业合作伙伴（以下简称“商业合作伙伴”）具有约束力。

商业合作伙伴承诺在合同中向那些与大众汽车集团有合同关系的商业合作伙伴（特别是供应商）传递可持续发展要求，并在可能和合理的范围内确保可持续发展要求在向大众汽车集团提供的商品和服务中得到应用及可持续性要求在供应链中得到体

现。商业合作伙伴应制定适当的控制措施，以核实可持续发展要求是否得到落实。

如果与商业合作伙伴达成的个别合同义务偏离了这些原则，则应优先考虑这些义务。

可持续发展的要求主要基于联合国（UN）全球契约的十项原则、联合国商业与人权指导原则、经合组织跨国企业准则、经合组织促进来自受冲突影响和高风险地区矿物的负责任供应链的尽职调查准则、以及国际劳工组织（ILO）公约，特别是工作中的基本权利和驱动可持续发展倡议的指导原则。

此外，本行为准则以国家和国际公认的标准为基础，如《世界人权宣言》，特别是《公民权利和政治权利国际公约》和《经济、社会、文化权利国际公约》中的规定，且符合所有相关的中国法律法规。

2. Fundamental sustainability requirements

General information

The Volkswagen Group considers compliance with the sustainability requirements to be essential and fundamental to its business relations.

The Volkswagen Group expects the business partner to integrate the values anchored in these sustainability requirements in day-to-day business through structured and competent management. Business partner management must identify and assess legal and other requirements and train employees to ensure compliance with the relevant requirements.

Business partners always comply with the applicable law. Insofar as these sustainability requirements go beyond the requirements of the applicable law, these must also be observed.

In addition to the obligatory requirements from this Code of Conduct, further recommendations and hints for business partners are given in extra text boxes.



2. 可持续性基本要求

一般情况

大众汽车集团认为遵守可持续发展要求对各自的业务关系至关重要。

大众汽车集团希望通过对商业合作伙伴进行结构化的专业管理，将这些可持续发展要求的价值融入日常业务中。商业合作伙伴管理层必须识别和评估法律和其他要求，并对员工进行培训，以确保遵守相关要求。

商业合作伙伴应在任何时候都遵守适用的法律。如果这些可持续性要求超出了适用法律的要求，也必须遵守。

本行为准则的强制性要求于“注意”文本框中加以补充。

Creation and application of management systems

Those business partners that operate production locations with more than 100 employees have to demonstrate certification for these locations according to the international standard ISO 14001 or the EMAS Regulation of the European Union.

Business partners that have production locations with more than 1000 employees have to additionally obtain certification for these locations according to the international standard ISO 45001 or a comparable standard.

HINT

For sales partners with more than 100 employees, we likewise recommend the international standard ISO 14001 or alignment with ISO 14001.

Business partners with fewer than 1000 employees in their locations should implement internal management systems or, where available, national/sector specific certifications.

For sales partners with workshops, we likewise recommend the international standard ISO 45001 or alignment with ISO 45001.

创建和应用管理体系

拥有超过100名员工的生产基地的商业合作伙伴应按照国际标准ISO 14001或欧盟的EMAS条例进行认证。

拥有超过1000名员工的生产基地的商业合作伙伴，必须另外按照国际标准ISO 45001或类似的标准获得认证。

注意

对于拥有超过100名员工的经销伙伴，我们也建议采用国际标准ISO 14001或面向现场的ISO 14001。

员工人数少于1000人的商业合作伙伴，应以内部管理系统为目标，或在有条件的情况下，获得国家/部门的认证。

对于有车间的分销伙伴，我们也建议采用国际标准ISO 45001或面向标准ISO 45001。

Corporate statement

Business partners prepare a corporate statement (e.g. a Code of Conduct), which commits them to social, ethical and environmental standards. This statement should be prepared in languages understood by local employees.

Sustainability officer

Business partners are encouraged to appoint a sustainability officer or a similar officer who reports to the management of the respective business partner. The officer should develop sustainability objectives and measures within the company.

Training

To support its business partners in complying with the sustainability requirements, the Volkswagen Group offers its business partners different training formats free of charge ([Trainings and Dialogue vwgroupsupply.com](https://www.vwgroupsupply.com)). Participation in this training is obligatory depending on the result of a risk analysis for business partners carried out in advance. Business partners may be exempted from mandatory participation in such training if they can prove to have already undergone a similar training offered by third parties.

HINT

Business partners are recommended to develop their own training programs in order to define guidelines to improve implementation of processes and communication of expectations to their employees. Business partners should provide ongoing training for their employees.

企业声明

商业合作伙伴准备一份企业声明（如行为准则），承诺遵守社会、道德和环境标准。该声明应以当地职工理解的语言编写。

可持续发展官

我们鼓励商业合作伙伴任命一名可持续发展官或类似职位，向各自商业合作伙伴的管理层报告。该人员应在公司内部制定可持续目标和措施。

培训

为了支持其商业合作伙伴遵守可持续发展要求，大众汽车集团为其商业合作伙伴免费提供各种培训形式（[Trainings and Dialogue vwgroupsupply.com](https://www.vwgroupsupply.com)）。根据事先的风险分析结果，商业合作伙伴有义务参加这些培训课程。如果能提供参加第三方供应商类似培训的证明，商业合作伙伴可以免于参加强制性培训活动。

注意

建议商业合作伙伴制定自己的培训计划，以改善政策制定、流程实施和对员工的期望沟通。商业合作伙伴应持续培训其员工。

3. Sustainability requirements in environmental protection

Business partners know and observe the Group environmental policy of the Volkswagen Group as described in the Group Environmental Policy Statement ([Environment vwgroupsupply.com](https://www.vwgroupsupply.com)).

Greenhouse gas emissions

Business partners take appropriate measures to reduce air emissions that pose a risk to the environment and health, including greenhouse gas emissions. In order to improve the environmental performance of products and services, business partners provide for proactive reduction of greenhouse gas emissions along the entire supply chain, for instance through increased use of carbon neutral energy sources.

