



# FFT Group – Employee Code of Conduct

## 爱孚迪集团- 员工行为准则

**Dear Colleagues,**  
**亲爱的同事们，**

The trust that we receive from our customers, owners, employees and the public depends critically on the conduct of each individual in the company. It is based upon strict compliance with the law and with all of our internal rules (Compliance).

公司的客户、所有者、员工以及社会公众对本公司的信赖很大程度上取决于每位员工各自的行为。而始终遵守法律法规及所有企业内部规章制度（合规）正是建立这种信任关系的基础。

爱孚迪清楚自己的社会责任，并为之贡献自己的一份力量。我们认识到企业和员工对公益事业负有共同的责任。所以，按照这一准则，爱孚迪公司归纳制定了最重要的、适用于全球爱孚迪员工的强制性规范。

The Code of Conduct is also meant to serve as a guide to employees, helping them to act within their own responsibility for the good of the company. This responsibility is both a privilege and a duty. Each employee must ensure that his or her conduct is always in keeping with the rules set forth here. Our managers must not only communicate these rules in an effective manner, they must lead by example and demand compliance from their subordinates.

同时，这一行为准则赋予每位员工明确的行为指南，为其独自负责的且受企业利益影响的行为提供有力支持。这种个人责任感既是权利又是义务。每一位员工在其职责范围内，都必须对自己的行为负责，要保证自身行事始终符合行为准则中的规定。考虑到高层领导的榜样效应，我们要求公司高层领导不仅要以适当的方式传播这些规定，而且要起带头表率作用，并督促自己的员工照此执行。

We trust and expect every one of our employees to meet this requirement by taking the "FFT Code of Conduct" and making it the standard for his or her behaviour.

我们期望，同时也相信我们的每一个员工都能完全达到爱孚迪行为准则的要求，同时将此准则作为自己日常的行为规范。

**Management of FFT Produktions systeme GmbH & Co. KG**  
**爱孚迪集团管理团队**

**May 2015**  
**2015年5月**

## 1. Preliminary Remarks and Application

### 序言和应用

With regard to the company's business activities, FFT has undertaken to treat its employees, customers, suppliers and competitors with honesty and integrity. FFT is aware of the fact that legal and cultural requirements can differ throughout the global market.

在任何的公司商业活动中，爱孚迪保证将以诚实和正直的态度对待员工，顾客，供应商或是竞争对手。爱孚迪清楚了解各地的法律和文化要求，会随着全球区域的变化而有所不同。

The Code describes a minimum standard which can be augmented regionally in accordance with stricter local legal requirements and cultural customs.

此准则描述了一个最低标准，即通过地区间互补而调整制定的，能够达到更为严格的地方性法规和文化习俗要求的最低标准。

In cases where, in addition to this Code, FFT has issued separate corporate guidelines on special matters, they shall remain applicable as supplementary regulations. In case of conflicts such specific regulations shall prevail. References to specific regulations are made on the intranet site of the Legal and compliance Department.

除了这一行为准则，还有针对特殊主题发布的集团规章制度，它们同样也应该作为实施细则使用。法务和合规部门将会在公司内网上对这些法则进行公示。

This Code is valid for all employees of the FFT Group worldwide. The regulations contained in this code shall be applicable to relationships between each of the companies in the FFT Group and its employees.

这一准则适用于全球范围内的爱孚迪集团所有员工。涵括在该准则内的规定可以应用在爱孚迪企业集团的各下属公司之间及其员工中。

It shall not constitute a basis of third-party rights.

不应制定任何有利于第三方的条例规定。

## 2. Cooperation with customers, suppliers and other business partners

### 与客户，供应商和其他商业伙伴的合作

Besides expecting high-quality products and services, our customers, suppliers and other business partners expect a high degree of professionalism and integrity in our dealings with them.

除了产品和服务质量之外，我们的客户、供应商和其它业务合作伙伴同样希望我们在业务往来中具备高度的专业水平和绝对的诚实可信度。

### Fair competition

#### 公平竞争

FFT observes the rules of fair competition. FFT will therefore not pursue any contract if doing so would violate applicable laws.

