

**GROBEST 全興國際**  
**Suppliers Code of Conduct 供應商行為準則**

**Introduction 前言**

Grobest Group Limited and its subsidiaries (hereinafter referred to as “Grobest”) are built on a foundation of fairness, honesty, and integrity. We strive to preserve the foundation by bringing these to our everyday business practices, including respect for human rights and commitment to safe, responsible and sustainable growth. This Supplier Code of Conduct (hereinafter referred to as the “Code”) is based on the standards created by the International Labour Organization, the United Nations Guiding Principles on Business and Human Rights, and the UK Modern Slavery Act 2015.

全興國際控股股份有限公司與其子公司(以下稱“全興國際”)建立在公平、誠實和正直的理念基礎上。我們致力於將這些原則融入在日常商業實踐中以維護該基礎，包括尊重人權和對安全、負責任以及可持續發展的承諾。本供應商行為準則(以下稱“準則”)以國際勞工組織制定的相關標準、《聯合國工商業與人權指導原則》和英國《現代奴隸制法案 2015》為基準。

Grobest intends to work only with reputable suppliers, who share our commitment to operate ethically, in compliance with all applicable laws, and in conformance with the standards outlined in this Code. This Code explains how we expect all of our business suppliers to operate. Failure to meet that obligation can lead to termination of a Partner’s contract.

全興國際期望僅與信譽良好的供應商建立合作，共同在營運中恪守商業道德，遵守所有適用法律，並符合本準則所概述的標準。本準則闡述了我們對所有供應商的運作期望，若未能符合相關義務，全興國際得終止供應商合約。

**Scope 範圍**

**Suppliers** in this Code refer to all suppliers, including but not limited to ingredient manufacturers with whom Grobest contracts.

本準則所稱之供應商，係指所有供應商，包括但不限於與全興國際簽訂契約之原材料製造商。

Some requirements in this Code only apply to raw material suppliers. Raw Materials refer to marine ingredients, plant ingredients, feed stuff (e.g., land animals, algae, insect), feed additives (i.e., premixes, vitamins, minerals, trace elements and colourants) and packaging materials.

本準則中的部分要求僅適用於原材料供應商。原材料係指海洋成分、植物成分、飼料原料(例如：陸地動物、藻類、昆蟲)、飼料添加劑(即預混料、維生素、礦物質、微量元素和著色劑)和包裝材料。

The Code may be adapted to the complexity of the contract, but all of Grobest’s suppliers are expected to operate in accordance with applicable local and international laws, regulations and standards regarding human rights.

本準則可根據契約複雜程度進行調整，但全興國際期望所有供應商均遵循根據與人權相關的本地和國際適用法律、法規和標準。

**Standards of Conduct 行為標準**

**1 Comply with Law and Code 遵守法律和準則**

Grobest expects its suppliers to operate in accordance with the principles in this Code and to comply with all applicable laws and regulations that govern their business activities.

全興國際期望供應商根據本準則的原則，並遵守所有適用於其商業活動的法律和法規。

Suppliers should also work with their own suppliers to promote business conduct consistent with the principles in this Code.

同時，全興國際期望供應商與其自身供應商合作，共同推動與本準則原則一致的商業行為。

**2 Anti-corruption and Business Ethics 反腐敗與商業道德**

Suppliers or any parties on behalf of them may not offer or accept any bribes, kickbacks, advantages or other corrupt practices in conducting business. Suppliers should comply with relevant laws, regulations and applicable provisions, specifically international anti-corruption standards, including those stated in the UN Global Compact, international and local anti-corruption and bribery laws. Suppliers should avoid any conflict of interest relating to financial interests or other arrangements with Grobest employees that may be considered a bribe or otherwise inappropriate.

供應商或代表供應商的任何一方不得在從事商業活動的過程中提供或接受任何賄賂、回扣、好處或任何其他腐敗行為。供應商應遵守相關法律、法規和適用的規定，尤其是國際反腐敗標準，包括聯合國全球契約和國際及當地的反腐敗和反賄賂法律中載明的標準。供應商應避免在涉及財務利益或任何其他安排方面與全興國際的員工發生可能被視為賄賂或不當行為的利益衝突。

**3 Records, Information and Data Protection 記錄、資訊以及資料保護**

Suppliers should maintain genuine and honest books and records that reflect all transactions in an accurate and timely manner. Information (including personal data) is an important business asset that must be protected to avoid unwanted disclosure that may harm Grobest business operations, our brand and stakeholders. Suppliers are responsible for safeguarding against abuse or misuse of such information and should not disclose any confidential information to external parties outside Grobest without Grobest’s permission.

