烽火通信科技股份有限公司

FiberHome Telecommunication Technologies Co., Ltd.

供应商 ESG 红线

ESG Red Lines for Suppliers

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供应商 ESG 十条红线

Ten ESG Red Lines for Suppliers

烽火通信供应商 ESG 红线依据适用的中国法律法规，并参考经济合作与发展组织（OECD）《关于来自受冲突影响和高风险区域的矿石的负责任供应链尽职调查指南》、中国五矿化工进出口商会（CCCMC）《中国负责任矿产供应链尽责管理指南》等适用的供应链尽职管理框架，结合《烽火通信供应商社会责任行为准则》《绿色采购政策》《冲突矿产管理政策》《供应商反腐败政策》制定，适用于所有向烽火通信提供物品或劳务的供应商。供应商触碰任意一条红线，烽火通信将根据问题性质、严重程度及整改情况，采取限期整改、暂停下单、压降份额、终止合作、纳入供应链黑名单、启动法律追责等分级处置措施；涉嫌违法犯罪的，依法移交有关机关处理。

FiberHome's ESG Red Lines for Suppliers are formulated in accordance with applicable laws and regulations of the People's Republic of China, with reference to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains issued by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC), and other applicable supply chain due diligence frameworks, as well as FiberHome's Supplier Social Responsibility Code of Conduct, Green Procurement Policy, Conflict Minerals Management Policy and Supplier Anti-Corruption Policy. The Red Lines apply to all suppliers providing goods or services to FiberHome. Where a supplier breaches any Red Line, FiberHome will apply tiered measures based on the nature and severity of the issue and the status of corrective action, including requiring rectification within a specified period, suspending new orders, reducing procurement shares, terminating cooperation, adding the supplier to the supply chain blacklist, or initiating legal proceedings. Suspected criminal conduct will be referred to the competent authorities in accordance with applicable laws.

一、严禁违规使用童工

I. Strict Prohibition on the Illegal Employment of Child Labor

1、严禁招录、聘用、隐匿未满 16 周岁童工，不得伪造身份信息、入职档案规避年龄核查。
1. Suppliers shall strictly prohibit the recruitment, employment or concealment of any child labor under the age of 16, and never falsify identity information or employment records to evade statutory age verification requirements.
2、规范 16-18 周岁未成年工管理，不得安排夜班、有毒有害、重体力、高危作业，建立专项管理台账并落实年度健康体检。
2. Suppliers shall properly manage minor workers aged 16 to 18, prevent them from being assigned to night shifts, work involving toxic or hazardous substances, heavy physical labor, or high-risk operations, establish dedicated management records, and organize them for annual checkups.
3、学生工、实习生、劳务派遣人员用工手续必须真实完备，严禁虚假用工、违规顶岗。

3. Suppliers shall ensure that employment procedures for student workers, interns and labor dispatch workers are true and complete, and prohibit false employment practices or unauthorized replacement of workers.

二、严禁各类强迫劳动

II. Strict Prohibition on All Forms of Forced Labor

1、不得扣押员工身份证件，不得收取入职押金、保证金，不得设置障碍限制员工依法离职。
1. Suppliers shall not withhold employees' identity documents, collect onboarding deposits or security deposits, or impose obstacles that restrict employees from lawfully terminating their employment.
2、禁止拘禁用工、抵债用工、监狱代工、胁迫劳动等非自愿用工行为。
2. Suppliers shall prohibit involuntary labor practices such as confinement, debt-for-labor arrangements, prison labor, and coerced labor.
3、不得以罚款、停岗、克扣薪酬、威胁恐吓等方式强制员工加班、带病作业、违章冒险作业。
3. Suppliers shall not force employees to work overtime, work while ill or perform unsafe operations by means such as fines, suspension from work, wage deductions, threats or intimidation.