爱孚迪坚持公平竞争原则。因此，公司不提倡在合同谈判中有任何违反公平竞争原则的行为。

All employees are required to obey the laws against restraint of trade. Formal or informal agreements with competitors for the purpose of obstructing competition are therefore prohibited. The same applies to behavior based on tacit understandings.

每个员工都有义务遵守《反限制竞争法》。因此，禁止与竞争对手达成以通过非法手段阻碍竞争或影响竞争为目的的正式或非正式约定。同样禁止私下约定的、恶意串通的行为方式。

Accordingly, it is not permitted to demarcate sales areas or divide up customers with a competitor, nor may there be any agreements or exchanges of information with competitors concerning prices, supply relationships, business terms, capacities, market shares, profit margins, costs, customer data, bid contents or bidding behavior.

按照该规定，竞争对手之间进行特殊的区域划分或客户分配，进行有关价格、供货关系、支付条件、生产能力、市场份额、保证金、成本、特殊客户信息及供货内容或供货行为方面的约定和信息交换，都是不允许的。

In the event that FFT achieves a dominant market position, such position must not be exploited in an illegal manner.

在爱孚迪达到市场主导地位之处，绝不允许利用该地位作非法行为。

## **Corruption and bribery**

### **贪污和贿赂**

FFT will not tolerate corruption or bribery in any form.

爱孚迪不能容忍任何形式的贪污和贿赂。

As competitors we rely on the quality and performance of our products and services. We therefore do not allow any agreements or supplementary agreements that involve granting benefits, either directly or indirectly, to individuals or organizations in connection with arranging, awarding, approving, implementing or paying for contracts.

在竞争中我们专心致力于产品和服务的质量和效率。因此，所有涉及到由于订单的介绍、分派、许可、供货、处理或支付等事宜而直接或间接提供好处给个人或组织的协议或附加约定，都是禁止的。

This applies in particular to agreements with business partners, their employees and officers, but it extends to third parties as well. The same holds true for the granting of benefits in dealings with public authorities.

这尤其涉及到所有与业务合作伙伴及其员工或公职人员，也包括与其它第三方人员达成的约定。该规定同样也适用于在官方程序方面给予好处的情况。

Such payments are unacceptable whether they are in the form of money or goods. The granting of benefits to an individual can also be unacceptable if the individual only benefits indirectly, for example if payments are made to a family member or if payments (such as donations) are made to a third party and the individual's social or political standing is enhanced as a result.

这种非法好处可以是金钱和财物。给予私人好处也是不允许的，即便只是间接给予此人好处也不可以；这

种间接好处可以是为此人的亲属提供便利或为其它第三方提供服务（例如捐赠），而通过该第三方此人可以获得一定的好处，例如借此提高自己的社会或政治地位。

Gifts and invitations are permitted only if they are not large enough in terms of value, financial scope or otherwise to improperly influence the recipient's actions or decisions or to create a state of obligation on the part of the recipient. When issuing invitations to an event or gathering, it must additionally be ensured that the event is of a size and type that is customary in business circles or that it is specifically related to business activities. Especially strict standards must be applied in the case of public officers. Monetary gifts are prohibited under all circumstances.

只有在考虑了礼物和邀请的价值、资助范围或在其它方面不会影响到收受人的行为或决定，或者不会迫使收受人履行对应义务的情况下，才可以赠送礼物和发出邀请。邀请参加活动时必须格外注意，举办的活动要么属于一般业务活动，而且形式和规模都比较恰当，要么就属于纯粹的商务活动。尤其在面对公职人员时必须采取严格的标准加以衡量。

Compensation to third parties, in particular agents, brokers and other mediators, in the form of commissions or other payments must be plausible and bear a reasonable proportion to the work performed. Such compensation must be provided in an amount which does not suggest that it is being used to circumvent the rules on granting benefits. Agreements with agents, brokers, consultants and other advisors, including all later amendments and must be made fully in writing.