供應商應保有真實誠信的帳簿和記錄，準確、及時地反映所有交易。資訊(包括個人資料)係重要商業資產，應予以保護，以避免不必要的揭露損害全興國際的業務營運、品牌以及利益相關者。供應商有責任保護該等資訊免於濫用或誤用，且未經全興國際的允許，不得向全興國際以外的外部方披露任何機密資訊。

**4 Labour Rights 勞動權利**

4.1 Child labour should not be used, supported or permitted. While the term “child” is ultimately defined by local law, no suppliers may employ any individual under the age of fifteen. Individuals under the age of eighteen may not be employed to perform hazardous or harmful tasks.

不得使用、支援或默許兒童作為工人。「兒童」一詞最終由當地法律界定，但任何供應商不得僱傭十五歲以下的個人，未滿十八歲的人不得從事危險性或有害性之工作。

- 4.2 Any form of forced labour is strictly forbidden. This includes, but is not limited to:  
嚴禁任何形式的強迫勞動，包括但不限於：
- a. Involuntary prison labour or any form of bonded labour should not be used under any circumstances.  
不得在任何情況下使用非自願的奴役勞動或任何形式的抵債勞動。
  - b. Workers should not be required to pay hiring-related fees to employers, agents or labour brokers outside legally allowed fees. All fees charged to workers must be disclosed in advance and documented in a language that the workers understand.  
除法律允許的費用外，雇主、代理或勞務仲介不得要求工人支付任何與僱傭相關的費用，所有向工人收取的費用須提前予以揭露，並使用工人可理解的語言進行記錄。
  - c. Workers should not be required to hand over government issued identification papers, passports or work permits as a condition of employment.  
不得要求交出或扣留工人任何原始身份證明檔、護照或工作許可證等作為僱傭條件。
  - d. Workers are free to leave upon delivery of reasonable notice.  
工人發出合理通知後，可自由離職。
  - e. Workers should not be kept involuntarily in the workplace outside of a work shift.  
不得在工作班次結束後，強制要求勞工繼續留在工作場所。
  - f. Workers should not be required to reside in employer-operated accommodation as a condition of employment for non-remote, readily accessible, operations.  
不得強制要求工人居住在雇主提供的住所，除非工作地點偏遠或難以到達。
  - g. Workers are allowed to freely move around the workplace in order to use sanitary facilities and have access to potable drinking water during their work shift.  
允許工人在其工作班次期間在工作場所自由走動，以使用衛生設施和獲取飲用水。
- 4.3 Suppliers are to respect the rights of workers to associate freely, including to join (or not to join) a labour union as any individual worker sees fit.  
供應商應尊重工人自由結社的權利，包括按照工人個人意願選擇加入(或不加入)工會的權利。
- 4.4 Discrimination or harassment on the basis of race, color, caste, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status will not be tolerated.  
不容忍基於種族、膚色、種姓、年齡、性別、性取向、民族、身心障礙、宗教、政治立場、工會會員資格或婚姻狀態的歧視或騷擾行為。
- 4.5 Suppliers are to contract with workers in a transparent manner and to compensate workers competitively relative to the industry and local labour market, in accordance with the terms of applicable collective bargaining agreements (if any), and in compliance with both the letter and spirit of local wage laws. Suppliers should have disciplinary practices that respect dignity and health of the workers and should not make deductions as a form of discipline. Any other deductions (e.g., for lodging, uniforms or supplies) must be made with the express consent of the worker unless required by law. Under no circumstances may a deduction bring the worker's take home pay below what is mandated by law and necessary to meet a worker's basic needs and to provide some discretionary income for the worker.  
供應商將以透明的方式與工人簽訂合同，並根據適用的集體協商協議(如有)的條款，遵守當地工資法規的條文和精神前提下，提供工人在行業內及當地勞務市場上具有競爭力的報酬。供應商應制定尊重工人尊嚴和健康的紀律措施，且不得以扣減工資作為紀律處分的形式，除非法律要求，任何其他工資扣減(如住宿、制服或物資)均須獲得工人的明確同意。在任何情況下，不得因扣減工資導致工人的實際工資低於法律規定、可滿足工人基本需求並提供一定的可支配收入。
- 4.6 Working hours must comply with all national laws and industry standards. Overtime work must be voluntary and compensated as required by relevant laws.  
工作時間須符合所有國家法律和行業標準，加班須採取自願原則，且應根據相關法律要求予以補償。
- 4.7 Harsh and inhumane treatment is strictly forbidden. This means physical abuse or discipline (or threat thereof), verbal abuse, sexual or other harassment are not permitted and will not be tolerated.  
嚴禁粗暴及不人道待遇，不允許且不容忍身體虐待、懲戒(或人身威脅)、言語霸凌、性騷擾或其他騷擾行為。
- 4.8 Suppliers should have a grievance mechanism accessible and applicable to all workers, including requirements for non-retaliation.  
供應商應制定適用於全體工人且可使用的申訴機制，包括不得報復的要求。
- 4.9 Suppliers must provide a safe and hygienic working environment and worker accommodation (where this is provided by Suppliers). Where the workplace is not readily accessible and public transportation is not available, Suppliers should offer workers reasonable and safe transportation to leave the premises.  
供應商須提供安全和衛生的工作環境和工人宿舍(如供應商提供)，如工作場所交通不便，且沒有可使用的公共交通工具，供應商應為工人提供合理且安全的交通工具以離開工作場所。
- 4.10 Respect for indigenous and tribal people's rights - where applicable, Suppliers should proactively engage with the local indigenous and tribal people to periodically identify, avoid or mitigate significant negative social impacts resulting from activities of the Suppliers, including an effective grievance procedure accessible and applicable to the indigenous and tribal people.  
尊重原住民和部落人民的權利-在適用的情況下，供應商與當地原住民和部落人民主動接觸，定期確定、避免或減輕因供應商的活動而導致的重大負面社會影響，包括提供適用於原住民和部落人民有效可行的申訴程序。

