

VON ARDENNE 

CODE OF CONDUCT

DATE 03/2023

MESSAGE FROM THE CEO

CEO致辞

As the managing partner, it is my personal concern that we always uphold our values as a family company. For me, this includes above all responsible corporate action, integrity and trust as the basis for our business activities at VON ARDENNE. It is my fundamental aim to ensure sustainable economic success in compliance with all national and international laws and regulations.

作为管理合伙人，我个人关心的是，我们始终坚持我们作为家族企业的价值观。对我来说，这首先包括负责任的企业行为、诚信和信任，这是我们冯阿登纳开展业务活动的基础。我的根本目标是确保在符合所有国家和国际法律法规的情况下取得可持续的经济成功。

This Code of Conduct is an integral part of our compliance system. It refers to all units of the VON ARDENNE group - hereinafter referred to as VON ARDENNE. It contains principles and rules that are binding for all employees at VON ARDENNE. It provides a clear orientation to act ethically in our day-to-day work and to practice fairness, sustainability and integrity both internally and externally.

本行为准则是我们合规体系不可或缺的重要组成部分，它针对冯阿登纳集团的所有单位以下简称冯阿登纳。它包含了对冯阿登纳所有员工都具有约束力的原则和规则。它为我们的日常工作提供了明确的道德方向，并在内部和外部实践公平，可持续和诚信。

Compliance has the highest priority for me as the managing director. The senior management at VON ARDENNE has a special responsibility in this regard. Within their area, they are responsible for ensuring that the principles of this code of conduct are observed and implemented in such a way that no compliance violations occur. The senior managers convince with their personal role model function and are available as the first point of contact for questions. For us, an open feedback culture and mutual respect are part of our day-to-day work. Of course, this also applies to the relationship with our business partners.

作为常务董事，合规是我的首要任务。冯阿登纳的高级管理层在这方面负有特殊责任，在其管辖范围内，他们有责任确保本行为守则的原则得到遵守和执行，不发生违反规定的情况。高级管理人员用他们的个人榜样职能说服他人，并且可以作为问题的第一个联系人。对我们来说，开放的反馈文化和相互尊重是我们日常工作的一部分。当然，这也适用于我们与商业伙伴的关系。

The individual responsibility of each employee to comply with the VON ARDENNE Code of Conduct is essential for its successful implementation. We do not tolerate any violations of the law and are committed to fighting any form of discrimination, harassment and corruption.

每位员工都遵守冯阿登纳行为准则的个人责任对整个准则的成功实施至关重要。我们绝不容忍任何违反法律的行为，并致力于打击任何形式的歧视、骚扰和腐败。

The agreement to comply with the VON ARDENNE Code of Conduct is a fundamental criterion for us when selecting new suppliers and sales partners: we assume that our business partners conduct their business based on the values of this code and we support them as best we can. At the same time, we ask our suppliers to ensure the same in their supply chains.

同意遵守冯阿登纳行为准则的协议是我们选择新供应商和销售合作伙伴的基本标准；我们假设我们的业务合作伙伴基于本准则的价值观开展业务，并尽我们所能支持他们。与此同时，我们要求我们的供应商确保他们的供应链也是如此。


CODE OF CONDUCT

This Code is based on the Code of Conduct and the sustainability standards set out therein by the Responsible Business Alliance (RBA), whose principles and guiding values we fully share.

本准则以责任商业联盟(Responsible Business Alliance, RBA)的《行为准则》和可持续发展标准为基础，我们完全认同RBA的原则和指导价值观。

Thank you very much for your contribution to the compliance culture at VON ARDENNE through your personal conduct.

非常感谢您通过您的个人行为为冯阿登纳的合规文化做出的贡献。

A handwritten signature in black ink, appearing to read 'P. v. Ardenne', with a large, stylized initial 'P'.

Pia von Ardenne
Executive Director of the VON ARDENNE Group

1. LAW AND REGULATION 法律法规

VON ARDENNE and all employees comply with all applicable national and international laws as well as with the recognised international standards of the countries in which VON ARDENNE operates.