以佣金或其它形式支付给第三方，尤其是支付给代理人、经纪人、顾问或其它中介人的酬劳，必须是与其付出的劳动相匹配的合理支付。不能利用发放酬劳来规避前面提及的规定，以变相提供非法的好处。与代理人、经纪人、顾问和其它中介人的约定，包括所有事后的变更，都必须以书面形式完整地予以记录。

Although it is customary among business partners to exchange gifts of a limited size, the acceptance

of gifts can damage the reputation of our company and lead to conflicts of interest. For this reason our employees are strictly prohibited from demanding or accepting personal benefits such as services or inappropriate invitations, whether for their own advantage or for that of individuals or institutions close to them. Occasional gifts of a small value are an exception.

业务合作伙伴赠送礼物在一定范围内属于普遍现象，但是这会损害我们公司的声誉或导致利益冲突。因此，严厉禁止公司员工向关系亲近的个人或机构索要或接受个人好处，比如服务、不合适的邀请等。价值较小的偶尔性礼物除外。

Gifts of money are not allowed under any circumstances.

不允许任何金钱形式的赠送。

### **Donations**

#### **捐款**

Donations must be made in a transparent manner, which means that the recipient and the intended use must be known. Payments to private bank accounts are not permitted. No donations may be made to organizations that could damage FFT's reputation

捐赠行为必须是合理可追溯的，这就意味着必须了解接受方和赠款用途。不允许向私人帐户汇款。禁止向名声不好的组织捐赠。

### **Selection of suppliers and service providers**

#### **供应商和服务合作方的选择**

FFT conducts fair and unbiased examinations of all offers submitted by its suppliers. The assessment, awarding and handling of a contract must be based on strictly professional criteria and be carried out in a transparent manner. It is not allowed under any circumstances to give undue preference to a supplier or impede its efforts to win a contract. When selecting business partners, FFT demands that they too shall respect the values set forth in this Code. FFT's Code of Conduct for Suppliers and Business Partners shall be valid,

published under [www.fft.de](http://www.fft.de)

爱孚迪公正客观地审核供应商的每一份报价。订单的审核、决定、派发和处理都必须严格按照合乎事实的且易于理解的方式执行。优待或阻碍供应商的违规行为是不允许的。选择业务合作伙伴时爱孚迪同样要求合作伙伴遵守该行为准则中提及的价值观。爱孚迪供应商和业务伙伴的商业准则已正式生效并已刊登在公司官网[www.fft.de](http://www.fft.de)上。

### **3. Management and employees at FFT**

#### **爱孚迪高层主管和员工**

Productivity and humanity must go hand in hand to ensure sustained success in an enterprise. FFT's economic success is dependent on the help and co-operation of its employees worldwide.

生产率和人性化是企业取得持续成功不可缺少的部分。爱孚迪取得的经济成果离不开我们全球员工的共同努力和奉献。

#### **Leadership and trust**

##### **领导文化和信任文化**

All of our employees are required to adhere to this Code, and our management personnel must set an example. FFT cultivates an atmosphere of trust in which its managers are responsible for providing sufficient supervision to prevent any violations of the Code.

每位员工都有义务遵守这一行为准则，而我们的高层主管更要起带头表率作用。在爱孚迪推行的信任文化框架下，这些高层主管在各自业务领域中负责通过合理的监督来阻止违规行为或加大违规难度，从而确保不会有违背行为准则的现象出现。

#### **Tolerance and equal opportunities**

##### **容忍和机会平等**

FFT respects human rights worldwide. As a company with a global reach it works with employees and business partners of many different nationalities, cultures and customs. It does not tolerate unequal treatment (discrimination), harassment or degradation in violation of the law. In particular, it does not tolerate discrimination on account of race, ethnic origin, gender, religion or

worldview, political opinions, age or gender identity. 爱孚迪尊重世界上每个人的基本权利。作为全球性集团我们拥有不同国籍、不同文化和思维方式的员工及业务合作伙伴。我们绝不容忍各种违法举止(歧视)、骚扰或侮辱行为。我们尤其不能容忍任何形式的歧视,其中包括对人种或种族、性别、宗教信仰或世界观、政治信念、残疾、年龄或性取向的歧视。

### **Fair working conditions**

#### **公平的就业环境**

FFT gives its employees fair pay and provides fair working conditions in compliance with all statutory requirements. It rejects all forms of forced labor and child labor, and it will not obstruct lawful employee representation.