三、严禁歧视、人身侵害、职场骚扰与打击报复行为

III. Strict Prohibition on Discrimination, Personal Abuse, Workplace Harassment, and Retaliation

1、不得基于性别、年龄、民族、籍贯、婚育状况、残疾等因素，在招聘、定薪、晋升实施差别化歧视对待。
1. Suppliers shall not discriminate against employees in recruitment, remuneration determination or promotion on the grounds of gender, age, ethnicity, place of origin, marital or parental status, disability or other factors.
2、禁止体罚、辱骂、非法搜身、职场霸凌、性骚扰等损害员工人格与人身安全的行为。
2. Suppliers shall prohibit corporal punishment, verbal abuse, illegal body searches, workplace bullying, sexual harassment, and other acts that harm employees' dignity and personal safety.
3、禁止私装设备偷拍员工隐私区域，不得打击报复提出申诉、举报的员工。
3. Suppliers shall prohibit the unauthorized installation of devices to secretly record employees' private parts, and never retaliate against employees who file complaints or reports.

四、严禁薪酬、工时、社会保障违法违规

IV. Strict Prohibition on Violations Regarding Compensation, Working Hours, and Social Security

1、支付员工工资标准不得低于项目所在地法定最低工资标准，工资应及时、足额支付，严禁无故拖欠或克扣薪酬。除上述红线要求外，供应商应按照《供应商社会责任行为准则》关注生活工资理念及员工基本生活需要，结合经营所在地生活成本、行业工资水平等因素持续改善薪酬福利保障。

1. Suppliers shall pay employees no less than the statutory minimum wage applicable at the project location and shall pay wages fully and on time, without unjustified delay or deduction. In addition to the foregoing Red Line requirements, suppliers shall, in accordance with the Supplier Social Responsibility Code of Conduct, take into account the concept of a living wage and employees' basic living needs and continuously improve compensation and benefits with reference to local living costs and industry wage levels.

2、严格遵守法定工时与加班管理要求，加班费依法核算，杜绝长期超时加班、篡改考勤记录。

2. Suppliers shall strictly comply with statutory working hour and overtime management requirements, calculate overtime pay by law, and eliminate long-term excessive overtime and the tampering of attendance records.

3、依法签订劳动合同、足额缴纳社会保险，不得以业务外包、劳务派遣方式规避法定用工责任。

3. Suppliers shall execute employment contracts in accordance with applicable laws, pay social insurance contributions in full, and never evade statutory employment responsibilities through business outsourcing or labor dispatch.

五、严禁违法违规排放及危险废弃物不合规处置

V. Strict Prohibition on Illegal Emissions and Non-compliant Disposal of Hazardous Waste

1、生产产生的废水、废气、废渣必须经处理达标后方可排放，禁止直排、偷排、私设暗管排污。

1. Suppliers shall ensure that wastewater, waste gas and solid waste generated during production are treated to meet applicable standards before discharge, and strictly prohibit direct discharge, illegal discharge, and the installation of concealed discharge pipes.

2、严禁干扰、关停环保在线监测设备，篡改监测数据，防范受到生态环境主管部门行政处罚。

2. Suppliers shall strictly prohibit the interference with or shutdown of online environmental monitoring equipment, as well as the tampering with monitoring data, so as to prevent administrative penalties imposed by ecological and environmental authorities.

3、危险化学品、危险废物分区规范存放、建立完整台账，委托具备相应资质单位处置。

3. Suppliers shall store hazardous chemicals and hazardous waste separately in designated areas, maintain complete records, and entrust appropriate qualified entities for waste disposal, in accordance with applicable laws and regulations.

4、落实 RoHS 管控及烽火绿色采购要求，禁止交付有害物质超标的产品。

4. Suppliers shall implement RoHS compliance measures and meet FiberHome's green procurement requirements, and prohibit the delivery of products containing harmful substances exceeding applicable limits.

