

Anti-Corruption Policy

反腐败政策

GP2.07

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目录

1	Summary 概述.....	3
2	Introduction 简介.....	4
2.1	Aim 目的	4
2.2	Scope 范围.....	4
2.3	Contacts 联系我们.....	5
3	Definitions 定义.....	6
3.1	Examples of corruption 腐败示例	6
3.2	Improper advantage or benefit 不正当优势或好处.....	6
3.3	Facilitation payments 疏通费	7
3.4	Trading in influence 影响力交易.....	7
3.5	Public and private sector payments prohibited 禁止向公营和私营部门的支付	8
3.6	Liability for corrupt acts of affiliates or representatives 子公司或代表的腐败行为的 责任 8	
3.7	Accurate accounting 准确的会计	8
4	General Guidelines 一般指南.....	9
5	Relations with Customers, Suppliers and Public Officials 与客户、供应商和公职官员的 关系 10	
5.1	General principles 总则.....	10
5.2	Travel and entertainment expenses 差旅费和招待费	11
5.3	Gifts 礼物.....	13
5.4	Political contributions 政治献金.....	13
5.5	Facilitation payments - 疏通费.....	14
6	Relations with Agents and Other Representatives 与代理人和其他代表的关系	15
7	Relations with Minority Owned Companies, Joint Ventures and M&A 与少数族裔开设的 公司、合资企业及并购对象的关系.....	16
8	Legislation and Ethical Rules 法律和道德准则	17
9	Risk Assessment 风险评估.....	18
10	Roles and Responsibility 职务与责任	18
11	Consequences of Non-Compliance 不合规的后果	19
11.1	For the company - 对于公司.....	19
11.2	For the individual 对于个人.....	20
11.3	For agents and other representatives 对于代理人和其他代表	20
12	Training 培训	20



13	Reporting Improper Benefits and Gifts – Speak Up! - 报告不正当利益和礼物——大声讲 出来!	20
13.1	Raising concerns is encouraged 鼓励引起关注.....	21
13.2	The Whistleblower function – 检举功能	22
14	Deviations - 背离.....	22

This document is also available in Chinese, Polish and Swedish. The English version of this Anti-Corruption Policy shall prevail should there be any discrepancies between the available language versions. For questions, please contact your local Legal department.

本文件还提供中文、波兰语以及瑞典语版本。各版本反腐败政策之间存在冲突时，应以英文版本为准。如有任何疑问，请联系当地法务部门。

1 Summary 概述

- **Zero Tolerance for Corruption:** Gränges is committed to ethical business practices, with zero tolerance for corruption in any form. Corruption is seen as detrimental to economic development, competition, and reputation.
 - **对腐败零容忍：**格朗吉斯致力于合乎道德的商业实践，对任何形式的腐败零容忍。腐败被视为会损害经济发展、竞争和声誉。
- **Scope of Policy:** The Anti-Corruption Policy applies to all Gränges' employees, board members, temporary staff, intermediaries, agents, and anyone acting on behalf of Gränges. It covers all business activities and relationships with suppliers, customers, and other partners.
 - **政策范围：**反腐败政策适用于格朗吉斯所有员工、董事会成员、临时员工、中间商、代理人以及代表格朗吉斯的任何人。政策涵盖所有商业活动以及与供应商、客户和其它合作伙伴的关系。
- **Prohibited Activities:** The policy defines corruption as giving or receiving improper benefits and prohibits activities such as bribery, facilitation payments, and trading in influence. Both public and private sector payments that constitute corruption are banned.
 - **禁止的活动：**政策将腐败定义为给与或接受不正当的利益以及禁止的活动，例如贿赂、疏通费和影响力交易。禁止向公营或私营部门付款构成腐败。。
- **Responsibilities:** Employees must comply with this policy, applicable laws, and internal guidelines, even if stricter than local laws. Managers are responsible for ensuring that their teams understand and follow these principles.
 - **责任：**员工必须遵守本政策、适用法律及内部指南，即便比当地法律更严格。经理负责确保其团队理解并遵守这些原则。
- **Reporting and Whistleblower Protection:** Employees are encouraged to report suspected corruption through their managers, manager's manager, designated contacts or anonymously via Gränges' Whistleblower Function, ensuring confidentiality and protection from retaliation.
 - **报告与举报保护：**鼓励员工通过其上级、上级的上级或指定联系人或者通过格朗吉斯“检举机制”匿名报告可疑的腐败行为，确保机密并不会遭到报复。
- **Guidelines for Conduct:** All dealings with customers, suppliers, and public officials must be ethical and transparent. Expenses and gifts must be reasonable, documented, and not intended to influence decisions improperly.
 - **行为指南：**所有与客户、供应商、公职官员的接洽均应合乎道德且透明。花费与礼物必须合理、有记录且不得企图对决策有不当影响。

