

Code of Conduct

行为准则

Scope 适用范围	Dätwyler Cabling Solutions AG 德特威勒电缆系统公司
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Dear Employees
亲爱的各位员工

More than 100 years of innovation for the benefit of our customers, employees, shareholders and other stakeholders – that is the hallmark of the Datwyler Group of Companies. Since 1 January 2013, Datwyler Cabling Solutions has been operating as a private sister company of the publicly listed Datwyler Group, while remaining under the common umbrella of Pema Holding, domiciled in Altdorf, Switzerland. In recent years, Datwyler Cabling Solutions has grown into an international enterprise with global production, engineering and sales facilities. Building on our strong roots, we have developed our own style with high standards and unique values:

100 余年的创新，为我们的客户、员工、股东和其他利益相关者创造利益——这是德特威勒集团的标志。自 2013 年 1 月 1 日伊始，德特威勒电缆系统公司正式以一家公众上市德特威勒集团公司的私人姊妹公司运营，但仍然不脱离于位于瑞士乌里州阿尔道夫的 **Pema** 控股公司旗下。近年来，德特威勒电缆系统公司已经发展成一家专注于全球化生产，工程及销售设施的国际性企业。建立于我们自身强大的根基，我们已经按着高标准和独特价值观发展自己的风格：

- We are entrepreneurs. 我们是企业家。
- We bring value to our customers. 我们为客户创造价值。
- We excel in what we do. 我们锐意进取力争最高效能。
- We have respect for others. 我们致力于维护互相尊重的企业氛围。

While the social and economic environment is changing at an ever faster pace, we want to uphold the strengths of Datwyler Cabling Solutions. This makes it vital to establish clear guidelines summarising our continuously evolving standards. The Code of Conduct below sets out those same standards of conduct that our employees have always applied using good common sense.

当社会和经济环境正以史无前例的高速变化时，我们坚持德特威勒集团的优势。这就必须制定明确的指导方针，总结我们不断发展的标准。以下《行为准则》规定了一些行为的标准，已成为我们员工一直运用的良好常识。

We are convinced that these traditional basic values are regaining importance in our continually globalising world and that they will be an additional competitive advantage. Based on this conviction, Datwyler has joined the UN Global Compact. As a member of this UN initiative, Datwyler has committed itself to the ten principles relating to human rights, labour standards, environmental protection and anti-corruption initiatives.

这些传统的基础价值正是我们持续追求全球化发展的意义所在，也将进一步强化我们的竞争优势。基于此，德特威勒加入了《联合国全球契约》。作为这一联合国机构的一员，德特威勒就有关人权、劳工标准、环境保护以及预防腐败等作出了十项基本原则之庄严承诺。

For us as an international company, it is extremely important to lay down binding standards of conduct expected by us, to regularly communicate them, to provide the necessary training, and to take appropriate disciplinary action in the event of any violations. As in the past, we are confident that everyone who works for Datwyler Cabling Solutions will adhere to the highest standards of ethical behaviour. If any unclear situations arise in day-to-day business activities, this Code of

Conduct will provide practical guidance. We are counting on you!

对于我们作为一个国际公司来说，制定我们所期望的有约束力的行为标准、定期沟通这些标准、提供必要的培训、以及在发生任何违规行为时采取适当的纪律行动，都是极其重要的。在过去，我们自信任何为德特威勒电缆系统公司工作的员工都是遵循最高道德行为标准。在每天的商业活动中发生的任何不明确的情形，本《行为准则》会提供实际的指导。你们是我们的希望！

Altdorf, 11 March 2013, updated on 1 January 2014 and 1 July 2018.

阿尔道夫，2013年3月11日（更新于2014年1月1日，2018年7月1日）

Dätwyler Cabling Solutions AG

德特威勒电缆系统公司

On behalf of the Board of Directors
代表董事局



Hanspeter Fässler, Chairman

On behalf of the Corporate Management
代表管理层



Johannes Müller, CEO

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1 Background

背景

Datwyler Cabling Solutions is a leading provider of high-quality solutions and services for electrical building infrastructure. Focusing on Europe, the Near and Middle East and Asia, the Company with its global workforce of about 900 employees is a professional partner offering innovative customised solutions in numerous countries.

德特威勒电缆系统公司是领先的高品质电气建筑基础设施解决方案和服务项目供应商。公司是在全球许多国家提供客户化创新解决方案的专业合作伙伴，其重心集中在欧洲、近东、中东地区和亚洲，在全球范围内拥有约 900 名员工。

We seek to sustain profitable growth for the benefit of our customers, employees and all other stakeholders. This is the foundation on which we add value in the long term and preserve the corporate independence of Datwyler Cabling Solutions. As a competent development partner, we maintain close contact with our customers, deliver the highest quality and provide satisfaction with innovative services. Every Datwyler employee is committed to contributing to our customers' success in their markets.