六、严禁商业贿赂、弄虚作假、商业欺诈及洗钱行为

VI. Strict Prohibition on Commercial Bribery, Fraud, Commercial Deception, and Money Laundering

1、禁止向烽火通信工作人员及其关联方实施任何形式利益输送，包括回扣、礼金、礼品、宴请、旅游安排等。
1. Suppliers shall never provide any form of improper benefits to FiberHome's employees or related parties, including kickbacks, cash gifts, gifts, banquets or travel arrangements.
2、不得围标串标，严禁资质、检测报告、物料溯源文件、业绩材料造假。
2. Suppliers shall not engage in bid rigging, bidding collusion, or the falsification of qualifications, test reports, material traceability documents, or performance records.
3、禁止以次充好、偷减工艺标准、虚假履约等商业欺诈行为。
3. Suppliers shall prohibit commercial fraud, such as passing off inferior products as superior ones, cutting corners on process standards, or failing to fulfill contractual obligations.
4、严禁擅自泄露烽火技术图纸、涉密信息、商业秘密，不得从事洗钱、违规贸易等违法活动。
4. Suppliers shall strictly prohibit the unauthorized disclosure of FiberHome's technical drawings, confidential information or trade secrets, and never engage in illegal activities such as money laundering or non-compliant trade.

七、严禁将相关人员置于具备致死、重伤风险的作业环境

VII. Strict Prohibition on Exposing Personnel to Working Environments with Risks of Fatality or Serious Injury

1、作业场所配齐安全防护设施、劳动防护用品、安全警示标识，杜绝无防护开展高风险作业。
1. Suppliers shall ensure that work sites are fully equipped with safety protection facilities, personal protective equipment, and safety warning signs, and eliminate the performance of high-risk operations without proper protection.
2、有限空间、高空、动火、带电、危化品作业严格执行作业审批、现场监护、持证上岗制度。
2. Suppliers shall ensure that strict work approval procedures, on-site supervision requirements and certified personnel systems are implemented for confined space operations, work at height, hot work, live electrical work and hazardous chemical operations.
3、管控粉尘、噪声、有毒有害气体等职业危害，防范急性中毒、重伤、职业病事故。
3. Suppliers shall control occupational hazards such as dust, noise and toxic or hazardous gases, and prevent incidents involving acute poisoning, serious injuries and occupational diseases.

八、杜绝发生重大火灾、爆炸类安全生产责任事故

VIII. Elimination of Major Work Safety Accidents Involving Fire or Explosion

1、厂区、仓库、机房、工地消防通道、安全出口保持畅通，消防设施完好可用。
1. Suppliers shall ensure that fire lanes and emergency exits in factory premises, warehouses, equipment rooms, and construction sites remain unobstructed, and that firefighting equipment is in good working condition.
2、严禁违规动火、违规用电、违规存储易燃易爆物品。
2. Suppliers shall strictly prohibit unauthorized hot work, unauthorized use of electricity, and unauthorized storage of flammable and explosive materials.
3、防范发生火灾、爆炸、危化品泄漏、特种设备失效等一般及以上安全生产事故。
3. Suppliers shall prevent general and higher-level work safety accidents, such as fires, explosions, hazardous chemical leaks, and failures of special equipment.

九、杜绝发生非正常死亡、群体性事件、公共卫生恶性事件

IX. Elimination of Unnatural Deaths, Mass Incidents, and Serious Public Health Incidents

1、防范在生产、生活区域发生员工非正常死亡、猝死、重大人身伤害事故。
1. Suppliers shall prevent incidents such as abnormal deaths, sudden deaths, and major personal injury accidents involving employees in production and living areas.
2、严防集体食物中毒、聚集性传染病、群体性工伤事件。
2. Suppliers shall strictly prevent collective food poisoning, cluster outbreaks of infectious diseases, and mass work-related injury incidents.
3、供应商应建立依法合规的劳资沟通和申诉处理机制，及时、妥善处理集体劳动争议；不得干涉员工依法享有的结社、集体协商及其他合法权利，不得对提出申诉、举报或参与合法活动的员工实施打击报复。
3. Suppliers shall establish lawful labor communication and grievance-handling mechanisms and address collective labor disputes in a timely and appropriate manner. Suppliers shall not interfere with employees' lawful rights to freedom of association, collective bargaining or other lawful activities and shall not retaliate against employees who raise grievances, submit reports or participate in lawful activities.

