

C O D I C E  
**ETICO**  
CODE OF CONDUCT



**BONDIOLI  
& PAVESI** 

**INTRODUCTION 介绍**

At present companies take on more and more responsibilities, and not only as for the economic effects of their business. In fact, they play more extensive and wide roles.

如今，企业承担的责任越来越多，且不仅局限于其业务产生的经济影响。事实上，它们发挥着更为广泛的作用。

While efficiently complying with more and more requirements, companies should prove their awareness that their production cycles and consequent final products include interests which do not only affect the consumer, but the citizen mainly.

在高效满足日益繁多要求的同时，企业应意识到，其生产周期及最终产品所涉及的利益，不仅影响消费者，更主要地影响着普通公民。

These are interests that aim at protecting the environment, health, safety and security, jobs, futures, and the wealth of the entire community as well as the social relationship system. The protection of these interests is implemented through environmental commitment, social commitment and good corporate conduct. These moral obligations are expressed in this document and are the basis of the “Sustainability Policy” of the Bondioli & Pavesi Group.

这些利益旨在保护环境、健康、安全，保障就业、未来，维护整个社会的财富以及社会关系体系。对这些利益的保护通过环境承诺、社会承诺以及良好的企业行为得以实现。这些道德义务在本文件中予以阐述，是Bondioli & Pavesi集团“可持续发展政策”的基础。

Within such a frame, excellence is always looked for and promoted when supplying products and services through a constant and punctual stimulation of the design, research, production, and sale processes, in the respect of any employee, customer, supplier and the environment where the factory is located.

在此框架内，公司在提供产品和服务时，始终追求并倡导卓越，持续、及时地推动设计、研发、生产和销售流程的发展，同时尊重每一位员工、客户、供应商以及工厂所在地的环境。

Therefore, the Company decided to enforce the present Code of Conduct drafted as a real Declaration of Relationships that the company develops with its Stakeholders (shareholders, customers, employees, suppliers).

因此，公司决定实施本行为准则，该准则被拟定为公司与利益相关者（股东、客户、员工、供应商）发展关系的真实宣言。

**The Code of Conduct defines values the company strongly believes in and which it would**

like to be committed to, it puts forward the principles of conduct they depend on, according to the relationships with its Stakeholders. Such a tool is functional to the increase of everybody's consistency inside the company as to get the confidence of the relative interlocutors.

行为准则明确了公司坚信并致力于践行的价值观，并根据与利益相关者的关系，提出了相应的行为原则。这一工具有助于增强公司内部人员行为的一致性，从而赢得相关沟通对象的信任。

The present Code of Conduct are related to Bondioli & Pavesi Hydraulic and Mechanical Component (Hangzhou) Co. Ltd & HANGZHOU BONDIOLI & PAVESI COMMERCIAL&TRADE CO., LTD, both directly or indirectly controlled by Finsuge S.p.A. a Company duly incorporated in Italy. Hereinafter they are referred to in the rest of the text, briefly, as "Company" or "Companies".

本行为准则适用于邦贝液压机械（杭州）有限公司和杭州邦贝商贸有限公司，这两家公司均由在意大利合法注册成立的 Finsuge S.p.A. 直接或间接控制。在本文的其余部分，将其简称为“公司”。

This document expresses the ethical values and principles of behavior that must inspire the management of all Bondioli & Pavesi Group's companies worldwide and all who work there.

本文件阐述了道德价值观和行为原则，这些原则必须激励Bondioli & Pavesi集团在全球范围内的所有公司管理层以及在其中工作的每一个人。

On the Bondioli & Pavesi headquarter Company's official website, the versions of the companies that have adopted this Code of Ethics are available, adapted in compliance with their current regulations and in their own language.

在Bondioli & Pavesi总部公司的官方网站上，可获取已采用本道德准则的公司版本，这些版本根据各自现行法规进行了调整，并提供了相应语言版本。

The Code of Conduct for the above-mentioned companies is applicable to any employee, shareholder, partner, and a copy is shared with any employee, and it is shared with newly hired operators

上述公司的行为准则适用于任何员工、股东、合作伙伴，并且会向每一位员工分享一份准则内容，新入职的员工也会收到。

**Company mission 公司使命**

Companies work to supply excellent products and services to their customers, profiting from the highest possible development in each single territory. Companies strongly believe in growth duly paying attention to sustainability in time of results and aiming at consolidating them on the reference markets.

公司致力于为客户提供卓越的产品和服务，从各个地区的最大发展潜力中盈利。公司坚信，在追求发展成果的同时，应高度重视可持续性，并致力于在目标市场巩固自身地位。

Such a result can only be obtained through a virtuous loop based on trust, competences and relationship transparency based on the customer and shareholder satisfaction, on the Company family membership, on the closeness to the real requirements of communities and territories.

这一目标只有通过基于信任、能力和关系透明的良性循环才能实现，而这种良性循环建立在客户和股东满意度、公司归属感以及贴近社区和地区实际需求的基础之上。

**Reference values 参考价值观**

The reference values are the expression of the company culture, and they represent on the one side a tool allowing better complying and interpreting the various possible situations and on the other to tend to as a unique and outstanding feature of the company activity aiming at the future.

参考价值观是公司文化的体现，一方面，它是一种工具，有助于更好地遵守和解读各种可能出现的情况；另一方面，它作为公司活动面向未来的独特显著特征，引领着公司的发展方向。

The growth strategy aims at creating stiff and solid values, under the economic, social, and environmental viewpoint, based on confidence of the actors and mainly based on the hereinafter listed values.

公司的增长战略旨在从经济、社会和环境角度创造坚实稳固的价值，这一战略基于参与者的信任，并主要基于以下列出的价值观。

**Loyalty and transparency 忠诚与透明**

All those working in the Company uprightly behave, well balanced and respecting each other. They are all inspired by profound principles such as honesty, correctness, transparency and good faith to the Stakeholders and other people they interact with, for whatever reason, when carrying out their businesses.

The management should stand out for its upright behavior, transparency, loyalty besides discouraging attitudes and conducts which are not in line with the company values.

所有在公司工作的人员都应行为端正、心态平衡且相互尊重。在开展业务时，无论出于何种原因，他们都应以诚实、正直、透明和诚信等深刻原则为指引，对待利益相关者以及与之互动的其他人。管理层应以身作则，展现出正直的行为、透明度和忠诚度，同时抵制与公司价值观不符的态度和行为。

### **1. Value of the person 人的价值**

The value of the person, his/her way of conducting, listening, and speaking is a driver for a constant improvement of any relationships with the company stakeholders.

Within the above-mentioned companies, people represent an absolute and unique value: thanks to

their individual contribution companies reached the present positioning and can keep it as well as to confirm their credibility and fame.

人的价值，以及其行为、倾听和表达的方式，是不断改善与公司利益相关者关系的驱动力。

在上述公司中，人是绝对且独一无二的价值：正是由于每个人的贡献，公司才达到了目前的地位，并能够保持这一地位，同时也确立了自身的信誉和声誉。

### **2. Diversity & Inclusion 多元化与包容**

The Company is committed to maintaining a peaceful, inclusive and diversity-respectful working environment. Any discrimination whatsoever is forbidden in any conduct, and everybody is committed to comply with any difference in terms of genre, age, race, belief, language, or skills.

公司致力于营造一个和谐、包容且尊重多元化的工作环境。禁止任何形式的歧视行为，所有人都应尊重在性别、年龄、种族、信仰、语言或技能等方面存在的差异。

### **3. Sense of affiliation 归属感**

For the Company, the sense of affiliation means sharing the same goals, being proud to be part of the Company and mutually supporting each other, mainly in case of problems.

对公司而言，归属感意味着共享相同的目标，为自己是公司的一员而感到自豪，并在遇到问题时相互支持。

### **4. Excellence of the product and service 产品和服务的卓越性**

The above-mentioned companies share the constant goal, unique in their DNA, to constantly improve, challenging the future, anticipating any challenge, cultivating the staff widespread

creativity, and enhancing their merits, whenever required.

上述公司有着共同的、融入其基因的目标，即不断改进，挑战未来，预见并应对任何挑战，培养员工广泛的创造力，并在必要时提升他们的优势。

### 5. Teamwork and competence 团队合作与能力

Gather a winning team is a duty of the managers of the above-mentioned companies. The managers and operators should in general drive and spur teamwork among colleagues, motivate and involve them, stimulating interdisciplinary and multifunctional working team, efficient and effective as well, to professionally take part to the team, with the highest possible co-operation and result oriented. Thus, each employee will increase his/her competence thanks to the constant technical exchange.

组建一支胜利之师是上述公司管理者的职责。管理者和员工通常应推动和促进同事之间的团队合作，激励并让他们积极参与，激发跨学科和多功能的工作团队，使其高效且富有成效，以尽可能高的合作程度和注重结果导向的方式专业地加入到团队中。这样，每位员工都能通过持续的技术交流提升自己的能力。

### 6. Communication and dialogue 沟通与对话

The Company identifies communication and dialogue as the foundation on which the relationships are grounded.