Business partners who supply products to the Volkswagen Group provide information to the Volkswagen Group on request at product level in relation to the overall energy consumption in MWh and carbon emissions in tonnes (scope 1, 2 and 3) so that the Volkswagen Group can improve the environmental performance indicators of its products.

Hint

In addition, we recommend that our business partners set science-based and time-bound emission reduction targets and renewable energy objectives that are aligned to the Paris Agreement and put in place measures that drive forward the decarbonisation along the entire value chain.

Business partners are also encouraged to commit to the Paris Agreement of a CO²-neutral economy by 2050.

3. 环境保护的可持续要求

商业合作伙伴应了解并遵守大众汽车集团的环境政策，该政策详见于环境政策声明-大众汽车集团 ([environmental vwgroupsupply.com](https://www.vwgroupsupply.com))

温室气体排放

商业合作伙伴应采取适当措施，减少对环境和健康构成威胁的空气排放，包括温室气体排放。为了提高产品和服务的环保性能，商业合作伙伴应积极主动地减少整个供应链中的温室气体排放，例如增加使用碳中性能源。

向大众汽车集团提供产品的商业合作伙伴应要求向大众汽车集团提供产品层面的总能耗（以兆瓦时为单位）和二氧化碳排放量（以吨为单位）的信息，以便改善其产品的环境性能指标。

注意

此外，我们建议我们的商业合作伙伴制定科学的、有时限的减排目标以及与《巴黎协定》相一致的可再生能源使用目标，并采取措施推动整个价值链的去碳化。

我们还建议我们的商业合作伙伴承诺遵守《巴黎协定》，争取在2050年实现碳中和。

Efficient use of resources

Business partners take appropriate measures to ensure efficient use of energy, water and raw materials, usage of renewable resources and a minimisation of damage to the environment and health.

Registration, evaluation and restriction of substances and raw materials

Business partners implement appropriate measures to avoid or refrain from using substances and materials with adverse effects on the environment or health (for example, carcinogenic, mutagenic, reprotoxic substances) within the framework of the respective applicable law and with due regard for applicable regulations of the Volkswagen Group.

Business partners are obliged to act in conformity with the requirements of the international conventions and other legal instruments pertaining to the production, use, handling and

disposal of certain substances (in particular including the requirements of the Minamata Convention of 10 October 2013 on mercury, the Stockholm Convention of 23 May 2001 on persistent organic pollutants (POPs)) as well as the related applicable implementing legislation at the national and supranational level.

In regard to smelters or refineries of tin, tungsten, tantalum and gold, business partners may only use raw materials from smelters or refineries that meet the requirements of the “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas” as assessed by the Responsible Mineral Initiative (RMI) or similar organisations.

Business partners have to take appropriate and adequate measures to exclude raw materials extracted from deep sea mining from their supply chains.

资源利用效率

商业合作伙伴应采取适当措施，确保有效利用能源、水和原材料，使用可再生资源，并尽量减少对环境和健康的损害。

物料的登记、评估和限用

商业合作伙伴应采取适当措施，在适用法律框架内并考虑到大众汽车集团的适用法规，避免使用对环境或健康有不利影响的物质和材料（如致癌、诱变或对生殖系统有毒的物质）。

商业合作伙伴有义务遵守以下要求生产、使用、处理、储存和运输方面，商业合作伙伴有义务遵守国际公约和其他法律文书的要求。

和处置某些物质（特别是2013年10月10日《关于汞的水俣公约》和2001年5月23日《关于持久性有机污染物的斯德哥尔摩公约》的要求，以及国家和超国家层面的相应适用实施条例。

对于锡、钨、钽和金的冶炼厂或精炼厂，商业合作伙伴应只使用符合经合组织《促进来自冲突和高风险地区的矿物的负责任供应链的尽职调查指南》的要求并经负责任的矿物倡议（RMI）或类似组织核实的原材料。

商业合作伙伴应采取适当和合理的措施，将来自深海采矿的原材料排除在其供应链之外。

Circular economy and waste management

Business partners take appropriate and adequate measures aimed at avoiding waste, re-using resources, recycling as well as the safe, environmentally friendly disposal of residual waste, chemicals and wastewater. Such measures can be applied in particular in development activities, production, product service life and subsequent end-of-life recycling as well as in other activities. Thereby, the business partners comply with international agreements on the cross-border transport of hazardous waste, in particular the Basel Convention on the Control of Trans-boundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 as well as with the corresponding, applicable implementation rules at national and supranational level.

HINT

Whenever technically possible and economically reasonable, business partners should use secondary materials within their processes. Business partners should know the percentage of recycled content in their products and make this information available to the Volkswagen Group on request.

Business partners should endeavour to pursue and promote closed loop systems in addition to following these principles.

循环经济和废物管理

商业合作伙伴应采取适当和合理的措施，以实现防止浪费、资源再利用、回收和安全、环保地处理残余废物、化学品和废水。这些措施尤其可以在开发、生产、产品生命周期和生命周期结束后的回收利用期间以及其他活动中采取。在这样做时，商业合作伙伴也应遵守关于危险废物越境转移的国际公约，特别是1989年3月22日的《控制危险废物越境转移及其处置巴塞尔公约》，以及国家和超国家层面的相关适用执行立法。

注意

只要技术与经济上可行，我们建议商业合作伙伴在其生产过程中使用二级材料。商业合作伙伴应了解其产品回收成分的百分比，并应大众汽车集团的要求予以提供。

除了遵守这些原则外，商业合作伙伴应努力建立并推广闭环回收系统。

Water

Business partners take appropriate and adequate measures to minimise water consumption at their sites and/or along their own supply chains with prioritisation for water stressed regions. The right to water is respected at all times.

Business partners that supply products to the Volkswagen Group provide, upon request, the Volkswagen Group with information on total fresh water consumption on product level.

HINT

Suitable measures may, in particular, include those aimed at effectively reducing, re-using and recycling water with responsible and effective treatment of wastewater discharges to protect the environment and improve overall water quality.

