



海尔智家生态平台

吹哨人管理规范

Haier Smart Home ECO-Platform

Whistle Blower Policy

November 2021

2021 年 11 月

I. Introduction

政策背景

The purpose of this Policy is to set out how suspected instances of misconduct or wrongdoing can be reported and how those reports will be processed by Haier Smart Home Co. Ltd. and its subsidiaries (“Company” hereinafter).

为明确海尔智家生态平台及其子公司（以下简称“公司”）如何报告可疑的不当行为或违法行为，以及如何处理报告事件，特制定本规范。

The Company is committed to the highest standards of conduct and ethical behavior and encourages the disclosure of matters involving breach of the Company’s Code of Conduct (appended hereto) or any misconduct or wrongdoing.

公司致力于遵守最高的行为标准和道德准则，并鼓励披露涉及违反公司行为准则的事项（见附件）以及任何不当行为或违法行为。

The Company operates in multiple countries and is subject to applicable local laws and regulations. The Company will comply with its obligations relating to protection of whistle blower under these laws and regulations. If any local laws and regulations are inconsistent with this policy or impose a higher level of protection than this policy, those local laws and regulations take precedence in that jurisdiction to the extent of the inconsistency.

公司业务涉及诸多国家，需遵守各国所适用的当地法律法规。公司将遵守法律法规所规定的保护举报人的义务。如果任何国家的法律法规与本政策存在不一致，或规定比本政策更高的保护级别，针对规定不一致的部分，当地法律法规在该司法管辖区内优先适用。

II. Our Commitment

我们的承诺

The Company encourages an employee to speak up and report activity or behavior that doesn’t seem right. There are multiple channels available to employees to report concerns either directly or anonymously. We take each of these concerns seriously and we ensure they are thoroughly investigated. We will not tolerate retaliation against any employee who reports misconduct or wrongdoing – regardless of the outcome of the investigation.

公司鼓励员工大胆直言并报告看似不正确的活动或行为。员工可使用多种渠道直接或以匿名的方式报告问题。我们会认真对待每一个问题，并且保证对问题进行调查。无论调查结果如何，我们绝不容忍对披露不当行为的员工实施报复。

We will also support external parties to report any suspected instances of misconduct or wrongdoing by employees.

我们同样对外部各方举报公司员工的任何不当行为或违法行为提供支持。

We will, when necessary and appropriate, report certain misconduct or wrongdoing to the

local police or other relevant government authorities.

在必要及适当的情况下，我们将向当地警方或有关政府当局举报某些不当或违法行为。

III. Report Procedure

报告程序

When making a report of suspected misconduct or wrongdoing, an employee shall be expected to have reasonable grounds to believe that the information(s) he discloses concerns misconduct or wrongdoing. An employee will not be penalized if the information turns out to be incorrect.

在报告涉嫌不当行为或违法行为时，员工应有合理的理由怀疑其披露的信息与不当或违法行为有关。如果该信息经调查发现不正确，员工不会因此受到处罚。

However, an employee must not make a report (s)he knows to be untrue or misleading or make a report under malicious intent. If an employee knowingly make such report, his(her) action may constitute a breach of the Code of Conduct and result in disciplinary action.

但是，员工不得在明知错误或存在误导信息的情况下进行投诉或举报。如果员工在知情的情况下做出虚假报告，其行为可能构成违反员工行为准则并导致纪律处分。

If an employee wishes to report any suspected instance of misconduct or wrongdoing, (s)he can do so by reporting the matter to one of the following channels:

员工可以通过以下渠道举报任何可疑的不当行为或违法行为：

1. His or her line manager;

直线经理；

In some instance an employee may reasonably make the judgment that the matter to be reported can be competently handled by his or her line manager. He or she may in these types of matters report the matter to his or her line manager. If he or she finds the result of the report-processing unsatisfactory, (s)he may explore further options described below in option 2 or 3.

如果员工可以合理地判断要报告的事项可以由其直线经理妥善处理，这种情况下，员工可以向其直线经理报告。如果员工认为报告处理的结果不满意，可以通过以下第 2 或 3 中所述的途径进行报告。

2. Haier Smart Home compliance email: 690legal@haier.com;

海尔智家合规邮箱: 690legal@haier.com

The Haier Smart Home compliance email is managed by compliance team in legal department. Reports received by the email box will be handled in a confidential and discreet manner by internal control professionals.

海尔智家合规邮箱由法务部合规团队管理。通过该邮箱收到的报告将以保密和谨慎的方式交由内控专业人士进行处理。

3. Haier Smart Home compliance hotline:

海尔智家合规热线:

Chinese website (中文网页):

<https://www.haierchina.ethicspoint.com>

English website (英文网页):

<https://secure.ethicspoint.eu/domain/media/en/gui/102394/index.html>

The Haier Smart Home Compliance Hotline is managed by NAVEX Global, an independent third party, on behalf of the Company. An employee may report suspected instances of misconduct or wrongdoing by accessing the website of Haier Compliance Hotline.

