



文件编号 File No.	HQ- COM-SCOC	爱派克斯国际物流集团 供应商行为准则 Apex Supplier Code of Conduct	适用范围 Application	所有供应商 All Suppliers
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爱派克斯供应商行为准则
Apex Supplier Code of Conduct

爱派克斯是全球领先的国际货运公司，在 70 多个国家拥有 46 个分公司。我们经营的强大供应商和其他第三方网络是我们爱派克斯成功的原因之一。我们采购服务和外包作业的方式影响着作为负责任的企业公民的声誉。对于我们的可持续发展和全面成功，我们的供应商起着重要的推动作用。为保证爱派克斯及其股东的长远成功，爱派克斯提出了对经济、社会和环境的可持续发展至关重要的几项原则。为此，爱派克斯要求其供应商亦能遵守《供应商行为准则》中的原则，并付出合理的努力确保自己的供应商亦能遵守这些原则。

Apex is a global leader in international forwarding with 46 branches in more than 70 countries. We deal with a large network of suppliers and other third parties that contribute to our success. The way we purchase supplies and contract out operations affects our reputation as a responsible corporate citizen. Our suppliers play an important role as enablers of our sustainable growth and overall success. Apex has set forth principles that are key for economic, social and environmental sustainability in order to ensure long-time success of Apex and its stakeholders. Because of this, Apex requires its suppliers to adhere to the principles embodied in the Supplier Code of Conduct and to use reasonable efforts to ensure that their own suppliers will also comply with these principles.

道德标准
Ethical Standards

供应商应以合乎道德的方式开展业务并诚信行事。这包括但不限于：

Suppliers shall conduct their business in an ethical manner and act with integrity. This shall include but is not limited to:

- 疏通费：禁止向政府官员支付疏通费，除非在法律允许的例外情况下。
Facilitation payments: Facilitation payments made to governmental officials are prohibited unless for legally granted exceptions.
- 利益冲突：供应商应以书面形式向 Apex 披露任何可能对业务关系产生不利影响的实际、潜在或被认为存在的利益冲突。
Conflicts of interest: Suppliers shall disclose to Apex in writing any actual, potential, or perceived conflicts of interest that may adversely influence the business relationship.



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- 礼品和招待： 供应商不得提供或接受任何有价物品以获取或保留不当利益或优势。在正常业务过程中， 礼品和招待应始终是适度、合理、不频繁的， 并受到适用法律法规和相关客户标准的允许。
Gifts and entertainment: Suppliers shall neither offer nor receive anything of value to obtain or retain improper benefits or advantages. Gifts and entertainment shall always be modest, reasonable, infrequent, in the normal course of business and permitted by applicable laws and regulations and relevant customer standards.
- 政治捐款： 供应商不得代表 Apex 提供政治捐款。
Political contributions: Suppliers shall not make political contributions on behalf of Apex.
- 内幕交易： 禁止出于内幕交易目的使用或与他人分享非公开资讯。
Insider trading: Using or sharing non - public information with others for insider trading purposes is prohibited.
- 负责任的沟通： 未经事先书面同意， 供应商不得向媒体发表声明或发布新闻稿， 或进行任何形式的宣传， 包括使用 Apex 的品牌、标志或商标素材。
Responsible communication: Suppliers shall not make statements to the media or issue press releases, or any publicity including use of Apex's brand, logo, or trademark materials without prior written consent.

劳工和人权

Labor and Human Rights

供应商应致力于维护国际公认的工人人权。禁止雇用未达法定最低工作年龄的儿童。供应商不得参与或支持使用任何形式的强迫、强制或非法劳工。至少必须支付法定工资， 并且必须遵守适用的工作时间法规。供应商应允许其员工自由组成和加入或不加入工会以及集体谈判。供应商应确保其员工不会因性别、婚姻或父母身份、种族或国籍、性取向、宗教信仰、政治立场、年龄或残疾而受到歧视。

Suppliers shall be committed to upholding internationally proclaimed human rights of workers. It is forbidden to employ children under the minimum legal working age. Suppliers shall not engage in or support the use of any form of forced compulsory or illegal labor. As a minimum, statutory wages must be paid, and applicable working time legislation must be followed. Suppliers shall enable their employees to freely form and join, or not to join, trade unions and to bargain collectively. Suppliers shall ensure that their employees are not discriminated against on



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grounds of their gender, marital or parental status, ethnic or national origin, sexual orientation, religious belief, political affiliation, age, or disability.