Business partners shall, where required, seek to ensure that people affected by their operations have access to safe, acceptable and affordable water in sufficient quantities for personal use.

Biodiversity

The protection of the natural ecosystem, especially the protection of endangered habitats of wild animals, and the sustainable usage of natural resources are required to be ensured.

Business partners must strive to ensure supply chains are free of deforestation and conversion in accordance with applicable law and international biodiversity regulations. These international regulations include, for example, the resolutions and recommendations on biodiversity from the Centre for Biological Diversity (CBD) and the World Conservation Union (IUCN).

Ethical Treatment of animals

Business partners should support and promote ethical and humane treatment of animals.

水

商业合作伙伴应采取适当和合理的措施，最大限度地减少其场地和/或其供应链上的用水量，优先考虑缺水地区。在任何时候都应尊重用水权。

向大众汽车集团提供产品的商业合作伙伴应根据要求向大众汽车集团提供产品层面的淡水总消耗量信息。

注意

适当的措施可包括但不限于有效减少水的消耗，对水进行再利用和循环，并负责任地有效处理废水，以保护环境和改善整体水质。

商业合作伙伴应在必要时，努力确保受其业务影响的人能够获得足够数量的安全、可接受和负担得起的水供个人使用。

生物多样性

必须确保对自然生态系统的保护，特别是对濒危野生动物栖息地的保护，以及自然资源的可持续利用。

在有关生物多样性的适用法律和国际法规的框架内，商业合作伙伴必须努力实现不涉及森林砍伐和退化的供应链。这些国际法规包括，例如，生物多样性中心（CBD）和世界保护联盟（IUCN）关于生物多样性的决议和建议。

善待动物

商业合作伙伴应支持和促进对动物的道德和物种适当的待遇。

4. Sustainability requirements in the area of human rights and employment law of employees

Business partners are required to comply with the conventions of the International Labour Organization (ILO) as amended from time to time, in particular the fundamental rights at work.

Elimination of child labour and the protection of young workers

Business partners must comply with the minimum employment age in their business activities and their supply chain. They ensure that the minimum age for acceptance for employment is determined according to the respective applicable law and that prohibited child labour does not occur.

No modern slavery, no human trafficking and no unethical recruitment

Business partners must take appropriate and adequate measures to eliminate debt bondage, forced and compulsory labour, as well as all forms of modern slavery and human trafficking in their own area of responsibility and/or along the supply chain. Business partners ensure that employment relationships are voluntary and allow employees to give notice of their own volition in observance of a reasonable notice period. Employees of business partners are given a contract at the time of hiring that complies with applicable law and is in a sufficiently documented form (e.g. written or electronic), is written in a language they un-

derstand and in which their rights and obligations are truthfully and clearly set out.

Furthermore, business partners must not mislead or defraud potential employees about the nature of the work, ask employees to pay recruitment fees or inappropriate transportation fees, and/or confiscate, destroy, conceal, and/or deny access to employee passports and other identity documents issued by government and/or restrict the employees' freedom of movement or require employees to involuntarily use accommodation provided by the company for no operational reason.

Protection of bodily integrity, no corporal punishment

Business partners attach the utmost importance to the protection of bodily integrity and introduce appropriate measures to ensure respect for this legally protected right. Business partners ensure in their area of responsibility and along their supply chain that any involvement, including complicity or participation in kidnapping, torture, killing or similar acts, is excluded and that no corporal punishment is applied as part of their disciplinary practices. In addition, business partners ensure in their own area of responsibility and along the supply chain that other serious human rights violations and abuses, such as sexual violence, as well as war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide, are prohibited.

4. 人权领域及合法雇佣关系的可持续要求

商业合作伙伴承诺遵守国际劳工组织（ILO）不时修订的公约，特别是工作中的基本权利。

童工和保护未成年工

商业合作伙伴应在其活动和供应链中符合最低工作年龄要求。他们应确保根据适用的法律和国际劳工组织的标准确定最低就业年龄，并消除被禁止的童工现象。

无现代奴隶制，无人口贩运与无不道德的招聘

商业合作伙伴必须采取适当和合理的措施，在自己的企业和/或供应链上防止债役、强迫劳动、强制劳动和所有形式的现代奴隶制和人口贩运。商业合作伙伴应确保雇佣关系是自愿的，员工可以按照自己的意愿并在合理的通知下终止雇佣关系。

商业合作伙伴应向雇员提供符合适用法律的雇佣合同，该合同应采用充分的文件形式（如书面或电子），使用他们理解的语言，并如实和明确地规定他们的权利和义务。

此外，商业合作伙伴不得在工作性质上误导潜在工人，不得向工人收取招聘费或不合理的交通费用，和/或没收、销毁、隐藏和/或拒绝提供工人的护照和其他政府颁发的身份证件，和/或限制工人的行动自由或要求工人在没有商业理由的情况下非自愿使用公司提供的住宿。

保护人身安全，无体罚

商业合作伙伴应极其重视对生理尊严与完整的保护，并采取适当措施，确保这一受法律保护的权利得到尊重。商业合作伙伴应确保在其责任领域和供应链上排除任何包括同谋或参与绑架、酷刑、杀戮等类似行为，并确保不将体罚作为其管理办法的一部分。此外，商业合作伙伴应在其责任区和供应链上确保排除任何严重侵犯人权和虐待行为，如性暴力，战争罪或其他严重违反国际人道主义法、危害人类罪或种族灭绝罪等行径。

Compensation and benefits

Business partners pay their employees a reasonable wage. A reasonable wage is at least the minimum wage established under the applicable law and is otherwise measured according to the law of the place of employment. This wage should at least, as far as possible, cover the basic needs of employees and enable a decent standard of living for employees and their families (living wage). Business partners are required to pay employees directly, in full and on time.

Occupational health and safety, fire protection

Business partners comply with the applicable occupational health, safety and fire protection legislation. Business partners establish a process enabling the continuous reduction of work-related health and safety risks and improvement of occupational health, safety and fire protection. All occupational health and safety measures must not involve any expenditure for the employees.

