蓝思科技股份有限公司行为准则
Lens Technology Co., Ltd. Code of Conduct

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1. 引言与适用范围
1. Introduction and Scope

1.1 目的

本行为准则旨在确立蓝思科技股份有限公司在劳工管理、健康安全、环境保护、商业道德及管理系统方面的基本责任行为准则，并确保公司所有业务活动遵循国际公认的标准和公司运营所在地适用的法律法规及行业标准要求。

1.1 Purpose

This Code of Conduct aims to establish basic responsibility standards for Lens Technology Co. Ltd. in labor practice, health and safety, environmental protection, business ethics, and management systems, to ensure that all business activities follow internationally recognized standards and other applicable laws and industry standards in the jurisdictions where we operate.

1.2 适用范围

本准则适用于蓝思科技股份有限公司及其子公司（以下简称“蓝思科技”）之全体成员，包括董事、监事、高级管理人员及全体员工（以下统称“蓝思成员”）。

1.2 Scope

This Code applies to all members of Lens Technology Co., Ltd. and its subsidiaries (hereinafter referred to as 'Lens Technology'), including directors, supervisors, senior management, and all employees (hereinafter collectively referred to as 'Lens Members').

1.3 核心原则声明

- 尊重人权和基本自由
- 遵守适用法律法规
- 持续改进和透明度
- 利益相关方参与

1.3 Core Principles Statement

- Respect for human rights and fundamental freedoms
- Compliance with applicable laws and regulations
- Continuous improvement and transparency
- Stakeholder engagement

2. 劳工标准
2. Labor Practice Standards

2.1 预防强迫劳动与人口贩卖

要求：

- 所有工作必须基于个人自由、自愿选择
- 所有劳动均为自愿性质，禁止使用强迫、抵债或非自愿、监狱劳工及贩卖人口
- 禁止使用非法契约劳工或以扣押雇员持有的政府颁发的身份证件或旅行证件、非法收取押金等作为雇佣条件
- 不得向员工收取招聘费或相关费用；如已收取，应予以退还；员工有权在合理通知后自由离职
- 不得非法限制雇员在工作场所内的合理行动自由，或雇员进出公司提供的设施强行施加不合理限制等

2.1 Prevention of Forced Labor and Human Trafficking

Requirements:

- All employment must be based on personal freedom and voluntary choice
- All work shall be voluntary. The use of forced, bonded, or involuntary labor, prison labor, and human trafficking is strictly prohibited
- The use of illegal contract labor is prohibited. Furthermore, it is strictly forbidden to impose conditions of employment such as withholding government-issued identification or travel documents held by employees or illegally collecting deposits
- No recruitment fees or related fees shall be charged to employees. If such fees have been collected, they must be refunded. Employees have the right to resign freely after providing reasonable notice
- Employees shall not be unlawfully restricted in their reasonable freedom of movement within the workplace, nor shall unreasonable restrictions be forcibly imposed on their access to or egress from company-provided facilities

2.2 禁止童工及保护未成年工

要求：

- 禁止任何形式的童工劳动

- 不得雇佣未满 15 岁（中国为 16 周岁）或低于法定最低工作年龄或未达到完成义务教育年龄的儿童（以三者中最高年龄为准）。如发现童工，应建立补救程序，保障其脱离工作并继续接受教育，而非简单解雇
- 依法为未成年工提供特殊保护。相关雇佣行为需严格遵循国际劳工组织（ILO）第 138 号《准予就业最低年龄公约》的相关规定。未成年工人不得加班或从事夜班工作。可根据国际劳工组织（ILO）第 138 号《准予就业最低年龄公约》第六条中关于教育受益的相关原则，为年满 16 周岁的人员提供在合法工作场所进行的学徒培训计划，或安排符合该公约第七条中规定的轻度工作
- 未成年工不得从事可能危害其健康、安全或道德发展的工作

2.2 Child Labor

Requirements:

- Child labor shall not be used
- Children shall not be employed if they are under 15 years of age (16 years of age in China), below the local legal minimum working age, or below the age for completing compulsory education, whichever is higher. If child labor is identified, remediation procedures must be established to ensure the child is removed from work and continues to receive education, rather than being simply dismissed
- Special protection shall be provided to young workers in accordance with the law. Such employment must strictly comply with the relevant provisions of ILO Convention No. 138 (Minimum Age Convention). Young workers shall not be required to work overtime or perform night shifts. In accordance with the educational benefit principles outlined in Article 6 of ILO Convention No. 138, apprenticeship training programs may be provided to individuals aged 16 or above in lawful workplaces, or they may be assigned light work as stipulated in Article 7 of the Convention
- Young workers shall not be assigned to tasks that may jeopardize their health, safety, or moral development

