



ISS  
Speak Up Policy

舉報政策





## 政策说明 Policy statement

为符合 ISS 核心价值及行为规范，ISS 的企业诚信是不容妥协的。我们保证依法并以高道德标准来经营我们的事业，举报政策的目的是为了：

- 提供员工、事业伙伴及其他关系人针对严重及敏感的事件一个申诉的平台
- 确保这些事件可获得适当地处理且举报人员可以受到保护不致遭到报复。

In line with the ISS Values and Code of Conduct, the business integrity of ISS is non-negotiable. We are committed to conducting our business in accordance with the law and high ethical standards. This policy aims to:

- provide a platform for employees, business partners and other stakeholders to raise serious and sensitive concerns;
- ensure that such concerns are treated seriously and appropriately, and re-assure that any person raising a serious concern in good faith will be protected from reprisals or retaliation.

## 范围 Scope

举报政策是对 ISS 的企业营运绩效会产生不利影响且无法透过正常管道进行举报的严重及敏感事件提供申诉的机制，严重及敏感事件内容包括：

- 不法行为
- 诈欺(例如：做假帐、违反内控程序、盗用资产或舞弊)
- 贪污或贿赂(例如：利益冲突、行/受贿、赞助和捐赠、送礼或送红包)
- 高阶管理阶层之不当行为无法透过当地管道举报
- 违反竞业法令(例如：订价、交换敏感的价格情报、勾结竞争者)
- 严重危害安全、健康与环境
- 其他受制于法律、条约、协议的不适当行为(例如：歧视、性骚扰、雇用童工、违反人权)

This policy is meant to provide grievance redressal to serious and sensitive concerns that could have an adverse impact on the operations and performance of the business of ISS, and which, due to the nature of the concern, cannot be reported through the normal reporting lines. The nature of concerns could include:

- unlawful activity;
- financial fraud (for example accounting manipulation, non-compliance with internal controls procedures, misappropriation of assets or fraudulent statements);
- bribery or corruption (for example conflicts of interest, bribery, sponsorships & donations, gifts or facilitation payments);
- acts by senior management that cannot be reported using local channels
- violation of competition laws (for example price fixing, exchange of price sensitive information, collusion with competitors);
- serious endangerment to environment, health and safety;
- activities, which otherwise by law, treaty or agreement amount to serious improper conduct (for example discriminatory practices, sexual harassment, use of child labour, human rights violations).

### 就地咨询 **Consult locally at first**

我们鼓励员工遇有严重及敏感事件时，可先向直属主管或其他的合适部门如当地的人力资源部门、法务或财务长举报。若与当地工作场所雇佣关系有关之事件例如主管与同事间的冲突、惩处、薪资福利正确和及时性应直接当地就处理。

Employees that have a concern are encouraged to discuss such matters first with their supervisors, managers or other appropriate personnel such as local HR, local legal counsel or local CFO.

Concerns relating to the employment terms or matters at the local workplace such as conflicts with colleagues and managers, disciplinary sanctions, correct and timely payment of wages and benefits should normally be resolved locally.

### 保密 **Confidentiality**

除非您有特别的要求否则所有的通讯将会采匿名及保密方式。ISS 鼓励您表明您的身分并详细说明举报内容，以加速调查进度。当信息来源经过证实才会进一步追踪调查，请尽可能地提供充足的信息，以利调查进行。

All communication will be anonymous and confidential unless you directly instruct otherwise. You are encouraged to identify yourself and explain your concern in sufficient detail to facilitate investigation of the matter. Follow-up questions and investigation may not be possible unless the source of the information is identified. In order to assist ISS in conducting an investigation of a complaint, please provide as much information as possible.

除非该举报事件已达到需要进行公开调查的程度，否则所有举报都会在保密的方式进行，举报者的身份亦会受到保密。

ISS will treat all concerns and issues raised under this policy in a confidential manner except to the extent necessary to conduct a complete and fair investigation. The identity of the complainant shall be kept confidential.

### 没有歧视或报复 **No discrimination or retaliation**

ISS 将会确保任何一位向 ISS 举报的员工或第三方没有受到任何的歧视以及报复，如果有员工认为他/她因参与调查而受到报复，应立即将此状况报告丹麦—哥本哈根总部内部稽核部门主管。所有相关报告皆会被保密。

ISS will ensure that there will be no discriminatory or retaliatory action against any employee or third party who reports a concern to ISS in good faith based on his/her personal knowledge. If a person believes that he or she has been retaliated against for reporting or participating in an investigation, he/she should immediately report such perceived retaliation to the Head of Group Internal Audit, based in Copenhagen, Denmark. All such reports will also be investigated confidentially.

任何恶意或毫无根据的举报可能会受到适当的处分。

Allegations made in bad faith and without any factual substance may result in disciplinary or other appropriate action.

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## 举报记录及保留 **Receipt and retention of concerns and investigation**

总部内部稽核主管会受理每一个投诉，并将会：(1)记录所有的举报 (2)考虑举报的严重性及可信度(3)确保每一个举报有适当的处理。部分投诉可能无须调查。

Each complaint or concern will be received by the Head of Group Internal Audit. The Head of Group Internal Audit shall (i) record all reported complaints or concerns, (ii) consider the seriousness and credibility of the complaint or concern raised and (iii) proceed accordingly in determining the appropriate action. Some complaints or concerns may be resolved without requiring investigation.

集团内部稽核部门主管可自行决定并与稽核委员会(或稽核委员会指派之人员)及管理高层进行咨商。亦可聘请外部稽核人员、调查员或法律顾问协助调查和分析结果。

The Head of Group Internal Audit may, on his/her sole discretion, consult with the Audit Committee (or a body appointed by the Audit Committee) and any senior members of the management. He or she may also engage external auditors, investigators and/or legal counsel to assist in the investigation and analysis of the results thereof.

调查结果将提报给稽核委员会。稽核委员会可以依照违反的程度及严重性决定是否在董事会前提交调查报告。

The conclusions of the investigation will be submitted to the Audit Committee. The Audit Committee may decide on placing any investigation report before the Board of Directors depending on the gravity and magnitude of the violation.

## 补救措施 **Remedial Action**

如果调查过程违反举报政策，必须适当的补救行动。

In case an investigation shows any violation of this policy, appropriate remedial action will be taken.

## 保留记录 **Retention of the Records**

ISS 董事会应保留一份所有举报、调查报告及所有相关文件的副本，稽核委员会应遵从法令规定决定 ISS 所有记录的保留时间。

ISS A/S shall retain a copy of all complaints or concerns, investigation reports and all relevant documentation thereof. The Audit Committee shall decide the period of retention of all these records by ISS, subject to limitations in applicable legislation.