- **Due Diligence and Third-Party Relations:** Thorough due diligence is required before engaging with agents, representatives, or entering partnerships. Contracts must include anti-corruption provisions, and payments should be transparent and justified.
 - **尽职调查与第三方关系:** 在与代理人、代表接洽或确定合作关系前，必须进行全面的尽职调查。合同必须包括反腐败条款，支付应透明且具备正当理由。
- **Employee training and Enforcement:** Gränges provides anti-corruption training to relevant employees. Non-compliance can result in severe consequences, including fines, imprisonment, and dismissal for individuals, and significant penalties and reputational damage for Gränges.
 - **员工培训与强化:** 格朗吉斯为相关员工提供反腐败培训。不合规行为可能导致严重后果，包括对个人的罚款、监禁、开除，以及对格朗吉斯的严重惩罚与声誉损失。

2 Introduction 简介

Gränges is committed to ethically sound business practices and running its business in compliance with all applicable laws and regulations. Gränges shall be an ethically sound partner in all relations and in all the countries in which Gränges conducts business.

格朗吉斯致力于合乎道德的良好商业实践并以符合道德标准和所有适用法律法规的方式开展业务。格朗吉斯在所有合作关系中和在所有经营业务的国家，均为恪守符合道德标准的良好合作伙伴商业行为。

Gränges has zero tolerance towards corruption. Corruption prevents economic development, distorts competition, leads to increased costs and destroys confidence, reputation and brand. It is costly for Gränges as a company as well as for individuals and could lead to imprisonment and fines. Gränges does not tolerate corruption and will always act rapidly, stringently and vigorously upon discovering corruption or type of unethical behaviour.

格朗吉斯对腐败采取零容忍的态度。腐败会阻碍经济发展，扭曲竞争，导致成本增加，摧毁人们的信心，损害公司声誉和品牌形象。一旦出现腐败，格朗吉斯公司和个人都将付出高昂代价，可能会招致监禁和罚款。格朗吉斯绝不容忍腐败，一旦发现腐败或不道德行为，便会迅速采取行动，给予严厉惩罚。

2.1 Aim 目的

The aim of this policy is to describe Gränges' efforts to prevent bribery and other types of corruption.

本反腐败政策旨在介绍格朗吉斯在预防贿赂和其他类型腐败方面所做的努力。

2.2 Scope 范围

This Anti-Corruption Policy applies to all Gränges employees and board members in entities owned by Gränges throughout the world, temporary staff (e.g. independent contractors, consultants etc.), intermediaries, agents or others acting on behalf of Gränges in their work and activities. Additionally, this Anti-Corruption Policy applies to all business and activities within the Gränges Group, and to all relations with suppliers, customers, and other business partners. All suppliers with an annual spend above 500 kSEK or equivalent amount in local



currencies are required to commit to Gränges' Supplier Code of Conduct or have an equivalent standard in place of which anti-corruption is one criterion. For more information see GP 2.11 Supplier Code of Conduct Policy.

本反腐败政策适用于格朗吉斯集团全球范围内的所有员工和董事会成员、临时员工（如独立承包商、顾问等）、中间商、代理人，以及代表格朗吉斯开展工作和活动的其他人员。此外，本反腐败政策还适用于格朗吉斯集团内部的所有业务和活动，以及与供应商、客户和其他业务伙伴的所有合作关系。所有年采购额超过 50 万瑞典克朗或等值当地货币的供应商都应遵守格朗吉斯的《供应商行为守则》或已具备同等准则，其中标准之一即为反腐败。欲了解更多信息，请参见 GP2.11 格朗吉斯的《供应商行为守则政策》。

This Anti-Corruption Policy provides an overview of Gränges' anti-corruption principles and explains the basic legal and ethical requirements that Gränges' employees and other individuals who are covered by this policy shall follow to avoid corrupt practices throughout their business activities for Gränges. In addition to following applicable laws and regulations, all employees must comply with internal company policies which, in some cases, are stricter. In cases where there is a difference between the Anti-Corruption Policy and local requirements and guidelines, whenever legally possible, the more stringent standard of conduct shall be applied.