我们为客户、员工和其他利益相关者寻求持续盈利增长。这是我们长期增加产值和保持德特威勒电缆系统企业独立性的基础。作为一个有发展能力的合作伙伴，我们与客户保持密切的联系，提供最高品质和令人满意的创新服务。每个德特威勒的员工都为我们的客户在他们的市场上取得成功而做出贡献。

2 Principles and objectives

原则和目标

The Code of Conduct contains binding rules that apply to all Datwyler Cabling Solutions employees worldwide. They are designed to help deal with ethical and legal challenges in our day-to-day work. Any employee may speak to his line manager or the manager of the local company at any time if he has questions or concerns relating to the Code of Conduct.

《行为准则》包含了约束性的规则，这些规则适用于所有德特威勒电缆系统公司的全球员工。它们的制定是帮助解决日常工作中道德和法律上的挑战。如果员工对《行为准则》有任何问题，可以在任何时间和他的直属经理或公司经理交谈。

3 Basic principles of conduct:

No violations of law, discrimination or harassment

行为的基本原则

不违法、歧视和侵犯

3.1 Compliance with laws

遵循法律

Compliance with laws is the top priority for our Company. Every employee must respect and obey the laws and regulations of the jurisdiction in which he operates. Violating the law must be avoided under all circumstances. Besides the penalties imposed by law, any employee guilty of a violation can expect disciplinary action, up to and including dismissal, for breach of his obligations under his employment contract.

遵循法律是我公司的首要任务。每个员工在其行动范围必须尊重和遵守法律法规。在任何情况下都不得违反法律。任何违反雇佣合同所规定义务的员工除了要受到法律处罚外还要接受纪律处分，最高包括开除。

3.2 Mutual respect, honesty and integrity

互相尊重、诚实和正直

We respect the human rights, dignity, privacy and personal rights of every individual. We work with men and women of different origins, nationalities, cultures, religions and colours, nurturing a culture of mutual respect and trust. We will not tolerate any form of discrimination, humiliation, oppression, harassment or offence. In particular, we strictly condemn sexual harassment and bullying. We categorically reject the use of child and forced labour.

我们尊重人权、尊严、隐私和个人权益。我们和不同种族、国籍、文化、宗教和肤色的男性和女性同事一起工作，这孕育了互相尊重和信任的企业文化。我们不能允许任何歧视、羞辱、压迫、骚扰和冒犯。我们尤其严厉斥责性骚扰和欺负弱小。我们无条件拒绝雇用童工和强迫劳力。

We are open and honest, act with integrity and take responsibility for our actions. We are reliable partners and do not make promises we cannot keep. These principles apply both to the way we interact with each other within the Company and to our conduct in dealings with external partners.

我们开放、诚实、行为正直且为我们的行为负责。我们是值得信赖的伙伴，绝不做不能信守的承诺。这些原则不仅适用于公司内部互相交流方式，也适用于与外界合作伙伴的沟通方式。

3.3 Upholding the reputation of the Datwyler Cabling Solutions AG

维护德特威勒电缆系统公司的声誉

The reputation of Datwyler Cabling Solutions largely depends on the behaviour and conduct of each one of us. Inappropriate behaviour or conduct of even a single employee can cause serious harm to the Company. Every employee is required to uphold the public image of Datwyler Cabling Solutions. Everything he does in the performance of his duties must be guided by this principle. Rules for the use of social media platforms by Datwyler Cabling Solutions employees are set out in separate Social Media Guidelines.

德特威勒电缆系统公司的荣誉主要依靠我们大家的行为举止。每一个员工的不正当行为会给公司造成

严重的损害。每个员工都应维护德特威勒电缆系统公司的公众形象。在工作中，员工必须遵循此原则。在相应的《社交媒介指南》中规定了德特威勒电缆系统公司员工使用社交媒介平台的原则。

3.4 Coordinated external communications

协调外部沟通

In respect of external communications issued by Datwyler Cabling Solutions, the following must be observed:

关于德特威勒电缆系统公司的对外通讯，必须遵循以下规定：

Inquiries from trade media concerning technical matters must be referred to the Head of Communications of Datwyler Cabling Solutions, who will then coordinate communications with trade media. The current Head of Communications is Dieter Rieken, dieter.rieken@datwyler.com.

有关技术事务的贸易媒介问题，必须提交给德特威勒电缆系统公司通讯部部长，其将负责协调与贸易媒介的通讯。现任通讯部部长为 Dieter Rieken, dieter.rieken@datwyler.com。

Datwyler Cabling Solutions' external communications must additionally take into account the needs of publicly listed Datwyler Holding. To ensure that all stakeholders are treated equally as required, communications with members of the daily, business and financial media must be coordinated with the CEO of Datwyler Cabling Solutions. The current CEO is Johannes Müller, johannes.mueller@datwyler.com. He will ensure coordination with the Head of Corporate Communications of Datwyler Holding.