2.3 工作时间

要求：

- 每周工作时间不得超过当地法律规定上限
- 每 7 天至少休息 1 天
- 遵守工作时间和休息日相关的所有适用法律法规，加班必须自愿且符合法律规定

2.3 Working Hours

Requirements:

- Weekly working hours shall not exceed the maximum limit stipulated by local laws
- At least one day off in every seven-day period
- Comply with all applicable laws and regulations regarding working hours and rest days. Overtime must be voluntary and comply with legal requirements

2.4 薪酬与福利

要求：

- 依法支付不低于法定最低工资、合同约定工资中较高者的工资，逐步推动工资水平满足员工基本生活需要并具有一定可支配收入
- 提供法定福利包括但不限于法定带薪假期和社会保险。不得将工资扣减作为纪律处分措施
- 工资应以法定货币形式定期支付
- 提供公平薪酬和福利

2.4 Compensation and Benefits

Requirements:

- Wages shall be paid no less than the highest among the statutory minimum wage, the wage agreed in contract. Progressively work toward wages that meet workers' basic needs and provide some discretionary income
- Provide statutory benefits including but not limited to statutory paid leave and social insurance. No deductions from wages shall be made as a disciplinary measure.
- Wages shall be paid regularly in legal tender
- Provide fair and equitable compensation and benefits

2.5 反骚扰和虐待

要求：

- 禁止威胁、体罚、身体或精神胁迫、言语侮辱、性骚扰及其他不人道待遇
- 提供健康安全的工作环境

2.5 Anti-Harassment and Abuse

Requirements:

- Prohibit any form of threats, corporal punishment, physical or mental coercion, verbal abuse, sexual harassment, and other inhumane treatment
- Provide a safe and healthy work environment

2.6 非歧视和多元化

要求：

- 在招聘、薪酬福利、培训、晋升、工作分配、纪律处分及雇佣关系等方面禁止基于种族、性别、宗教、残障、国籍、政治派别、年龄、性取向、工会成员身份、婚姻状况、孕育状况、家庭责任等任何形式的歧视
- 为残疾员工提供合理便利
- 除非适用的法律法规有明确要求或应工作场所安全保障的合理需要，不开展任何歧视性目的的医疗检查

2.6 Non-Discrimination & Diversity

Requirements:

- Prohibit any discrimination based on race, gender, religion, disability, nationality, political affiliation, age, sexual orientation, union membership, marital status, pregnancy, maternity, reproductive status, family responsibilities or any other status protected by applicable law in hiring, compensation and benefits, training, promotion, job assignments, disciplinary actions, and termination of employment
- Provide reasonable accommodations for employees with disabilities
- Medical examinations shall not be used in a discriminatory manner, unless required by applicable law or necessary for workplace safety

2.7 结社自由与集体谈判

要求：

- 尊重员工依法结社自由和集体谈判权利，尊重员工依法通过工会、职工代表大会、员工代表或其他合法渠道表达意见和参与沟通的权利
- 允许员工代表访问工作场所
- 不得因参与工会活动而歧视或报复员工

2.7 Freedom of Association and Collective Bargaining

Requirements:

- Respect employees' freedom of association in accordance with applicable law and collective bargaining rights. Respect employees' right to express their views and participate in communication through unions, workers' congresses, worker representatives, or other legal channels in accordance with the law
- Allow access to the workplace by employee representatives
- No discrimination or retaliation against employees for exercising their rights to freedom of association and collective bargaining

3. 健康与安全
3. Health and Safety

3.1 职业健康安全

要求：

- 遵守所有健康与安全方面的法规
- 依法获取所有必需的健康安全许可，并保持其持续有效、及时更新
- 提供并持续维持健康安全的工作环境，防止工伤事故
- 建立健康安全管理系统来识别、评估和控制工作场所各类危险源
- 雇员有权拒绝不安全的作业并报告不健康的工作环境
- 建立健康安全量化指标体系，持续降低事故率和伤害率, 达成零重大事故、零伤害愿景

3.1 Occupational Health and Safety

Requirements:

- Comply with all applicable laws and regulations in occupational health & safety
- Obtain all necessary health & safety permits in accordance with the law, and ensure that they remain valid and update in a timely manner
- Provide and maintain a safe and healthy work environment to prevent workplace injuries and accidents
- Establish a health & safety management system to identify, assess, and control the hazards in the workplace
- Respect employees' right to refuse unsafe work and report unhealthy working conditions without retaliation
- Establish a quantifiable health & safety metrics system, to achieve goal of zero major incidents and continuous reduction of injury rates

3.2 应急准备和响应

要求：

- 针对公司运营紧急状况, 制定、落实应急预案并定期演练
- 确保紧急出口畅通无阻
- 依法提供足够的消防设备和培训

3.2 Emergency Preparedness & Response

Requirements:

- Develop and implement emergency response plans for potential operational emergencies and conduct regular drills
- Ensure unobstructed emergency exits
- Provide adequate fire protection equipment and training according to applicable laws and regulations

3.3 职业健康

要求：

- 定期进行职业健康检查
- 控制化学品和其他有害物质暴露
- 提供必要的个人防护用品
- 提供清洁的饮用水和卫生设施

3.3 Occupational Health

Requirements:

- Conduct regular occupational health examinations
- Control exposure to chemicals and other hazardous substances in the workplace
- Provide necessary personal protective equipment
- Provide clean drinking water and sanitation facilities in the workplace

3.4 工作与生活条件

要求：

- 提供必要的工作、生活设施，包括但不限于便捷、洁净的卫浴设施以及符合饮用标准的饮用水
- 提供安全、卫生的员工宿舍 (如果适用)
- 确保适当的居住空间和通风 (如果适用)
- 提供符合卫生规范要求的就餐场所、食物制备及储存设施（如果适用）

3.4 Working and Living Conditions

Requirements:

- Provide necessary working and living facilities, including but not limited to convenient and clean sanitary facilities, as well as drinking water that meets potable water standards.
- Provide safe and sanitary employee housing (if applicable)
- Ensure adequate living space and ventilation (if applicable)
- Dining areas, food preparation, and storage facilities must also be provided in accordance with hygiene regulations (if applicable)

3.5 事故管理

要求：

- 建立工人健康与安全事故和未遂事件报告机制，以及此类报告的调查、跟踪和管理机制
- 制定并实施纠正措施计划, 有效降低安全伤害风险
- 为受伤工人提供必要的医疗救治，并助力他们顺利重返工作岗位

3.5 Incident Management

Requirements:

- Establish a reporting mechanism for worker health and safety incidents and near misses, as well as a system for investigating, tracking, and managing such reports
- Develop and implement corrective action plans to effectively mitigate injury risks
- Provide necessary medical treatment for injured workers and facilitate their safe return to work

3.6 高风险作业管理

要求：

- 任何机构或个人在公司运营场所内涉及动火作业、吊装作业、高空作业、有限空间作业、临时用电等高风险作业前，必须执行作业票管理流程，指定现场安全管理人员，遵守安全法规标准要求及公司内部安全管理要求。

3.6 High-Risk Operation Management

Requirements:

- Prior to conducting high-risk operations—including hot work, lifting operations, working at heights, confined space entry, and temporary electrical work in business operation workplaces, the work permit process must be followed, on-site safety personnel must be designated, and all applicable laws, regulatory standards, and company internal safety management requirements must be strictly followed

3.7 机械安全与防护

要求：

- 对生产设施设备和其它机器在设计阶段考虑和满足安全标准要求
- 对生产设备和其它机器评估安全危险性，对可能造成伤害的机械提供物理防护、联锁以及光栅、急停等安全装置，并确保安全有效运行

3.7 Machine Safety and Safeguarding

Requirements:

- Production equipment and machines shall be designed to meet safety standards.
- Conduct safety assessments of hazards associated with production equipment and machinery. Physical guards, interlocks, light curtains, emergency stops, and other safety devices shall be provided for machines that may cause injury, and ensure safe and effective operation

3.8 人体工程管理

要求：

- 识别、评估并控制从事高体力劳动工作给员工带来的影响，包括人工搬运材料和重复提举重物、长时间站立和高度重复或强力的装配工作

3.8 Ergonomics Management

Requirements:

- The impacts of high-physical-demand work on employees shall be identified, assessed, and controlled, including manual material handling and repetitive heavy lifting, prolonged standing, and highly repetitive or forceful assembly tasks

3.9 健康与安全沟通

要求：

- 向雇员提供以员工能够理解的语言提供工作场所健康与安全信息，包括但不限于安全培训、健康安全标识
- 鼓励员工报告工作场所的健康和安全疑虑，并保障员工不会因报告健康与安全疑虑而受到打击报复

3.9 Health and Safety Communication

Requirements:

- Workplace health and safety information shall be provided to employees in a language that employees understand, including but not limited to safety training and health & safety warning signs
- Employees shall be encouraged to report health & safety concerns in the workplace, and employees shall be protected from retaliation for reporting health and safety concerns

4. 环境保护
4. Environmental Protection

4.1 环境管理和环保许可报告

要求：

- 遵守所有适用的环境法律法规
- 依法开展建设项目环境影响评价、排污许可、环境监测和报告，依法获得、持续维护并遵循所有必要的环保许可和报告相关要求
- 实施环境管理体系

4.1 Environmental Management and Permits & Reporting

Requirements:

- Comply with all applicable environmental laws and regulations
- Conduct the Environmental Impact Assessments (EIA) for construction projects, obtain and maintain pollutant discharge permits, and carry out environmental monitoring and reporting in accordance with the applicable laws.
- Implement an environmental management system

4.2 污染预防

要求：

- 最大限度减少废水排放、废气排放、噪声影响和固体废物产生
- 实施清洁生产技术
- 建立污染预防目标，对污染物处理及排放控制系统的性能进行定期监测
- 运用系统化方法防止雨水径流受到污染, 系统识别、控制并减少运营过程中产生的废水, 评估废水处理系统的运行效能
- 杜绝违法违规排放污染物

4.2 Pollution Prevention

Requirements:

- Minimize wastewater discharge, air emissions, noise impacts, and solid waste generation
- Implement cleaner production technologies
- Establish pollution prevention targets, and regularly monitor the performance of pollution treatment and emission control systems
- Employ a systematic approach to prevent the contamination of stormwater runoff, systematically identify, control and reduce wastewater generated during operations, and evaluate the operational efficiency of wastewater treatment systems
- Strictly prohibit any illegal or non-compliant discharge of pollutants

4.3 能源和资源效率

要求：

- 提高能源、水及资源使用效率
- 减少能源、原材料消耗
- 实施循环经济原则
- 定期对整体水资源利用绩效展开监测，涵盖用水量情况

4.3 Energy and Resource Efficiency

Requirements:

- Improve energy, water and resource usage efficiency
- Reduce energy and raw material consumption
- Implement circular economy principles
- Regularly monitor overall water utilization performance, including water consumption

4.4 危险有害物质管理

要求：

- 安全储存、使用和处置危险化学品
- 提供化学品安全数据表（SDS）
- 实施化学品泄漏应急预案
- 遵守产品及制造过程有关禁用或限用或受管制物质（包括回收和处置）的相关法律、法规和客户要求
- 在产品设计、原材料采购、生产制造及供应链管理中持续减少、替代和逐步淘汰高 VOC 含量材料及有害物质

4.4 Hazardous Substances Management

Requirements:

- Safely store, use, and dispose of hazardous chemicals
- Provide Safety Data Sheets (SDS)
- Implement chemical spill emergency response plans
- Comply with applicable laws, regulations, and customer requirements concerning prohibited, restricted, or regulated substances in products and manufacturing processes (including recycling and disposal)
- Continuously reduce, substitute, and phase out high-VOC materials and hazardous substances in product design, raw material procurement, manufacturing, and supply chain management

4.5 废弃物管理

要求：

- 依法实施废弃物识别、分类管理和回收计划
- 减少有害废物产生
- 确保废物合规处置，尽可能减少废弃物填埋量

4.5 Waste Management

Requirements:

- Implement waste identification, classification and recycling programs in accordance with legal requirements
- Reduce hazardous waste generation
- Ensure compliant waste disposal and minimize landfilling to the greatest extent possible

4.6 保护林地和生物多样性

要求：

- 将生物多样性、林地保护及绿色低碳纳入运营与决策流程
- 主动评估并最小化业务活动对自然栖息地和生态系统的负面影响，避免或减少与生产活动相关的毁林行为
- 通过土地使用管控、厂区绿化、包装材料管理、木质/纸质材料采购要求和供应链无毁林风险评估等措施，降低对森林和自然生态系统的负面影响
- 倡导可持续的自然资源利用与采购
- 积极参与生态修复与保护行动，促进人与自然和谐共生

4.6 Forest Protection and Biodiversity Conservation

Requirements:

- Integrate biodiversity conservation, forest protection, green and low-carbon development principles into operations and decision-making processes
- Proactively assess and minimize the negative impacts of business activities on natural habitats and ecosystems, and avoid or reduce deforestation associated with production activities

- Implement measures to protect forest resources, land usage, site landscaping, packaging materials, procurement of wood/paper materials, and ensuring a deforestation-free supply chain, and minimize the negative impact on forest and natural ecosystems
- Promote sustainable natural resource utilization and procurement
- Actively participate in ecological restoration and conservation efforts to foster harmonious coexistence between humanity and nature

4.7 温室气体排放管理

要求：

- 科学识别、管理、减少并负责任地控制全公司运营过程中的温室气体（GHG）排放
- 采用 GHG Protocol 或 ISO 14064-1 核算 Scope 1、Scope 2 及相关 Scope 3；建立基准年、减排目标、行动计划、数据核查和披露机制，并持续跟踪进展
- 编制并持续维护覆盖全公司的温室气体清单及温室气体排放数据

4.7 Greenhouse Gas (GHG) Emission Management

Requirements:

- Scientifically identify, manage, reduce, and responsibly control GHG emissions across all company operations
- Adopt the GHG Protocol or ISO 14064-1 methodologies to account for Scope 1, Scope 2, and relevant Scope 3 emissions; Establish mechanisms for setting a base year, setting emission reduction targets, workplan, data verification, and disclosure, continuously track progress regarding GHG emissions
- Compile and maintain a company-wide GHG inventory and emissions data

5. 商业道德
5. Business Ethics

5.1 反腐败

要求：

- 禁止任何形式的贿赂和腐败
- 遵守适用的反腐败和反商业贿赂法律法规
- 建立准确账簿记录、内部控制和财务透明管理机制

5.1 Anti-Corruption

Requirements:

- Prohibit all forms of bribery and corruption
- Comply with applicable anti-corruption and anti-bribery laws and regulations
- Establish accurate books and records, internal control and financial transparency management mechanisms

5.2 公平竞争

要求：

- 遵守反垄断和公平竞争适用性法律法规
- 禁止价格操纵和市场分割
- 尊重和保护知识产权

5.2 Fair Competition

Requirements:

- Comply with applicable antitrust and fair competition laws
- Prohibit price fixing and market allocation
- Respect and protect intellectual property rights

5.3 信息披露

要求：

- 信息披露内容包括但不限于商业活动、劳工状况、健康与安全措施、环境实践及商业道德实践等方面信息
- 按照监管和法律法规要求， 公开、公正、公平、及时、准确完整的进行信息披露，不存在虚假记载、误导性陈述和重大遗漏
- 禁止内幕交易和市场操纵，依法保障投资者的权益
- 保护公司商业机密和客户机密信息

5.3 Information Disclosure

Requirements:

- Information disclosure includes, but is not limited to, information regarding business activities, labor practices, health & safety measures, environmental practices and business ethics
- Disclose information in a truthful, accurate, complete, timely and fair manner in accordance with regulatory and legal requirements. There shall be no false records, misleading statements, or material omissions
- Prohibit insider trading and market manipulation, and protect the legitimate rights and interests of investors in accordance with the law
- Safeguard the company's trade secrets and customers' confidential information

5.4 利益冲突

要求：

- 识别和管理实际或潜在的利益冲突
- 禁止利用职务之便谋取私利
- 建立利益申报制度

5.4 Conflict of Interest

Requirements:

- Identify and manage actual or potential conflicts of interest
- Prohibit the use of one’s position for personal gain
- Establish conflict of interest declaration policy and procedures

5.5 负责任采购

要求：

- 制定、实施并持续践行负责任的材料采购模式
- 对材料供应链中的相关材料如冲突矿产等进行尽职调查，以识别、评估、减轻和补救与供应商采购原材料、循环利用材料和/或可再生材料相关的任何重大问题。调查范围包括但不限于：源自冲突关联地区的采购风险；涉及童工或未适龄劳工、强迫劳动及人口贩运的风险；严重侵犯人权的行为（如大规模性暴力）风险；以及其他根据合理客观的判断存在的高风险活动（包括严重的健康和安全风险以及重大的负面环境影响）
- 不得采购或使用直接或间接资助武装冲突、严重侵犯人权、洗钱、腐败或其他重大风险的矿产；对于来自受冲突影响和高风险地区的矿产，应开展基于风险的尽职调查，并识别、预防、减缓和说明如何处理相关风险。对生产的产品中所含的 3TG（锡、钽、钨和金）及钴、云母等重点责任矿物来源及监管链进行溯源尽职调查，以合理确保其来源符合经济合作与发展组织 (OECD)《受冲突影响和高风险地区矿产供应链尽职调查指南》或同等和公认的尽职调查框架
- 建立一套可获取完整可追溯性数据的系统，包括但不限于追溯至材料原产地的供应链交易数据

5.5 Responsible Sourcing

Requirements:

- Develop, implement, and continuously practice responsible material procurement models
- Conduct due diligence on relevant materials in the supply chain, such as conflict minerals, to identify, assess, mitigate, and remediate any significant issues related to the risks of suppliers' procurement of raw materials, recycled materials, and/or renewable materials. The scope of the investigation includes but is not limited to: procurement risks originating from conflict-affected areas; risks involving child labor or underage labor, forced labor, and human trafficking; risks of severe human rights abuses (such as widespread sexual violence); and other high-risk activities (including severe health and safety risks and significant adverse environmental impacts) identified through reasonable and objective judgment
- Minerals that directly or indirectly finance armed conflict, severe human rights abuses, money laundering, corruption, or other significant risks shall not be procured or used. For minerals sourced from Conflict-Affected and High-Risk Areas (CAHRAs), risk-based due diligence shall be conducted, and identify, prevent, mitigate and explain how to address the related risks. Due diligence and traceability investigations shall be conducted on the origin and chain of custody of 3TG minerals (tin, tantalum, tungsten and gold), as well as other priority minerals such as cobalt and mica contained in the manufactured products. This is to provide reasonable assurance that their sourcing complies with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, or an equivalent and recognized due diligence framework
- Establish a system that provides access to complete traceability data, including but not limited to supply chain transaction data traceable to the material's origin