本反腐败政策概述了格朗吉斯的反腐败原则，并说明了格朗吉斯员工和其他受本政策约束的人员应遵守的基本法律和道德要求，这些基本法律和道德要求旨在防止上述人员在为格朗吉斯工作期间出现腐败行为。除了遵守适用的法律法规以外，所有员工还必须遵守公司内部的政策，在某些情况下，内部政策更为严格。当本反腐败政策与当地要求和准则存在差异时，在法律的允许范围内，应遵守最为严格的行为准则。

In this document you can find group-wide principles and guidelines as well as practical guidance on how to live up to these principles and guidelines and how to think and act. There is always a need for personal integrity and sound judgement. There may be situations where no specific principles exist and, in such cases, conduct should be in line with the spirit of this Anti-Corruption Policy. You may also ask your manager for advice.

本文针对如何践行上述原则和指南以及如何思考和行动，提供了适用于全集团的原则和指南以及实践指导。任何时候都需要保持个人诚信和正确的判断。在某些情况下，可能不存在具体行事原则；此时，应按照本反腐败政策的精神行事。您也可以向您的经理征求意见。

Each individual is responsible for reading, understanding, and following this Anti-Corruption Policy!

所有人员均有责任阅读、理解和遵循本反腐败政策!

2.3 Contacts 联系我们

If you need advice, contact any of the below individuals:

如果您需要咨询，请联络以下人士：

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3 Definitions 定义

While the specifics of anti-corruption law may vary in different parts of the world, most anti-corruption laws share a common core definition of “corruption”.

虽然反腐败法的具体内容在世界各地可能有所不同，但大多数反腐败法对“腐败”都有一个共同的核心定义。

For the purpose of Granges’ Anti-Corruption Policy, corruption is defined as any attempt to directly or indirectly (through middlemen):

在格朗吉斯的反腐败政策中，腐败被定义为具有以下企图的行为，直接或间接（通过中间人）地：

- Give or offer someone an improper benefit based on position, assignment or duty (active corruption), or
- 向某些职位、工作或职责的人给予或提供不正当利益（主动腐败）；
- Demand, receive or accept an offer to receive an improper benefit based on position, assignment or duty (passive corruption).
- 向某些职位、工作或职责的人要求、收取或接受不正当利益（被动腐败）。

3.1 Examples of corruption 腐败示例

Bribing an official to obtain a contract is corruption. Corruption may also include activities such as illegitimately or unlawfully paying for travel or entertainment expenses for officials or their family members; agreeing to purchase goods or services from officials or their friends or family members in return for favours; or donating to a charity or sponsorship linked to an official in expectation of a benefit from that official.

为获取合同而贿赂官员的行为属于腐败行为。腐败还可能包括为官员及其家属非法或不正当支付差旅费或招待费等行为；同意从官员及其朋友或家属处购买商品或服务，以换取支持；或者向与官员有关的慈善机构或赞助机构捐赠财物，以期从该官员处获取好处。

3.2 Improper advantage or benefit 不正当优势或好处

Whether an advantage or benefit is improper will depend on several factors such as the nature of the benefit, the position of the recipient, the relationship between the parties and the specific context in which the benefit is being provided. Any benefit provided in return for

the misuse of the receiver's position, task or assignment will generally be considered an improper benefit. Please note that an advantage can be improper even if no benefit is provided in return. An improper advantage will usually be a benefit in the form of cash or objects with economic value but may also include benefits without economic value. Personal benefits provided in relation to the recipient's position, task or assignment, such as services carried out for free or with a discount, invitations to otherwise private arrangements or clubs may also be regarded as improper. Benefits in exchange for or which constitute a breach of statutory or contractual obligations, such as the receipt or delivery of proprietary information, will by their nature be considered an improper benefit. Benefits exchanged in relation to acts and lack of transparency associated with granting of a benefit should be red flags for a potential improper advantage.