此外，德特威勒电缆系统公司的对外通讯必须考虑上市德特威勒控股公司的需要。为了确保所有股东都能够按要求受到平等地对待，各成员的日常、商务和财务媒介通讯必须由德特威勒电缆系统公司首席执行官进行协调。现任首席执行官为 Johannes Müller, johannes.mueller@datwyler.com。他将负责与德特威勒控股公司企业通讯部部长的协调工作。

The above-named persons/units will decide whether and in which form it is best to communicate. The Corporate Design Guidelines must be followed at all times when using any communication tools.

以上人员/单位将决定是否需要进行沟通及以什么样的方式进行最好地通讯。在任何情况下，只要使用了任何通讯工具，都必须遵循《企业设计指南》的要求。

4 Attractive employer

有魅力的雇主

4.1 Modern corporate governance

现代公司管理

As a company committed to creating long-term value, Datwyler Cabling Solutions has a clear framework of sound organisational, management and control policies. These policies are set out in the Articles of Association, Rules of Organisation, and the Delegation of Responsibilities of Datwyler Cabling Solutions. They satisfy the demands of corporate governance thinking.

作为一家致力于创造长期价值的公司，德特威勒电缆系统公司有清晰、完善的组织，管理和控制政策。这些政策制定于德特威勒电缆系统公司章程、组织规章制度，以及公司管理层代表职责之中。他们必须满足企业管理理念的要求。

4.2 Decentralised management

分散管理

Datwyler Cabling Solutions operates a systematically decentralised management system within a clear framework. By taking decisions at the lowest possible level close to the market and customers, the Company fosters a culture with a high degree of identification and fast response times. Full transparency in the organisation ensures the necessary sense of responsibility in decision-making. In the performance of his duties, every employee must abide by the Rules of Organisation, Delegation of Responsibilities and special instructions issued by the employer.

德特威勒电缆系统公司在清晰的架构下运行系统化的分散式管理体系。尽可能接近市场和客户来做出决定，集团培育了一个有高识别度和快速响应的企业文化。组织的全透明度，在作出决策时确保了必要的组织责任感。在履行职责中，每位员工应遵守公司制定的组织规章制度、代表的职责和任何特殊指令。

4.3 Responsibility and supervision

职责和监督

Each line manager is responsible for the employees reporting to him. He must earn their respect through exemplary personal conduct, performance, reliability and social skills. He sets clear, ambitious and realistic goals, leads by trust and allows employees as much personal responsibility and freedom as possible. He or the Human Resources Department can also be consulted by employees if they have any job-related or personal concerns.

每位直属经理负责员工向其汇报。直属经理必须通过模范的个人行为、表现、信赖度和社会技能赢得员工的尊重。制定明确的、富有雄心和可实现的目标，在信任引导下，尽可能给员工个人责任和自由。如果员工有任何工作或个人相关的问题，也可以向其上级或人事部咨询。

Each line manager has organisational and supervisory duties to perform. He is responsible for ensuring that no violations of law are committed within his area of responsibility that could have been prevented or impeded by proper supervision. He still remains accountable even if some tasks have been delegated.

每一位直属经理应履行组织和监督责任，有责任确保在其职责区域内没有本可以阻止或通过适当监管

可以防止的违法事件的发生。即使某些任务已经委派，其仍然负有责任。

The following applies in particular to management, responsibility and supervision:

以下内容尤其适用于管理、职责和监督。

1. The line manager must exercise care in selecting employees based on their personal and professional qualifications. The duty of care increases with the importance of the task to be performed by the employee (duty of selection).

直属经理必须基于员工的个人和专业资格精心挑选。员工的尽责是随着其执行任务的重要性而增加（职责挑选）。

2. The line manager must define the tasks in a precise, complete and binding manner, in particular with respect to compliance with legal requirements (duty of instruction).

直属经理必须以详细、完整且有约束力的方式确定各项任务，特别是要符合法律法规的要求（责任指令）。

3. The line manager must ensure that compliance with legal requirements is monitored continuously (duty of monitoring).

直属经理必须确保不间断地监督遵守法律法规的要求（岗位监督）。

4. The line manager must clearly communicate to employees that violations of law are not acceptable and will have consequences under labour law.

直属经理必须明确地传达员工：违反法律是不能接受地，且会根据劳动法进行处理。

In addition, each superior is required to familiarise his employees with the Code of Conduct on a regular and documented basis.