All managers are required to promote, both within their function and with the Company other business roles, mutual discussion, constant exchange of information and teamwork, setting an example through their own behavior.

It is understood that all collaborators must, in turn, follow the same approach.

公司将沟通和对话视为建立关系的基础。所有管理者都必须在其职能范围内，以及与公司其他业务部门之间，促进相互讨论、持续的信息交流和团队合作，并以身作则。显然，所有员工也必须遵循同样的方式。

### 7. Social and environmental commitment 社会和环境承诺

Supporting activities of a social, humanitarian, environmental protection and sustainable development of the territory and carrying out activities on health and safety in the workplace means actively interacting with Civil Society, proposing itself as a participant in achieving social well-being. 支持社会、人道主义、环境保护和地区可持续发展活动，开展工作场所的健康和安全活动，意味着积极与公民社会互动，表明自己是实现社会福祉的参与者。

Any employee is requested to professionally take part and co-operate to any social initiative,

organized by the Company and they are supposed to enforce environmental and health-care-friendly behaviors, for themselves and their colleagues.

要求每位员工专业地参与并配合公司组织的任何社会倡议活动，同时，员工应为自己和同事践行对环境和健康有益的行为。

The Management should support and drive mutually respectful relationships between employees, through its example as well.

管理层也应通过自身的榜样作用，促进员工之间相互尊重的关系。

The Companies promotes responsible practices in its business processes and in the development of its products, based on the ESG (Environment, Society and Governance) principles. By using the most recent technologies in the production phases, we try to reduce our environmental impact, through the energy saving, the reduction of CO2 emissions, the waste produced and the adoption of materials recycling or reuse practices.

公司在业务流程和产品开发中，基于 ESG（环境、社会和治理）原则，推广负责任的实践。在生产阶段，我们采用最新技术，通过节能、减少二氧化碳排放、降低废弃物产生以及采用材料回收或再利用的做法，努力减少对环境的影响。

Concerning the most recent international policies on sustainability, in the "Summit on Sustainable Development" the leaders of the 193 UN member countries defined the 17 Sustainable Development Goals, 5 of which can be associated to the same "Reference Values" as shown in this Code of Ethics which acts as a guideline for the Bondioli & Pavesi Group.

关于最新的国际可持续发展政策，在“可持续发展峰会”上，193个联合国成员国的领导人确定了17个可持续发展目标，其中5个目标与本道德准则中的“参考价值观”相关，本道德准则为Bondioli & Pavesi集团提供了指导方针。

 **SUSTAINABLE DEVELOPMENT GOALS**



*2030 Agenda, the 17 Sustainable Development Goals.*

**GOAL 5 AGENDA 2030 – GENDER EQUALITY 目标 5: 性别平等**



*“Achieve gender equality and empower all women and girls.”*

*“实现性别平等，赋予所有妇女和女童权力。”*



➤ Code of Ethics Reference

道德准则参考:

- ✓ Reference Values: Diversity and inclusion
- ✓ 参考价值观: 多元化和包容
- ✓ Staff Management
- ✓ 员工管理
- ✓ Integrity and people protection
- ✓ 诚信和人员保护

The inalienable right to gender equality is one of the reference values included in this Code of Ethics. In this context, respect for the person, as well as the evaluation of the skills and abilities of our collaborators constitute an effective tool for professional growth and social development.

性别平等这一不可剥夺的权利是本道德准则所包含的参考价值观之一。在这种背景下，尊重个人以及对员工技能和能力的评估，是实现职业发展和社会发展的有效工具。

## GOAL 7 AGENDA 2030 – AFFORDABLE AND CLEAN ENERGY

### 目标 7：经济适用的清洁能源



*“Ensure access to, affordable, reliable, sustainable and modern energy for all.”*

“确保人人都能获得经济适用、可靠、可持续和现代的能源”。

- Code of Ethics Reference: Safety, security, health, and Environment

道德准则参考：安全、安保、健康和环境。

By using affordable, reliable, and modern energy services, we seek make energy efficiency grow.

通过使用经济适用、可靠和现代的能源服务，我们致力于提高能源效率。

## GOAL 9 AGENDA 2030 – INDUSTRY INNOVATION AND INFRASTRUCTURE

### 目标 9：产业、创新和基础设施



*“Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation.”<sup>1</sup>*

*“建设有韧性的基础设施，促进包容和可持续的工业化，并促进创新”。*

- Code of Ethics Reference: Social and environmental commitment
- 道德准则参考：社会和环境承诺

The Company can contribute to the progress of this goal by strengthening Research and Development, with a special focus on digital skills, since scientific and technological progress represent tools for growth, social development, and environmental safeguard:

公司可以通过加强研发，特别是关注数字技能，为实现这一目标做出贡献，因为科技进步是促进增长、社会发展和环境保护的工具。具体包括：

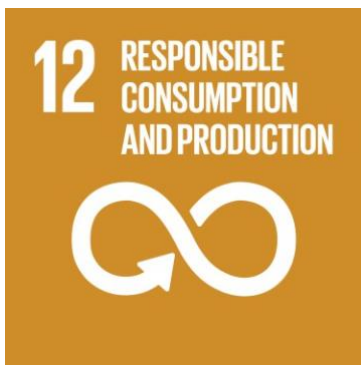
- we encourage innovation, by trying to improve our products, services, production processes and internal management, according to sustainability criteria.
- 鼓励创新，根据可持续性标准改进产品、服务、生产流程和内部管理；
- we implement sustainable, resilient, and quality plants and factories for the well-being of our collaborators and the local Community.

为员工和当地社区的福祉，建设可持续、有韧性和高质量的工厂和设施；

- we offer all workers access to Information and Communication Technologies (ICT) and promote their transmission along the supply chain.
- 为所有员工提供信息和通信技术（ICT）的使用机会，并促进其在供应链中的传播；
- we invest in research and development which focus on technological advancement and innovation in activities.
- 投资于专注于技术进步和创新活动的研发。

## GOAL 12 AGENDA 2030 – RESPONSIBLE CONSUMPTION AND PRODUCTION

### 目标 12：负责任的消费和生产



*“Ensure sustainable consumption and production patterns”.*

*“确保可持续的消费和生产模式”。*

- Code of Ethics Reference: Safety, security, health, and Environment
- 道德准则参考：安全、安保、健康和环境

As stated in the Code of Ethics, we strive to maintain an environmentally friendly approach within the production process by adhering to sustainable and conscious purchasing policies designed to avoid waste of materials, resources, and energy.

正如道德准则中所述，我们在生产过程中努力保持环保的方式，遵循可持续和审慎的采购政策，以避免材料、资源和能源的浪费。

We intend to reduce waste through prevention and, where possible, recycling.

我们致力于通过预防措施减少废弃物，并在可能的情况下进行回收利用。

Our eco-friendly handling of chemicals complies with regulations designed to significantly reduce the chemicals release into air, water, and soil, thus minimizing their negative impact on human health and the environment.

我们对化学品的环保处理符合相关法规，旨在大幅减少化学品向空气、水和土壤中的排放，从而将其对人类健康和环境的负面影响降至最低。

## GOAL 13 – CLIMATE ACTION

## 目标 13: 气候行动



*“Take urgent action to combat climate change and its impacts”.*

*“采取紧急行动应对气候变化及其影响”*

- Code of Ethics Reference: Safety, security, health, and Environment
- 道德准则参考: 安全、安保、健康和环境。

Being aware that the containment of greenhouse gas emissions will only be achieved with a globally shared and environmentally conscious conduct, we strive to:

我们深知，只有通过全球共同认可且具有环保意识的行为，才能实现温室气体排放的控制。

因此，我们努力做到：

- reduce consumption by improving energy efficiency.
- 通过提高能源效率减少能源消耗；
- implement and use low energy consumption systems and equipment.
- 实施并使用低能耗系统和设备；
- progressively reduce our waste, embracing alternatives which are as eco-compatible as possible and/or by using easily recyclable materials and managing their correct disposal.
- 逐步减少废弃物，尽可能采用生态兼容的替代方案，或使用易于回收的材料，并妥善管理其处置。

### Conduct and behavioral principles and related standards 行为原则及相关标准

The Code of Conduct, mainly, is binding for any employee and external consultant (hereinafter called "Consultants").

More precisely any consultant is requested to:

- Act and behave according to the regulations in force, as for the main issues defined in the present document.
  - Act and behave according to what specified in the Code.
  - Signal to their managers any violation to the Code, whenever informed.
  - Co-operate in the definition and compliance with the internal procedure set to enforce the Code.
  - Refer to the relative manager as for the parts of the Code to be interpreted and/or clarified.
- Suppliers, commercial Partners - as well as everyone directly or indirectly working at any level whatsoever with the above-mentioned companies - to correctly behave according to what specified in the Code of Conduct.