Violations of the law will not be tolerated and must be avoided. Likewise, the company's internal guidelines (e. g. conducts or occupational health and safety) must be adhered to by all employees.

冯阿登纳及其所有员工均遵守所有适用的国家和国际法律，以及冯阿登纳经营所在国家公认的国际标准。违法行为是不能容忍的，必须避免。同样，所有员工都必须遵守公司的内部准则(例如行为或职业健康与安全)。

2. FAIR COMPETITIVE ENVIRONMENT 公平的竞争环境

2.1. Corruption - 腐败

VON ARDENNE strictly rejects any kind of corruption and bribery. We do not grant any unlawful advantages and do not accept such either.

Our employees may not offer, promise or grant any bribes or improper advantages, directly or indirectly, to any public official or private business or contractual partner. Likewise, no bribes or improper advantages may be accepted, tolerated or used.

Business transactions and payments must be documented in such a way that they can be traced at any time.

Donations and grants are only made based on our clear internal guidelines for processes, approvals and transparency in compliance with legal regulations.

冯阿登纳坚决反对任何形式的腐败和贿赂，我们不给予任何非法利益，也不接受非法利益。我们的员工不得直接或间接地向任何公职人员、私营企业或合同合作伙伴提供、承诺或给予任何贿赂或不正当利益。同样，不得收受、容忍或使用贿赂或不正当利益。

商业交易和支付必须以可以随时追溯的方式进行记录。

捐赠和赠款仅根据我们明确的内部流程、批准和透明度准则进行，并符合法律法规。

2.2. Money laundering - 洗钱

VON ARDENNE only maintains business relationships with business partners who conduct their business in accordance with the law and whose funds come from legal sources. All business transactions and payments must be documented in such a way that they can be traced at any time and that the statutory storage requirements are complied with.

冯阿登纳只与依法开展业务且资金来源合法的商业伙伴保持业务关系。所有商业交易和付款都必须以可以随时追溯的方式进行记录，并遵守法定的存储要求。

2.3. Antitrust law - 反垄断法

VON ARDENNE complies with applicable competition and antitrust laws, which prohibit agreements or practices that unduly restrain trade.

冯阿登纳遵守适用的竞争法和反垄断法，这些法律禁止不适当地限制贸易的协议或做法。

2.4. Customs & Export - 海关与出口

VON ARDENNE complies with all applicable export and customs regulations as well as applicable trade restrictions, sanctions and embargoes. This also includes economic sanctions and anti-terrorism regulations.

冯阿登纳遵守所有适用的出口和海关法规以及适用的贸易限制、制裁和禁运，包括经济制裁和反恐条例。

3. FAIR DEALING WITH EMPLOYEES AND BUSINESS PARTNERS – SOCIAL AND ETHICAL RESPONSIBILITY

公平对待员工和商业伙伴——社会和道德责任

3.1. Discrimination and harassment - 歧视和骚扰

VON ARDENNE does not tolerate any discrimination or harassment in the work environment, be it because of age, gender, language, political views, ethnic, national or social origin, skin colour, religion, sexual orientation or physical limitations.

The employment of VON ARDENNE employees is based solely on personal and professional competence and performance.

冯阿登纳不容忍工作环境中的任何形式的歧视或骚扰，无论是因为年龄、性别、语言、政治观点、种族、国家或社会出身、肤色、宗教、性取向或是身体限制。

冯阿登纳雇佣员工完全基于个人和专业能力及表现。

3.2. Forced labour and child labour - 强迫劳动和童工

VON ARDENNE strictly rejects any form of forced or child labour. VON ARDENNE is also committed to the prohibition of any form of human trafficking.

VON ARDENNE assumes that its suppliers and sales partners also oppose any form of forced labour, child labour and human trafficking in their company. We also assume that they clearly communicate these requirements to their respective suppliers and sales partners.

