

	桂林福达阿尔芬大型曲轴有限公司		
	标题	员工行为准则	版本及修订
		Employee Code of Conduct	第 1 版
			生效日期
			2018-6-1

1. INTRODUCTION 引言

The following code of conduct shall be applicable for the Board of Directors, the Senior Officers as well as the employees of the Company. The Senior Officers shall make sure the compliance of the employees with the code of conduct. The Board of Directors shall appoint an compliance officer.

以下行为守则适用于董事会，高级管理人员和公司员工。 高级管理人员应确保员工遵守行为准则。董事会应指定合规专员。

2. SCOPE 范围

This Code of Conduct shall apply to all employees (hereinafter also called “we”) of Guilin Fuda Alfin Large Crankshaft Co Ltd and its subsidiaries (hereinafter collectively also called “ALFU”). Each employee shall personally be responsible for reading, understanding and implementing this Code of Conduct.

本行为准则适用于桂林福达阿尔芬大型曲轴有限公司及其子公司（以下统称“ALFU”）的所有员工（以下简称“我们”）。每位员工应亲自负责阅读，理解和实施本行为准则。

As a supplement to this Code of Conduct, ALFU has issued further regulations for its employees (such as work regulations, job instructions, process instructions) which also shall be binding. In the event of conflicts between legal and company standards and in the event of conflicts between different internal standards the more stringent regulation shall apply. 作为对本行为准则的补充，ALFU已经对其员工颁布了进一步的规章制度(例如工作条例、工作指示、操作说明)，这些规章也将具有约束力。在法律和公司标准发生冲突的情况下以及不同内部标准发生冲突的情况下，应适用更严格的规定。

In the event of doubts or questions concerning this Code of Conduct or in the event of violations of this Code of Conduct, the Compliance Officer shall be contacted.

如果对本行为守则准则有疑问或者违反本行为守则准则，应联系合规专员。

Any violation of this Code of Conduct or the relating regulations may lead to disciplinary and legal consequences.

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任何违反本行为准则或相关规定的行为都可能导致纪律和法律后果。

3. GENERAL CODE OF CONDUCT 一般行为准则

3.1 We take it for granted to comply with all applicable laws of the countries in which ALFU operates. Every employee is obligated to inform himself/herself of the applicable laws necessary for his/her activities and to comply with these laws at any time. For reference, information on the applicable laws can be gained from the work regulations, the applicable job description and all job instructions and process instructions. Furthermore, principals and the Compliance Officer can be contacted any time for questions and explanations.

我们理应遵守 ALFU 所在国家适用的所有法律。每个员工都有义务随时提醒自己所需适用的法律，并遵守这些法律。作为参考，有关适用法律的信息可以从工作条例，适用的工作指示以及所有工作说明和操作说明中获得。此外，可以随时向负责人和合规专员提出问题，寻求解释。

3.2 We expect all our employees to act with responsibility and integrity in accordance with the principles of conduct laid down in this Code of Conduct. Every employee is responsible for ALFU' s reputation and shall ensure that no harm is done to ALFU by his/her behaviour. We shall act at any time to the best of our knowledge and belief, we shall be personally responsible for our behaviour and shall bear ALFU' s reputation in mind in everything we do.

我们期望所有员工按照本行为准则中规定的行为原则，以负责任的态度行事。每个员工都对 ALFU 的声誉负责，并确保其行为不对 ALFU 造成任何伤害。我们将在任何时候尽我们的所知与所信行事，我们将对我们的行为负有个人责任，并在我们行事时首先考虑 ALFU 的名誉。

3.3 All principals shall support this Code of Conduct by their conduct and act as role models. Principals shall avert improper behavior within their managerial functions and shall avoid any violations of this Code of Conduct by appropriate action within their scope of responsibility.

所有负责人应以他们的行为支持这一行为准则，并作为榜样。负责人应避免在其管理职能范围内的不当行为，并应在其职责范围内避免任何违反本准则的行为。

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3.4 We respect all internationally accepted human rights and support their observance. We especially do not approve any kind of enforced labour as well as any kind of child labour and comply with all applicable legal provisions, such as for example minimum age of employees.

