



Red Hat Procurement Supplier Code of Conduct

1. INTRODUCTION

This Supplier Code of Conduct explains Red Hat's (including its subsidiaries) general expectations for **all third parties supplying goods or services to or on behalf of Red Hat**, including staffing agencies and independent contractors. In this Supplier Code of Conduct, we refer to these third parties, including their employees, personnel, agents, and subcontractors, as "Suppliers."

Red Hat values integrity, respect and ethical conduct, as well as the commitment and courage it takes to hold each other accountable when we fail to adhere to those values. We expect that our Suppliers will uphold these values and monitor their own compliance with this Supplier Code of Conduct.

2. COMPLIANCE WITH LAW

Suppliers must conduct their business activities in full compliance with this Supplier Code of Conduct and all applicable laws and regulations while conducting business with and/or on behalf of Red Hat, including, without limitation, laws regulating:

- A. Trade, exports and competition
- B. Labor
- C. Insider trading
- D. Anti-corruption
- E. The environment (including conflict minerals)
- F. Record keeping
- G. Health and safety
- H. Data privacy and protection

3. GIFTS AND GRATUITIES

红帽采购部门 供应商行为准则

1. 简介

针对向红帽提供或其代表红帽提供商品或服务的所有第三方（包括中介机构 and 独立承包商），本供应商行为准则说明了红帽（及其子公司）对其的总体期望。在本供应商行为准则中，这些第三方（包括其雇员、人员、代理人 and 分包商）统称为“供应商”。

红帽重视诚信、尊重和道德操守，供应商应承诺，如果其未坚守这些价值观，则应承担责任。我们希望供应商秉承这些价值观，并对自身对供应商行为准则的遵守情况进行监督。

2. 遵守法律

供应商在与红帽和/或代表红帽开展业务时，必须充分遵守本供应商行为准则以及所有适用的法律法规，包括但不限于有关下列各项的法规：

- A. 贸易、出口和竞争
- B. 劳动
- C. 内幕交易
- D. 反腐败
- E. 环境（包括冲突矿物）
- F. 记录保存
- G. 健康和 safety
- H. 数据隐私和保护

3. 礼品和馈赠



Supplier representatives and employees must not offer to any Red Hat employee or representative any bribe, kickback, favor, gratuity, entertainment or anything of value, either directly or indirectly, in order to obtain or retain business or otherwise gain favorable treatment or an improper advantage from Red Hat. As long as a gift is not intended to obtain an unfair or improper advantage for the supplier and does not create the appearance of a bribe, kickback, payoff, or irregular type of payment, Red Hat employees are allowed to accept the gift if (a) it is of nominal value, (b) public disclosure would not embarrass or reflect negatively on Red Hat, (c) acceptance is consistent with applicable country law and local customs, (d) providing the gift is consistent with the Supplier's business practices and policies, as may be revised from time to time, and (e) acceptance is consistent with Red Hat's business practices and policies, as may be revised from time to time.

4. CONFLICTS OF INTEREST

Suppliers shall not enter into any financial or other relationship with a Red Hat employee or any other party that creates or appears to create a conflict of interest for Red Hat. Supplier representatives and employees shall not deal directly with any Red Hat employee whose spouse, domestic partner, other family member or relative holds a significant financial interest in the Supplier. All such conflicts must be disclosed to and approved by Red Hat management.

5. REPORTING CONCERNS

You should report to Red Hat any conduct, including conduct of any Red Hat employee or representative, that you believe in good faith to be a possible violation of this Supplier Code of Conduct, another Red Hat policy, or regulation or law. We refer to these possible violations as "Supplier Concerns."

If appropriate, you may work with your primary Red Hat contact to address a Supplier Concern.

供应商的代表和员工不得直接或间接向任何红帽员工或其代表提供任何贿赂、回扣、佣金、赠物、酬谢或有价之物，从而在红帽处获得或保留业务，或者以其他方式获得优惠待遇或不正当好处。如果相关礼品并非旨在为供应商带来不公平或不正当好处，并且不构成贿赂、回扣、佣金或非正规付款方式，则红帽员工可以接受，但前提是 (a) 它的价值很低；(b) 在公开披露时不会使红帽感到尴尬或者对其产生负面影响；(c) 符合相关国家/地区的法律和当地习俗；(d) 提供礼品与供应商的业务惯例和政策（可不时修订）相一致；和 (e) 接受礼品与红帽商业惯例和政策（可不时修订）相一致。

4. 利益冲突

供应商不得与红帽员工或任何其他当事方建立任何财务或其他关系，倘若这与红帽构成（或可能构成）利益冲突。倘若红帽员工的配偶、家庭伴侣、其他家庭成员或亲戚在供应商处拥有重大财务利益，则供应商代表和员工不得直接与该红帽员工进行交易。所有该等冲突必须向红帽管理层披露并征得其批准。

5. 报告问题

如果您善意地认为任何行为可能违反了本供应商行为准则、其他红帽政策或者法律法规，则应向红帽进行举报，其中包括任何红帽员工或代表的行为。我们将这些潜在违规行为称为“供应商问题”。

在适当情况下，您可以联系红帽主要联系人以解决供应商问题。如果无法联系或者这种做法不当，请通过以下任一方法联系红帽：



If that is not possible or appropriate, please contact Red Hat about any Supplier Concern through either of the following methods:

Mail: Mail a letter to the General Counsel at Red Hat, Inc., 100 East Davie Street, Raleigh, NC 27601.