## 5 Environment 環境

Suppliers should comply with relevant environmental laws and regulations. Resources should be used in an efficient and sustainable way, and Suppliers should strive to minimize their greenhouse gas emissions and other negative impacts on biodiversity, water, energy use, and the environment. Suppliers should implement a systematic approach to identify, monitor, control, treat and dispose of waste

and effluents responsibly, with particular care taken for waste that contains substances known to be hazardous to people and the environment.

供應商應遵守相關的環境法律和法規，以高效且可持續的方式使用資源，與此同時，供應商應努力減少其溫室氣體排放以及其他對生物多樣性、水資源、能源利用和環境產生的負面影響。供應商有責任實行系統化方法以識別、監測、控制、處理和處置廢棄物和廢水，特別需謹慎處理含有已知危害人體與環境物質的廢棄物。

#### 6 Product Safety and Quality (this section is applicable only to raw material suppliers) 產品安全與品質

Suppliers are expected to operate an effective quality system based on Hazard Analysis Critical Control Points (HACCP) principles. For products that lay claim to any certifications or identity preserved schemes, integrity of the certification should be maintained throughout the supply chain until delivery to Grobest. Suppliers should put in place procedures to ensure that products that are manufactured for and/or delivered to Grobest:

全興國際期望原材料供應商以《危害分析與關鍵控制點(HACCP)體系認證實施規則》為基礎，運行有效的品質體系，對於聲稱具有任何驗證或身份標章驗證的產品，應在整個供應鏈中保持其驗證的完整性，直至交付給全興國際。供應商應制定程序，以確保為全興國際製造和/或交付的產品：

- a. Comply with all applicable national and international legislation as well as regulatory guidelines of the destined country(ies) in relation to feed industry standards, safety regulations, packaging labelling and quality assurance systems.  
遵守所有適用的國家和國際法規，以及目的地國家就飼料行業標準、安全規定、包裝標籤以及品質保證體系有關的監管準則。
- b. Follow applicable requirements set by Grobest, depending on destined plant's certification requirements such as requirements stated in ISO 22000/ HACCP, BAP, etc.  
遵守全興國際根據目的地工廠之認證(如 ISO 22000、HACCP 或 BAP 等標準之規定)所制定之適用要求。
- c. Comply with the agreed product specifications and provide the necessary analysis report for each product delivery.  
符合一致同意的產品規格，並為每次的產品交付提供必要的分析報告。
- d. Fall within shelf life and be suitable and safe for its intended use.  
在保存期限內，對於其預期用途是合適且安全的。
- e. They are free from biological, chemical and physical contamination.  
無生物性、化學性及物理性污染。

#### 7 Traceability (this section is applicable only to raw material suppliers) (可追溯性)

Suppliers are expected to implement traceability systems that enable the products sold to Grobest to be traced back to the country of origin and manufacturer for each delivery. A defined traceability system is required to identify Grobest-qualified products and distinguish them from non-matching products.