健康与安全

Health and Safety

供应商应遵守强制性的全球和当地职业健康与安全法律、法规和标准，例如 ISO 45001 或类似标准，包括 Apex 的安全与健康声明。最严格的要求将始终优先适用。

Suppliers shall comply with mandatory global and local occupational health and safety laws, regulations, and standards such as ISO 45001 or similar, including Apex's Safety & Health Statement. The most stringent Requirement always prevails.

供应商将提供安全且有利于健康的工作环境。这包括提供适当的训练、防护设备并确保设施符合安全标准，包括危险物质的处理、应急准备和风险控制。

Suppliers will provide work environments that are safe and conducive to good health. This involves providing proper training, protective equipment, and ensuring that facilities meet safety standards, including handling of hazardous materials, emergency preparedness, and risk mitigation.

这样的工作环境将保护员工的健康，并防止事故、伤害和与工作有关的疾病。供应商需要识别所有与工作和工作场所相关的危险，并通知参与合同工作的所有人员已识别的风险，并应进行风险缓解实践培训，其中包括有关所用的危险物质（例如化学品和活性药物成分）的安全资讯。

Such working environments will preserve the health of their employees and prevent accidents, injuries, and work - related illnesses. Identification of all work and workplace - related hazards is required. Suppliers shall inform all persons involved in the contracted work about the identified risks and shall train in risk mitigation practices which includes safety information about hazardous substances used, for example, chemicals and active pharmaceutical ingredients.

供应商必须明确禁止在工作场所或操作过程中饮酒和吸毒。

Suppliers are required to explicitly prohibit alcohol and drug use at work sites or during operations.

应急准备和响应

Emergency Preparedness and Response



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供应商应识别和评估其工作场所的紧急情况，并透过实施紧急响应计划和程序等安全控制措施来最大程度地减少不利影响。紧急响应包括按法律要求配备经过充分培训和认证的急救人员和/或应急干预小组。

Suppliers shall identify and assess emergency situations in their workplaces and minimize adverse impacts by implementing safety controls like emergency response plans and procedures. Emergency responses include adequately trained and certified first aiders and/or first intervention teams as required by law.

供应商应制定有效的业务持续管理和计划，以减少最紧迫的风险。供应商应定期培训员工，并每年至少进行一次威胁模拟。其结果在 Apex 要求时提供。

Suppliers shall have effective business continuity management and plans in place to mitigate the most imminent risks. Suppliers shall train personnel regularly and shall conduct threat simulations at least once a year. Results shall be shared with Apex upon request.

环境

Environment

Apex 的供应商应遵守 ISO 14001 或类似标准等环境法律、法规和标准，并符合 Apex 的环境政策声明的要求。所有必需的许可证、执照和化学品登记都应在需要时能够提供。其目标是持续减轻资源消耗（即能源、水、原料和初级原料）、环境影响（即排放、污染物、废弃物）和气候变化。

Suppliers of Apex shall comply with environmental laws, regulations, and standards such as the ISO 14001 or similar and meet the requirements of Apex's Environmental Policy Statement. All required permits, licenses and chemical registrations will be available. The aim is to continuously minimize resource consumption (i.e., energy, water, raw materials, and primary materials), environmental impact (i.e., emissions, pollutants, waste), and climate change.

此外，Apex 期望包括其上游和/或下游供应链在内的供应商施行有效措施，减少直接和间接二氧化碳排放，并将这项承诺传达给其价值链。

In addition, Apex expects its suppliers to implement effective measures to reduce direct and indirect CO2 emissions, including their upstream and/or downstream supply chain, and communicate this pledge to their value chain.

供应商应持续减少并防止污染物排放到环境中。任何可能对人类或环境健康产生不利影响的废弃物、废水排放或气体排放，必须在排放到环境中之前进行适当的管理、测量、控制和处理。废弃物管理将有利于废弃物预防、废弃物再利用或回收以及回收材料的使用。在处理危险化学品



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品和废弃物时，供应商应确保以防止和减轻意外泄漏和释放到环境中的方式识别、标记、储存、处理和运输所有构成环境风险的物质。

Suppliers shall continuously minimize and prevent polluting releases into the environment. Any waste, wastewater discharge, or air emissions with potential to adversely impact human or environment health will be appropriately managed, measured, controlled, and treated prior to release into the environment. The waste management will favor waste prevention, recycling or recovery of waste and use of recovered materials. When handling hazardous chemicals and waste, Suppliers will ensure that all the substances presenting an environmental risk are identified, labelled, stored, handled, and shipped in a manner that prevents and mitigates accidental spills and releases to the environment.