冯阿登纳坚决反对任何形式的强迫劳动或雇佣童工。冯阿登纳还致力于禁止任何形式的人口贩运。

冯阿登纳假定其供应商和销售合作伙伴也反对任何形式的强迫劳动、童工和人口贩卖。我们还假设他们将这些要求清楚地传达给各自的供应商和销售伙伴。

3.3. Freedom of assembly - 集会自由

VON ARDENNE respects the right of employees to freedom of organisation and assembly as well as freedom to negotiate collective agreements in accordance with the applicable legal regulations. We assure that employees who engage in such activities in accordance with the law will not face any negative consequences.

冯阿登纳尊重雇员组织和集会自由的权利以及根据适用的法律条例谈判集体协议的自由。我们保证，依法从事此类活动的员工不会面临任何负面后果。

3.4. Fair working conditions - 公平的工作条件

VON ARDENNE ensures fair working conditions for all employees. This includes, among other things, compliance with all applicable legal regulations on working hours and occupational health and safety as well as appropriate remuneration, which is at least based on the applicable statutory minimum wage as well as remuneration benchmarks and industry-related collective wage agreements.

We also assume that our suppliers and distribution partners treat their employees fairly, pay them appropriately and comply with all applicable legal regulations.

冯阿登纳确保为所有员工提供公平的工作条件。包括遵守关于工作时间和职业健康与安全的所有适用法律法规以及适当的薪酬，薪酬至少是基于适用的法定最低工资以及薪酬基准和与行业有关的集体工资协议。

我们也假设我们的供应商和分销合作伙伴公平对待他们的员工，向他们支付适当的薪酬，并遵守所有适用的法律法规。

3.5. Conflicts of interest - 利益冲突

Our employees are guided exclusively by the interests of the company in carrying out their professional duties. Decisions must be based on objective considerations.

Professional activities that are contrary to the interests of our company are to be avoided. Employees must not misuse their professional position, company information or company property for personal gain or for the benefit of others.

In the event of conflicts between personal interests and official duties, all employees are encouraged to contact their supervisor or to take the matter up with the Compliance Board.

我们的员工在履行其专业职责时完全以公司利益为指导，决策必须以客观考虑为基础。应避免从事与公司利益相悖的专业活动。

员工不得滥用其专业职位、公司信息或公司财产谋取个人利益或他人利益。

如果个人利益与公务发生冲突，我们鼓励所有员工与他们的主管联系或向合规委员会提出问题。

4. INTELLECTUAL PROPERTY 知识产权

VON ARDENNE respects and protects the intellectual property of business partners and competitors. VON ARDENNE refrains from any activities that violate the property rights of third parties, as well as from any kind of counterfeiting or piracy.

We assume, our suppliers and sales partners behave in the same way.

冯阿登纳尊重并保护商业伙伴和竞争对手的知识产权。冯阿登纳不从事任何侵犯第三方产权的活动，也不从事任何形式的假冒或盗版活动。

我们假设，我们的供应商和销售合作伙伴以同样的方式行事。

5. COMPANY PROPERTY - 公司财产

The company's property and assets are values that our employees have created through their work.

These values must be preserved through careful handling.

All employees are obliged to observe this in their daily work by: Protecting the company's property from loss, damage and misuse. Employees shall not make decisions or take actions that are contrary to the property and asset interests of the company.

公司的财产和资产是我们员工通过他们的工作创造的价值。

这些财产须仔细处理保存。

所有员工都有义务在日常工作中遵守这一点：保护公司财产不受损失、损坏和滥用。员工不得做出与公司财产和资产利益相违背的决定和行为。

6. TRADE AND BUSINESS SECRETS - 商业和商业秘密

VON ARDENNE protects the company's trade and business secrets as well as confidential information of all business partners and always obliges third parties to maintain confidentiality if confidential information or trade and business secrets are shared with them.

We ensure that this information is stored in such a way that it is not accessible to unauthorised persons.

冯阿登纳保护公司的贸易和商业秘密以及所有业务合作伙伴的机密信息，并始终要求第三方在与其共享机密信息或贸易和商业秘密时保持机密性。

我们确保这些信息的存储方式不会被未经授权的人访问。

7. DATA PROTECTION & HANDLING OF CONFIDENTIAL INFORMATION 数据保护和机密信息处理

VON ARDENNE attaches great importance to data protection and the confidentiality of the information entrusted to us.

