



HENGYI

Procedure 流程制度名称		Organizational Affiliation Avoidance Management System 人事关系回避管理办法				Classified Level 密级	General 一般
Doc. Level 文件层次	II 二层	Doc. No. 文件编号	HY02-(2020A0)-78			Distribution No. 分发号	
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Date of Approval 批准日期	2020-7-3		Date of Trial Implementation 试行日期	Date of Formal Implementation 施行日期	2020-7-3		

### 1.Purpose 目的

The organizational affiliation avoidance management system is hereby formulated to regulate human resource management within the company, maintain fair and justice in staff management, set up a sound talent selection and employment mechanism and establish a healthy and harmonious organizational affiliation. 为规范公司人力资源管理工作，维护员工管理的公平、公正性，形成良性人才选拔及用人机制，建立健康、和谐的组织人事关系，特制定本办法。

### 2.Scope of Application 适用范围

- 2.1.The organizational affiliation avoidance management system shall include post avoidance and employment avoidance. 本办法所称人事关系回避包括岗位回避和履职回避。
- 2.2.The organizational affiliation avoidance management system shall be applicable to all participants in the human resource management of Hengyi headquarters and its subsidiaries. 集团总部及各子公司人力资源管理工作所有参与方适用本办法。

### 3.Major Roles & Responsibilities of Departments/Posts 部门/岗位主要职责

Departments/Posts 部门/岗位	Major Roles & Responsibilities 主要职责
Hengyi Group HR Dept. 集团人力资源部	➤ Responsible for the formulation and implementation of organizational affiliation avoidance management system and the provision of guidance and supervision for all recruiting departments and HR Dept. of its subsidiaries to carry out relevant work. 负责人事关系回避管理办法的制定、执行，并指导、监督用人部门及子公司人力资源部门开展具体工作。
Subsidiaries HR Dept. 子公司人力资源部门	➤ Responsible for the implementation and supervision of organizational affiliation avoidance management system within the company. 负责本公司内部人事关系回避管理办法的执行、监督。

<b>Audit &amp; Legal Dept.</b> <b>审计法务部</b>	➤ Responsible for the audit and supervision of the implementation of organizational affiliation avoidance management system. 负责对人事关系回避管理办法执行的审计监督。
<b>Recruiting Departments</b> <b>用人部门</b>	➤ Responsible for the implementation of organizational affiliation avoidance management system within the responsible organization. 负责所在组织内人事关系回避管理办法各项规定的执行。

#### 4. Post Avoidance 岗位回避

4.1. Personnel in the same company with the following domestic relation or interest relation shall not be employed by the same department, nor work in the post/department with direct interest, nor work as immediate superior and subordinate: 在同一公司内部凡是有下列亲属关系或利益关系的人员，不得在同一部门任职、不得在直接利益相关岗位/部门任职、不能存在直接领导或管理关系：

1) Conjugal relation; 夫妻关系；

2) Next of kin (NOK) including grandparents, grandparents-in-law, parents, children, grandchildren and grandchildren-in-law; 直系血亲，包括祖父母、外祖父母、父母、子女、孙子女、外孙子女；

3) Collateral relatives within three generations including parents' siblings, siblings, cousins, nephews and nieces; 三代以内旁系血亲关系，包括叔伯姑舅姨、兄弟姐妹、堂兄弟姐妹、表兄弟姐妹、侄子女、甥子女；

4) Close affinities including spouse' s parents, siblings and their spouse, children' s spouse and their parents, spouse of collateral relatives within three generations; 近姻亲关系，包括配偶的父母、配偶的兄弟姐妹及其配偶、子女的配偶及子女配偶的父母、三代以内旁系血亲的配偶；

5) Other domestic relation including foster parents and children, stepparents and stepchildren with foster relationship and the following next of kin, collateral relatives within three generations and close affinities; 其他亲属关系，包括养父母子女、形成抚养关系的继父母子女及由此形成的直系血亲、三代以内旁系血亲和近姻亲关系；