In particular, business partners will:

- Inform employees of identified hazards and the associated preventive and corrective measures put in place to minimise risks. The information must be available in an appropriate language.
- Conduct sufficient training measures on the prevention of work-related health disorders and of accidents at work, as well as first aid, chemicals management and fire protection.

- Provide suitable protective equipment and protective clothing free of charge.
- Provide appropriate fire protection measures (technical, structural or organisational) to reduce damage in the event of fire.
- Monitor and control work-related health and safety hazards (e.g. chemical, biological, physical and physiological dangers) as well as the corresponding protective measures.
- Label chemicals used according to the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) or, in European countries, the Classification, Labelling and Packaging (CLP) regulation. Chemicals must be stored, transported and handled in accordance with the applicable legal and contractual requirements.
- Fully explain appropriate emergency plans and provide the corresponding first aid, fire protection and medical assistance, as well as materials and adequate transport for further treatment.
- Ensure an appropriate number of emergency exits, escape routes and emergency assembly points, all of which are marked with sufficient signage.

In case of an accident, first aid and medical assistance must be provided. In the event of work-related health hazards, such as pandemics, the business partners take all appropriate measures to protect their employees and the company. Thereby, any measures issued by the local authorities have to be fully observed and complied with.

薪酬和福利

商业合作伙伴向员工支付合理的工资。合理的工资至少是适用法律规定的最低工资，并根据就业地的法律进行计量。这一工资至少应尽可能满足员工的基本需求，并使员工及其家人享有适宜的生活水平（生活工资）。商业合作伙伴必须直接、全额、按时向员工支付工资。

职业健康、安全和消防安全

商业合作伙伴遵守适用的职业健康、安全和消防法规。业务部分制定了一个流程，能够持续降低与工作相关的健康和安全风险，并改善职业健康、安全和消防安全状况。所有职业健康和安全措施不得涉及员工的任何支出。

特别的，业务合作伙伴将：

- 告知雇员已知的危险以及相关的预防和纠正措施，以最大限度地减少危险。必须用雇员可以理解的语言传达相关信息。
- 就预防工作相关的健康问题、预防工作事故、急救、化学品管理和消防安全开展充分的雇员培训。

- 免费提供合适的防护设备和防护服。
- 提供适当的消防措施（技术、结构或组织），以减少火灾时的损失。
- 监测和控制与工作相关的健康和安全隐患（如化学、生物、物理和生理危险）以及相应的保护措施。
- 根据《全球化学品统一分类标签制度》（GHS）或欧洲国家的《分类、标签和包装条例》（CLP）对使用的化学品进行标签。化学品的储存、运输和处理必须符合适用的法律和合同要求。
- 充分说明适当的应急计划，并提供相应的急救、消防和医疗援助，以及进一步治疗所需的物资和充足的交通工具。
- 确保紧急出口、逃生路线和紧急集合点数量充足、安排合理，并在上述位置充分设置标志。

如果发生事故，必须提供急救和医疗救助。如果发生与工作相关的健康危害，如流行病，业务合作伙伴将采取一切适当措施保护员工和公司。因此，地方当局发布的任何措施都必须得到充分遵守。

Working hours

Business partners ensure that working hours comply with national law and/or the national requirements in force in the respective economic sector.

Working and living conditions

Business partners provide their employees with toilet facilities and access to clean drinking water. All facilities for the consumption and preparation of food as well as for food storage comply with applicable minimum hygiene requirements. If the nature of the work requires the provision of dormitories for employees, sufficient space, cleanliness and safety is ensured. Their access must not be restricted inappropriately.

No harm to land, water, air

Business partners ensure that they do not cause harmful soil modification, water pollution, air pollution, harmful noise emission or excessive water consumption, which may lead to significant impairment of the natural foundations for food and drinking water or the health of a person.

No forced eviction

Business partners comply with the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests and waters in the acquisition phase, development or other use of land, forests and waters.



工作时间

商业合作伙伴确保工作时间符合国家法律和/或各自经济部门现行的国家要求。

工作和生活条件

商业合作伙伴为员工提供厕所设施和清洁饮用水。所有用于食品消费和制备以及食品储存的设施都符合适用的最低卫生要求。如果工作性质需要为员工提供宿舍，则应确保足够的空间、清洁和安全。不得对其访问进行不适当的限制。

对土地、水、空气无害

商业合作伙伴确保其不会造成有害的土壤改良、水污染、空气污染、有害的噪音排放或过度用水，这可能会严重损害食品和饮用水的自然基础或人的健康。

不得强行驱逐

商业合作伙伴在土地、森林和水域的获取、开发或其他用途中遵守禁止非法开采和禁止非法剥夺土地、森林或水域的规定。



Human rights defenders

Business partners must not tolerate or engage in any form of threats, intimidation or attacks against human rights and environment defenders, including those exercising their rights to freedom of expression, association, peaceful assembly and protest against the business activities of the business partner. They guarantee access to their grievance channels without the threat or imposition of retaliatory measures.

Freedom of association and collective bargaining

The business partners recognise the right of all employees to form trade unions and employee representation bodies and to join them. In this context, the business partners commit to safeguarding neutrality. This precludes any form of discrimination or retaliatory measures based on union activities. Business partners recognise the right to collective bargaining and the right of trade unions to be allowed to operate freely and in accordance with the law of the place of employment. This law includes the right to strike and the right to negotiate collectively.

HINT

If this right is constrained by any applicable laws, alternative and lawful possibilities to establish employee representation should be fostered.

Business partners shall promote social and societal dialogue based on collective bargaining, where possible, in order to ensure that work hours are humane and compatible with health.