We process data in accordance with the requirements of the applicable data protection laws and commit ourselves to appropriate data and IT security measures.

We inform and advise the responsible persons at VON ARDENNE and regularly monitor compliance with the applicable law with regard to personal data requiring special protection.

VON ARDENNE respects the privacy of employees and protects their personal data to the best of its ability in accordance with applicable laws and regulations. Personal data of employees is only collected and stored if this is necessary for the smooth running of the business or to comply with legal requirements.

Likewise, VON ARDENNE ensures that all information security requirements for processing information from customers, suppliers and service providers are strictly adhered to.

冯阿登纳非常重视数据保护和委托给我们的信息的保密性。

我们根据适用的数据保护法律的要求处理数据，并承诺采取适当的数据和IT安全措施。

数据保护官员向冯阿登纳的负责人提供信息和建议，并定期监督有关需要特殊保护的个人信息数据的适用法律的遵守情况。

冯阿登纳尊重员工的隐私，并根据适用的法律法规尽其所能保护他们的个人数据。只有在业务平稳运行或符合法律要求所必需的情况下，才会收集和存储员工的个人数据。

同样，冯阿登纳确保严格遵守处理来自客户、供应商和服务提供商的信息的所有信息安全要求。

8. OCCUPATIONAL HEALTH AND SAFETY - 职业健康与安全

Constantly ensuring the occupational safety of all employees and business partners is a top priority at VON ARDENNE and is part of our company's self-perception. A safe and healthy working environment promotes the motivation of our employees and provides an important contribution to the success of the company. In addition to the overall responsibility of the management board to organise occupational safety, health and fire protection, all senior managers as well as the employees are obliged to comply with the regulations on this subject at all times.

The identification of hazards, the determination of suitable measures to avoid these hazards and the instruction of employees by the responsible senior managers are the fundamental prerequisites for creating safe working conditions. As part of their duty to cooperate, employees are responsible for ensuring compliance with occupational safety regulations and report violations or potentials for improvement to their senior managers. We assume that our suppliers and sales partners comply with all applicable health and safety regulations. These are part of all contractual agreements.

不断确保所有员工和业务合作伙伴的职业安全是冯阿登纳的首要任务，也是我们公司自我认知的一部分。一个安全健康的工作环境可以提高员工的积极性，并为公司的成功做出重要贡献。除了管理委员会负责职业安全、健康和消防之外，所有高级管理人员和员工都有义务在任

何时遵守有关这一主题的规定。

识别危险，确定避免这些危险的适当措施，并由对此负责的高级管理人员对员工进行指导，是创造安全工作条件的基本先决条件。作为合作义务的一部分，员工有责任确保遵守职业安全法规，并向高级管理人员报告违规行为或需要改进的地方。我们假定我们的供应商和销售合作伙伴遵守所有适用的健康和法规。这是所有合同协议的一部分。

9. PRODUCT SAFETY & QUALITY - 产品安全与质量

Excellent product quality and customer satisfaction are key priorities at VON ARDENNE. The products comply with all legal requirements as well as the extensive internal company safety and quality requirements. A comprehensive safety assessment is preceded by a well-founded risk assessment of the development department.

With proactive instruments such as advance quality planning and a stringent error management process, a holistic interdisciplinary control loop for quality assurance is maintained. Customers can always rely on the safety and reliability of VON ARDENNE products, as well as on their high quality.

The senior managers of the business units ensure that the quality assurance requirements are enforced in the areas they manage and that complaints are dealt with comprehensively and in good time.

Comprehensive quality management and the continuous improvement of our products and processes in terms of quality and reliability are the cornerstones of our success.