5.6 隐私、数据及信息安全保护

要求：

- 遵守涉及隐私、数据保护及网络安全等所有适用的法律法规
- 根据适用的信息安全与数据隐私要求，制定并持续维护信息安全计划，其中应包括技术层面和组织层面的措施，用于防止对机密信息、专有信息、个人信息或其他受保护信息的滥用、泄露、丢失、篡改或未经授权的披露、获取或访问。

5.6 Privacy, Data and Information Security Protection

Requirements:

- Comply with all applicable laws and regulations regarding privacy, data protection, and cybersecurity relevant to the company or its suppliers
- Develop and maintain an information security program in alignment with applicable standards in information security and data privacy. The program shall include technical and organizational measures to prevent the misuse, leakage, loss, or alteration of confidential information, proprietary information, personal information, or other protected information, as well as unauthorized disclosure, acquisition, or access

5.7 反洗钱和反逃税

要求：

- 不参与或协助任何个人或组织藏匿非法资金或从事其他可疑活动
- 依法履行全部纳税义务，不得以任何方式协助或促成第三方或关联实体逃避纳税义务
- 建立透明的财务管理制度

5.7 Anti-Money Laundering (AML) and Anti-Tax Evasion

Requirements:

- Do not participate in or assist any individual or organization in concealing illicit funds or engaging in other suspicious activities
- Fully comply with all tax obligations in accordance with the law, and shall not assist or facilitate any third party or affiliated entity in evading tax obligations by any means
- Establish a transparent financial management system

6. 管理系统
6. Management Systems

6.1 管理承诺

要求：

- 高层管理者明确承诺遵守本准则
- 制定企业社会责任政策和目标
- 提供必要的资源支持
- 参与行业倡议和标准

6.1 Management Commitment

Requirements:

- Senior management demonstrates clear commitment to this Code

- Establish CSR policies and objectives
- Provide necessary resources
- Participate in industry initiatives and standards

6.2 风险管理

要求：

- 制定风险缓解措施
- 建立 CSR/ESG 风险识别、评估、控制、监测、升级和整改机制

6.2 Risk Management

Requirements:

- Develop risk mitigation measures
- Establish mechanisms to identify, assess, control, monitor, escalate, and remediate CSR/ESG risks

6.3 能力建设

要求：

- 为员工提供 CSR/ESG 及合规培训
- 提高管理者和员工的意识
- 建立内部沟通机制

6.3 Capacity Building

Requirements:

- Provide CSR/ ESG and compliance training for employees
- Enhance awareness among managers and staff
- Establish internal communication mechanisms

6.4 文件与记录管理

要求：

- 建立完整的文件管理体系
- 保留必要的合规记录
- 确保记录的真实性和完整性

6.4 Document and Record Management

Requirements:

- Establish comprehensive documentation management systems
- Maintain necessary compliance records
- Ensure authenticity and completeness of records

6.5 持续改进

要求：

- 定期评审和更新管理系统
- 采纳最佳实践
- 推动持续改进文化

6.5 Continuous Improvement

Requirements:

- Regularly review and update management systems
- Adopt best practices
- Promote a culture of continuous CSR improvement

7. 合规与监督
7. Compliance and Monitoring

7.1 内部审核

要求：

- 定期进行内部合规审核
- 建立纠正和预防措施程序
- 跟踪合规整改落实情况

7.1 Internal Audits and Assessment

Requirements:

- Conduct regular internal compliance audits
- Establish corrective and preventive action procedures
- Track implementation status of corrective action plans

7.2 外部验证

要求：

- 配合适用的外部审核、客户审核、第三方认证，披露必要的信息
- 依据适用的法律法规、客户要求及公司的信息披露机制公开报告公司履行情况

7.2 External Verification

Requirements:

- Undergo and cooperate with external audits, customer audits and third-party certifications where applicable and disclose necessary information
- Report performance in accordance with applicable laws, regulations, customer requirements, and the Company’s disclosure arrangements

7.3 投诉与沟通机制

要求：

- 建立面向员工、供应商、客户及其他利益相关方的沟通与申诉渠道，包括保密、匿名和反报复机制，并持续与他们保持沟通
- 保护投诉者免受报复
- 及时调查和处理投诉

7.3 Grievance and Communication Mechanisms

Requirements:

- Establish communication and grievance channels for employees, suppliers, customers, and other stakeholders, including mechanisms for confidentiality, anonymity and non-retaliation, and maintain continuous communication with them
- Protect complainants from retaliation
- Promptly investigate and address complaints