行为准则主要对任何员工和外部顾问（以下简称“顾问”）具有约束力。

更确切地说，要求任何顾问：

- 按照现行法规以及本文件所定义的主要问题行事。
- 按照行为准则的规定行事。
- 一旦知晓任何违反行为准则的情况，应向其经理报告。
- 协助制定并遵守为实施行为准则而制定的内部程序。
- 对于行为准则中需要解释和 / 或澄清的部分，应咨询相关经理。

供应商、商业合作伙伴，以及所有直接或间接在上述公司各级工作的人员，都应按照行为准则的规定正确行事。

## 1 Relationships with the shareholders 与股东的关系

A constant dialogue is to be kept with shareholders, while committing to:

- Promptly inform them about any action and decision which could consistently affect their investment.
- Provide the availability, in advances, of the meeting documents
- Provide for the ordered and functional meeting operations, in compliance with the fundamental rights of any shareholder to ask for information and clarifications on the different topics discussed and to express his/her opinion.
- Provide for efficient facilities to manage relations with shareholders.

应与股东保持持续对话，同时致力于做到：

- 及时告知股东任何可能对其投资产生重大影响的行动和决策。
- 提前提供会议文件。
- 确保会议有序、有效地进行，遵守每位股东就讨论的不同主题要求提供信息和澄清的基本权利，并让他们能够表达自己的意见。
- 提供高效的设施以管理与股东的关系。

## **2 Relationships with suppliers 与供应商的关系**

The relationship with the company suppliers must be mainly managed by appointed managers or operators.

公司与供应商的关系主要由指定的经理或员工管理。

### **2.1 Selection of the supplier - Certification of the supplier 供应商的选择 - 供应商认证**

Purchase and supply processes are substantially based on an edge or competitive advantage for the Company, on the possibility to grant equal opportunities to each supplier and what is more they are based on pre-contractual and contractual behaviors mainly loyalty -, transparency -, confidentiality - and co-operation-oriented.

采购和供应流程主要基于公司的竞争优势，基于为每个供应商提供平等机会的原则，并且主要基于以忠诚、透明、保密和合作为导向的合同前和合同期行为。

The Company should check all the available information on its commercial partners, as well as to check their respectability, and the legitimacy of their activities before starting any business relationship.

在建立任何业务关系之前，公司应核实其商业合作伙伴的所有可用信息，以及他们的信誉和活动的合法性。

Principles any supplier relationship is based on, during the selection and then throughout the entire supply relationship, are defined in the quality system procedure PG10 “Supply management”.

在选择供应商以及整个供应关系期间，任何供应商关系所基于的原则在质量体系程序 PG10 “供应管理” 中进行了定义。

Among the different contract documents governing the relationships with any supplier, whenever required, there is the Confidentiality Agreement, as well as the Supplier Code of Conduct (the latter is a document by which the principles contained in the Code of Conduct

are considered across the entire supply chain). The document describing modes and methods to manage and disclose confidential information is procedure PG12 “Confidential information management”.

在管理与任何供应商关系的不同合同文件中，如有需要，会包括保密协议以及供应商行为准则（后者是一份将行为准则中的原则应用于整个供应链的文件）。描述管理和披露机密信息的方式和方法的文件是程序 PG12 “机密信息管理”。

## **2.2 Integrity and independence 诚信与独立性**

Any relationship with supplier is governed by common principles, constantly monitored by the company. Any contract signed with suppliers is to be based on clear principles, avoiding dependency whenever possible.

与供应商的任何关系都受共同原则的约束，并由公司持续监控。与供应商签订的任何合同都应基于明确的原则，尽可能避免产生依赖关系。

Thus, company suppliers should inform the Company when their turnover is greater than 50% of more of its total turnover.

因此，当公司供应商的营业额占其总营业额的 50% 或以上时，应告知公司。

It is furthermore not at all correct to drive a supplier to sign unfavorable contracts, while promising a following more profitable contracts.

此外，诱使供应商签订不利合同，同时承诺后续会有更有利可图的合同，这种做法是完全错误的。

As to be transparent and efficient throughout the purchasing process, appointed people should keep in compliance with regulations in force or according to the internal procedures, any document relating to single choices of any supplier, whenever documented.

为了在整个采购过程中保持透明和高效，指定人员应遵守现行法规或内部程序，妥善保存与任何供应商单项选择相关的文件（如有记录）。

## **2.3 Supply ethical issues 供应中的道德问题**

Nobody working with the above-mentioned companies, even under pressure, should promise and/or pay or receive money, promise and/or grant whatever goods or benefits, indirect too to any supplier, simply aiming at promoting or supporting the interests of one of the above-mentioned companies.

在上述公司工作的任何人，即使受到压力，也不应为了促进或支持上述公司的利益，向任何供应商承诺和 / 或支付金钱、给予或接受任何物品或利益（包括间接利益）。

Nobody working in a company is entitled to avoid complying with similar prescriptions, for example turning to different types of benefits or contributions through sponsorship, charges, consultancies, ads, etc., aiming at the same goals. The companies will pay in time any performance, good or service provided by a supplier.

在公司工作的任何人都无权规避类似规定，例如通过赞助、费用、咨询、广告等方式寻求不同形式的利益或赞助以达到相同目的。公司将及时支付供应商提供的任何工作成果、产品或服务。

Bondioli and Pavesi Group carries out its business activity in compliance with any anti-money laundering legislation and of any rule approved by the competent authorities, thus refusing any suspect activity in terms of correctness and transparency.

Bondioli and Pavesi 集团按照所有反洗钱法规以及主管部门批准的任何规则开展业务活动，因此拒绝任何在正确性和透明度方面存在疑问的活动。

The Company pursues a Purchasing Policy firmly anchored to the ESG principles, promoting them within its supply chain. These principles are the foundation of its business practices and guide every decision towards goals of ethical and operational excellence.

公司推行基于 ESG 原则的采购政策，并在供应链中推广这些原则。这些原则是其商业实践的基础，指导每一项决策朝着道德和运营卓越的目标前进。

#### 2.4 Conflict Mineral Policy 冲突矿产政策

The metals tantalum, tungsten, tin, and gold "3TG" also known as "conflict minerals" are extracted from many different locations including the Democratic Republic of the Congo and neighboring countries (Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, Sudan, Tanzania, Uganda, and Zambia).

钽、钨、锡和金（“3TG”）等金属，也被称为“冲突矿产”，它们从包括刚果民主共和国及邻国（安哥拉、布隆迪、中非共和国、刚果共和国、卢旺达、苏丹、坦桑尼亚、乌干达和赞比亚）在内的许多不同地区开采。

Given that these are high-risk areas and fearing that the purchase of extracted minerals will finance the armed forces of these conflict-affected countries, causing deaths among citizens and violations of human rights, such as forced labor and the abuse of women and children, The Company is committed to constantly operate in a socially responsible manner,



embracing a policy designed to discourage the purchase of products containing minerals extracted in conflict- affected or "high-risk" areas, and this commitment is also required of its suppliers.

鉴于这些地区属于高风险地区，并且担心购买这些开采的矿产品会为这些受冲突影响国家的武装部队提供资金，导致公民死亡以及侵犯人权行为（如强迫劳动和虐待妇女儿童），公司致力于始终以对社会负责的方式开展业务，采用旨在抵制购买含有在受冲突影响或“高风险”地区开采的矿产的产品的政策，并且要求其供应商也遵守这一承诺。

### **3 Relationships with customers 与客户的关系**

The Company promotes the success complying with any customer requirement, professionally, correctly, and honestly working in compliance with any regulation on loyal competition. Honorability and professional expertise of its commercial partners are the foundation any economic relationship is based on and work with reliable and sound commercial partners.

公司通过专业、正确和诚实地遵守所有关于公平竞争的法规，满足客户的所有要求，以此促进自身的成功。商业合作伙伴的诚信和专业能力是任何经济关系的基础，公司只与可靠且专业的商业伙伴合作。

Thus, it is entirely forbidden to develop any business relationship with companies that are not commercially reliable and professional.

因此，严禁与商业信誉不佳或不专业的公司建立任何业务关系。

Any relationship with customers is to be mainly managed by the appointed departments and consultants, as reported in the Quality system procedure PG08 “Processes relating to the customer”.

与客户的任何关系主要由指定的部门和顾问管理，如质量体系程序 PG08 “与客户相关的流程”中所述。

Among the different contract documents regulating the relationship with the Customer, whenever required, there is a confidentiality agreement. The document describing the confidential information mode of management is procedure PG12 “Management of confidential information”.

在管理与客户关系的不同合同文件中，如有需要，会包括保密协议。描述机密信息管理方式的文件是程序 PG12 “机密信息管理”。

**3.1 Impartiality with the customer 对客户的公正性**

Everybody is committed not to substantially discriminate arbitrarily any customer.

