

EMPLOYEE CODE OF BUSINESS CONDUCT

员工职业操守行为准则

Dear Factory Management,
致厂方代表，

Sears Holdings Management Corporation and Sears Holdings Global Sourcing Ltd (SHGS) have implemented a strict 'Code of Business Conduct' for our employees in which prohibit the acceptance of gifts, payment, or benefit of any kind. This Code of Business Conduct letter is presented to all factory management to explain the expectations we have for our own employees as well as factory employees during our visit. I kindly ask that you read this, understand it, sign it, and follow it:

Sears Holdings Management Corporation 及 Sears Holdings Global Sourcing Ltd (SHGS) 执行严格的“员工职业操守行为准则”，决不允许员工收取厂方礼物，红包或任何形式的利益。我们特向厂方传达此份“员工职业操守行为准则”，以明确我们在工厂工作过程中对 SHGS 员工和厂方人员的期望和要求。我们希望厂方认真阅读，理解，签署并且遵从这份准则。

- Bribe requests:** never under any circumstances give in to demands or requests for benefits or payments from a SHGS employee. If a SHGS employee requests or solicits for any direct or indirect benefit or payment we expect you to contact us immediately.
员工索取利益：任何情况下都不可屈从于 SHGS 员工有关利益或金钱方面的索求。如果 SHGS 员工索取任何直接或间接的利益或金钱，我们希望厂方立刻跟我们联系。
- Bribe offers:** never, under any circumstances offer a payment, bribe, gift or benefit to any SHGS employee. Any benefit given or offered to a SHGS employee will be considered as a corrupt practice and will be reported to us within 24 hours.
工厂给付：任何情况下厂方都不可给付红包，礼物或其他利益给 SHGS 员工。对 SHGS 员工给付任何利益都将被认定是贿赂行为，并会在 24 小时内报告给我们。
- Undue pressure:** do not put any pressure on our employees to execute their work in a subjective way or to amend their findings. Furthermore, do not directly seek out our employees outside of the visit time period, for example, at their homes, hotel, etc. for any reason.
不合理的要求：不要以任何方式给员工施加压力，干预他们的工作或者要求他们修改工作报告。工作过程以外的时间请不要以任何理由在诸如他们的家里，酒店等地方直接会见员工。
- Work environment:** please create an environment where employees can work freely & constructively in a way that allows them to do their job properly, timely, and in such a way that SHGS's expectations can be met.
工作环境：请提供员工良好合理的工作环境，以使员工的工作能够适当，及时地完成并达到 SHGS 的要求。
- Meal:** SHGS employees should not take meal at an outdoor restaurant with factory management.
用餐：SHGS 员工不得在工厂以外的餐厅跟厂方代表共进用餐。
- Rides:** SHGS employees may only accept rides under unique circumstances where alternative transportation is not available.
交通：SHGS 员工可在没有其他交通工具可供选择的情况下接受工厂的接送。

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If you are in doubt about the professionalism or conduct of any SHGS employee, please contact us immediately and we will objectively investigate your complaint.

如果你们对 SHGS 员工的工作行为存有任何疑问，请马上跟我们联系，我们将客观地调查你们的投诉。

Many thanks in advance for your co-operation.

多谢合作。

Joseph Wong
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Global Compliance Department
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全球供应商审核部

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Email: Joseph.Wong@searshc.com

Factory representative acknowledged:

厂方代表签署及盖厂印章

Signature & Factory Stamp

Date 日期

Factory Name 工厂名字:

Name of Factory Representative 工厂代表人姓名:

Job title/department 职位/部门:

Name of SHGS Employee(s):

SHGS 员工签署

Signature

Date 日期