人权维护者

商业合作伙伴不得容忍或参与对人权和环境维护者的任何形式的威胁、恐吓或攻击，包括对商业合作伙伴的商业活动行使言论、结社、和平集会和抗议自由权利的人。他们保证在不威胁或实施报复措施的情况下进入申诉渠道。

自由结社和集体谈判

商业合作伙伴承认所有员工都有权组建工会和员工代表机构，并加入这些机构。在这种情况下，业务合作伙伴承诺保持中立。这就排除了基于工会活动的任何形式的歧视或报复措施。商业部分承认集体谈判的权利，以及允许工会根据就业地法律自由运作的权利。这项法律包括罢工权和集体谈判权。

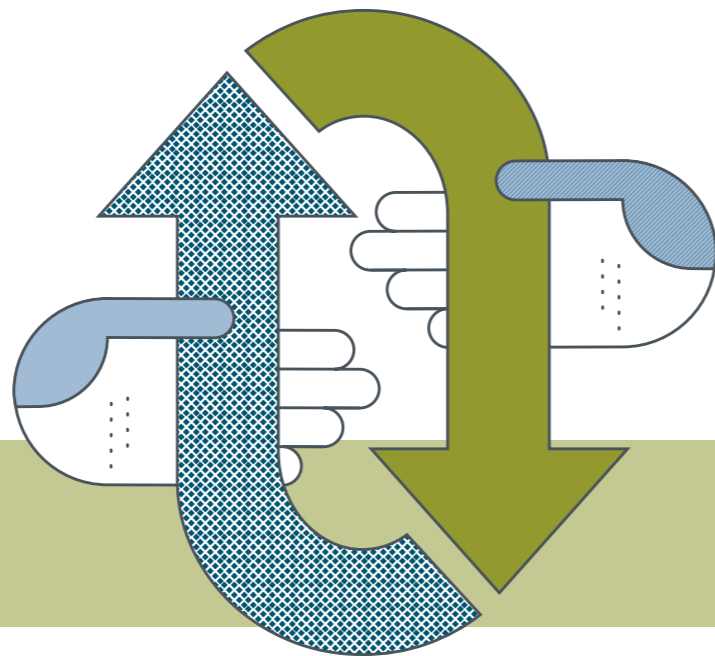
注意

如果这一权利受到任何适用法律的约束，则应促进建立员工代表的其他合法可能性。

商业合作伙伴应在可能的情况下，促进基于集体谈判的社会和社会对话，以确保工作时间是人道和健康的。

No discrimination or harassment

Business partners ensure that all forms of discrimination, intimidation, harassment or unwarranted disadvantage towards their employees and in the work environment are avoided. In particular, unequal treatment is prohibited, for example due to ethnic or social origin, skin colour, gender, nationality, language, religion, physical or mental limitations, gender identity, sexual orientation, health status, age, marital status, pregnancy/parenthood, union membership or political persuasion, to the extent that it is based on democratic principles and tolerance of dissent, unless it is justified by the requirements of employment. Unfair treatment shall include, in particular, unequal pay for work of equal value.



无歧视或骚扰

商业合作伙伴确保避免在工作环境中对其员工进行任何形式的歧视、恐吓、骚扰或不必要的不利待遇。特别是，禁止不平等待遇，例如由于种族或社会出身、肤色、性别、国籍、语言、宗教、身体或精神限制、性别认同、性取向、健康状况、年龄、婚姻状况、怀孕/为人父母、工会成员或政治说服，只要这种待遇是基于民主原则和对异见的容忍，除非根据雇佣要求证明是合理的。不公平待遇应特别包括同工同酬。

Use of security forces

Business partners ensure that the commissioning or deployment of security forces does not lead to violations of human rights. Business partners ensure not to contribute directly or indirectly to supporting private or public security forces that unlawfully exercise control over mining sites, transportation routes and upstream stakeholders in the supply chain.

HINT

Business partners should apply the Voluntary Principles for Security and Human Rights, if applicable.

Minorities, vulnerable groups and indigenous people

Business partners respect the rights of minorities, vulnerable groups and local communities to decent living conditions.

Diversity and inclusion

Business partners should develop and promote an inclusive culture where diversity is valued. Diversity shall be promoted among all employees at all hierarchical levels, in particular, but not exclusively, cultural, ethnic and religious diversity.

Business partners shall ensure that all employees can contribute fully and realise their full potential and ensure a healthy work-life balance.

Business partners are encouraged to foster working with diverse business partners managed or owned by minority groups and women.

安保的使用

商业合作伙伴确保安保的委任或部署不会导致侵犯人权。商业合作伙伴确保不直接或间接支持非法控制矿场、运输路线和供应链上游利益相关者的私人或公共安全部队。

注意

商业合作伙伴应酌情适用《安全与人权自愿原则》。

少数群体、弱势群体和土著人民

商业合作伙伴尊重少数群体、弱势群体和当地社区享有适宜的生活条件的权利。

多样性和包容性

商业合作伙伴应发展和促进一种重视多样性的包容性文化。应促进各级员工的多样性，特别是但不限于文化、种族和宗教的多样性。

业务合作伙伴应确保所有员工都能充分贡献和发挥他们的全部潜力，并确保健康的工作与生活平衡。

鼓励商业合作伙伴促进与少数群体和妇女管理或拥有的不同商业合作伙伴合作。

5. Sustainability requirements for business ethics

Business partners act with integrity at all times and take adequate and appropriate measures to end violations if they are identified.

Avoiding conflicts of interest

Business partners make their decisions solely on the basis of objective criteria and must not allow themselves to be influenced by extraneous interests or relationships.

Prohibition of corruption

Business partners reject and prevent all forms of corruption, including what are known as facilitation payments (payments to speed up the performance of routine tasks by officials). Business partners ensure that their employees, subcontractors and agents do not grant, offer or accept bribes, kickbacks, improper donations or other improper payments or benefits to or from customers, officials or other third parties.

Free competition

Business partners respect fair and free competition and comply with the applicable competition and antitrust rules. In particular, they must not enter into anti-competitive arrangements or agreements with competitors, suppliers, customers or other third parties nor abuse a possible market dominant position. Business partners ensure that no exchange of competitively sensitive information or any other behaviour that restricts or could potentially restrict competition in an improper manner takes place within their area of responsibility.

Import and export controls

Business partners strictly comply with all applicable laws for the import and export of goods, services and information. Furthermore, the respective applicable sanction lists will be followed.