全興國際期望供應商實施追溯體系，確保每批交付給全興國際的產品均可追溯其原產國和製造商，明確的追溯系統，以區分符合全興國際資格要求的產品與不符合的產品。

#### 8 Sustainable Sourcing of Marine Products 海洋產品的可持續採購

- a. **Scope:** This section applies to all suppliers of marine products used in our supply chain including traders, agents or processors.  
**範圍：**本節適用於我們供應鏈中所有海洋產品的供應商，包括貿易商、代理或加工商。
- b. **Certification:** Grobest supports and promotes the principles of the Food and Agriculture Organization (FAO) Code of Conduct for Responsible Fisheries. Hence, Grobest encourages suppliers to obtain recognized third-party certifications from MarinTrust (formerly known as International Fishmeal & Fish Oil Organization IFFO RS), Marine Stewardship Council (MSC) and Friend of the Sea (FOS) that demonstrate compliance with the criteria specified in those codes. Alternatively, suppliers are encouraged to join active and approved Improvers Programs as verified by IFFO or the Sustainable Fisheries Partnership (SFP) or other equivalent fishery improvement projects.  
**認證：**全興國際支持並推廣聯合國糧食及農業組織(FAO)《負責任漁業行為守則》的原則，因此全興國際鼓勵供應商獲取MarinTrust、海洋管理委員會(MSC)和海洋之友(FOS)等公認的協力廠商認證，以證明其符合該等準則中規定的標準。全興國際也鼓勵供應商加入經過可持續漁業夥伴組織(SFP)或其他同等漁業改進專案驗證的積極且經批准的改進計畫。
- c. **Responsible Sourcing:** Suppliers are expected to demonstrate that measures are taken to ensure the responsible sourcing of legal, regulated and reported marine ingredients and avoidance of ingredients sourced from Illegal, Unreported and Unregulated (IUU) fishing activity nor sourced from vessels officially listed as engaging in IUU fishing activity. This can be achieved by, but not limited to, sourcing from marine ingredients with assurance from national, regional or international governing bodies. Species of whole fish and by-products shall not be in the list of CITES appendices (Convention on International Trade in Endangered Species of Wild Fauna and Flora), or be categorized by the IUCN as Endangered or Critically Endangered.  
**負責任採購：**全興國際期望供應商證明其已採取措施，以確保合法、受管制和有報告的海洋成分的負責任採購，避免來自非法、未報告和不受規範的(IUU)捕撈活動的成分採購，也不得採購來自被正式列為從事非法捕撈(IUU捕撈)活動船隻的成分，可通過但不限於從具有國家、地區或國際管理機構保證的海洋成分中採購實現。使用之魚類及其副產品，其物種不得列入瀕危野生動植物國際貿易公約(CITES)名單，亦不得被國際自然保護聯盟(IUCN)列為瀕危或極度瀕危物種。

#### 9 Sustainable Sourcing of Soya Products 大豆製品的可持續採購

- a. **Scope:** This section applies to all suppliers of soya products used in our supply chain including traders, agents or processors. This includes, but is not limited to, soybean meal, soy oil, soy lecithin and other soybean derivatives.  
**範圍：**本節適用於我們供應鏈中所有大豆製品的供應商，包括貿易商、代理或加工商。包括但不限於經過加工的豆粕、豆油、大豆卵磷脂及其他大豆衍生品。
- b. **Certification:** Grobest supports and promotes the principles of responsible soya programs including Pro Terra, RTRS (Round Table on Responsible Soy), SSAP (Soy Sustainability Assurance Protocol), organic, and standards compliant with the European Feed Manufacturers' Federation (FEFAC) Guidelines, all of which prohibit illegal deforestation. For all soy inputs, whether certified or

not, feed mills are encouraged to set clear goals for: traceability to country of origin, exclusion of material derived from illegal deforestation, and exclusion of material derived from ecologically sensitive areas.