判断优势或好处是否正当取决于若干因素，例如好处的性质、接受者的职位、双方之间的关系，以及提供好处的具体情况。任何为换取滥用接受者的职位、工作或职责所提供的好处，一般均视为不正当的好处。请注意，即便没有利益回报，所获优势也可能是不正当的。尽管不当利益通常是一种以现金或具有经济价值物品形式存在的好处，但也可能是不涉及经济价值的好处。与接受者的职位、工作或职责有关的个人好处，例如免费服务、提供折扣、或者邀请参加他人的私人活动或私人俱乐部，也可能属于不正当好处。对于为了谋取好处而违反法定或合同项下义务的行为，例如收受或提供专有信息，则在性质上被视为不正当利益。出于某种行为进行的利益交换，以及给予好处而损害透明度的行为，应视为潜在不正当利益的危险信号。

3.3 Facilitation payments 疏通费

Facilitation payments are payments made to expedite a service that one is entitled to or to secure the performance of routine governmental action ordinarily performed by lower-level officials, such as issuing permits, processing visas and other papers, providing utility service, loading and unloading cargo, or protecting perishable products or commodities from spoilage. Routine governmental action do generally not include decisions where the government official has legal discretion on how he or she will act on the issue at hand. In accordance with applicable anti-corruption legislation, Gränges has a general policy against facilitation payments.

疏通费是指为加快办理某项业务或确保执行那些通常由低级别官员履行的例行政府事务而支付的费用，例如发放许可证、处理签证和其他文件、提供公共服务、装卸货物或保护易腐产品或商品免受损坏。例行政府事务通常不包括政府官员对他们将如何处理手头事宜具有法律自由裁量权的决定。根据适用的反腐败法律，格朗吉斯针对疏通费制定了一般政策。

3.4 Trading in influence 影响力交易

Trading in influence is the offer of an improper benefit to, or acceptance to receive an offer by, someone who has the ability to influence the performance of a position, assignment or duty. Trading in influence is to be regarded as corruption and a violation of Gränges' Anti-Corruption Policy.

影响力交易是指向有能力影响某个职位、工作或职责执行情况的人员提供不正当利益，或接受该等人员提供的不正当利益。影响力交易被视为腐败行为，违反了格朗吉斯的反腐败政策。

3.5 Public and private sector payments prohibited 禁止向 公营和私营部门的支付

Some anti-corruption laws focus on corrupt payments to governmental or public-sector entities. However, several national regimes prohibit corrupt payments to any person, including public officials and executives, employees or agents of private sector companies. Granges' Anti-Corruption Policy prohibits corrupt activities of any type, whether those activities are related to a position, assignment or duty within public or private sector.

一些反腐败法律专门针对向政府或公营部门实体支付腐败款项。然而，很多国家禁止向任何人员行贿，包括政府官员及企业的高管、私营企业的雇员或代理人。格朗吉斯的反腐败政策禁止任何类型的腐败活动，无论这些活动是否与公营或私营企业中人员的职位、工作或职责有关。

3.6 Liability for corrupt acts of affiliates or representatives 子公司或代表的腐败行为的责任

Corruption may also include payments made by subsidiaries, affiliates, agents or others acting on behalf of the parent company or as part of the parent company.

腐败还可能包括子公司、关联公司、代理人或其他代表母公司或以母公司成员身份行事的人员所支付的款项。

3.7 Accurate accounting 准确的会计

Anti-corruption law requires that Granges has in place effective internal accounting controls and maintains books and records that accurately reflect the companies' transactions. All entities within the group must correctly account for income and expenditures and must ensure that payments are not recorded falsely in company books. Misreporting or omitting subsidiaries' or affiliates' bribes in the parent company's consolidated accounts may be a breach of anti-corruption law (notably the U.S. Foreign Corrupt Practices Act - the FCPA, or the UK Bribery Act) by the parent company. This does not mean that accurately reporting bribes will somehow make them legal, but that the misreporting of such payments in an effort to conceal them is itself a violation.