Business partners ensure that all taxes, duties and royalties levied in connection with the mining, trade and export of minerals in conflict and high-risk areas are remitted in accordance with respective applicable law.

5.商业道德的可持续性要求

商业合作伙伴在任何时候都保持诚信，并在发现违规行为时采取充分和适当的措施结束违规行为。

避免利益冲突

商业合作伙伴的决策完全基于客观标准，不得让自己受到外部利益或关系的影响。

禁止腐败

商业合作伙伴拒绝并防止一切形式的腐败，包括所谓的便利费（为加快官员执行日常任务而支付的款项）。业务合作伙伴确保其员工、分包商和代理人不会向客户、官员或其他第三方提供、提供或接受贿赂、回扣、不当捐赠或其他不当付款或利益。

自由竞争

商业合作伙伴尊重公平和自由竞争，遵守适用的竞争和反垄断规则。特别是，他们不得与竞争对手、供应商、客户或其他第三方订立反竞争安排或协议，也不得滥用可能的市场主导地位。商业合作伙伴确保在其责任范围内不会以不当的方式交换竞争敏感信息或任何其他限制或可能限制竞争的行为。

进出口管制

商业合作伙伴严格遵守货物、服务和信息进出口的所有适用法律。此外，还将遵循各自适用的制裁清单。

商业合作伙伴确保根据各自适用的法律免除与冲突和高风险地区矿产开采、贸易和出口有关的所有税款、关税和特许权使用费。

Prohibition of money laundering

Business partners ensure compliance with the applicable legal provisions against money laundering within their business operations.

Intellectual property rights

Business partners respect intellectual property rights and protect associated information.

Protection of confidential information

Business partners ensure that sensitive data (trade secrets and personal data) is properly and lawfully collected, processed, saved and deleted. Business partners impose a corresponding obligation on their employees. Sensitive data must not be, transmitted to a third party or made available in any other form without the necessary authorisation and must be protected in this respect.

Usage of artificial intelligence

Data privacy and security are crucial requirements for the use of Artificial Intelligence (AI). Business partners ensure that all developments using AI are subject to applicable laws and regulations.

AI systems are to be created reliable and without any discrimination. Control of AI applications always remains with human beings.

No support for armed groups

Business partners exclude that their business does not contribute directly or indirectly to supporting non-state armed groups.

Disclosure and information

Business partners record information regarding their business activities, working methods, health and safety and environmental practices. Such information is disclosed, when requested by the Volkswagen Group, insofar as the disclosure does not violate legal requirements.

禁止洗钱

业务合作伙伴确保在其业务运营中遵守反洗钱的适用法律规定。

知识产权

商业合作伙伴尊重知识产权并保护相关信息。

机密信息的保护

业务合作伙伴确保敏感数据（商业机密和个人数据）得到正确合法的收集、处理、保存和删除。商业合作伙伴对其员工施加相应的义务。未经必要授权，不得将敏感数据传输给第三方或以任何其他形式提供，并且必须在这方面受到保护。

人工智能的使用

数据隐私和安全是使用人工智能的关键要求。业务合作伙伴确保所有使用人工智能的开发都遵守适用的法律法规。

人工智能系统的创建是可靠的，没有任何歧视。人工智能应用程序的控制权始终属于人类。

不支持武装团体

商业合作伙伴排除了他们的企业没有直接或间接为支持非国家武装团体做出贡献的可能性。

披露和信息

商业合作伙伴记录有关其商业活动、工作方法、健康和安全性以及环境实践的信息。应大众汽车集团的要求，在不违反法律要求的情况下披露此类信息。

6. Sustainability requirements for responsible supply chains

Transparency

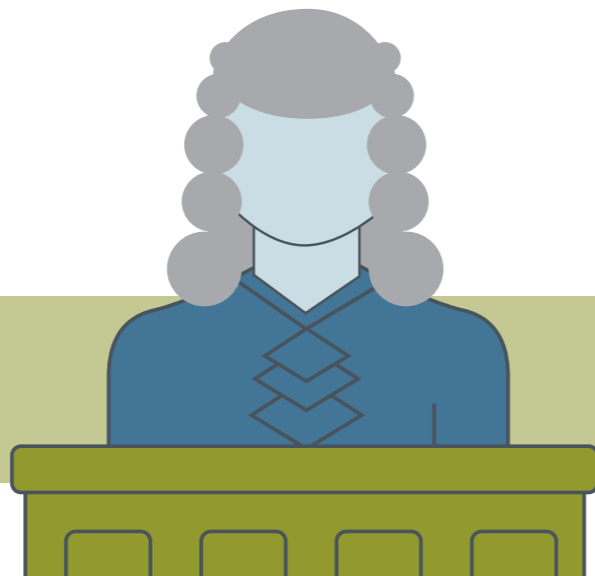
To identify and mitigate sustainability risks in the supply chain, business partners, on request, disclose information on their supply chains to the Volkswagen Group that are required by the Volkswagen Group to fulfil its legal obligations. The business partners are also obliged to impose a corresponding disclosure obligation on their suppliers, which they in turn are required to pass on to their suppliers.

This may require in particular that business partners disclose their supply chain to the Volkswagen Group up to the material origin (including choke points like smelters and refiners) and provide evidence of management systems or third-party verifications demonstrating processes that prevent or mitigate sustainability risks in the supply chain.

Raw material supply chains

Due to their significant impact on people and planet, raw material supply chains, in particular, require special due diligence from all actors along the supply chain both in terms of compliance with human rights and protecting the environment.

Therefore, business partners comply in particular with their due diligence obligations as described in the “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas” regarding relevant raw materials.