此外，要求每一位上司应定期让其员工熟悉《行为准则》，并做好相关记录。

4.4 Fair employment conditions

公平的雇佣条件

Datwyler Cabling Solutions companies ensure equal opportunities, equal treatment and fair employment conditions, pay fair wages and salaries, and offer employee benefits in line with national and industry standards. In business reorganisation programmes, we consider the needs of the employees. Regular employee surveys provide the foundation for continuous improvements. Our employees are free to join trade unions. We maintain a constructive dialogue with internal employee representatives.

德特威勒电缆系统公司确保提供均等的机会、相同的待遇和公平的就业条件，支付公平的工资和薪金，为员工提供与国家 and 行业标准相一致的员工福利。定期的员工调查为持续改善提供了基础。我们的员工可以自由地加入工会，且我们与内部员工代表之间保持建设性地对话。

4.5 Systematic training and development

系统化培训和发展

The markets in which the Datwyler Cabling Solutions operates call for highly trained employees undergoing continuous development and improvement. Some of our initiatives to train young people are reflected in the numerous apprenticeships offered by Datwyler Cabling Solutions companies worldwide. We support training and retraining programmes to develop the technical and social skills of employees at all levels in the hierarchy. To promote management talent, Datwyler Cabling Solutions provides individual programmes tailored to future job skill requirements.

德特威勒电缆系统公司所运作的市场需要受过高级培训的员工，并且不断地发展和提高。我们倡导对年轻人的培训，部分体现在德特威勒电缆系统公司在世界各地提供许多学徒培训项目。我们支持培训和再培训方案来提高各级层次员工的技能和社会技巧。为了培养管理人才，德特威勒电缆系统公司为人提供适应未来职能需要的培训项目。

4.6 Occupational health and safety

职业健康和安全

Datwyler Cabling Systems companies are committed to ensuring a safe and healthy working environment and provide employees with regular training. It is the responsibility of each individual towards his fellow employees and colleagues that provides the best safeguard against hazards and accidents. This applies both to technical planning of workplaces, equipment and processes and to safety management and personal behaviour in everyday working life. Every employee must pay constant attention to safety.

德特威勒电缆系统公司致力于确保为员工提供一个安全健康的工作环境，以及定期培训。为同事提供最佳的安全环境来防范危险和意外事故是每位员工的责任。这均适用于技术规划的工作场所、设备和工艺，以及安全管理和日常生活中的个人行为。每位员工必须随时注意安全。

5 Dealings with business partners and third parties: No collusion, bribery or corruption

与商业伙伴或第三方交易：
没有勾结、贿赂或腐败

5.1 Compliance with competition and antitrust laws

遵守竞争法和反垄断法

Fair competition is fundamental to free enterprise. The principle of integrity also applies to competition for market share. Every employee is required to observe all rules of fair competition. In particular, employees must not enter into any discussions with competitors where arrangements are made about prices, capacities, industries, market territories or customers. Arrangements with competitors not to compete or to submit sham bids in a competitive bidding process are also prohibited.

公平竞争是自由贸易的根本。诚信原则也适用于市场份额的竞争。每一位员工都必须遵守所有的公平竞争法则。尤其是员工不得与竞争对手参与任何关于价格、产能、行业、市场区域或客户安排的讨论。严禁与竞争对手在投标过程中安排不参与竞争或提交虚假标书。

As per 1 July 2016 the corruption law has been updated in Switzerland. It is essential to pay special attention to this update as corruption may also occur in a Swiss company with global presence. The company can be punished, independently of the culpability of an individual person.

截至 2016 年 7 月 1 日，瑞士《反腐败法》已经更新。必须特别注意这一最新情况，因为在全球性的瑞士公司也可能发生腐败。公司可以因为个人的罪责而受到惩罚。

5.2 No offering and granting of benefits

不提供和给予好处

We compete for contracts on the merits of the quality and price of our innovative products, solutions and services. No employee may directly or indirectly offer or grant unwarranted benefits ("bribes", "kickbacks") to others in connection with his business activities, whether in cash or in the form of other services or benefits.

我们利用创新性产品、解决方案、服务质量和价格优势去参与竞争，赢取合同。任何员工不可以在其商务活动中对相关人员以直接或间接的方式给予或授予不当的好处（“贿赂”、“回扣”），无论是以现金，其它服务或好处。

Business gifts to employees of business partners must be chosen so as to avoid any appearance of dishonesty and impropriety with the recipient.

给商业伙伴员工的商务礼品必需经过挑选，以避免任何外观不实和不当的单据。

Employees who enter into contracts with consultants, intermediaries, agents or similar third parties must make sure that those parties do not offer or grant any unwarranted benefits either.

与咨询公司、中间商、代理公司或类似的第三方进行合同签订的员工必须确保与这些机构之间相互不得提供或给予任何不当的好处。

5.3 No solicitation and acceptance of benefits

不索要和接受好处

No employee may use his position with the Company to solicit, accept, procure or be promised benefits (“bribes”, “kickbacks”). This does not apply to the acceptance of occasional gifts of nominal value. Other gifts must be refused or returned.