爱孚迪公司为其员工提供了合理的薪酬和公平的工作条件,符合所有法定要求。正如维护员工的合法权益那样,公司同样拒绝任何形式的强迫性劳动或使用童工。

### **Avoidance of conflicts of interest**

#### **避免利益冲突**

It is important to FFT that its employees do not have conflicts of interest or loyalty in the course of their work. Such a conflict can occur if, for example, there are business transactions between FFT companies and employees or members of their families. Any such transaction shall be avoided. If in exceptional cases based on objective criterias such transaction is necessary, it must be disclosed in advance to the employee's superior.

对于爱孚迪来说,公司高度重视在员工从事本职工作时不使其陷入利益或道德冲突。例如在公司和员工或与其关系密切的亲属之间发生业务往来时就可能会出现这种冲突。所以,类似的业务来往都应该被避免。如果有特殊情况需要有类似业务往来的,员工必须事先向上级主管汇报备案。

### **Political activities**

#### **政治活动**

FFT does not participate in activities involving political parties. However, under no circumstances will it deter its employees from taking part in appropriate political activities during their

nonworking hours. We expressly welcome our employees' involvement as citizens in the affairs of society and their participation in social and charitable activities. Employees who are engaged in such activities do so as private individuals.

爱孚迪不参与任何党派的政治活动。但是绝不会妨碍员工利用自己的业余时间以适当方式参与政治活动。我们完全赞赏公司员工积极参与公民和社会活动以及慈善和公益事业。在此框架下,公司员工是以个人身份参与其中。

### **Protection of assets**

#### **资产保护**

FFT requires its employees to protect the tangible and intangible assets of the company. These assets include property, production equipment and inventory stocks; securities and cash; office equipment and supplies; information systems and software; and patents, trademark rights and know-how. Violations of the law such as fraud, theft, embezzlement and money laundering will be prosecuted. Machinery and equipment may only be used for work-related purposes unless private use is expressly permitted. Internet users must take care not to retrieve or transmit any information that could incite racial hatred, glorify violence or other crimes, or have an offensive content.

公司要求自己的员工保护公司的有形和无形资产,其中包括不动产、生产设备和库存物品; 有价证券和现金; 办公设施和办公用品; 信息系统和软件以及专利权、商标权和专有知识。对诸如欺诈、偷窃、贪污和洗钱等违法行为都将追究刑事责任。只要没有明确批准可供私人使用,那么所有设备和设施只能用于公务目的。使用因特网时必须注意,在任何情况下都不能检索和传播那些鼓吹种族仇恨、恐怖暴力或其它犯罪行为或含有有伤风化的信息。

### **Use of information /personal data security**

#### **信息的使用和个人数据安全**

We expect employees to take appropriate care when using company information. We abide by all valid laws and regulations, and all FFT principles and guidelines on IT security. The FFT's Group's data protection officer supports the technical

divisions in this undertaking. Personal information is only collected, processed or used if it is legally permissible to do so, or with the consent of the person concerned.

我们必须在遵循谨慎原则的前提下使用公司信息。我们严格遵用有效的法律法规，保证爱孚迪信息技术安全符合相关规定。集团内部会设立数据保护负责人作为技术方面的支持。个人信息只有在合法条件下或员工同意的情况下被收集，处理或使用。

## **Confidentiality**

### **保密**

Confidentiality must be maintained concerning in-house matters that have not been disclosed to the public. This also applies to inventions and other kinds of know-how. These are essential to the long-term success of the FFT Group. Employees must therefore not pass information about new discoveries or company secrets in any form to third parties. All employees must respect valid intellectual property rights of third parties. No employee is allowed to obtain secrets from third parties or make unauthorized use of such secrets.

对于不适合对外公布的内部事务必须保持缄默。这同样适用于发明和其它专有知识。这些元素既是持续取得成功的基石，也是爱孚迪集团未来发展的保障。因此，任何一位员工都不得以任何形式将获得的新知识或企业商业秘密透露给第三方。同时所有的员工应尊重第三方的知识产权，员工不允许从第三方获得未经授权的保密信息。

## **Privacy and information security**

### **隐私和信息安全**

The global electronic exchange of information is essential for effective work and business success in general. But besides having benefits, electronic communication can pose risks to privacy and data protection. Official documents and data storage media must therefore be protected from access by third parties at all times. Both managers and employees must take effective protective measures against these risks, and this is an important component of IT management.