根据反腐败法要求，格朗吉斯拥有有效的内部会计控制，并留存有准确反映公司交易的账簿和记录。该集团旗下所有实体都必须准确核算收入和支出，并确保公司账簿上无虚假款项记录。如果母公司在合并账务中虚报或漏报子公司或关联公司的贿赂行为，可能违反了反腐败法（尤其是美国《反海外腐败法》或英国《反贿赂法》）。这并不意味着准确报告贿赂行为在某种程度上将贿赂行为合法化，但为了掩盖贿赂行为而虚报款项本身就是一种违法行为。

For you this means: / 这要求您：

- Do not pay to secure or expedite governmental actions being performed.
- 不要为了确保或加速政府事务的执行而提供报酬。
- Be honest and accurate when reporting or recording business transactions.
- 真实准确地报告或记录各项业务交易。

4 General Guidelines 一般指南

Non-compliance with anti-corruption laws and Gränges' Anti-Corruption Policy is a serious breach of Gränges' business principles and may cause great damage to Gränges. If you have reason to believe that employees, agents or other persons representing any Gränges company have engaged in, or intend to engage in, corrupt activities this should be reported immediately. See below under Report improper benefits and gifts– speak up!

不遵守反腐败法律和格朗吉斯《反腐败政策》，视为严重违反格朗吉斯的经营原则，可能会给格朗吉斯造成重大损害。如果您有理由相信，格朗吉斯员工、代理人或者代表格朗吉斯的其他人士参与或打算参与腐败活动，应立即予以举报。请看后文“报告不正当利益和礼物——大声讲出来！”章节。

For you this means: / 这要求您:

- Understand Gränges' rules on gifts and events/entertainment and have a legitimate business reason for anything you offer. If applicable, make sure to follow your local policy.
- 熟知格朗吉斯关于礼物和活动/招待的规定，并且您提供的任何事务都有合法的商业理由。务必遵循当地的政策（若适用）。
- Don't give or accept bribes or anything that could be considered as a bribe. This includes cash, job opportunities, favours, travel or unlawful gifts and entertainment.
- 请勿给予或收受贿赂或任何可能被视为贿赂的事物，包括现金、工作机会、帮忙、旅游或不合法的礼物和招待。
- Never accept anything from a business partner if it might affect or appear to influence a business decision.
- 切勿接受业务伙伴任何可能影响或似乎会影响业务决策的事物。
- Understand what is allowed if working with government officials where rules are typically very strict.
- 在通常有严格规定的情况下，与政府官员接洽时，了解哪些行为是准许的行为。
- If you are not sure whether a gift is allowed under this Anti-Corruption Policy, talk to your manager or the local Legal department.
- 当您不确定本反腐败政策是否允许赠送礼物时，请咨询您的经理或当地法务部门。
- If a supplier or business partner offers you inappropriate gifts or entertainment, talk to your manager or the local Legal department.
- 当供应商或商业伙伴给您提供不适当的礼物或招待时，请咨询您的经理或当地法务部门。

5 Relations with Customers, Suppliers and Public Officials 与客户、供应商和公职官员的关系

5.1 General principles 总则

Gränges' employees shall act in an open, ethical and lawful manner towards all potential and existing customers, suppliers, and public officials.

格朗吉斯的员工应以公开、合乎道德和合法的方式对待所有潜在和现有的客户、供应商和政府官员。

In addition to following Gränges' anti-corruption guidelines in dealings with customers, suppliers, and public officials, employees must also verify whether applicable customer, supplier or public body anti-corruption policies require additional precautions to ensure compliance.

在与客户、供应商和公职官员接洽时，除了应遵循格朗吉斯的反腐败指南外，员工还必须确认客户、供应商或公共机构的相关反腐败政策是否还有额外的注意事项，以确保合规。

Gränges shall always perform its contractual obligations in accordance with the terms of the relevant contract unless deviations are approved by appropriate management and properly documented in company records. Payments in cash or similar, or payments to unconfirmed recipients or account numbers, shall not be accepted.