Email: Send an email to supplierconcerns@redhat.com.

Red Hat values confidentiality and will take reasonable measures to preserve confidentiality in light of the circumstances of any particular report. Red Hat will review and respond as appropriate to reports regarding Supplier Concerns.

Red Hat expects that its Suppliers will not retaliate against anyone who makes a good faith report of a Supplier Concern, whether that report is made internally at the Supplier or to Red Hat.

6. DATA PRIVACY/SECURITY

Suppliers are expected to safeguard and protect all confidential information from misuse or unauthorized disclosure. If Supplier receives personal data or other confidential information from or on behalf of Red Hat, such data or information should be processed and stored securely and shared only internally with those Supplier representatives and employees who require access to it in order to perform their assigned roles and responsibilities. Confidential information and personal data must not be transferred, published, used, or disclosed other than as necessary to provide services to Red Hat or as expressly directed or authorized by Red Hat.

7. USE OF RED HAT TRADEMARK

Unless expressly authorized by Red Hat, Suppliers may not use the Red Hat trademark, images or name or other materials in which Red Hat owns the copyright. If authorized, such authorization must be in writing and subject to compliance with Red Hat's

邮件：向 Red Hat, Inc. (100 East Davie Street, Raleigh, NC 27601) 总法律顾问邮寄信件。

电子邮件：发送电子邮件至 supplierconcerns@redhat.com。

红帽重视举报内容的机密性，并根据特定举报的情况而采取合理措施对其进行保密。针对供应商举报的问题，红帽将对其进行审查并做出适当回应。

针对善意地举报供应商问题的人员，无论是在供应商内部还是向红帽进行举报，红帽要求供应商不得对其进行报复。

6. 数据隐私/安全

供应商应保护所有保密信息，防止滥用或未经授权地披露该等信息。如果供应商从红帽或其代表接收个人数据或其他保密信息，则应安全地处理和存储这些数据或信息，并且仅可向为了履行其指定职责而需要访问该等信息的供应商代表和员工进行内部共享。除了出于向红帽提供服务的必要性或者经红帽明确指示或授权外，不得转移、发布、使用或披露保密信息和个人数据。

7. 红帽商标的使用

除非征得红帽的明确授权，否则供应商不得使用版权归红帽所有的相关红帽商标、图像、名称或其他材料。若要给予授权，则该授权必须采用书面形式，并须遵守



trademark guidelines set forth at <https://www.redhat.com/en/about/trademark-guidelines-and-policies> (including any successor site).

8. HUMAN RIGHTS AND LABOR PRACTICES

Red Hat strongly opposes illegal human trafficking and forced labor (and all other forms of modern slavery) in any form. Suppliers shall comply with slavery, human trafficking and child (and minimum age) labor laws of the country or countries in which they conduct business, shall ensure that slavery, servitude, forced or compulsory labor (including prison labor) and human trafficking are not taking place in their supply chains, and shall deal honestly, ethically, and fairly in these relationships.

Red Hat expects that its Suppliers will promote a workplace free of harassment, abuse and unlawful discrimination. Although we recognize that what constitutes “unlawful” discrimination may vary by jurisdiction, we expect that Suppliers will treat people fairly in hiring, compensation, access to training, promotion, termination and retirement, and will not discriminate based on any protected characteristics (for instance, race, color, religion, sex, sexual orientation, gender identity, national origin, disability, or age).

Suppliers must also afford their workers humane working conditions and wages and working hours that comply with applicable laws, while also respecting the legal rights of workers to freely associate and bargain collectively, including by joining or refraining from joining trade unions.

<https://www.redhat.com/en/about/trademark-guidelines-and-policies> (包括任何后续网站) 中规定的红帽商标指南。

8. 人权和劳工措施

红帽强烈反对任何形式非法的人口贩卖和强迫劳动（以及所有其他形式的现代奴隶制）。供应商应遵守经营所在国家/地区的反奴役、人口贩卖和童工的劳动法，遵守劳工最低年龄的规定，并确保不得将奴隶、奴役、强迫或强制劳动（包括监狱劳动）和人口贩卖置于其供应链中，并应诚实、道德和公平地对待这些事宜。

红帽公司希望供应商能够创建一个没有骚扰、虐待和非法歧视的工作场所。尽管我们认识到构成“非法”歧视的因素可能因司法辖区而异，但我们希望供应商在雇佣、薪酬、培训、晋升、解雇和退休方面公平地对待员工，并且不得基于任何受保护特征（例如种族、肤色、宗教、性别、性取向、性别认同、国籍、残疾或年龄）进行歧视。

供应商还必须为工人提供合法的人道工作条件、工资和工作时间，同时还应尊重工人自由结社和集体谈判的合法权利，包括是否加入工会的权利。