全球性电子信息交换是员工效率和业务成功的一个

决定性的前提条件。电子交流的优势与数据保护和数据安全的风险并存。因此，公务文件和数据载体原则上必须防止第三方查阅。有效预防此类风险既是高层主管的任务，也是每一个员工的任务，更属于信息技术管理的重要组成部分。

## **Insider knowledge**

### **内部消息**

It is not permissible to derive personal advantage or advantages for others through the use of in-house knowledge. The same applies to unauthorized disclosure of such knowledge.

绝不允许利用公司内部消息为自己谋取私利或获取其它好处。同样也禁止未经授权对外透露此类内部消息。

## **4. Occupational safety, health,**

### **职业安全与健康**

## **environmental protection and sustainability**

### **环境保护和可持续性**

FFT makes every effort to protect the life and health of its employees and deal responsibly with resources and hazardous materials. All employees must avoid hazards in the workplace, minimize harm to the environment and use resources economically. In developing and manufacturing our products we adhere to the principles of sustainability and environmental compatibility.

保护全体员工的生命安全与健康，认真负责地利用资源和处理有害物质，是爱孚迪公司不容推卸的职责。避免在工作岗位上危及人身安全、尽量减少对环境的影响、节约利用资源，是全体员工的职责所在。在产品研发和生产过程中，我们始终遵循可持续性发展和环保原则。

## **5. Implementation of the Code of Conduct**

### **行为准则的执行**

## **Advice**

### **建议**

FFT provides its employees with information to help them comply with the law and the Code of Conduct. In particular, this includes training sessions on specific topics and selected areas of risk. If

employees nevertheless have questions, they can submit them to the responsible legal or human resources department or his / her direct supervisor. 爱孚迪将为员工提供适当的信息，以帮助他们避免可能违反法律和该行为准则的情况发生。这尤其包括对特定主题内容和挑选出的容易违规的领域进行专门学习。如果仍有疑问，员工可以向相关的法律部门，人力资源部或者部门主管提出。

### **Complaints and reports of misconduct**

#### **投诉和不当行为的汇报**

Any employee can and has the right to report a violation or suspected violation of the Code of Conduct to FFT. At the employee's discretion, the contact for this purpose can be the direct supervisor, the responsible Head of HR dept., the Management of the company, any member of the Legal dept or or a member of the workers council. 任何员工有权检举违反爱孚迪行为准则的行为或疑似行为。出于对员工的考虑，员工可以向包括直接主管，人力资源部负责人，公司管理层，法务部员工或者工会委员在内的人员进行汇报。

An employee who on the basis of tangible evidence honestly believes that the Code of Conduct has been or might have been violated and who makes use of the right to report this to FFT will not suffer any kind of retaliation. In each such case, FFT will take the necessary steps to protect the employee against such retaliation. To the extent possible and legally permissible, FFT will maintain confidentiality about the identity of any employee who follows this procedure to report a violation or suspected violation of the Code of Conduct. The same applies to the identity of employees who cooperate in the investigation of such violations or suspected violations.

如果员工根据具体线索确信存在或可能存在违反行为准则的事情，并利用赋予自己的权利向爱孚迪公司报告此类违规行为或可疑行为，那么他绝不会遭致任何不利的后果。爱孚迪公司在任何情况下，只要有必要，都会采取措施保护该举报员工免受此类不利后果的影响。如果员工举报了违反行为准则的情况或根据指导方针要求举报相关可疑行为，只要有可能，而且

法律上允许，爱孚迪公司都会对该员工的身份进行保密，这同样适用于参与说明违反行为准则或相关可疑行为事项的员工。

### **Implementing regulations**

#### **规则执行**

The FFT Code of Conduct is available in several languages. In the event of any differences or contradictions between the different versions, the German version shall take precedence.

爱孚迪的行为准则会推出多个语言版本。如果翻译版本的内容同德语版本之间有异议的话，以德语版本为准。

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