任何员工不得利用公司职务之便去索要、接受、取得或被许诺好处（“贿赂”、“回扣”）。这不适用于偶尔接受常规价值的礼品。其它礼品必须拒收或退回。

5.4 Special contracting rules

特殊合同规则

Anyone bidding for a contract expects his tender to be given fair and impartial consideration. Employees involved in awarding contracts must in particular observe the following rules:

每人都期望自己合同招投标得到公平、公正的对待。员工在参与赢得项目合同时尤其要注意以下规则：

- The employee must inform his line manager of any personal interest he might have in connection with the performance of his duties for the Company. In particular, this also includes any family or personal relationships with a potential supplier. In such cases, competitive tenders must be obtained.
- 员工必须告知其直属上司其在履行与公司相关的个人职责时可能会获得的任何个人好处。特别应包括与潜在供应商的任何家庭或个人关系。在这种情况下，必须经过正规的比价流程。
- Suppliers competing for contracts must not be unfairly favoured or discriminated against.
- 供应商在参与合同招投标时不得受到不公正地对待或歧视。
- Invitations from business partners may only be accepted if the occasion and the scope of the invitation are appropriate and if refusing the invitation would be discourteous. We exercise restraint in travel and functions involving overnight stays and, if an invitation is accepted, pay the costs of overnight accommodation and return travel ourselves. A process is in place for reporting invitations accepted that have a value equivalent to more than CHF 500.-/EUR 400.-/USD 500.-. Each company must implement this process in an appropriate manner.
- 如果邀请的场合和规模合适，或者如果拒绝邀请被视为无礼，那么来自商业伙伴的邀请可以接受。我们拒绝旅行和在外过夜的邀请。如果接受了这类邀请，那么过夜的住宿费和旅行回程的费用将由我们自己支付。应制定一项程序，以便上报价值超过 CHF 500.- /EUR 400.- /USD 500.-的项目邀请。每个公司都必须以适当的方式执行该程序。
- Gifts from business partners must be refused or returned unless they are occasional token gifts of nominal value.
- 商业伙伴送的礼品必须拒收或退回，除非这些是偶尔的象征性礼品。
- No employee may have private work carried out by firms with which he has business dealings if he could gain any advantage from the deal.

- 如果员工可能会从交易中获取任何好处，那么其不可利用公司所进行的商务交易开展私人工作。

5.5 Sponsorship payments and donations

赞助付款与捐赠

Datwyler Cabling Solutions companies may make donations in cash or in kind to education and science, the arts, culture, sports and social causes. Datwyler Cabling Solutions does not provide financial support to political parties, organisations or office holders. The following rules apply for granting donations:

德特威勒电缆系统公司可以以现金或实物方式向教育、科学、艺术、文化、体育领域和因社会原因而做出捐赠。德特威勒电缆系统公司绝不会为政党、官方组织提供财务支持。以下政策适用于捐赠事宜：

- No payments to persons or organisations associated with a competitive bidding process for a business contract or order.
- 与商务合同或订单的竞标程序相关的所有人员或机构，不得收取任何费用。
- Requests from individuals for donations should generally be refused.
- 来自个人的捐赠要求通常应被拒绝。
- No payments to private accounts.
- 不得向私人账户付款。
- A donation may never be granted to individuals or organisations that do not have an impeccable reputation or whose objectives are not consistent with those of Datwyler Cabling Solutions.
- 捐赠可能永远不会给予声誉不佳或其目标与德特威勒电缆系统公司相违背的个人或组织。
- The donation must be transparent. The recipient of the donation and its actual use by the recipient must be known. The donor must be able to account for the reason for the donation and its intended purpose at any time.
- 捐赠必须透明，捐赠的接受者和捐赠的实际用途必须告知公司。捐助者必须在任何时候能够说明捐赠的原因和使用目的。
- A process is in place for approval and reporting of sponsorship payments and donations totalling an amount in excess of CHF 500.-/EUR 400.-/USD 500. -- per recipient and financial year. Each company must implement this process in an appropriate manner.
- 应制定一项程序，用于审批和上报按照每位接受者和财政年度而言，总价值超过 CHF 500.- / EUR 400.- / USD 500的赞助和捐赠款项。每个公司都必须以恰当的方式执行该程序。

5.6 Separate Supplier Code of Conduct

相应的《供应商行为准则》

We give our suppliers fair contractual terms and reasonable valuable consideration. In return, we also expect them to treat their employees and suppliers fairly and honestly. Our specific requirements to be met by our suppliers are set out in a separate Supplier Code of Conduct applied consistently by all Datwyler Group companies, subsidiaries and brands.