我们尊重且遵守所有国际公认的人权。我们尤其不会批准任何形式的强制劳动和任何形式的童工，并遵守所有应适用的法律规定，例如员工的最低年龄。

3.5 ALFU practises an open and communicative work climate which requires a fair, tolerant and confident cooperation of all employees. All ALFU employees acknowledge to respect personality and dignity of any human being and shall treat all individuals in the way they wish to be treated themselves.

ALFU 的工作环境是开放的、沟通的，需要全体员工公平、宽容、自信的合作。所有的 ALFU 雇员都承认并尊重任何一个人的人格和尊严，并且应该以他们希望被对待的方式对待所有的人。

3.6 ALFU boycotts any kind of discrimination. We shall especially be fair with co-workers and business partners and treat them with respect. Any discrimination due to race, ethnic origin, sex, religion or ideology, due to disability, age, sexual identity, nationality or other features protected by law is strictly prohibited.

ALFU 抵制任何形式的歧视。我们特别公平地对待同事和商业伙伴，并尊重他们。严禁任何因种族，民族，性别，宗教或意识形态，残疾，年龄，性别，国籍或受法律保护的其他特征而受到的歧视。

3.7 All applicable national employment laws and collectively regulated agreements shall be adhered to.

应当遵守所有应适用的国家就业法规和集体管理的协议。

4. CONDUCT IN BUSINESS 业务行为

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4.1 ALFU is committed to fair conduct with business partners and obeys the applicable anti-trust, competition, economy and trade laws and regulations. These regulations shall govern ALFU' s conduct towards competitors, contractors and third parties.

ALFU 致力于对业务伙伴的公平行为，遵守反托拉斯、竞争、经济和贸易方面的法律法规。这些法律法规适用于 ALFU 对竞争对手、合作方和第三方的行为。

4.2 In the event of violation of these laws, both ALFU and the offending employee may face severe consequences. In case of doubt in how far these standards concern the employee' s own field of activity, the Compliance Officer shall be consulted.

如果违反这些法律，ALFU 和违规的员工可能会面临严重的后果。如果对这些标准涉及员工自身活动领域的程度有疑问，应咨询合规专员。

4.3 Every employee is committed to adhere to these laws and regulations. This shall include not to gain any contracts by degrading competitors or their products and not to use any unfair methods in order to do harm to competitors. Any kind of understandings, agreements or collusions with competitors concerning prices, reductions, price changes, sales conditions and profit margins shall be prohibited. The attempt to unreasonably disadvantage any competitors in the competition or to gain illegal access to their confidential information is considered as an offence.

每个员工都致力于遵守这些法律法规。这包括不通过贬低竞争对手或其产品而获得任何合同，也不得使用任何不公平的方法来损害竞争对手。禁止与竞争对手就价格，减价，价格变动，销售条件和利润空间达成任何谅解，协议或共谋。在竞赛中不合理地使竞争对手处于不利地位或企图非法获取其机密信息的行为被视为犯罪行为。

4.4 In international business, ALFU shall comply with all applicable customs, import and export control laws and regulations.

在国际业务中，ALFU 应遵守所有应适用的海关和进出口管制法律法规。

5. CONDUCT TOWARDS BUSINESS PARTNERS AND GOVERNMENT AUTHORITIES

对业务伙伴和政府机关的行为

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5.1 Benefits, gifts or other personal advantages (such as an invitation for a business lunch) may be granted or accepted only if they are in line with usual business practices, this applies to both during working and during leisure time. Any benefits, gifts or personal advantages that may affect decision making shall not be allowed.

只有在符合通常的商业惯例的情况下，才能给予或接受好处，礼品或其他个人利益（例如商务午餐邀请），这同时适用于工作期间和休闲期间。给予或接受任何可能影响决策的好处，礼品或个人利益均不被允许。

5.2 ALFU is, based on applicable law, willing to cooperate with confidence with government officials and agencies. Therefore we shall comply with all lawful regulations of government agencies watching at the same time ALFU' s lawful rights.