6) Staff and departments with interest recommended by external agencies with businesses and interests related to the company (such as suppliers and customers, etc.), e.g., personnel recommended by suppliers shall not be employed by Procurement Dept. and personnel recommended by customers shall not work in sales department; 与公司业务存在业务关联及利益往来关系的外部机构（例如：供应商、客户等）推荐的员工与利益相关部门，如供应商推荐人员不在采购部门任职、客户推荐人员不得在销售部门任职等；

7) Personnel with other interest relations with direct business liaisons. 与直接业务对接人存在其他利益关系的个人。

- 4.2. In Article 4.1, “Personnel in the same company with the following domestic relation or interest relation shall not be employed by the same department...” , “the same department” here shall be defined as Class I functional departments in Hengyi headquarters, as Class II departments in operational units and as Class III departments (production workshops) in production units, which is not applicable to operator workshops. 本办法第 4.1 条指出“不得在同一部门内任职”中的“同一部门”，定义在总部指一级职能部门，在经营单位指二级部门，在生产单位指三级部门（生产车间），其中操作序列员工间不受该条件约束。
- 4.3. In Article 4.1, “...nor work in the post/department with direct interest...” , “post with direct interest” here shall be referred to as posts with relations like supervision and containment like procurement and acceptance, construction management and project acceptance, accounting and finance, quality inspection and production, security and warehouse management, warehouse management and material requisition and posts with relevant occupational limits, etc. 本办法第 4.1 条指出的“直接利益相关岗位”，特指存在监督、牵制等关系的岗位，例如采购与验收、施工管理与工程验收、会计与出纳、质检与生产、保安与仓管、仓管与领料及有关职业法则限定的岗位等。
- 4.4. In Article 4.1, “...nor work as immediate superior and subordinate...” here stipulates that personnel with domestic relation shall not work as immediate superior and subordinate within the same company/department and one shall not engage in HR, supervision, audit and finance within an organization in which his/her relative holds the post of leadership (management posts including Assistant CEO and above). 本办法第 4.1 条指出的“直接领导或管理关系”，特指亲属间不得在同一公司/部门担任有直接上下级领导关系的职务，不得在其中一方担任领导职务（总经理助理及以上管理岗位）的组织内从事人事、监察、审计和财务工作。
- 4.5. In case of avoidance, generally personnel with lower rank shall be the one to avoid; while for two people holding similar rank, it shall be HR Dept. to decide which party shall avoid in accordance with work demand and actual conditions. 岗位职级不同的一般由岗位职级较低的一方回避；岗位职级相同的，由人力资源部门根据工作需要和实际情况决定其中一方回避。

## 5. Employment Avoidance 履职回避

- 5.1. Employment activities for relations to be avoided in Article 4.1 shall include personnel recruitment, performance appraisal, promotion review, procurement, sales, bidding evaluation, project management and acceptance and other activities with interest conflicts which requires avoidance. 本办法第 4.1 条指出的回避关系间应当回避的履职活动包括：人员招聘、考核、晋升评审，采购、销售、评标，工程管理、工程验收，以及其他存在利益冲突需回避的履职活动。
- 5.2. If management personnel could not be employed due to relevant avoidance management regulations, in principle, his/her superior or person designated by the company shall work on