6. 对负责任供应链的可持续性要求

透明度

为了识别和减轻供应链中的可持续性风险，业务合作伙伴应要求向大众汽车集团披露其供应链信息，这些信息是大众汽车集团履行其法律义务所要求的。商业合作伙伴也有义务对其供应商施加相应的披露义务，而这些义务又被要求传递给其供应商。

这可能特别要求业务合作伙伴向大众汽车集团披露其供应链，直至材料来源（包括冶炼厂和炼油厂等瓶颈），并提供管理系统或第三方验证的证据，证明其流程可以防止或减轻供应链中的可持续性风险。

原材料供应链

由于原材料供应链对人类和地球的重大影响，尤其需要供应链上所有参与者在遵守人权和保护环境方面进行特别的尽职调查。

因此，商业合作伙伴特别遵守《经合组织关于受冲突影响和高风险地区矿产负责任供应链的尽职调查指南》中关于相关原材料的规定。

7. Verification of compliance with the sustainability requirements by Volkswagen Group

General information

The Volkswagen Group reserves the right to verify compliance with sustainability requirements regularly, randomly or for specific events and using appropriate and adequate means before awarding a new contract and throughout the business relationship.

This can be done, for example, by means of a risk assessment of the relevant business partner's area of responsibility, a self-assessment by the business partner and/or by deploying experts locally (on-site assessment). An on-site assessment of this nature is only carried out in the presence of representatives of the business partner during regular working hours and in accordance with applicable laws, in particular with regard to data protection. The business partners take appropriate and adequate measures that give the Volkswagen Group the right to carry out similar assessments of their business partners if this is necessary for the fulfillment of legal obligations .

Assessment prior to entering a contract

If sustainability risks are identified during pre-contractual assessments referred to above may also take place before entering a contract or before awarding a new contract, the resulting measures, if any, shall then be binding on the contract to be concluded. In this case, the business partner is obliged upon entering into the contract to assess any determined or imminent violation of the sustainability requirements in its own business area or in its supply chain within a reasonable period and to remedy any such non-compliance at no additional cost to the Volkswagen Group.

The findings of the pre-contractual assessments for compliance with the sustainability requirements constitute a criterion relevant to the award of contracts.

7. 根据大众汽车集团要求对可持续性合规情况的验证

一般信息

大众汽车集团有权在授予新合同之前和整个业务关系期间，定期、随机或针对特定事件，并使用适当和充分的手段验证是否符合可持续性要求。

例如，这可以通过对相关业务合作伙伴责任领域的风险评估、业务合作伙伴的自我评估和/或在当地部署专家（现场评估）来实现。这种性质的现场评估只能在正常工作时间内，在业务合作伙伴代表在场的情况下，根据适用法律，特别是在数据保护方面进行。业务合作伙伴采取适当和充分的措施，使大众汽车集团有权对其业务合作伙伴进行类似的评估，如果这是履行法律义务所必需的。

签订合同前的评估

如果在签订合同之前或授予新合同之前，上述合同前评估中发现了可持续性风险，则由此产生的措施（如有）应对即将签订的合同具有约束力。在这种情况下，业务合作伙伴有义务在签订合同时，在合理的期限内评估其自身业务领域或供应链中任何已阻止或即将违反可持续性要求的行为，并在不增加大众汽车集团成本的情况下纠正任何此类不合规行为。

遵守可持续性要求的合同前评估结果构成了与授予合同相关的标准。

Violation of sustainability requirements by business partners

If a violation of the sustainability requirements by the business partner has occurred or is imminent, the Volkswagen Group is entitled to take prompt and appropriate measures to prevent, stop or minimise the extent of such violation.

The business partner is obligated in this case to take all appropriate measures to prevent, stop or minimise the extent of such violation.

The business partner will participate in one or more training formats of the Volkswagen Group, provided that participation in the training may lead to the termination or minimization of the violation.

If the nature of the violation is such that it cannot be terminated in the foreseeable future, the business partner prepares and implements a plan (including a specific schedule) to stop or minimise the violation without undue delay. If required by law, the Volkswagen Group shall be appropriately involved in the preparation of the plan.

Violation of sustainability requirements in the business partner's supply chain

If there are material grounds (substantiated information) for believing that a human rights or environmental obligation may have been violated in the upstream supply chain (with direct suppliers of Volkswagen Group), the business partner shall, without undue delay:

1. Participate in a risk analysis by the Volkswagen Group,
2. Embed appropriate prevention measures with respect to respective business partner , and
3. Appropriately support the Volkswagen Group with the preparation and implementation of a plan to prevent, stop or minimise the violation.

商业合作伙伴违反可持续发展要求

如果业务合作伙伴已经发生或即将发生违反可持续性要求的行为，大众汽车集团有权立即采取适当措施，防止、制止或最大限度地减少此类违规行为。

在这种情况下，业务合作伙伴有义务采取一切适当措施来防止、制止或最大限度地减少此类违规行为。

业务合作伙伴将参加大众汽车集团的一种或多种培训形式，前提是参加培训可能会导致违规行为的终止或最小化。

如果违规行为的性质在可预见的未来无法终止，则业务合作伙伴应制定并实施一项计划（包括具体时间表），以在不无故拖延的情况下停止或最大限度地减少违规行为。如果法律要求，大众汽车集团应适当参与计划的编制。

违反商业合作伙伴供应链中的可持续性要求

如果有实质性理由（经证实的信息）认为上游供应链（与大众汽车集团的直接供应商）可能侵犯了人权或环境义务，则业务合作伙伴应立即：

1. 参与大众汽车集团的风险分析，
2. 针对各自的商业合作伙伴制定适当的预防措施，以及
3. 适当支持大众汽车集团制定和实施计划，以防止、制止或最大限度地减少违规行为。

Other consequences

If a business partner violates or does not comply with the sustainability requirements, the Volkswagen Group reserves the right to take appropriate steps to maintain its rights, such as:

- Requesting implementation of improvement measures
- Verifying highlighted improvements/measures
- Excluding the business partner from new orders and
- Terminating the contract up to extraordinary termination

The Volkswagen Group may waive the exercise of its right of termination if the business partner can credibly affirm and prove that it has immediately initiated countermeasures to prevent future, similar violations.