十、杜绝引发严重损害烽火品牌声誉的重大负面事件

X. Elimination of Major Negative Incidents that Seriously Damage FiberHome's Brand Reputation

1、不得发生重大违法违规、违背公序良俗的恶性经营及用工事件。
1. Suppliers shall not be involved in any serious violations of laws and regulations or malicious business or labor practices that contravene public order and good morals.
2、杜绝因安全、环保、劳工、廉洁、质量问题引发社会媒体曝光、全网负面舆情。

2. Suppliers shall prevent social media exposure and widespread negative public sentiment arising from issues relating to safety, environmental protection, labor, integrity or quality.
3、禁止发生损害烽火通信央企形象、客户合作关系、跨国供应链合规声誉的重大不良事件。
3. Suppliers shall prevent any major adverse incidents that could damage the image of FiberHome as a central state-owned enterprise, its customer relationships, or its reputation for compliance within the global supply chain.

执行与监督

Implementation and Oversight

供应商应将本红线要求传达至其管理人员、相关岗位员工及上游供应链，并建立相应的内部培训和沟通机制。烽火通信可根据供应商类型、所在地区、风险水平和合作重要性，对关键供应商、高风险供应商及其他适用供应商开展红线要求及劳工标准相关培训与能力建设，并通过培训记录、测试或反馈、审核结果及整改情况等适当方式评价培训效果。
Suppliers shall communicate the Red Lines to their management, employees in relevant positions and upstream supply chains and establish appropriate internal training and communication mechanisms. Based on supplier type, location, risk level and business importance, FiberHome may provide training and capacity building on the Red Lines and labor standards for key suppliers, high-risk suppliers and other applicable suppliers and may evaluate training effectiveness through appropriate measures such as training records, tests or feedback, audit results and corrective action status.
烽火通信将红线遵守情况和劳工管理表现作为供应商准入、选择、绩效评估，以及合同签订或续约、订单或采购份额分配和持续合作管理的适用考虑因素，并根据供应商类型、所在国家或地区、业务范围、合作重要性和风险水平，通过问卷调查、文件审查、现场审核或符合适用法律法规要求的独立第三方评估等方式开展风险分级监督；必要时，相关要求可延伸至供应商上游供应链。公司留存审核报告、不符合项、整改计划及复核验证记录等适当证据。
FiberHome considers compliance with the Red Lines and labor management performance, as applicable, in supplier onboarding, selection and performance evaluation, as well as decisions on contract award or renewal, order or procurement-share allocation and ongoing cooperation. Based on supplier type, country or region, business scope, business importance and risk level, FiberHome conducts risk-based oversight through questionnaires, document reviews, on-site audits or independent third-party assessments that comply with applicable laws and regulations. Where necessary, relevant requirements may extend to upstream supply chains. Appropriate evidence is retained, including audit reports, non-conformity records, corrective action plans and follow-up verification records.
对于发现的问题，供应商应分析根本原因并制定纠正和整改行动计划，明确整改措施、责任主体、完成期限及验证方式，并配合烽火通信开展文件复核、现场复审或其他适当形式的跟踪验证；对未按要求整改、重复违规或存在重大风险的供应商，公司按照本红线规定实施升级处置。供应商及其员工可通过《供应商社会责任行为准则》所列申诉与举报渠道反映相关问题，烽火通信按照受理、调查、反馈、整改和闭环程序处理，保护举报人的身份和隐私并禁止打击报复。公司根据适用的信息披露要求，以汇总方式披露违规事件数量和类型、涉及供应商情况、整改状态及完成情况。
For identified issues, suppliers shall analyze root causes and develop corrective action plans specifying corrective measures, responsible parties, completion deadlines and verification methods and cooperate with FiberHome’s document review, follow-up on-site audits or other appropriate verification.

FiberHome applies escalated measures under the Red Lines where corrective actions are not completed as required, violations recur or material risks exist. Suppliers and their employees may report relevant concerns through the grievance and reporting channels set out in the Supplier Social Responsibility Code of Conduct. FiberHome handles cases through intake, investigation, feedback, remediation and closure procedures, protects the identity and privacy of reporters and prohibits retaliation. In accordance with applicable disclosure requirements, FiberHome discloses aggregated information on the number and types of non-compliance incidents, suppliers involved, corrective action status and completion.