法律及法规标准

Legal and Regulatory Standards

供应商应确保其业务活动始终基于高道德和法律标准。供应商必须遵守与其业务相关的所有法律和法规。Apex 不容忍非法行为或违反适用法律或违反要求的行为。这包括但不限于：

Suppliers shall ensure their business activities are always based on high ethical and legal standards. Suppliers must comply with all laws and regulations relevant to their business. Apex does not tolerate unlawful behaviors or violations of applicable laws or breaches of the Requirements. This shall include but is not limited to:

- 反贿赂和反贪腐：供应商不得从事任何形式的贿赂或贪腐行为。这包括主动和被动贿赂、滥用采购流程、不当回扣和欺诈活动。
Anti - bribery and anti - corruption: Suppliers shall not engage in any form of bribery or corruption. This includes active and passive bribery, misuse of procurement processes, improper kickbacks, and fraudulent activities.
- 贸易法：供应商应遵守禁止提供商品和/或服务的任何适用的联合国、美国、欧盟或国家海关、进口、出口、过境、国防、贸易管制或制裁法律和法规。
Trade laws: Suppliers shall comply with any applicable United Nations, United States, European Union or national customs, import, export, transit, defense, trade control or sanctions laws and regulations that would prohibit the provision of goods and/or services.
- 资料隐私和资讯安全：供应商不得在未经授权的情况下，披露在与 Apex 合作期间或之后收到的属于 Apex、其客户和/或任何业务合作伙伴的任何机密或专有资讯。供应商必须遵



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守有关资料保护、网络和资讯安全的所有相关标准和法规，确保采取适当的措施来保护资料并保持机密性。供应商应提供证明符合要求所需的所有资讯。

Data privacy and information security: Suppliers shall not, without authorization, disclose any confidential or proprietary information belonging to Apex, its customers, and/or any business partners, received by Suppliers during or after collaboration with Apex. Suppliers must adhere to all relevant standards and regulations regarding data protection, cyber and information security, ensuring appropriate measures are in place to safeguard data and maintain confidentiality. Suppliers shall make available all information necessary to demonstrate compliance with the Requirements.

- 反洗钱：供应商应确保其任何活动均不会促成洗钱、资助恐怖主义和/或任何其他犯罪行为。
Anti - money laundering: Suppliers shall ensure that none of its activities facilitates money laundering, funding of terrorism and/or any other criminal activities.
- 反垄断与公平交易：供应商不得从事反竞争行为，并应合法减轻可能对竞争产生不当影响的情况。
Antitrust and fair dealings: Suppliers shall not engage in anti - competitive behavior and shall lawfully mitigate circumstances that could have an improper impact on competition.
- 逃税：供应商不得自行或代表他人协助或参与非法逃税。
Tax evasion: Suppliers shall not facilitate or engage in unlawful tax evasion by themselves or on behalf of others.
- 会计：供应商应根据相关会计和保留法律和标准，保存其业务活动的准确、完整的账簿和记录。
Accounting: Suppliers shall maintain accurate and complete books and records of their business activities in line with relevant accounting and retention laws and standards.

冲突矿物和金属

Conflict Minerals and Metals

在适用的情况下，供应商应按照适用法律和法规的要求，建立系统和流程来识别、管理和报告供应链中与冲突矿物和金属相关的风险。供应商应在 Apex 要求时向其提供所需资讯。

When applicable, Suppliers shall have in place systems and processes to identify, manage, and report on risks relating to conflict minerals and metals in the supply chain as required by



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applicable laws and regulations. Upon request, Suppliers shall provide Apex with required information.

安全

Security

供应商应了解 Apex 遵守某些（尤其是政府支持的）供应链安全制度，特别是 WCO 安全标准框架、欧盟（EU）授权经济营运商（AEO）和美国海关边境保护局（CBP）海关反恐贸易伙伴计划（C - TPAT）。因此，供应商应确认遵守适用制度中规定的安全条款，并也符合 Apex 安全声明的要求。

Suppliers shall understand that Apex adheres to certain (inter alia governmentally supported) supply chain security regimes, in particular WCO Safe Framework of Standards, EU (European Union) Authorized Economic Operator (AEO), and US Customs Border Protection's (CBP) Customs Trade Partnership Against Terrorism (C - TPAT). Therefore, Suppliers shall confirm to comply with security provisions set forth in applicable regimes and also meet Requirements of Apex's Security Statement.