his/her behalf. 若管理人员因回避管理相关规定无法正常履职的，原则上应由其上级或公司指定的人员代为履职。

## 6. Management & Supervision 管理与监督

### 6.1. Relations to Be Declared for Avoidance 回避关系申报

- 6.1.1. The company encourages its employees to introduce qualified candidates through manners like internal recommendation. HR Dept. shall make a good record for all candidates including their respective application channels to ensure full compliance with organizational affiliation avoidance management regulations and admit the best candidates after interview and appraisal. 公司鼓励员工通过内部推荐等方式介绍合格的候选人进入公司，人力资源部门应对内部推荐及其他渠道应聘的候选人做好信息的登记，确保符合公司人事关系回避管理的规定，并通过公司面试、考核后择优录取。
- 6.1.2. For post avoidance due to rotation, promotion or other personnel alternation and employment avoidance resulted from involvement in businesses, employees shall actively declare such relation to the responsible HR Dept. 因调动、晋升或其他人员异动将形成岗位回避关系，以及因参与业务工作形成履职回避关系的，员工需主动提前向所在组织人力资源部门申报。
- 6.1.3. For newly formed domestic relations after recruitment, the staff himself/herself shall timely declare such relation to the responsible HR Dept. within one week after such relation to be avoided is formed. 对在员工入职后新形成的亲属关系，员工本人应在回避关系形成后一周内及时向所在组织人力资源部门申报。
- 6.1.4. Subsidiaries HR Dept. shall make good registration of the domestic relations of all their employees (including domestic relations within the subsidiaries and inter-company) and report to Headquarters HR Dept. quarterly. 子公司人力资源部门应做好所有员工亲属关系的登记（含子公司内、跨公司亲属关系），并按季度报备总部人力资源部。

### 6.2. Avoidance Exception Management 回避例外管理

- 6.2.1. For avoidance in important management posts, key technical and business posts with inevitable personnel recruitment, rotation and promotion due to work requirements, it shall be the responsible HR Dept. to report to Headquarters HR Dept. for approval. Then the HR Dept. will reject such application or further report to HR Management Committee for final approval on the basis of comprehensive assessment of the post and personnel scarcity. 对于重要管理岗位、关键技术岗位和关键业务岗位存在回避关系情形，但确因工作需要录用、调动、晋升该人员的，由所在人力资源部门报集团人力资源部审批，人力资源部综合评估岗位及人员紧缺性后予以驳回或报公司人力资源管理委员会审批。
- 6.2.2. For avoidance in important management posts, key technical and business posts with inevitable personnel involvement in interest related business activities due to work requirements, it shall be Class I Organizational Director to review and approve such employment. However, if the Class I Organizational Director himself/herself is involved in the avoidance, it shall be the company HR Management Committee to review and approve such employment. 对于重要管理岗位、关键技术岗位和关键业务岗位存在回避关系情形，但确因工作需要该员工参与利益相关业务活动的，由所在一级组织负责人审批后执行，若是一级组织负责人涉及回避关系情形的，由公司人力资源管理委员会审批后执行。

### 6.3. Responsibility Identification & Management 责任认定与处理

For post avoidance due to recruitment, rotation, promotion or other personnel alternation and employment avoidance resulted from involvement in businesses: 1) if the concerned employee hid such relation, it will be deemed as fraud and be handled accordingly; 2) if the responsible supervisor had not taken any actions to handle the avoidance, the hereby agreed or approved matters shall be canceled and the responsible supervisor shall be deemed as fraud and be handled accordingly. 对于因招聘录用、调动、晋升或其他人员异动形成岗位回避关系，以及因参与业务工作形成履职回避关系的：1) 若员工隐瞒回避关系，视为舞弊进行处理；2) 若相关负责人对应回避未做回避的，所议定或审批事项结果取消，并对相关负责人视为舞弊进行处理。

### 6.4. Company-wide Supervision 全员监督

All employees shall have the obligation to supervise the implementation of post avoidance and employment avoidance and report anything they know to **HR Dept.** faithfully. 全体员工有义务对岗位及履职回避工作进行监督，并将了解到的情况如实反馈给**人力资源部**。

## 7. Supplementary Provisions 附则

7.1. The system shall enter into force since July 3<sup>rd</sup>, 2020. 本制度自2020年7月3日起执行。

7.2. The system shall prevail for any contradictions with former system documents. 之前各类制度文件规定中与本制度不符的，以本制度为准。

7.3. **Headquarters HR Dept.** shall be responsible for the final interpretation of the system. 本制度由**集团人力资源部**负责解释。

## 8. Procedure Documents 相关流程制度文件

No. 序号	Procedure No. 流程制度编号	Procedure 流程制度名称	Responsible Dept. 归属部门
1			

## 9. Table Sheets 相关表单

No. 序号	Table Sheet No. 表单编号	Table Sheet 表单名称	Kept by (Dept.) 保管部门	Kept for (Term) 保存期限
1				