其他后果

如果业务合作伙伴违反或不遵守可持续发展要求，大众汽车集团保留采取适当措施维护其权利的权利，例如：

- 要求实施改进措施
- 验证突出的改进/措施
- 将商业合作伙伴排除在新订单之外，以及
- 根据特别终止终止合同

如果商业合作伙伴能够可靠地确认并证明其已立即采取反措施防止未来发生类似违规行为，大众汽车集团可以放弃行使其终止权。

8. Reporting Misconduct

Reporting misconduct

Misconduct must be identified at an early stage, dealt with and remedied without delay in order to protect employees, business partners, third parties and the Volkswagen Group. This means that everyone needs to be aware of all compliance regulations, and pay attention and be ready to point out potential serious violations of the rules in case of concrete evidence.

Business partner grievance mechanism

Business partners establish a grievance mechanism adequate to their business.

The mechanism allows for concerns related to business ethics, human rights or the environment to be raised by both their own employees as well as other potentially affected people anonymously, confidentially and without fear of retaliation.

Business partners shall not undertake any actions that hinder, block or impede access to the complaints procedure. Business partners undertake to contractually pass on the obligations referred to in the preceding sentence to its suppliers and to ensure, to the extent possible and reasonable, that the obligations are passed on in the supply chain.

HINT

The grievance channel should build upon the effectiveness criteria from UN Guiding Principle 31 on Business and Human Rights and cover the company's own operations and the supply chain.

8. 举报不当行为

举报不当行为

必须尽早发现不当行为，及时处理和补救，以保护员工、业务合作伙伴、第三方和大众汽车集团。这意味着，每个人都需要了解所有合规规定，并注意并准备在有具体证据的情况下指出潜在的严重违规行为。

商业合作伙伴申诉机制

商业合作伙伴建立了一个适合其业务的申诉机制。

该机制允许自己的员工以及其他可能受到影响的人匿名、保密地提出与商业道德、人权或环境有关的问题，而不必担心遭到报复。

商业合作伙伴不得采取任何阻碍、阻止或阻碍进入投诉程序的行为。商业合作伙伴承诺通过合同将上一句中提到的义务传递给其供应商，并在可能和合理的范围内确保这些义务在供应链中传递。

注意

申诉渠道应建立在《联合国商业与人权指导原则³¹》的有效性标准之上，并涵盖公司自身的运营和供应链。

Volkswagen Group Whistleblower System

The Volkswagen Group values confidential, relevant tip-offs from business partners, customers and other third parties.

In the event of specific indications of potential misconduct by employees of the Volkswagen Group, or of the business partner or its business partners in turn in the context of collaboration with the Volkswagen Group, the Volkswagen Group offers all stakeholders the possibility to report such misconduct to the Volkswagen Group Whistleblower System.

All information and contact channels can be found at [Whistleblower System \(volkswagengroupchina.com.cn\)](http://volkswagengroupchina.com.cn).

Business partners should provide their employees with unhindered access to the Whistleblower System implemented by the Volkswagen Group and not perform any actions that obstruct, block or impede access. Business partners undertake to contractually pass on the obligations referred to in the preceding sentence to its suppliers and to ensure, to the extent possible and reasonable, that the obligations are passed on in the supply chain.

HINT

The Volkswagen Group Whistleblower System is responsible for disclosures regarding serious regulatory and statutory violations. In the context of a fair and transparent procedure, the Whistleblower System protects the company, the persons implicated and the whistleblowers. The system is based upon uniform, fast processes as well as a confidential and professional system for the investigation of tip-offs by internal experts.

The Volkswagen Group Whistleblower System offers the possibility to contact with the Investigation Office via an Internet-based communication platform and to exchange documents and remain in contact using a dedicated mailbox. This is a confidential and secure process. Whistleblowers can decide if they would like to remain anonymous or disclose their name when submitting a report.

External ombudspersons are another point of contact. As lawyers, the ombudspersons are subject to the company's legal duty of confidentiality. In this way we can guarantee the anonymity of whistleblowers vis-à-vis the company should they wish to remain anonymous. The ombudspersons pass on the report to the Volkswagen Group Whistleblower System with the consent of the whistleblower – also in anonymised form if required.

大众汽车集团举报系统

大众汽车集团重视来自商业合作伙伴、客户和其他第三方的机密、相关举报。

如果有具体迹象表明大众汽车集团的员工、业务合作伙伴或其业务合作伙伴在与大众汽车集团合作的情况下可能存在不当行为，大众汽车集团向所有利益相关者提供向大众汽车集团举报系统报告此类不当行为的可能性。

所有信息和联系渠道均可在[举报系统 \(volkswagengroupchina.com.cn\)](http://volkswagengroupchina.com.cn)上找到。

业务合作伙伴应为其员工提供对大众汽车集团实施的举报系统的无序访问，不得采取任何阻碍、阻止或阻碍访问的行动。商业合作伙伴承诺将上一句中提及的义务以合同形式传递给其供应商，并在可能和合理的范围内确保这些义务在供应链中传递。

注意

大众汽车集团举报系统负责披露严重的监管和法定违规行为。在公平透明的程序背景下，举报人制度保护公司、涉案人员和举报人。该系统基于统一、快速的流程以及用于调查内部专家举报的机密和专业系统。

大众汽车集团举报系统提供了通过基于互联网的通信平台与向调查办公室律师咨询、交换文件和使用专用邮箱保持联系的可能性。这是一个保密和安全的过程。举报人可以在提交报告时决定是匿名还是透露自己的姓名。

外部监察员是另一个联系点。作为律师，监察员须遵守公司的法律保密义务。通过这种方式，如果举报人希望保持匿名，我们可以通过公司保证他们的匿名性。监察员在征得举报人同意的情况下，将报告传递给大众汽车集团举报人系统——如果需要，也可以匿名形式。

In those cases where obligations have been agreed with the business partner under individual contracts that diverge from the principles in this document, such divergent obligations prevail.

在个别合同下，若大众汽车集团与商业合作伙伴商定的义务与本文件中的准则存在不同，则以个别合同内的相关义务为准。

Beijing, January 2024

北京, 2024年1月

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Purchasing

Lan Zhang
Sales

Harald Moeckelmann
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Tianxu Ling
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