每个人都应致力于避免对任何客户进行实质性的、任意的歧视。

**3.2 Ethical aspects of consultants to customers 顾问对客户的道德方面**

The behavioral style of any consultant as for any assigned task and for relationship with customers is mainly based on the following elements:

任何顾问在执行任何指定任务以及与客户建立关系时的行为风格主要基于以下要素：

- ⇒ Enforcement of a correct, friendly, and available behavior in any situation.
- ⇒ 在任何情况下都要保持正确、友好和积极配合的态度；
- ⇒ Signaling to the appointed supervisor any problem or critical issue.
- ⇒ 向指定的主管报告任何问题或关键事项；
- ⇒ Constructive commitments to solve possible problems.
- ⇒ 积极致力于解决可能出现的问题；
- ⇒ Spreading out of clear and true information.
- ⇒ 传播清晰、真实的信息；
- ⇒ Protection of the company, shareholders, supervisors, and colleagues' fame.
- ⇒ 保护公司、股东、主管和同事的声誉。

Everybody should lead to a co-operative and highly professional behavior.

每个人都应展现出合作且高度专业的行为。

**3.3 Quality and customer satisfaction 质量和客户满意度**

Everybody is committed to provide for very high-quality standards for offered products and services, according to predefined levels and to periodically monitor the perceived quality, in line with what defined in the Company quality system procedure, PG08 “Processes relating to the customer”.

每个人都应致力于按照预先定义的水平，为提供的产品和服务设定非常高的质量标准，并根据公司质量体系程序 PG08 “与客户相关的流程” 的规定，定期监测感知质量。

**4 Relationship with the institutions 与机构的关系**

Company relations with the local, national, community and international public institutions are managed by the appointed company managers and consultants, in compliance with the regulations in force and according to the general correctness, loyalty and transparency principles.

公司与地方、国家、社区和国际公共机构的关系由指定的公司经理和顾问管理，需遵守现行法规，并遵循一般的正确性、诚信和透明度原则。

Similarly, any other relationship with public officials or people liable for public services, or bodies, representatives, agents, managers of public functions, public institutions, public administrations, public and economic bodies, institutes and local, national, or international public companies.

同样，与公职人员、负责公共服务的人员、机构、代表、公共职能部门的代理人、公共机构、公共行政部门、公共和经济机构、地方、国家或国际公共公司的关系也应如此。

Any consultant should avoid - during any business relationship, requests or commercial relations with public institutions or officers - enforcing (directly or indirectly) the following actions:

在与公共机构或官员开展任何业务关系、提出请求或进行商业往来时，任何顾问都应避免（直接或间接）实施以下行为：

- Examine and suggest employment or commercial opportunities to the benefit of the employees of the public companies or officers, with a personal interest.

为公共公司的员工或官员谋取个人利益，考察并推荐就业或商业机会；

- Offer or supply, accept or encourage gifts, favors or commercial and behavioral practices which are not based on transparency, correctness, and loyalty, and anyhow which do not comply with the application regulations in force;

提供、接受或鼓励不符合透明度、正确性和忠诚度原则，且无论如何都不符合现行适用法规的礼品、优惠或商业及行为做法；

- Request or get confidential information possibly compromising the integrity or fame of both parties or however violating an equal treatment or public evidence procedures enforced by public institutions or officers.

要求或获取可能损害双方诚信或声誉，或违反公共机构或官员执行的平等对待或公开证据程序的机密信息。

**4.1 Public financing 公共融资**

Contributions, aids, financing, loans at preferential rates and any other benefit received from the public administration (including tax reliefs, licenses or authorizations) should only be based on legal provisions, and they should only be destined to the main purpose they are granted for.

It is severely forbidden to provide for economic advantages through false or misinterpreted documents or tampering with any demanded information.

从公共行政部门获得的捐款、援助、融资、优惠利率贷款及任何其他福利（包括税收减免、许可证或授权），都应仅基于法律规定，且仅用于获批的主要目的。严禁通过虚假或误导性文件提供经济利益，或篡改任何所需信息。

At the same time, it is forbidden to use any aid, provided benefit or financing whatsoever for different purpose then what they are granted for.

同时，禁止将任何援助、所获福利或融资用于获批用途以外的其他目的。

The different liable subject throughout the different project phases is to be identified, clearly and separately identifying people liable for the production processes and people liable for in-progress document drafting. What is more specific hierarchical control activities are forecast on practices and on the documents to be forwarded to the competent institutions.

在不同项目阶段，应明确识别不同的责任主体，分别明确生产过程的责任人和起草文件过程中的责任人。此外，还应针对提交给主管机构的实践和文件进行特定的层级控制活动。

**4.2 Relationship with the Judicial authorities, Inspectorates and Control authorities as well as with the Police. 与司法当局、监察机构和警察的关系**

Any relationship with the Judicial Authorities, police, and inspectorates (Social Security Tax Office, Labour Security, etc), and any other Public administration) are constantly to be based on availability and cooperation.

与司法当局、警察和监察机构（如社会保障税务局、劳动保障部门等）以及任何其他公共行政部门的关系，应始终基于积极配合与合作。

The receivers of the present code, according to the enforced provisions for each single activity sector, should promptly and transparently respond to any request forward by Public authorities.

## CODE OF CONDUCT 行为准则

本行为准则的接收者，根据每个活动部门的强制规定，应及时、透明地回应公共当局提出的任何请求。

It is entirely forbidden to change, supplement, destroy documents, accounting registers, minutes, and records as to put forward any false declaration to the competent Authorities in case of judicial procedures, surveys, or inquiries.

在司法程序、调查或询问期间，严禁更改、补充、销毁文件、会计账簿、会议记录和记录，以向主管当局提供任何虚假声明。

It is not allowed to influence whoever is liable for controls or inspections with gift, cash, or whatsoever benefit.

禁止用礼品、现金或任何其他利益影响负责监管或检查的人员。

### 5 Relationships with the competition 与竞争对手的关系

The commercial development company activity is to be enforced, in general, in compliance with correct economic principles, in a regular market context, and loyally competing with Competitors.

公司的商业发展活动通常应在遵守正确的经济原则、在正常的市场环境中进行，并与竞争对手进行公平竞争。

### 6 Communication to the outside 对外沟通

The Company communication to any stakeholder (through the mass media too) is substantially based on the information right respect. No false or incorrect information and/or comment can be disclosed.

公司与任何利益相关者的沟通（包括通过大众媒体）主要基于尊重信息权。不得披露任何虚假或不正确的信息和 / 或评论。

Any communication activity complies with the regulations, rules, professional behavior practices and it is clearly, transparently, and promptly enforced, protecting among others the price-sensitive information and any industrial secret.

任何沟通活动都应遵守法规、规则和专业行为规范，并且应清晰、透明、及时地进行，尤其要保护价格敏感信息和任何商业机密。

Any pressure or favorable attitude by the communication is not correct.

沟通中施加压力或表现出偏袒态度都是不正确的。

As to provide for complete and coherent information, the company relations with mass media are only managed by the appointed department.

为了提供完整、一致的信息，公司与大众媒体的关系仅由指定部门管理。

It is useful to take part in conferences, seminars and working tables, besides scientific, social, and economic publication presence as for any activity according to the following general behavioral rules:

除了参与科学、社会和经济出版物相关活动外，按照以下一般行为规则参与会议、研讨会和工作会议也是有益的：

- Participation to any congress to a limited number of Companies employee;
- 公司员工参与任何会议的人数应有限制；
- Early communication to the Company of the relative willingness to take part to a company event or reception by the management to take part to the events.
- 管理层应提前告知公司其参与公司活动或招待会的意愿；
- Approval by the company management or any appointed manager, of technical/scientific documents, drafted to the publishers.
- 提交给出版商的技术 / 科学文件需经公司管理层或任何指定经理批准。

## **7 Economic relations with political parties, trade unions and associations 与政党、工会和协会的经济关系**

Companies are not entitled to finance anybody excluding the activities explicitly approved by Shareholders and therefore must avoid any direct or indirect external or internal pressure. 公司无权资助任何未经股东明确批准的活动，因此必须避免任何直接或间接的外部或内部压力。

In general, the companies do not pay any contribution to organizations in case of conflict of interests (for example trade unions, environmental-protection associations, or customer protection associations as well). However, it is possible to co-operate, financially too, with such organizations for specific projects according to the following criteria:

一般情况下，公司在存在利益冲突的情况下（例如工会、环境保护协会或消费者保护协会等），不会向组织支付任何捐款。然而，根据以下标准，可以在特定项目上与这些组织进行

## CODE OF CONDUCT 行为准则

合作，包括资金方面的合作：

- Goals linked to the company mission.
- 目标与公司使命相关；
- Clear and documented destination of resources.
- 资源的使用目的明确且有记录；
- Explicit authorization by the appointed departments to manage such activities and relationships within the company.
- 公司内指定部门明确授权管理此类活动和关系。

### 8 Gifts and benefits 礼品和福利

It is substantially forbidden to offer, directly and indirectly, and to personal benefit, money, gifts or whatsoever benefit to customers, suppliers, partners or whoever has any relationship with the above-mentioned companies as to offer unfair advantages.

原则上，严禁直接或间接向客户、供应商、合作伙伴或与上述公司有任何关系的人提供金钱、礼品或任何形式的利益，以获取不正当优势。

Commercial courtesy acts, such as gifts or hospitalities, are only allowed after being authorized by the manager, low in values and however not compromising one of the party's integrity and fame, and not affecting the receiver judgement independence.