**認證：**全興國際支持並推廣包括 ProTerra、RTRS(負責任大豆圓桌會議)、SSAP(美國大豆可持續保障計畫)、有機以及符合歐洲飼料生產商聯合會(PEFAC)準則等標準的負責任大豆計畫的原則。上述準則均禁止非法砍伐森林。對於無論是否經過認證的所有大豆製品投入，飼料廠均鼓勵制定如下明確目標：可追溯至原產國、排除源於非法砍伐森林的材料以及排除源於生態敏感區的材料。

- c. **Good Agriculture Practices:** To ensure product safety and an eco-friendly environment, Grobest encourages suppliers to implement Good Agriculture Practices that can prevent climate change, conserve water resources, and protect our land. Relevant practices include as follows: develop standard of exhaust emission; properly handle the waste disposal; set limitation on the usage of pesticides and agrochemicals. Suppliers are expected to convey the concept of Good Agricultural Practices among local soya farmers and further put into practice.

**良好農業規範：**為確保產品安全及生態友好的環境，全興國際鼓勵供應商實行良好農業規範，防止氣候變化、節約水資源以及保護我們的土地。相關規範包括：制定廢氣排放標準、妥善處理廢棄物、限制農藥及農用化學品的使用，期望供應商在當地種植大豆的農民群體中普及良好農業規範的概念，並付諸進一步實踐。

### Implementation 實施

Grobest expects all suppliers to adhere to the contents of this Code and comply with all relevant policies and procedures as required by Grobest.

全興國際期望所有供應商遵守本準則的內容，並根據全興國際的要求遵循所有相關政策和程序。

Suppliers have the responsibility to inform their employees, subsidiaries and any sub-suppliers to whom they delegate some or all of the supplier's business dealings with Grobest or from whom they source raw materials which may go into Grobest products:

供應商有責任向其員工、子公司及合作夥伴委託其與全興國際進行部分或全部業務往來或從其採購可能用於全興國際產品的原材料的分包商告知：

- a. about the contents of this Code and to encourage them to follow; and  
本準則的內容，並鼓勵其遵守；且
- b. that they may report any violation or suspected violations of the Code without fear of reprisal through our ethics hotline or contact us at [ethics@grobest.com](mailto:ethics@grobest.com)  
可透過道德熱線：[ethics@grobest.com](mailto:ethics@grobest.com) 聯繫我們以報告任何違反或涉嫌違反本準則的行為，且無需擔心遭到報復。

Suppliers will adopt a reasonable system to monitor and audit compliance with the above standards by their own employees, in their own operations and by any sub-suppliers to whom they delegate some or all of the supplier's business dealings with Grobest or from whom they source raw materials which may go into Grobest products.

供應商採用合理的系統來監控和審核其自身員工和分包商在自身營運中對上述標準的遵守情況，以及其委託與全興國際的部分或全部商業交易或從其採購可能用於全興國際產品的原材料的分包商對上述標準的遵守情況。

Suppliers will keep accurate, complete and honest records related to Grobest's business which Grobest has the right to monitor to confirm compliance of suppliers. Suppliers agree to make records and other documentation available, in connection with Grobest's business, for review and audit.

供應商應保有與全興國際商業往來相關的準確且完整的真實記錄，全興國際有權監控以確認供應商的遵守情況，供應商須同意提供與全興國際業務相關的記錄和其他憑證，以便用於審核和稽核。

Grobest is committed to engaging with suppliers to improve practices and alignment with this Code.

全興國際致力於與供應商合作共事，共同改進實踐並保證與本準則的一致性。

This Code is translated into other languages. In case of any inconsistency between languages, the English version shall prevail.

本準則將翻譯為其他語言版本。不同語言版本之間如有任何不一致，應以英文版本為準。

### Version 3.0 approved by the Grobest Vice Chairman, February 2026

版本3.0經全興國際副董事長批准，2026年2月

By signing acceptance of this Code, the supplier confirms it has received, read, understood and agreed to comply with the Grobest Supplier Code of Conduct.

經簽字接受本準則，供應商確認其已收到、閱讀、理解並同意遵守本全興國際供應商行為準則。

Company Name 公司名稱：

Signature 簽名：

Name and Title 姓名與職位：

Date 日期：



**Addendum 附錄**

Additional Terms and Conditions applicable to local requirements  
適用於當地要求的附加條款與條件

By signing acceptance of this Code, the supplier confirms it has received, read, understood and agreed to comply with the Grobest Supplier Code of Conduct.

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Company Name 公司名稱：

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Name and Title 姓名與職位：

Date 日期：