格朗吉斯应始终按照相关合同条款履行其合同义务。如有偏差，须经相关管理部门批准并在公司记录中妥善记录。禁止使用现金或类似物进行付款，禁止向未经确认的收款人或账户付款。

- All sales and marketing activities, coverage of third parties' expenses, payments and contract performance on behalf of Gränges shall be open and transparent internally and vis-à-vis Gränges' counterparties.
- 所有代表格朗吉斯的销售和营销活动、第三方费用支付、付款和合同履行均应在公司内部公开透明，并且对格朗吉斯交易伙伴保持相对公开透明。
- Any invitation for individuals to participate in events or activities fully or partly paid by Gränges shall be addressed to the appropriate management level within the relevant legal or public entity. Special caution must be exercised with public officials and in situations where the recipient is in a position to make a decision or act that could be beneficial to Gränges. Gränges employees must consult their supervisor if there is any doubt whether a certain marketing or service conforms to Gränges' or relevant third party's anti-corruption policies.
- 在邀请个人参加由格朗吉斯全额或部分支付的活动前，应将邀请提交至相关法律或公共实体内的相关管理层审批。在与公职官员接洽时，以及当收受者能够做出可能有利于格朗吉斯的决定或行动时，必须特别谨慎。如果格朗吉斯员工不确定某项营销或服务是否符合格朗吉斯或相关第三方的反腐败政策，必须咨询其主管。
- All expenses shall be approved under standard company procedures and documented and recorded in accordance with appropriate accounting standards.
- 所有费用均应按照公司标准程序进行审批，并按照适当的会计准则形成文件和记录。

Under no circumstances may any Gränges employee receive or provide any kind of improper benefit from or to a supplier or business partner, including but not limited to personal rebates, kickbacks, or undocumented discounts.

在任何情况下，格朗吉斯员工均不得从供应商或业务合作伙伴处获得或向其提供任何不正当好处，包括但不限于个人返利、回扣或无事实依据的折扣。

For you this means: / 这要求您：

- If you believe that an employee, agent or other person representing Gränges is involved in corrupt activities, or intends to engage in corrupt activities, this should be immediately reported, see *Report improper benefits and gifts – speak up!*
- 如果您认为，格朗吉斯员工、代理人或代表格朗吉斯的其它人士参与或打算参与腐败活动，应立即予以举报。请阅读后文“报告不正当利益和礼物——大声讲出来！”。
- You must follow Gränges’ Anti-Corruption Policy as well as customer, supplier or public body Anti-corruption policies, when applicable.
- 您必须遵循格朗吉斯《反腐败政策》，以及客户、供应商或公共机构的反腐败政策（若适用）。
- Do not make payments in cash, or payments to unconfirmed recipients or account numbers.
- 禁止使用现金进行付款，禁止向未经确认的收款人或账户付款。
- Be transparent with all sales and marketing activities, coverage of third parties’ expenses, payments and contract performance and invitations, especially in relation to public officials and in situations where the recipient is in a position to make a decision that affects Gränges.
- 所有销售和营销活动、第三方费用支付、付款和合同履行，以及邀请（特别是涉及到公职官员以及收受者能够做出可能有利于格朗吉斯的决定）均应公开透明。

5.2 Travel and entertainment expenses 差旅费和招待费

Payment for reasonable expenditures for seminars, travel, meals, lodging, and entertainment for potential or existing customers may be permissible if those expenditures are directly related to the promotion or demonstration of Gränges’ products or services or the performance of a contract. The principles above apply correspondingly for Gränges’ payment for the participants’ expenses. In addition, such payments:

对于向潜在或现有客户支付的研讨会、差旅、餐饮、住宿和招待费用，如果这些费用与格朗吉斯的产品或服务的推广或演示或合同履行直接相关，则可以允许支付。以上原则相应地适用于每位参与者的费用。此外，这些支出：

- Must be directly related to bona fide marketing, business development or contract performance expenses.

- 必须与真实的营销、业务发展或合同履行费用直接相关。
- May not be provided, or appear to be provided, in expectation of or return for any benefit.
- 可能不会提供或看似会提供带有任何利益回报的期望。
- Must be reasonable in amount, and appropriate under the circumstances.
- 金额必须合理，并且符合相关情况。
- Must be verified through reasonably detailed documentation of actual expenses, including receipts and explanations of the payments' purposes and the legitimate business reasons for them.
- 必须根据合理详细的实际支出文件进行核实，包括收据和付款目的的说明，以及付款的合法业务依据。
- Must be in line with the receiver's company policy and provided in an open and transparent manner.
- 必须符合收款方的公司政策，并且以公开透明的方式进行。

Payment of travel, meal, lodging or entertainment expenses for family members or friends of government or business officials is not permitted.