商业礼仪行为，如赠送礼品或款待，只有在得到经理批准、价值较低且不损害任何一方的诚信和声誉、不影响接受者判断独立性的情况下才被允许。

Similarly, no consulting company should receive, in general, any gift, invitation or favorable treatment, if not within any courtesy normal limits and however with a symbolic value. In all the other cases, all must inform any episode to their supervisor, deciding then whether to return the gift or to better use what received, while informing the donor of the company principles on the subject.

同样，一般情况下，咨询公司不应接受任何礼品、邀请或优惠待遇，除非在正常礼仪范围内且仅具象征意义。在所有其他情况下，相关人员必须将此类情况告知主管，然后决定是退还礼品，还是以更恰当的方式处置所收物品，同时向赠送者说明公司在此问题上的原则。

### 9 Relationship with consultants 与顾问的关系

#### 9.1 Staff selection 人员选拔

The staffs selection to be employed is mainly enforced according to the correspondence of

any candidate profile to the expected company requirements, granting equal opportunities to everyone.

Requested information is strictly linked to the assessment of the person professional or psycho-attitudinal profile, in compliance with privacy and candidate opinions as well.

员工的选拔主要依据候选人的个人情况与公司预期要求的匹配度进行，为每个人提供平等的机会。

所要求提供的信息与评估个人的专业能力和心理态度密切相关，同时也遵循隐私保护规定并尊重候选人的意愿

## 9.2 Set up of a working relationship. 建立工作关系

The staffs are hired according to a regular labor contract. No tolerance to any working activity against the law.

员工依据正规劳动合同被录用。公司绝不容忍任何违法的工作行为。

When signing a labor contract, generally following information are disclosed:

签订劳动合同时，通常会披露以下信息：

- ⇒ Features of the tasks and activities to be carried out.
- ⇒ 即将开展的任务和活动的特点。
- ⇒ Regulation and compensation issues, according to the national labor contract;
- ⇒ 根据国家劳动合同规定的规则和薪酬问题；
- ⇒ Regulations and procedures to be adopted as to avoid possible health-care risks connected to the company activity.
- ⇒ 为避免与公司业务相关的潜在健康风险而需采用的规定和程序。
- ⇒ Procedures to be enforced as to guarantee the company information and data privacy which the consultant will be informed of, and which are identified as confidential by the company, according to what reported in the dedicated procedure within the Quality system PG12.

根据质量体系 PG12 中的专门程序，为确保公司信息和数据隐私而需执行的程序。顾问会被告知这些信息，且公司将其认定为机密信息。

Such information is disclosed to allow the contract acceptance based on a real mutual understanding.



披露这些信息是为了使双方在真正相互理解的基础上接受合同。

### **9.3 Staff management 员工管理**

Companies avoid any type of discrimination against any employee.

公司避免对任何员工有任何形式的歧视。

Decision taken by management also during hiring processes are based on the correspondence between expected profiles and available profiles of the candidates (including for example in the case of promotion), and/or on merit considerations (for example incentives granted according to the reached results).

管理层在招聘过程以及其他决策中，依据候选人的期望资质与现有资质的匹配度（例如在晋升的情况下），和 / 或基于业绩考量（例如根据所取得的成果给予激励）来做出决定。

Access to roles and tasks is defined taking any competence and skill into account. What is more according to the general operating efficiency, flexibility of the working organization is supported in compliance with the labor contract and with the regulations in force.

在确定员工的岗位和任务时，会考虑其能力和技能。此外，为了提高整体运营效率，在遵守劳动合同和现行法规的前提下，支持灵活安排工作组织形式。

The candidate assessment is mainly enforced in compliance with the position proposed after listening their requests, and whenever possible, with who evaluated the candidate. The final decision is taken by the Manager or his/her appointed representative.

对候选人的评估主要依据所申请的职位进行，评估过程中会听取候选人的需求，并且尽可能地参考评估人员的意见。最终决策由经理或其指定代表做出。

#### **9.3.1 Disclosure of personal information 个人信息披露**

Information on the staffs is mainly available through the company communication tools (organization and communication documents to managers, and via communications and declarations available on the company notice board.

员工信息主要通过公司的沟通渠道发布（比如提供给经理的组织和沟通文件，以及公司公告板上的通知和声明）。

Information spread out to the staff mainly deals with: working times, holidays, information on the company development, safety, security and health within the working environment, recently hired people, enjoyment and playful proposals, compensations connected to the

national or company labor contracts or based on production trends, company technical and organization issues.

传达给员工的信息主要包括：工作时间、假期安排、公司发展动态、工作环境中的安全与健康信息、新入职员工情况、娱乐休闲活动提议、与国家或公司劳动合同相关的薪酬信息（或根据生产趋势确定的薪酬）、公司技术和组织方面的问题。

### 9.3.2 Resource enhancement and training 资源提升与培训

Managers recognize and support, whenever possible, professionalism of people present within the organization, activating any possible lever to enhance their professional development and growth through job rotation whenever possible, coaching by expert staff, leading to higher liabilities activities.

经理们会尽可能认可并支持公司内部员工的专业素养，利用一切可能的方式促进他们的职业发展和成长，比如尽可能安排岗位轮换、让专家员工进行指导，使员工能够承担更重要的工作。

Thus, communications by the managers on strengths and weaknesses of the staffs are extremely useful, as the consultants should then try to improve his/her competences through a targeted training.

因此，经理们对员工优缺点的反馈极为有用，员工可据此通过有针对性的培训提升自身能力。Company provides, whenever required, to their own staff, information and training tools, aiming at enhancing and improving their specific skills and preserving and protecting their professional staff value. Generally, people are driven to attend internal and external courses (for example by machine manufacturers), and any available course is advertised on the notice board.

公司会根据需要为员工提供信息和培训资源，旨在提升和完善他们的专业技能，维护和保障员工的专业价值。通常情况下，公司会鼓励员工参加内部和外部培训课程（例如由机器制造商提供的课程），布告栏上会公布所有可参加的课程信息。

The definition of the training requirement, training modes and assessment of any action and measure enforced are specified in the dedicated procedures in the Quality system, PG06 “Resource managers”.

培训需求的确定、培训方式以及对所实施的任何行动和措施的评估，都在质量体系的专门程序 PG06 《资源管理》中有详细规定。

### 9.3.3 Working time management of the workers 员工工作时间管理

Each manager should correctly organize the working time of their employees, asking for performances consistent with the roles and working organization plans as well.

每位经理都应合理安排员工的工作时间，同时要求员工的工作表现与岗位和工作计划相符。

A clear abuse of authority, is a measure enforced by the manager, that implies the request for performances, personal favors or any behavior violating the present Code of Conduct.

经理强制实施的一些措施，如果涉及不合理地要求员工表现、谋取个人私利，或存在任何违反本行为准则的行为，都属于明显的滥用职权。

### 9.3.4 Involvement of consultants 顾问的参与

The staff and consultant involvement are driven when working, including attendance to discussion or functional decisions while aiming at reaching the company goals.

在工作过程中，会推动员工和顾问的参与，包括参与讨论或职能决策，以实现公司目标。

The employees should take part to such an activity in a cooperative way and with his/her independent judgment.

员工应以合作的态度参与此类活动，并运用自己的独立判断力。

## 9.4 Intervention on the job organization 工作组织调整

In the case of a job re-organization, in general the value of any human resource is protected, enforcing, whenever possible, training and/or professional re-qualification measures.

在进行工作重组时，一般会保护人力资源的价值，尽可能实施培训和 / 或职业再培训措施。

Companies mainly comply with the following criteria:

公司主要遵循以下标准：

- Charges and burdens of the re-organization are as uniformly as possible spread on all employees, in line with the effective and efficient company activity;

重组的成本和负担尽可能均匀地分摊到所有员工身上，以符合公司高效的运营活动要求；

- In case of new or unforeseeable events, the employee can be moved to different activities in comparison to his/her previous tasks, paying attention to duly preserve his/her professional skills and competences.

遇到新的或不可预见的情况时，员工可能会被安排从事与之前不同的工作，但要注意适当保留其专业技能和能力。

### 9.5 Safety, security, health, and environment 安全、安保、健康与环境

Companies cover the entire value chain, looking for the best quality levels, and duly paying attention to the safety on the job and to the environment where employees and/or consultant's work. Thus, Company consistently invested in installations and machineries to improve safety standards, environments, and training/information activities of their staff.

公司覆盖整个价值链，追求最高质量标准，同时充分重视员工和 / 或顾问工作场所的安全以及工作环境。因此，公司持续对设施和机械设备进行投资，以提高安全标准、改善工作环境，并开展员工培训和宣传活动。

The competent manager, in general, monitors and does his/her best as to grant a suitable working environment in terms of staff safety, security and health, in line with the regulations in force on the matter and according to what reported and forecast in the company documents relating to the environmental issues and safety, security and health as well company policies, education and prevention projects through sensitivity campaigns.