我们为所有供应商提供公平的合同条件和合理的价值比较。相应地，我们也期望这些供应商能够公平、公正地对待其员工和供应商。在相应的《供应商行为准则》中，规定了我方供应商必须遵循的各项特殊要求，德特威勒集团的所有公司、子公司和品牌都应始终如一地遵循《供应商行为准则》。

6 Avoiding conflicts of interest

避免利益冲突

6.1 Policy of avoidance

回避政策

It is important to the Company that its employees do not face any conflicts of interest or loyalty in their work. Such conflicts can arise when employees work for or have a financial interest in another company. Conflicts of interest may also arise as a result of family or personal relationships. Therefore, the policy is to avoid conflicts of interest.

对德特威勒电缆系统公司来说，避免员工在工作中面对任何利益冲突或忠诚是至关重要的。当员工为另一家公司工作或与另一家公司有经济利益时，这种冲突就会发生。由于家庭或人员关系，也可能产生利益冲突。因此，本政策是为了避免利益冲突。

6.2 Non-competition

竞业限制

Employees are not permitted to run a business that fully or partly competes with Datwyler Cabling Solutions. In addition, they are not permitted to hold direct or indirect interests in a company that fully or partly competes with Datwyler Cabling Solutions.

员工不得经营与德特威勒电缆系统公司相竞争的（全部或部分）业务。此外，不得直接或间接持有与德特威勒电缆系统公司相竞争的（全部或部分）的非上市公司利益。

Prior written approval must be obtained before a financial interest is acquired in a company that is a business partner of Datwyler Cabling Solutions. Approval will be granted by the Corporate Management and documented in the employee's personnel file. Approval will not be granted or may be withdrawn later if the employee has business dealings with the company concerned.

员工在获得来自德特威勒电缆系统公司商业伙伴的经济利益之前必须取得公司书面批准。该批准文件将由公司管理层发出并存放于员工个人档案中。若该员工与涉及公司有业务往来，则该批准文件将会被拒绝或撤销。

Financial interests held by close relatives in a competing company or any other company described above must be disclosed to the superior immediately and the Human Resources Department in writing by the employee, if he is aware thereof. This will be documented in the employee's personnel file.

如果员工意识到其近亲在与公司业务相竞争的公司或上述公司持有经济利益，则其必须书面告知人事部，且该文件将被保存于员工个人档案中。

6.3 Outside activities

外部活动

The line manager must be notified in writing before an employee takes up any paid outside employment or activities. The outside activities may be prohibited if they interfere with work performance, are inconsistent with the employee's duties in the Company or could give rise to a

conflict of interest.

员工在参与任何有报酬的外部聘用或外部活动时必须提前书面告知其直属上司。如果该外部活动可能会影响其工作绩效，或不符合员工的工作职责或可能会引起利益冲突，那么这些外部活动可能会被禁止。

7 Use and protection of Company assets and information

使用和保护公司资产和信息

7.1 Use of assets

资产的使用

The facilities and equipment in offices and workshops (e.g. telephones, photocopiers, PCs including software and the Internet/Intranet, machines, tools) may be used only for business purposes. Exceptions and, if necessary, any payment will be determined locally. It is never permissible to access or transmit material that incites racial hatred, violence or other criminal offences or that contains material perceived as sexually offensive in the particular cultural context.

办公室和车间的设施和设备（如：电话、复印机、电脑包括软件、局域网/企业网、机械和工具）仅可以使用于商业目的。对于例外情况，如有需要，员工可能被收取费用。绝不允许接触或传播含有煽动种族仇恨，暴力或其它犯罪行为，或传播在特殊的文化背景中被视为淫秽内容的材料。

No employee is permitted without the consent of his line manager to create recordings, files, photo, video and audio documents or copies unless directly required to perform his job.

没有直属上司的同意，任何员工不得制作记录、文档、照片、视频和音频文件或复制，除非是其工作安排的需要。

7.2 Records and reports

记录和报表

Open and effective cooperation requires accurate and honest reporting. This applies to the relationship with investors, employees, customers, business partners, the public and government offices alike. All records and reports produced internally or distributed externally must be accurate and truthful. In accordance with proper accounting practices, data recorded and other records must always be complete, accurate, timely and understandable. In particular, the principle of truthful presentation also applies to expense accounts.

开诚布公的，有效合作需要准确、真实的报表。这适用于与投资方、员工、客户、商业伙伴、公众和政府部门。所有内部产生的或向外部分发的记录和报表必须准确真实。根据恰当会计实践，记录的数据和其它记录必须完整、准确、及时和易理解。如是，汇报原则也适用于费用账目。

7.3 Confidentiality: Intellectual property and inside information

保密：知识产权和公司内部信息

Internal Company affairs that have not been publicly disclosed must be kept confidential. Examples include trade secrets, intellectual property, internal reporting data and details relating to the Company's organisation and assets. The obligation to maintain confidentiality continues even after employment ends.