分包

Sub - contracting

未经 Apex 事先书面同意，供应商不得聘用任何分包商。任何分包服务始终仅限于其从事的供应链的需求。

Suppliers are not permitted to engage any subcontractors without Apex's prior written consent. Any sub - contracted services are always limited to the needs of the supply chain to which they are engaged.

禁止透过网络平台进行分包和中介。

Sub-contracting and brokering by means of web-platforms is prohibited.

监控和审计

Monitoring and Auditing

供应商应支援并帮助 Apex（或代表其指定的第三方）进行任何形式的监控和审计工作，包括但不限于完成环境、社会和治理（ESG）或安全绩效自我评估，以及现场审计和检查。

Suppliers shall support and facilitate any form of monitoring and auditing by Apex (or third parties assigned on its behalf) including but not limited to completing environmental, social, and



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governance (ESG) or security performance self - assessments, as well as on - site audits and inspections.

保密举报

Confidential Reporting

任何发现不当商业行为或非法活动的情况都可以秘密地报告给 Apex 保密举报热线，该热线受到 Apex 不报复承诺的保护。

Any observation of improper business conduct or unlawful activity can be reported confidentially to the Apex Confidential Reporting Line, which is protected by Apex's commitment to non - retaliation.

本供应商行为准则指南

Guidance for this Supplier Code of Conduct

为确保在整个供应链中有效实施和遵守本《供应商行为准则》，供应商应建立并维护包含下列内容的管理体系：

To ensure effective implementation and observance of this Supplier Code of Conduct along the supply chain, Suppliers are expected to establish and maintain a management system including the following:

- 将要求纳入他们自己的政策和标准中。
Incorporate the Requirements into their own policies and standards.
- 对相关人员进行基于风险的培训和沟通。
Perform risk - based training for and communication to relevant individuals.
- 进行有效的控制和监控。
Operate effective controls and monitoring.
- 确保维护充分账簿和记录，并遵守法律要求的文件保留期限。
Ensure to maintain adequate books and records in line with legally required retention of documents.
- 要求经批准的分包第三方定期以书面确认遵守要求。



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Require approved sub - contracted third parties to periodically confirm compliance with the Requirements in writing.

- 定期对分包第三方完成基于风险的尽职调查。
Periodically complete risk - based due diligence on sub - contracted third parties.
- 合理支持和协助任何相关资讯或资料的请求。
Reasonably support and facilitate any request for relevant information or data.
- 监控相关法律法规的变化，确保持续遵守。
Monitor relevant evolving laws and regulations ensuring ongoing compliance.
- 在合理或法律确定的时间范围内以书面通知 Apex 任何（重大）不合规情况。
Inform Apex in writing of any instance of (material) non - compliance within reasonable or legally determined timeframes.
- 应合理要求，配合调查违规行为。
Upon reasonable request, cooperate in case of an investigation of non - compliance.
- 有效纠正任何（重大）不合规问题。
Effectively remediate any (material) issues of non - compliance.
- 定期执行审计活动
Periodically perform audit activities
- Apex 保留终止与不符合本《供应商行为准则》要求的供应商的业务关系的权利。
Apex reserves the right to terminate business relationships with Suppliers not compliant with the Requirements of this Supplier Code of Conduct.

供应商声明

Declaration of the Supplier

我们已收到《供应商行为准则》的副本，除了与 Apex 的供应协议和/或采购订单中规定的承诺外，我们特此承诺致力于遵守其原则和要求。



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We have received a copy of the Supplier Code of Conduct and hereby commit ourselves, in addition to our commitments set out in the supply agreements and/or purchase orders with Apex, to comply with its principles and Requirements.

1. 我们同意，任何违反《供应商行为准则》中规定的原则的行为均被视为供应商的重大违约。
We agree that any breach of the principles stipulated in the Supplier Code of Conduct is considered a material breach of contract by the Supplier.
2. 我们同意，本声明受 Apex 与我们之间签订的供应协议和/或采购订单中规定的实体法、法律程序和管辖地的约束。
We agree that this declaration is subject to the substantive laws, legal proceedings and venue which are set out in the supply agreements and/or purchase orders concluded between Apex and us.

Place and Date

Company stamp and signature