通常，主管经理负责监督并尽力为员工提供一个在安全、安保和健康方面都适宜的工作环境，这既要符合相关现行法规的要求，也需遵循公司文件中有关环境问题、安全、安保和健康的规定与预期，以及公司政策、通过宣传活动推行的教育和预防项目的要求。

Likewise, the competent manager undertakes to comply with environmental legislation and company procedures, including technical standards where required. The “security, safety and environment documents” can be consulted in the list annexed to Enclosure 1 of the present document.

同样，主管经理有责任遵守环境法规和公司程序，必要时还需遵循技术标准。“安全、安保和环境相关文件”可查阅本文件附件 1 所附清单。

The environmental policy of the group pays attention to the issues of:

集团的环境政策关注以下问题:

- Energy efficiency 能源效率
- Waste reduction 减少废弃物
- Phase-out of harmful chemicals in the production process 在生产过程中逐步淘汰有害化学品
- Mindful use of water 合理用水

The Group undertakes to implement, in all production plants, measures to limit the negative impact of the activity not only by operating in a preventive manner when the risk of harmful or dangerous events is proved, but also as a precautionary measure when there is no certainty of the risk and its magnitude.

集团承诺在所有生产工厂实施措施，以限制生产活动的负面影响。不仅在有害或危险事件风险得到证实时采取预防措施，而且在无法确定风险及其程度时，也采取预防措施。

The companies of the Group therefore aim at implementing production processes with low environmental impact starting from the selection of production raw materials and to continuously improve the processes aimed at this objective.

因此，集团旗下各公司致力于从生产原材料的选择入手，实施对环境影响较小的生产流程，并持续改进以实现这一目标。

The Companies operates in full compliance with the legal system on use of chemicals.

各公司在化学品使用方面完全遵守相关法律制度。

Companies are mainly committed to spread out and consolidate a security, safety, and environmental protection culture, developing the awareness of risks, promoting responsible behaviors by employees. What is more they do their best to protect, through preventive actions mainly, operator security and safety as well as the environment where they work and the external environment as well as including the stakeholders' interests.

公司主要致力于传播和巩固安全、安保和环境保护文化，提高风险意识，促进员工的责任行为。此外，公司主要通过预防措施，尽力保护操作人员的安全，以及他们工作的环境和外部环境，同时兼顾利益相关者的利益。

The awareness that the progressive spreading of new information technologies (in particular, the free access to the Internet from Personal Computers, tablets and smartphones) constantly exposes employees, operators and company assets to risks for their own security, led to the introduction of an "Internal Company Regulation explaining methods and rules of conduct as for use of electronic devices of information systems, personal computers and electronic mail on the job and during working activities.

鉴于意识到新信息技术（尤其是个人电脑、平板电脑和智能手机可免费接入互联网）的逐渐普及，不断使员工、操作人员和公司资产面临安全风险，公司出台了《公司内部规定》，释明了在岗位上及工作活动中使用信息系统电子设备、个人电脑和电子邮件的行为方式和规则。

The correct use of telecommunications and IT systems, constitutes, together with the other

procedures in force, an integral part of the obligations each employee must scrupulously comply with.

正确使用电信和信息技术系统，与其他现行程序一起，构成了每位员工必须严格遵守的义务的一部分。

Companies mainly tend to protect their own human, asset and financial resources constantly looking for synergies required not only inside companies but also in co-operation with suppliers and customers involved in their activities.

公司主要致力于保护自身的人力资源、资产和财务资源，不断寻求协同效应，不仅在公司内部，还包括与参与其业务活动的供应商和客户合作。

In general, companies implement activities as to prevent and monitor on the reference scenario evolution and the consequences of the change in risks, aiming at defining technical, organization and training interventions mainly oriented to safety.

**Substantially through:**

一般而言，公司开展活动以预防和监测参考场景的演变以及风险变化的后果，旨在确定主要以安全为导向的技术、组织和培训干预措施。主要通过以下方式：

- ⇒ **Safety and environment organization models**
- ⇒ 安全和环境组织模式
- ⇒ **A constant risk and criticality assessment as for safety and environmental processes.**
- ⇒ 对安全和环境流程进行持续的风险和关键度评估
- ⇒ **Enforcement of the best possible technologies in line with the company requirements and strategies.**
- ⇒ 实施符合公司要求和战略的最佳技术
- ⇒ **Control and update of working methods.**
- ⇒ 控制和更新工作方法
- ⇒ **New training and information and communication proposals**
- ⇒ 提出新的培训、信息和沟通方案

As for the supplier access and more in general of people from outside the company, they can view information documents on safety and most suitable access modes, movements and exist from the above-mentioned companies. Documents referring to provisions for outside people are annexed to Enclosure 1 to the present document.

至于供应商及一般外来人员，可以查看有关安全以及进出上述公司的最合适方式、行动路线

## CODE OF CONDUCT 行为准则

的信息文件。涉及外来人员规定的文件附在本文件附件 1 中。

### 9.6 Protection of the privacy 隐私保护

The privacy of any employee is protected enforcing standards including information that the company asks to the consultant and relating processing and storage.

通过执行相关标准，包括规范公司向顾问收集信息以及对这些信息的处理和存储方式，来保护每一位员工的隐私。

Any survey on ideas, preferences, personal tastes and in general private life of employees or consultants is forbidden. Such standards forbid, except for any assumption permitted by the law, spreading out/disclosing personal information without the approval of the person affected in due advance and set the rules as for the control by each employee or consultants, of standards to protect their privacy.

禁止对员工或顾问的想法、偏好、个人品味以及一般意义上的私人生活进行任何调查。这些标准规定，除法律允许的情况外，未经相关人员事先批准，禁止传播 / 披露其个人信息，并制定了员工或顾问对保护自身隐私标准的监督规则。

### 9.7 Integrity and people protection 诚信与人员保护

Companies are committed to protect the moral integrity of employees or consultants while protecting and offering working conditions complying with their personal dignity. For such a reason, companies protect workers undergoing psychological violence and forbid any discriminatory or harmful attitudes or behaviors against people, their beliefs, and preferences (for example, in case of offences, menaces, isolation or excessive invasiveness or professional limitations).

公司致力于保护员工或顾问的道德操守，同时保障并提供符合他们个人尊严的工作条件。因此，公司保护遭受心理暴力的员工，禁止任何针对他人、他人信仰及偏好的歧视性或有态度与行为（例如冒犯、威胁、孤立、过度侵扰或职业限制等情况）。

No sexual harassment is tolerated, and any attitude or discussion is to be avoided possible affecting the sensitivity of the others (for example images with explicit sexual reference, constant or continuous comments with allusions).

公司绝不容忍性骚扰行为，避免出现任何可能影响他人感受的态度或言论（例如含有明确性暗示的图片、持续或不断带有暗示性的评论）。

Any company's possibly victim of harassment or discrimination for reasons connected to

age, sex, sexual practices, race, health conditions, disability, nationality or beliefs can report what happened to the Ethical Committee then assessing the measures to be enforced in case of a real violation to the Code of Conduct.

任何因年龄、性别、性取向、种族、健康状况、残疾、国籍或信仰等原因，可能遭受骚扰或歧视的公司员工，可向道德委员会报告相关情况。道德委员会将评估是否确实违反了行为准则，并据此决定应采取的措施。

It is forbidden to be a member of organizations, associations, movements or groups inciting discrimination or violence on the grounds of race, ethnicity, nationality or belief.

禁止加入任何煽动基于种族、民族、国籍或信仰的歧视或暴力的组织、协会、运动团体。

## **9.8 Duties of consultants 顾问的职责**

Employees should correctly behave in good faith, as to comply with signed obligations in their work contracts and with the Code of Conduct, granting the requested performances. They should report through the specific channels any violation to behavioral and conduct rules specified in the internal procedures.

员工应秉持诚信原则，端正自身行为，遵守劳动合同中签署的义务以及本行为准则的要求，完成规定的工作任务。若发现有违反内部程序所规定的行为规范的情况，员工应通过特定渠道进行报告。

### **9.8.1 Information management 信息管理**

The Company is convinced that the disclosure of correct, complete, and true information as well as the required confidentiality on any information is required to develop a confidence relationship with its partners. Therefore, the employees and consultants should keep any company confidential information whenever they inform during their employment, they should avoid any unauthorized third-party access as well as any information disclosure.

公司深信，披露准确、完整和真实的信息，以及对任何信息进行必要的保密，是与合作伙伴建立信任关系的必要条件。因此，员工和顾问在任职期间，应妥善保管公司的任何机密信息，避免未经授权的第三方访问以及任何信息泄露。

The employees and consultants should recognize and enforce what imposed and forecast by the Company policy as for safety of the information as to guarantee its integrity, confidentiality, and availability. He/she should process their documents, in a clear, objective,



and complete language, thus allowing any possible controls by his/her colleagues, managers and authorized subjects asking for them.

员工和顾问应认可并执行公司信息安全政策中的要求和预期，以确保信息的完整性、保密性和可用性。他们应以清晰、客观和完整的语言处理文件，以便同事、经理和要求查看文件的授权人员能够进行必要的检查。

### **9.8.2 Processing of confidential information 机密信息处理**

In carrying out their activities, employees who become aware of sensitive data and confidential information, commit to process them in compliance with laws in force on confidentiality, and best practices for the protection of privacy.