海尔智家合规热线由独立第三方 NAVEX Global 代表公司进行管理。员工可通过访问海尔合规热线网站报告可疑的不当行为或违法行为。

If an employee contact Haier Smart Home Compliance Hotline (s)he will be issued with a confidential number. **No personal details about an employee will be recorded.** After receiving the report, NAVEX Global (i.e. the hotline system) will automatically send an email to the Haier department responsible for monitoring and receipt of complaints from the complaint hotline, which is currently RICA. RICA will review the report and decide to open a case investigation or not. For incidents related to the Italian Decree 231, RICA will transfer to local supervisory body for further action.

如果通过海尔智家合规热线进行报告，举报人将得到一个保密号码。**合规热线不会记录举报人的个人信息。**收到报告后，NAVEX Global（即合规热线）将自动向风控内审团队发送电子邮件。风控内审团队审查并决定是否启动内部立案调查。对于涉及意大利 231 法案规定的相关事件，风控内审将移交当地监管机构采取进一步措施。

IV. Investigation Procedure

调查程序

Appropriately skilled and experienced personnel will conduct the investigation. If the incident involves legal, human resource, financial or other professional fields, appropriately skilled and experienced personnel from relevant departments will participate in the investigation together.

内部调查将由具有适当调查技能和经验的专业人员进行。如果事件涉及法律、人力、财务等专业领域，相关部门的专业人员将一同参与调查。

Following the investigation, the investigator will inform the whistleblower of the results of the investigation and any corrective actions taken. The investigator will inform Human Resource and General Counsel if the results of their investigation conclude that the Company should pursue disciplinary, civil or criminal action.

调查结束后，调查员将告知举报人调查结果和所采取的改正措施。如果调查结果表

明公司应采取纪律处分、或提起民事或刑事诉讼，调查员将通知人力资源部和公司总法律顾问。

The Company is committed to ensuring confidentiality in respect of all matters raised under this policy, and those who make a report under this Policy will be treated fairly with reasonable grounds, and free from any retaliation.

公司承诺对于本规范项下提出的所有报告予以保密，并根据本规范以合理的方式公平对待报告的员工，使其不受任何报复。

The Company will take all reasonable steps to protect a whistleblower against adverse employment actions, such as termination, demotion, harassment or other forms of discrimination as a result of making a report under this Policy.

公司将采取一切合理措施保护举报人免受因为根据本政策进行举报而产生的不利雇佣行为，如解雇、降职、骚扰或其他形式的歧视。

Except in circumstances where it is necessary to reveal the whistleblower identity for the purpose of the investigation (for example, as required by local laws), the Company will take all reasonable steps to protect the anonymity of the whistle blower, unless he or she consents in writing for the disclosure of his or her identity. In those limited exceptions, Company shall strive to limit the scope of the disclosure.

除非举报人书面同意，公司将采取一切合理措施保护举报人身份的匿名性。但是，因为调查的目的或者当地法律要求需要披露其身份的，在有限的例外情况下，公司也将严格限制披露的范围。

Employees involved in any investigation shall be treated fairly. Company shall ensure that they do not suffer from any discrimination.

参与被调查的员工应受到公平对待。公司应确保其不受任何歧视。

In case of conflicts or inconsistency between the investigation procedures required by local laws and this policy, local legal counsel can formulate detailed implementation rules in accordance with local laws. The implementation rules should be approved or confirmed by headquarters' legal department.

由于当地法律要求的调查程序与本规范存在冲突或不一致的，当地法务可以依据本规范制定符合当地法律的“实施细则”。“实施细则”须经公司总部法务审批或确认。

V. **Disciplinary Action**

纪律处分

If a claim of misconduct or wrongdoing is substantiated, Company will take appropriate disciplinary action against any responsible person, up to and including termination of employment.

如果指控的不当行为或违法行为被证实，公司将对相关责任人采取适当的纪律处分，直至采取包括终止雇佣关系等措施。

VI. Roles and Responsibilities

职责

The legal/compliance team of the company is responsible for drafting and issuing this policy. It is entitled to revise, replace and revoke this policy.

公司法务合规团队负责本规范的起草和发布。法务合规团队有权对本规范进行修订、更替及撤销。

The Haier Smart Home compliance hotline referred to in this policy is selected, engaged by legal/compliance team. Risk& Internal Control and Audit team is responsible for receiving and monitoring information from the hotline.

本规范所指的海尔智家合规热线由法务合规团队进行遴选、引入。风控内审团队负责接收和跟踪合规热线收到的信息。

Appendix Haier Group Code of Conduct

附件 海尔集团行为规范



Haier Group Code
of Conduct.pdf