公司内部尚未对外公布的信息必须保密。例如包括商业秘密，知识产权、内部报告数据和与公司组织和资产相关详细信息。即使雇佣终止后，员工也有义务对此类信息继续保密。

As Datwyler Cabling Solutions is the sister company of publicly listed Datwyler Holding, all employees are required to comply with insider trading legislation. Trading in securities of Datwyler Holding Inc. on the basis of privileged and confidential information is not permitted. Disclosing such

information without authorisation or making a recommendation for the purchase or sale of securities of Dätwyler Holding Inc. is also prohibited. Employees involved in the preparation of the Annual and Interim Reports are prohibited from trading in securities of Datwyler Holding Inc. during the binding closed periods specified.

作为一家上市公司，德特威勒电缆系统公司是德特威勒控股公司的姊妹公司。所有的员工都应遵守内部交易法规。在优先权和获悉保密信息的基础上进行德特威勒控股公司证券交易是被禁止的。禁止未经授权披露此类信息或者提供买卖德特威勒控股有限公司证券的建议。参与准备年度或中期报表的员工，在指定的具有约束力的封闭期内禁止买卖德特威勒控股公司的证券。

7.4 Data privacy and security

数据保密和安全

Together with the advantages of modern electronic communications, there are also risks for privacy and the security of confidential data. Taking effective measures to safeguard against these risks is an important part of ICT management, management responsibility and also the conduct of each individual. The standards of conduct expected in the use of ICT resources are set out in a separate ICT Security Policy.

现代电子通信带来优势的同时，也存在机密数据保密和数据安全的风​​险。采取有效的措施防止此类危险是 ICT 管理、管理责任和每个个人行为的重要部分。相应的《ICT 安全政策》中规定了有关使用 ICT 资源的行为标准。

Personal data may only be collected, processed or used if needed for specified, explicit and legitimate purposes. A high standard of data quality and technical protection to prevent unauthorised access must be ensured. The use of data must be transparent for those concerned; their rights to information and correction and, if need be, to object and have data blocked and deleted must be preserved.

如因具体的、清晰、合法目的需要，个人数据仅可以被收集、处理或运用。高标准的数据质量和技术保护，以防止未经授权的访问得到保证，此类相关数据的使用必须透明。如有需要，他们对信息和数据的访问、修改、阻止和删除必须得到保护。

7.5 General Data Protection Regulation (GDPR)

《一般数据保护条例》（GDPR）

The General Data Protection Regulation (GDPR) is a regulation by which the EU intends to strengthen and unify data protection for all individuals within the European Union. This regulation is applicable for all companies in the EU and companies in foreign countries who process personal data for EU based companies or for EU citizens. The deadline for the necessary changes and implementations with regard to the new regulation ends as of 25 May 2018. If the companies do not follow the regulation the regulatory authorities may take measures and sanction the companies up to 4% of the yearly turnover or a maximum 20 million EUR.

《一般数据保护条例》（GDPR）是欧盟旨在加强和统一欧盟内所有个人的数据保护的法规。本规定适用于欧盟的所有公司以及为欧盟公司或欧盟公民处理个人数据的外国公司。有关新法规的必要修改和实施的最后期限截止至 2018 年 5 月 25 日。如果公司不遵守规定，监管机构可以采取措​​施，对公司处以每年营业额的 4%或最高 2000 万欧元的罚款。

Datwyler Cabling Solutions has appointed a new Data Security Manager in September 2017. This

person has initiated, in collaboration with external partners, the necessary procedures to ensure the compliance with the new regulation.

德特威勒电缆系统公司在 2017 年 9 月任命了新的数据安全经理。他已与外部合作伙伴启动了确保遵守新规的必要程序。

8 Environment and community

环境和社团

8.1 Environmental protection

环境保护

Datwyler Cabling Solutions companies understand and live up to their responsibility to protect the environment, complying with all applicable legislation. Furthermore, we make every reasonable effort to minimise identifiable risks. Specifically, this means that when choosing resources and production processes, we are committed to finding the most environmentally friendly materials and techniques that will have the least possible impact on the environment when the products are manufactured, used and ultimately disposed of. All employees are required to conserve natural resources in their environment.

德特威勒电缆系统公司理解并履行其责任来保护环境，遵守任何适用法律。此外，我们作出一切合理努力来尽量减少可以识别的风险。具体来说，这意味着在我们选择资源和生产流程时，我们致力于寻找最环保的材料和技术，当采用它们来进行产品生产，产品使用以及产品最终处理时对环境的影响最小。所有员工都应保护自然资源。

Based on the core ecological values, two Datwyler Cabling Solutions companies are certificated to ISO 14001. All production companies are working towards ISO environmental certification. Datwyler Cabling Solutions has also been a member of the Swiss Energy Agency for Industry (EnAW) since 2003 through its Swiss company Datwyler Cabling Solutions AG.