在开展工作时，接触到敏感数据和机密信息的员工有责任按照现行保密法律以及隐私保护的最佳实践来处理这些信息。

Confidential information mainly consists of:

机密信息主要包括：

- Accounting and personal information on customers/suppliers
- 客户 / 供应商的财务和个人信息
- Commercial information
- 商业信息
- Projects, technical data, initiatives, and contracts as for the company activity, which are not known by the wider public.
- 公司业务相关的项目、技术数据、计划和合同，这些信息尚未向公众公开。
- Forecasts and balance information, consolidated as well, belonging to the companies, until they are disclosed to everyone after the approval of the financial year and consolidated financial year financial statement.
  - 公司的预测和财务结算信息（包括合并报表信息），在财年及合并财年财务报表获批并向公众披露之前属于机密。
- personal data, salaries and all data relating to the company staff.
- 员工个人数据、薪资以及与公司员工相关的所有数据。

Such information is only to be processed by authorized employees according to their activity and only for whatever required to carry out their activity.

此类信息仅允许经授权的员工根据其工作需要进行处理，且仅用于开展工作所必需的目的。

In general, employees or consultants, for working reasons, requested to be disclosed a confidential information, should not disclose it out to third parties if not obliged, after being duly authorized by the relative supervisor. In the case of communication to third parties, the disclosed information is to be identified as confidential information and therefore the affected third party will have to keep it confidential.

一般来说，员工或顾问因工作原因被要求接触机密信息时，在获得相关主管正式授权后，若没有法律强制要求，不应向第三方披露该信息。如果需要向第三方传达，所披露的信息必须明确标记为机密信息，接收信息的第三方也必须对其保密。

The internal disclosure and disclosure to third parties of any document including confidential information must be organized in an attentive manner as to avoid prejudices against companies and undue disclosures.

任何包含机密信息的文件在公司内部披露或向第三方披露时，都必须谨慎安排，避免给公司造成损害或出现不当披露的情况。

Any information not available to the wider public is to be considered confidential and they should only be used within each specific working activity.

任何未向公众公开的信息都应视为机密信息，且只能在特定的工作活动中使用。

More precisely it is entirely forbidden to consult confidential data for unprofessional reasons.

Any violation will be punished by a disciplinary measure.

更确切地说，严禁因非工作原因查阅机密数据。任何违规行为都将受到纪律处分。

The document describing the confidential information management mode is procedure PG12 “Confidential information management”.

描述机密信息管理方式的文件是程序 PG12 《机密信息管理》。

### **9.8.3 Conflicts of interests 利益冲突**

Any employee should avoid, in general, any situation where there are conflicts of interest and refrain from personally profiting from business opportunities they were informed of during their activities.

一般而言，任何员工都应避免陷入任何利益冲突的情形，并且不得利用工作中知悉的商业机会谋取个人利益。

As an example, which is not comprehensive, however, there could be conflicts of interests in the following situations:

以下举例虽不全面，但在这些情形下可能会出现利益冲突：

- Any management function (managing director, advisors, managers, supervisors) and common economic interests with suppliers, customers, and competitors (shareholding, professional activities, etc.)

担任任何管理职务（董事总经理、顾问、经理、主管）的人员，与供应商、客户和竞争对手存在共同经济利益（如持股、参与专业活动等）。

- Managers of any relationships with suppliers and a working consulting activity, through a relative as well, by the suppliers accept money or benefits and favors from people and companies intending to have a business relationship with the above-mentioned companies.

负责供应商关系管理的经理，通过亲属开展咨询工作，同时接受有意与公司建立业务关系的人员或公司给予的金钱、利益和好处。

- Any collusive behavior, favor, pressure, and solicitation towards third parties as to be granted personal advantages and/or career developments for themselves or others.

对第三方进行任何勾结行为、提供不当便利、施加压力或进行游说，为自己或他人谋取个人利益和 / 或职业发展机会。

In case of any possible apparent conflict of interest (also for activities done during leisure time), the consultant should inform his/her direct manager, who informs the company management to evaluate the case.

如果出现任何可能明显的利益冲突（包括在业余时间开展的活动引发的冲突），顾问应告知其直属经理，由直属经理通知公司管理层对该情况进行评估。

#### 9.8.4 Transparent accounting and traceability of financial flows 透明会计与财务流程可追溯性

The accounting and related registrations and records should comply with specific principles, such as truth, correctness, and information completeness.

会计及相关登记和记录应遵循特定原则，如真实性、准确性和信息完整性。

Thus, any employee should:

因此，任何员工都应做到：

- Correctly and completely record any economic operation and financial transaction.

正确、完整地记录任何经济业务和财务交易。

- Completely, transparently, and accurately represent the company activity.

全面、透明且准确地反映公司活动。

- Correctly store any document referring to any operation, transaction, or activity, as well as to support any possible control or survey in the future.

妥善保存与任何业务、交易或活动相关的文件，以便为未来可能的检查或调查提供支持。

- Logically record and store such documents as to be able to easily track them.

有条理地记录和存储这些文件，以便能够轻松追踪。

- Allow any control possible confirming the transaction features and motivations.

接受任何旨在确认交易特征和动机的检查。

- Supply to any auditors or control entity complete, true, and clear requested information.

向任何审计人员或监管机构提供完整、真实、清晰的所需信息。

Operations of any company in receiving stolen goods, money laundering, using goods or money of unlawful origin, or self-laundering, are prohibited.

任何公司都禁止进行接收赃物、洗钱、使用非法来源的货物或资金，以及自我洗钱等操作。

The traceability of financial flows can be considered as the major hindrance and prevents unlawful behavior at the same time. For this purpose, the companies usually spread fiscal and accounting standards to all the employees concerned and establish procedures allowing financial resources to be managed according to these criteria: transparency, fairness, and truthfulness.

财务流程的可追溯性既可以被视为一种主要约束，同时也能防止非法行为。为此，公司通常会向所有相关员工普及财务和会计标准，并建立程序，以便按照透明、公平和真实的标准管理财务资源。

The traceability of financial flows allows a reconstruction of the accounts regarding each operation to be carried out, and the companies' executives that have determined the use of such resources to be identified.

财务流程的可追溯性使得能够对每笔业务的账目进行重建，并识别出决定这些资源使用方式的公司高管。

**9.8.5 Use of the company assets 公司资产的使用**

Any employees or consultants should diligently do his/her best to protect the company assets, through responsible behaviors and in line with the operating documents available to govern their use. Such documents can be consulted in the dedicated area of Enclosure 1 to the present document.

任何员工或顾问都应秉持尽责态度，通过负责任的行为，并依据管理公司资产使用的现有操作文件，尽全力保护公司资产。这些文件可在本文件附件 1 的指定区域查阅。

In general, any employees or consultants should:

一般来说，任何员工或顾问都应做到：

- ⇒ **Attentively use any asset he/she is reliable for whenever required.**
- ⇒ 在有需要时，谨慎使用其负责管理的任何资产。
- ⇒ **Avoid any incorrect use of any asset he/she is responsible possibly leading to damages or efficiency reduction or anyhow against the company interests.**
- ⇒ 避免对其负责的资产进行任何不当使用，以免造成损坏、降低效率，或以任何方式损害公司利益。
- ⇒ **Accurately comply, when using the company assets, with whatever reported in any operating document, such as instructions, tables, etc.**
- ⇒ 在使用公司资产时，严格遵守操作文件（如说明、表格等）中的所有规定。

Any employees or consultants is liable for protecting resources he/she is liable for and should promptly inform any Department about possible risks or damages the company is running.

任何员工或顾问都有责任保护其负责的资源，并应及时向相关部门通报公司可能面临的风险或损失。

It is important to avoid any incorrect use of assets or facilities through accounting, financial control, analysis, and risk prevention systems, anyhow in compliance with what is imposed by the regulations in force (privacy law, worker bylaws, etc.).

通过会计、财务控制、分析和风险预防系统，务必避免对资产或设施的任何不当使用，且无论如何都要遵守现行法规（隐私法、员工规章制度等）的要求。

As for information applications, any consultant, in general, should:

至于信息应用方面，一般而言，任何顾问都应做到：

- Accurately enforced whatever indicated in the documents relating to the company**

safety, as not to endanger functions or protections of IT systems.

严格执行与公司安全相关文件中规定的内容，以免危及信息技术系统的功能或防护措施。

□ Not forward any compromising or offensive e-mail messages, avoiding any impolite language, not express any inappropriate comments which could offend people and/or damage the company image.

不转发任何可能造成不良影响或冒犯性的电子邮件，避免使用不礼貌的语言，不发表任何可能冒犯他人和 / 或损害公司形象的不当评论。

□ Not surfing on the internet looking for unsuitable, offensive contents, not in line with their role.