根据适用的法律，ALFU 愿意并有信心与政府官员和机构合作。所以我们应该在关注 ALFU 的合法权益的同时，遵守政府机关的所有合法规定。

5.3 Invitations to government officials or business partners shall be made exclusively on a business basis. The laws of the applicable country shall be adhered to. Complimentary gifts of minor value which are in line with generally accepted business practices and the refusal of which would be considered as unfriendly may be granted and accepted.

对政府官员或业务伙伴发出的邀请应完全在商业的基础上进行，并应遵守应适用的国家的法律。根据一般商业惯例认为价值较低的赠品和拒绝接受会被认为不友好的礼品可以被给予和接受。

5.4 It is prohibited to ALFU employees to claim any benefits, gifts or personal advantages. Accepting any financial benefits or other non-cash benefits (such as vouchers) for personal advantage is not allowed. Participating in business lunches or events organized by business partners shall be allowed only if participation is voluntary, if they have a permissible purpose and take place within usual business cooperation.

禁止 ALFU 员工索取任何好处，礼品或个人利益。不得接受任何经济利益或其他非现金利益（例如代金券）以获取个人利益。只有在自愿参加的情况下，才允许参加业务伙伴组织的商务午餐或活动，该午餐或活动目的是获得准许的，并且在平常的业务合作下进行。

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5.5 Private business or any other relationships between employees and ALFU business partners that might unreasonably affect the activities and decision-making of ALFU' s employees shall not be allowed.

员工与 ALFU 业务伙伴之间可能不合理影响员工的活动和决策的私人业务关系或其他关系均是不被允许的。

5.6 In case of doubts in individual cases which behaviour is correct, the Compliance Officer and / or the Board of Directors shall be consulted.

如果对个别情况存在疑虑，认为其行为正当，则应咨询合规专员和/或董事会。

6. CORRUPTION 贿赂

6.1 ALFU strictly refuses economic crime and any corrupt behaviour, especially manipulation and corruption of competition by bribery. Employees shall not be allowed to make use of ALFU' s business connections to the company' s detriment.

ALFU严格拒绝经济犯罪和任何腐败行为，特别是在竞争中通过贿赂进行操纵。员工不得利用ALFU的业务关系来损害公司的利益。

6.2 Benefits of all kinds to business partners or representatives of government aiming at gaining contracts or inadmissible advantages for ALFU or third parties, shall not be permitted. It is especially prohibited to offer, grant, claim or accept any kind of bribe payments, illegal payments and hidden commissions. It is furthermore prohibited to indirectly grant such benefits (e.g. donations, sponsoring).

不允许为了 ALFU 或第三方获得合同或不被许可的利益，向业务伙伴或政府代表提供任何形式的利益。特别禁止提供，给予，索取或接受任何形式的贿赂，非法付款和隐藏的佣金。此外，禁止间接授予此类好处（例如捐赠，赞助）。

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7. INDUSTRIAL SAFETY 工业安全

7.1 ALFU places great value upon safety and health of its employees. We undertake to apply all applicable regulations concerning safety and health protection. ALFU supports health and safety of ALFU employees by continuous improvement of working conditions and by numerous prevention measures. Every employee increases his/her own safety and health by complying with the applicable regulations for safety and health protection.

ALFU重视员工的安全和健康。我们承诺遵守所有有关安全 and 健康保护的规定。ALFU 通过不断改善工作条件和大量预防措施来维护员工的健康和安全。每名员工都应遵守有关安全及健康保护的规定，保护自己的安全及健康。

7.2 ALFU maintains a management system in accordance with Standard BS OHSAS 18001 (Occupational Health and Safety Management System) and is certified accordingly. Each employee shall support ALFU within his/her range of duties to maintain this status.