卓越的产品质量和客户满意度是冯阿登纳的关键优先事项。产品符合所有法律要求以及公司内部安全和质量要求。在进行全面的安全评估之前，开发部门要进行有充分的风险评估通过质量规划和严格的错误管理流程等前瞻性的积极主动的手段，保持了一个全面的跨学科质量保证控制循环。客户可以始终信赖冯阿登纳产品的安全性和可靠性，以及它们的高质量。业务部门的高级管理人员确保在其管理的范围内执行质量保证要求，并及时全面处理投诉。全面的质量管理以及在产品和工艺在质量和可靠性方面的持续改进是我们成功的基石。

10. ENVIRONMENT - 环境

VON ARDENNE is committed to the responsible and careful use of natural resources. Throughout the company, we ensure compliance with applicable national environmental laws, rules and standards. Furthermore, we support the use of modern, efficient and environmentally friendly technologies to reduce our consumption at the respective locations. We place a special focus on the expansion of renewable energies, the reduction of our emissions, and sustainable waste management. We also assume that our suppliers and distribution partners comply with all applicable environmental laws, regulations and standards.

冯阿登纳致力于负责任和谨慎地使用自然资源。在整个公司，我们确保遵守适用的国家环境法律、法规和标准。此外，我们支持使用现代、高效和环保的技术，以减少在各地的消耗。我们特别关注可再生能源的发展、减少排放和可持续的废物管理。我们还假定我们的供应商和分销合作伙伴遵守所有适用的环境法律、法规和标准。

11. WHISTLEBLOWER SYSTEM - 举报系统

All employees, but also our business partners, customers, suppliers and other third parties have the opportunity to report any suspected violation of applicable laws, this code or other guidelines of VON ARDENNE to the whistleblower office (Whistle Report (whistle-report.com)).

The whistleblower system receives specific indications of potential misconduct. The whistleblower system guarantees the greatest possible protection for whistleblowers and those affected. We check every report and follow it up consistently. An essential pillar of the whistleblower system is the principle of a fair trial. In addition, we guarantee the greatest possible protection for whistleblowers, those affected and the employees involved in the clarification of the whistleblowing.

Pressure on whistleblowers and all persons who contribute to promoting correct behaviour at VON ARDENNE will not be tolerated. The presumption of innocence applies to those affected until the violation is proven. Investigations will be conducted with due confidentiality. The information will be processed within the framework of a fair, fast and protected process. Should any questions arise in this regard or should a legal review of compliance issues be necessary, the VON ARDENNE legal department can be contacted. Depending on the severity of the possible violation, a superior/supervisor, the works council and/or the human resources department and/or the legal department may be involved.

Non-compliance with this code of conduct may result in disciplinary, civil and, if applicable, criminal sanctions.

所有员工，以及我们的业务合作伙伴、客户、供应商和其他第三方都有机会向举报办公室 (Whistle Report (whistle-report.com)) 举报任何涉嫌违反适用法律、本准则或冯阿登纳其他准则的行为。

举报人系统接收到潜在不当行为的具体迹象。举报人系统保证为举报人和受影响的人提供尽可能大的保护。我们检查每一份报告，并持续跟进。举报人系统的一个重要支柱是公平审判原则。此外，我们保证为举报人、受影响人和参与澄清举报人的员工提供尽可能大的保护。

对举报人和所有有助于促进冯阿登纳正确行为的人施加压力的行为是我们不能容忍的。在侵犯行为得到证实之前，无罪推定适用于那些受到影响的人。调查将在保密的情况下进行。这些信息将在公平、快速和受保护的程序框架内处理。如果在这方面出现任何问题，或者需要对合规问题进行法律审查，可以联系冯阿登纳法律部门。

根据违法行为的严重程度，上级/主管、劳动委员会和/或人力资源部门和/或法律部门可能会参与其中。

不遵守本行为准则可能导致纪律处分、民事和(如适用)刑事制裁。

12. TRAININGS - 培训

This code of conduct is accessible on the company's internal network as well as on the company's external website. It is available in languages German, English and Chinese. To strengthen the understanding of the code of conduct and to ensure its compliance, our employees are regularly trained on relevant topics related to this code of conduct. This can be ensured through classroom training or also via e-learning methods.

本行为准则可在公司的内部网络以及公司的外部网站上查阅。它有德文、英文和中文多种语言的版本。

为了加强对行为准则的理解并确保遵守，我们的员工定期接受与本行为准则相关的主题培训。这可以通过课堂培训或电子学习方法来确保。