不浏览与自身职责不符的、不合适或冒犯性的互联网内容。

## 10 Control Bodies 监督机构

### 10.1 Ethical Committee 道德委员会

Any violation to the Code of Conduct is to be reported to the Ethical Committee, the control body appointed to control the enforcement of any principle put forward in the Code and to inform the Company Management as to decide an enforce any disciplinary measure.

任何违反行为准则的情况都应向道德委员会报告。道德委员会作为指定的监督机构，负责监督行为准则中各项原则的执行情况，并告知公司管理层，以便决定并实施任何纪律处分措施。

It is up to the Ethical Committee as well as to spread out the content of the Code of Conduct, to periodically check its compliance enforcing any changes/integrations required, turning out to be suitable to guarantee an ethical approach which companies enforce in line with their policies.

道德委员会还负责传播行为准则的内容，定期检查其遵守情况，实施必要的修改或补充，以确保公司能够按照自身政策，以符合道德规范的方式运营。

The main documents used are:

主要使用的文件包括：

- ✓ communication and ethical training plans.
- ✓ 沟通与道德培训计划。
- ✓ periodic reports on the Health, Safety and Environment protection
- ✓ 健康、安全与环境保护定期报告。
- ✓ reports from the internal auditing.

## ✓ 内部审计报告

The Ethical Committee consists of 3 members appointed by Shareholders (the Group holding Company), who, on the occasion of its first meeting, appoint their Chairman.

道德委员会由股东（集团控股公司）任命的三名成员组成，在首次会议上，他们将推选委员会主席。

The Committee lasts for three years and its members can be re-elected. The deliberations of the Ethical Committee are approved with a simple majority.

委员会任期为三年，成员可连选连任。道德委员会的决议以简单多数决通过。

**10.2 Internal audit 内部审计**

The Internal Audit department should periodically, according to a defined program, audit the different companies in compliance with the Code of Conduct requirements. Results of the audits are documents in special Reports.

内部审计部门应依据既定计划，定期按照行为准则的要求，对各公司进行审计。审计结果会记录在专门的报告文件中。

The Internal Audit department within the companies reports any reported violation to the Code because of the ethical auditing activities and suggestions required to the Ethical Committee.

公司内部审计部门会将因道德审计活动发现的任何违反行为准则的情况，以及所需的建议，汇报给道德委员会。

The Ethical Committee, according to the results of the Audit, would enforce any measure as reported in the "Sanctions" section.

道德委员会会根据审计结果，执行“处罚措施”章节中所规定的相应措施。

**11. Enforcement standards and related sanction****执行标准与相关处罚措施****11.1 Enforcement standards 执行标准**

Everybody working in the above-mentioned Company, receivers of the present Code of Conduct, should comply with the reported principles.

在上述公司工作且收到本行为准则的每一个人，都应遵守准则中规定的原则。

Never the interest of any company can justify any conduct violating and/or different from

provisions and procedures.

任何公司利益都绝不能成为违反准则规定及程序行为的正当理由。

Whenever the receiver working for the companies is informed about a situation or event against the Code of Conduct principles, he/she should immediately inform the Ethical Committee, personally or via e-mail address available at the entrance of any operating site, which the Code of Conduct refers to.

为公司工作的人员，一旦知晓有违反行为准则原则的情况或事件，应立即亲自或通过行为准则所涉及的各工作场所入口处提供的电子邮箱，向道德委员会报告。

**Please note: Above MUST NOT BE USED if the report concerns criminal, civil or administrative violations that must be reported to the concerned People's Republic of China State bodies**

请注意：若报告涉及刑事、民事或行政违法行为，必须向相关的中国国家机构报告，此时请勿使用上述渠道。

The e-mail address is available to company employees, consultants and Stakeholders as well as to signal possible violations which directly or indirectly are benefits to the companies or are enforced in their interests.

该电子邮箱面向公司员工、顾问、利益相关者开放，用于举报可能直接或间接使公司受益或为公司利益而实施的违规行为。

**Any report to be considered, must be anonymous.**

任何被受理的举报都必须是匿名的。

The information will be promptly evaluated by the Ethical Committee, assessing any measure to be enforced, and always providing that the discloser will never be reported during any assessment.

道德委员会将迅速评估所举报信息，确定需采取的措施，并始终确保举报人在任何评估过程中都不会被泄露身份。

**The Committee can enforce a disciplinary measure in case no report was made by any informed stakeholder.**

若知情的利益相关者未进行举报，委员会可采取纪律处分措施。

**Suppliers, customers, Partners - commercials and other subjects' receivers of the present Code, are required to comply with reported principles and standards.**

供应商、客户、商业合作伙伴及其他收到本行为准则的主体，都必须遵守准则中规定的原则



**11.2 Sanctions 处罚措施**

In cases where the Ethics Committee deems it necessary to proceed with a sanction, the President must forward the request to the Managing Director (or the Company Administrator) who, if necessary, will define with the HR Dept. the applicable sanction.

若道德委员会认为有必要实施处罚，委员会主席必须将请求提交给总经理（或公司行政负责人）。如有必要，总经理将与人力资源部门共同确定适用的处罚措施。

It is the responsibility of the Human Resources Office to apply the sanctions and store/archive the appropriate records.

人力资源部门负责执行处罚措施，并保存 / 归档相应记录。

Sanctions always comply with the law and the applicable national employment contract.

所有处罚措施均严格遵守法律以及适用的国家雇佣合同规定。

**12. Reports of criminal, civil or administrative violations 刑事民事或行政违法举报**

To report or notify any misconduct by an employee or a person outside the company due to and during the performance of their job duties.

用于举报或通报员工或公司外部人员在履行工作职责期间发生的不当行为。

The subject is the person who reports to their public or private employer the possible perpetration of criminal, civil or administrative violations of which he or she has become aware during his or her work activity.

举报人是指将其在工作活动中知悉的可能存在的刑事、民事或行政违法行为，向其公共或私人雇主进行报告的人员。

The Company has defined a process for receiving and managing reports of misconduct and/or conduct that may represent a violation.

公司已制定了一套接收和处理有关不当行为及 / 或可能构成违法违规行为举报的流程。

**12.1 Object of the complaint. 投诉事项**

All offences can be reported, namely:

所有违法行为均可被举报，具体如下：

- administrative, accounting, civil or criminal offences.

行政、财务、民事或刑事违法行为。

- infringements falling within the scope of: public procurement, financial services, product and transport safety, environment, food, public health, consumer protection, data protection, security of network and information systems, competition.

涵盖以下领域的违规行为：公共采购、金融服务、产品与运输安全、环境、食品、公共卫生、消费者保护、数据保护、网络与信息系统安全、竞争。

- violations of corruption rules.

违反反腐败规定的行为。

## 12.2 Internal Reporting Channel 内部举报渠道

An internal reporting channel has been set up. It guarantees the anonymity and confidentiality of the employee who reports the alleged irregularity, that of the person who is the author of the alleged irregularity and of whom is named in the report. The report, can also be issued by self-employed workers, including those with a cooperative relationship, by freelancers and consultants.

公司已设立内部举报渠道。该渠道确保举报涉嫌违规行为的员工、被指称实施违规行为的人员以及举报中提及人员的匿名性和保密性。个体劳动者（包括存在合作关系的人员）、自由职业者和顾问也可进行举报。

Reports will only be read by the "Reports Manager". The content of the reports and the identity of the people involved will be managed and known only by the Manager and to the specifically authorized people, who will guarantee the confidentiality of the person that disclose the information against the possibility of any retaliatory actions.

举报内容仅由“举报事务经理”查阅。举报内容及相关人员身份信息，仅由该经理及特定授权人员处理和知悉，这些人员将确保举报人信息保密，防止其遭受任何报复行为。

The identity of the above person and any other information from which that identity

may be inferred, directly or indirectly, may not be disclosed without the above person consent to people other than those competent to receive or handle the reports.

未经举报人同意，不得向负责接收或处理举报的相关人员以外的其他人，披露举报人身份以及任何可能直接或间接推断出举报人身份的其他信息。

Reports (not anonymous) can be made by:

(非匿名) 举报方式如下:

**a) a written letter, addressed to the Reports Manager or verbally, through a meeting with the Reports Manager or by sending him an e-mail.**

可通过书面信函，寄给举报事务经理；也可通过与举报事务经理面谈，进行口头举报；还可向其发送电子邮件举报。

Anonymous reports will not be taken into consideration, unless they are adequately substantiated or present a clear, detailed, and complete description of facts of interest, the people involved and the context and/or present irrefutable elements of crime reporting.

匿名举报通常不予受理，除非举报内容有充分依据，或对所涉事实、相关人员及背景进行了清晰、详细且完整的描述，或提供了确凿的犯罪举报证据。

### **12.3 Processing of personal data. 个人数据处理**

The processing of personal data, related to the activity of above person, will be carried as per the People's Republic of China applicable Laws.

与上述人员活动相关的个人数据处理，将依据中国适用法律进行。

Attachments 附件

- Annex 1 – List of operational documents on Safety and Health at Work
- 附件 1 - 工作场所安全与健康操作文件清单