ALFU按照BS OHSAS 18001标准（职业健康和安全管理系统）维护其管理系统，并得到相应的认证。每位员工应在其职责范围内支持ALFU以维持这一状态。

8. ENVIRONMENTAL SAFETY / ENERGY EFFICIENCY 环境安全/能源效率

8.1 ALFU takes seriously its responsibility for nature and environment. In a continuous process, we foster the environmental awareness of our employees and reduce ecological risks. Natural resources are used appropriately and economically and waste is avoided as far as possible. ALFU participates in the development and deployment of environmentally friendly technologies. We maintain an environmental management system in accordance with Standard [ISO 14001] and an energy management system according to [ISO 50001] and we are certified accordingly.

ALFU认真对待其对自然和环境的责任。在一个持续的过程中，我们培养了员工的环保意识，降低了生态风险。我们适当和经济地使用自然资源，尽量避免浪费。ALFU参与了环保技术的开发与部署。我们按照ISO 14001标准维护着一个环境管理系统，按照ISO 50001标准维护着一个能源管理系统，并得到了相应的认证。

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8.2 All employees shall be responsible for complying with the relevant environmental laws and internal regulations, especially the process and job instructions. They shall support ALFU within the range of their duties assigned to them to maintain the above mentioned certifications and to achieve the environmental and energy management targets set. 所有员工都应遵守相关的环境法规和内部规定, 特别是操作和工作说明, 并在指定的职责范围内支持ALFU维护上述认证, 实现环境和能源管理目标。

9. PROTECTION OF INFORMATION AND HANDLING OF COMPANY PROPERTY

保护信息和处理公司财产

9.1 Protection of our business and trade secrets, of the business and trade secrets of our business partners and the protection of personal data is a major concern of ALFU. We collect, process and use personal data only to the extent that is consistent with law and ensure that usage of such data is comprehensible for all parties involved. Confidential information of our business partners shall be used only to fulfill our jobs assigned. Every employee shall be obliged to comply with the internal regulations covering non-disclosure and data protection.

对我们的业务和商业秘密的保护, 我们业务伙伴的商业秘密的保护和个人数据的保护是ALFU主要关注的问题。我们仅在符合法律规定的范围内收集, 处理和使用个人数据, 并确保所有相关方都能理解这些数据的使用情况。我们业务伙伴的机密信息只能用来完成我们指定的工作。每个员工都有义务遵守关于禁止披露和数据保护的内部规定。

9.2 ALFU property shall be treated carefully and appropriately and may be used for business purposes only, except if private use has been authorized in individual cases. Every employee shall protect company property from loss, theft or damage.

ALFU的财产应被认真和适当地处理, 只能用于商业目的, 除非在个别情况下私人使用已被授权。每个员工都应保护公司财产不受损失, 不被盗窃或损坏。

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9.3 ALFU' s intellectual properties are an important asset and are the basis of our success. Their illegal use may cause considerable damage. We therefore protect such information to the best of our knowledge and belief.

ALFU的知识产权，是我们的重要资产，是我们成功的基础。对其非法使用可能造成巨大损害。因此，我们将尽我们的所知与所信保护这些信息。

10. RESPONSIBILITES / CONTACT PERSONS / ADDITONAL INFORMATION

职责/联系人/补充信息

10.1 ALFU Board of Directors and the Compliance Officer shall be responsible for updating and supervising this Code of Conduct.

ALFU董事会和合规专员负责更新和监督本行为准则。

10.2 Responsibilities in Internal and External Relationships: For all questions concerning the Code of Conduct the authorized ALFU Compliance Officer shall be responsible.

内部和外部关系的责任：对于所有关于本行为准则的问题，被授权的ALFU合规专员应负责。

10.3 The Compliance Officer shall be appointed by the Board of Directors.

合规专员由董事会任命。

10.4 Any offences against this Code of Conduct are to be reported to the Compliance Officer.

The Compliance Officer shall decide with the Board of Directors how to proceed further.

任何违反此行为准则的行为均须向合规专员报告。合规专员应当与董事会决定如何进一步推进。

10.5 Applicable Documents: The Board of Directors reserves the right to rule all further details in related documents.

适用的文件：董事会保留在相关文件中规定所有进一步细节的权利。