7.4 社区参与

要求：

- 尊重经营所在地的社区，为社区发展做出积极努力，最大程度地降低对当地社区可能造成的不利影响
- 鼓励所有员工参与社区公益、志愿服务及与当地社区相关的发展活动

7.4 Community Engagement

Requirements:

- Respect the communities in locations where we operate, actively contribute to community development, and minimize any potential adverse impacts
- Encourage all employees to participate in community philanthropy, volunteer services, and development activities related to local communities

7.5 供应商管理

要求：

- 在供应商准入阶段必须将 ESG（环境、社会与治理）标准作为核心考量因素。供应商需通过合规性筛查，并签署包含劳工、健康与安全、环境及商业道德要求的相关协议和《供应商行为准则承诺书》
- 建立基于风险的供应商分级管理体系。根据供应商的合规风险、财务稳定性、交付可靠性及 ESG 表现进行量化评估与分类（如高、中、低风险），将管理资源优先集中于高风险供应商
- 建立线上评估与现场评估相结合的供应商定期考核机制。评估内容全面覆盖行为准则的劳工、健康安全、环境、道德及管理体系，并将 ESG 绩效与采购决策挂钩
- 对内部采购团队及外部供应商提供定期的 ESG 与合规培训。提升供应商对供应商行为准则的理解与执行能力，从“审核管控”向“协同赋能”转变，推动供应链整体可持续发展
- 将 ESG 与合规条款明确纳入供应商采购协议，要求供应商承诺遵守适用的法律法规及供应商行为准则，明确禁止强迫劳动、童工、商业贿赂及冲突矿产
- 依据供应商行为准则标准，定期对供应商开展现场审核。在合同允许、客户要求或基于风险需要时，审核范围可延伸至关键下级供应商，以确保供应链全链路的透明度与合规性
- 针对供应商审核中发现的不符合项，要求供应商在规定期限内提交根本原因分析及具体的纠正预防措施（CAP）。对供应商整改进度进行持续追踪与验证，确保问题得到闭环解决
- 对供应商严重违规（如使用童工、强迫劳动、重大安全隐患或严重环境违法）采取立即风险控制措施，并视违规性质、补救意愿及整改效果，暂停、限制或终止合作
- 建立供应链责任传导机制。要求一级供应商将供应商行为准则及企业的 ESG 要求纳入其自身的供应商管理体系中，并定期提供下级供应商的合规评估报告，防范深层供应链风险

7.5 Supplier Management

Requirements:

- Integrate ESG (Environmental, Social, and Governance) standards into the supplier qualification reviewing process. Suppliers are required to pass compliance reviewing and sign a Social Responsibility Agreement and Supplier Code of Conduct Commitment covering labor, health and safety, environment, and business ethics
- Establish a risk-based tiering supplier management system. Quantitatively evaluate and categorize suppliers (e.g., high, medium, low risk) based on compliance risks, financial stability, delivery reliability, and ESG performance, prioritizing management resources for high-risk suppliers
- Implement a regular assessment mechanism combining online questionnaires and on-site evaluations. Assessments must comprehensively cover Labor, Health & Safety, Environment, Ethics, and Management Systems, and supplier ESG performance should be linked to procurement decisions
- Provide regular ESG and compliance training for both internal procurement teams and external suppliers. Enhance suppliers' understanding and execution of the Code, shifting from "audit control" to "collaborative empowerment" to drive overall supply chain sustainability
- Explicitly incorporate ESG and compliance clauses into procurement agreements. Require suppliers to commit to applicable laws and the Code, strictly prohibiting forced labor, child labor, bribery, and conflict minerals
- Conduct regular on-site audits of suppliers based on the Code. Where permitted by contract, requested by the customer, or necessitated by risk, the audit scope must extend to critical sub-tier suppliers to ensure transparency and compliance across the entire supply chain
- For non-conformances identified during audits, require suppliers to submit root cause analysis and specific Corrective Action Plans (CAP) within a defined timeframe. Continuously track and verify remediation progress to ensure closed-loop resolution of issues
- Take immediate risk control measures against severe supplier violations (such as child labor, forced labor, critical safety hazards, or severe environmental breaches), and suspend, restrict, or terminate cooperation based on the nature of the violation, the willingness to remediate, and the effectiveness of the rectification

- Establish a supply chain responsibility cascading mechanism. Tier-1 suppliers shall integrate the Code and corporate ESG requirements into their own supplier management systems and periodically provide compliance assessment reports of sub-tier suppliers to mitigate deep-tier supply chain risks