基于核心生态价值，2 家德特威勒电缆系统公司已经获得 ISO 14001 认证。其它公司正努力取得 ISO 环境认证。德特威勒电缆系统公司自 2003 年已成为瑞士能源机构行业（EnAW）的成员。

8.2 Community involvement

参与社团

Datwyler Cabling Solutions recognises its share of responsibility for general civic causes and maintains regular contact with local authorities. We support social initiatives, endeavour to help the disadvantaged within and on the fringes of society and allow our employees to participate appropriately in community service.

德特威勒电缆系统公司认识到自己作为普通公民所承担的责任，且与地方当局保持定期联系。我们支持社会活动，努力帮助处于不利地位的内部人群和社会边缘人群，让我们的员工适当参与社团服务。

9 Reporting procedure, violations and disciplinary action

投诉流程，违规和纪律处分

Every employee is required to report circumstances that may constitute a violation of the Code of Conduct. Reports can be made verbally or in writing to the direct line manager, the Human Resources Department, or the Managing Director of the company concerned.

任何员工都应举报可能违反行为准则的情况。所有报告可以口头或书面形式上报给相关公司的直属经理、人力资源部或公司总经理。

Datwyler Cabling Solutions also provides two anonymous global toll-free options for reporting violations of the Code of Conduct:

同时，德特威勒电缆系统公司还提供了两部全球匿名免费电话，用于举报违反《行为准则》的行为：

- By e-mail: whistleblowing@datwyler.com
- 通过电子邮件: whistleblowing@datwyler.com
- Byphone: +800 875 11 000 (global), +800 0410 237 (UAE)
- 通过电话: +800 875 11 000 (全球), +800 040 237 (UAE)

The first person contacted will investigate the matter thoroughly. If appropriate, suitable action will be taken. Employees and line managers should use all internal means to resolve the matter at the lowest possible level. All documentation will be kept confidential. We will not tolerate retaliation of any kind. The reporting employee must not suffer any disadvantage as a result of submitting a complaint or report in good faith. However, deliberate abuse of the complaints system is a violation of the Code of Conduct by the employee and may result in disciplinary action.

联系的第一位人员将彻底调查该事件。如果适当的话，将采取适当的行动。所有员工和直属经理应采用各种内部方式，以便在尽可能低的层面解决该事件。所有文件资料都必须保密。我们不会容忍任何类型的报复行为。举报的员工不得因抱怨或真诚举报而遭受任何不利情况。但是，员工故意滥用举报系统将视为违反《行为准则》，并且可能遭到惩罚。

Any employee who violates rules contained in the Code of Conduct can expect disciplinary action, up to and including dismissal, besides the penalties imposed by law.

任何违反本《行为准则》所包含的规章，都将受到纪律处分，除法律实施的处罚外，直至并包括解雇。

10 Implementation and monitoring

实施和监督

The Datwyler Cabling Solutions Corporate Management actively facilitates widescale communication of the Code of Conduct and ensures its sustained implementation. Every employee will receive a copy of the Code of Conduct. Superiors and the Human Resources Departments will give the Code of Conduct to each new employee as an integral part of their employment contract. The Human Resources Departments are also responsible for communicating its contents.

德特威勒电缆系统企业管理层应积极促进本《行为准则》的广泛传达，并确保其持续实施。每位员工将收到一份本《行为准则》。人力资源部将会把该行为准则和劳动合同一起分发给每一位新员工，并负责传达其内容。

The internal auditors regularly monitor compliance with laws and observation of the Code of Conduct in all organisational units of Datwyler Cabling Solutions.

内审人员将定期遵循法律和《行为准则》对德特威勒电缆系统公司的所有组织单位进行观察和监督。

The Board of Directors receives an annual report from the Corporate Management concerning compliance with the Code of Conduct.

关于《行为准则》的遵守情况，企业管理层将以年报方式提交董事会。

This Code of Conduct was adopted by the Board of Directors of Dätwyler Cabling Solutions AG on 11 March 2013 and became retroactively effective on 1 January 2013. It was updated with effect from 1 January 2014 and 1 July 2018.

本行为准则于 2013 年 3 月 11 日获得德特威勒电缆系统公司董事会通过，并已于 2013 年 1 月 1 日起追溯生效。于 2014 年 1 月 1 日及 2018 年 7 月 1 日进行了更新。

Disclaimer

免责声明

This Code of Conduct does not create any rights enforceable by employees or third parties against Datwyler Cabling Solutions or any of its companies. The Code is subject to change.

本行为准则对员工或第三方，对德特威勒电缆系统或任何德特威勒电缆系统所属公司产生强制执行的权力，德特威勒保留对该行为准则进行修改的权利。