8. 附录
8. Appendices

附录 A：参考标准

- 国际劳工组织核心公约
- 联合国全球契约十项原则
- ISO 26000 社会责任指南
- 《联合国工商企业与人权指导原则》
- 道德贸易倡议（ETI）
- 经济合作与发展组织 (OECD)《受冲突影响和高风险地区矿产供应链尽职调查指南》
- GHG Protocol/ ISO14064-1
- 公司客户 CSR 标准和政策

Appendix A: Reference Standards

- ILO Core Conventions
- UN Global Compact Principles
- ISO 26000 Guidance on Social Responsibility
- UN Guiding Principles on Business and Human Rights
- ETI Base Code
- OECD Minerals Due Diligence Guidance
- GHG Protocol/ ISO 14064-1
- Relevant customer CSR standards and policies

附录 B：关键术语定义

- 强迫劳动：违背个人意愿而受到任何威胁和处罚
- 童工：低于法定最低工作年龄的儿童就业
- 未成年工：未成年工是指任何超过 ILO 公约中“儿童”（童工）定义的年龄，但未满 18 岁的员工。结合中国劳动法规定，未成年工特指年满 16 周岁但不满 18 周岁的劳动者
- 供应链：从原材料到最终产品交付的全过程
- 招聘费：向员工收取或由员工承担的任何招聘、录用、安置、交通、体检、中介等相关费用
- 申诉机制：指公司建立的持续性管理流程与沟通渠道，旨在评估员工对准则涵盖实践和条件的理解，获取反馈或违规报告，并促进持续改进
- 责任矿物：需开展负责任采购尽职调查的矿物，包括 3TG、钴、云母及其他根据客户、法规或风险评估确定的重点矿物
- 受冲突影响和高风险地区：指存在武装冲突（如国际或非国际冲突、内战等）、大范围暴力活动（包括犯罪网络制造的暴力）、政局不稳、制度缺陷、民用基础设施崩溃、广泛侵犯人权或腐败成风等特征的地区
- 个人信息：指与已识别或可识别的自然人（包括供应商、客户、消费者和雇员）相关的任何信息
- 重大环境影响：指公司在运营过程中对环境造成的严重负面影响，包括但不限于未合规的化学品泄漏、危险废物非法转移、严重超标排放废气废水，以及未能有效管控温室气体排放
- 高风险作业：指在工作场所中存在可能导致严重工伤、职业病或危及生命安全的作业活动或环境

Appendix B: Key Term Definitions

- Forced Labor: Under threat of penalty and for which the person has not offered themselves voluntarily
- Child Labor: Employment of children below the legal minimum working age
- Young Worker： any worker who is above the defined age for a "child" under the ILO Core Convention but under the age of 18. In accordance with Chinese labor laws, young workers specifically refer to workers who have reached the age of 16 but are under the age of 18
- Supply Chain: The entire process from raw materials to final product delivery
- Recruitment Fees: Any fees related to recruitment, hiring, placement, transportation, medical examinations, or agency services that are charged to the employee during the recruitment or employment process
- Grievance Mechanism: A continuous management process and communication channels established by the company, designed to assess workers' understanding of practices and conditions covered by the Code, obtain feedback or reports of violations, and promote continuous improvement
- Responsible Minerals: Minerals subject to responsible sourcing due diligence, including 3TG minerals, cobalt, mica and other priority minerals determined by customer requirements, regulations, or risk assessments
- Conflict-Affected and High-Risk Areas (CAHRAs): Areas characterized by the presence of armed conflict (such as international or non-international conflicts, civil wars), widespread violence (including violence perpetrated by criminal networks), political instability, institutional weakness, breakdown of civil infrastructure, widespread human rights abuses, or endemic corruption
- Personal Information: Any information relating to an identified or identifiable natural person (including suppliers, customers, consumers, and employees)
- Significant Environmental Impacts: Severe negative impacts on the environment caused by corporate operations, including but not limited to non-compliant chemical spills, illegal transfer of hazardous waste, excessive discharge of waste gas/water, and failure to effectively manage greenhouse gas emissions. These impacts may pose direct threats to ecosystems or human health
- High-Risk Operations: Operational activities or environments in the workplace that pose risks of severe occupational injuries, occupational diseases, or threats to life and safety

批准与生效
Approval and Effective Date

适用范围：蓝思科技股份有限公司及其子公司（简称“蓝思科技”）之全体成员，包括董事、监事、高级管理人员及全体员工（统称“蓝思成员”）。
Scope of Application: All members of Lens Technology Co., Ltd. and its subsidiaries (herein referred to as 'Lens Technology'), including directors, supervisors, senior management, and all employees (herein collectively referred to as 'Lens Members').

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Approved By: Zuo Doukai

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本行为准则将根据国际标准发展和企业实际情况进行定期更新
This Code of Conduct will be updated regularly based on international standards development and the company's actual situation