禁止为政府官员或企业高管的家属或朋友支付差旅费、餐饮费、住宿费、招待费。

For you this means: / 这要求您:

- All your expenditures for seminars, travel, meals, lodging and entertainment shall be directly related to the promotion, demonstration or explanation of Granges' products or services or the performance of a contract, must be reasonable in amount and verified.
- 您用于研讨会、差旅、餐饮、住宿和招待的所有支出均应与格朗吉斯产品或服务的推广、演示或说明或合同履行直接相关，且金额必须合理并经过核实。
- Payment of travel, meal, lodging or entertainment expenses for family members or friends of government or business officials is not permitted.
- 禁止为政府官员或企业高管的家属或朋友支付差旅费、餐饮费、住宿费或招待费。
- Under no circumstances should you offer or accept gifts of cash or cash equivalents.
- 在任何情况下，禁止提供或收受现金或现金等价物作为礼物。
- If you offer or accept a gift it must be of minimal economic value and clearly appropriate under the circumstances.
- 您提供或收受的礼物必须具有最低的经济价值，并且应明显符合情境。

5.3 Gifts 礼物

While exchanging gifts with customers, suppliers and business partners is customary, in some parts of the world, under no circumstances should Granges offer gifts of cash or cash equivalents. Gifts other than cash may be permitted, however, they:

尽管在全球的部分地区，与客户、供应商和商业伙伴交换礼物是商业惯例，格朗吉斯在任何情况下都严禁提供现金或现金等价物作为礼物。然而，可能允许提供除现金以外的礼物，而这些礼物须满足以下条件：

- Must be of minimal economic value, infrequent in nature and clearly appropriate under the circumstances.
- 必须具有最低的经济价值，事实上不频发的，并且在特定情境下明显合适的。
- Must not be given in a context or a way where there are reasons to suspect that the recipient will keep such gift or benefit hidden from his or her superiors, e.g. gifts should be addressed to the recipient's working address at the relevant legal or public entity.
- 赠送场合或方式不得让人有理由怀疑收受人会对其上级隐瞒此类礼物或好处，礼物应寄到收有人在相关法律或公共实体的工作地址。
- Must not be provided in return for any benefit.
- 不得有任何利益回报。

5.4 Political contributions 政治献金

Political contributions, such as contributions to a political campaign, a political party or fundraising efforts of public officials in support of their ability to run for office may be viewed differently under the laws of the countries in which Granges does business. Additionally, such contributions may have a potential impact on Granges' corporate image. Such contributions must therefore be approved in advance by the regional President in the respective business unit. Requests for approval should be directed to the regional President. If such contributions are approved, they must be provided in an open and transparent manner in compliance with all applicable laws and accounting principles.

根据格朗吉斯商业经营所在国家的法律，各地对政治献金可能持不同的观点，包括政治竞选献金、政党献金，或公职官员为支持其竞选活动而进行的筹款活动。此外，这些献金可能会对格朗吉斯的企业形象产生潜在影响。因此，这些献金必须事先经各业务单元的地区总裁批准。审批请求应直接呈递至地区总裁。如果上述献金获得批准，必须按照所有适用的法律和会计准则，以公开和透明的方式提供。

For you this means: / 这要求您：

- Political contributions must be approved in advance by the regional President.
- 政治献金必须事先得到地区总裁的批准。
- It is never allowed to offer facilitation payments.
- 严禁提供疏通费。

5.5 Facilitation payments 疏通费

Facilitation payments are payments to secure the performance of routine governmental action and do not include discretionary decisions or acts. In accordance with applicable anti-corruption legislation, Gränges has a general policy against facilitation payments and does not condone facilitation payments merely because it is customary or profitable in the circumstances.

疏通费是指为确保政府例行事务的执行而支付的款项，不包含基于自由裁量权的决定或行为。根据适用的反腐败法律，格朗吉斯针对疏通费制定了一般政策，不会因商业惯例或在某些情况下有利可图而纵容疏通费支付行为。

In certain extortion-like situations facilitation payments may be necessary and justifiable in order to avoid a significant harm to Gränges' values or legitimate business interests. This will have to be assessed in the specific circumstances at hand, but will generally not include any of the following:

在某些类似敲诈勒索的情况下，为了避免对格朗吉斯的价值观或合法商业利益造成重大损害，支付疏通费可能属于必要且正当行为。此时，必须根据具体情况下加以评估，但一般不包括下列任何一项：

- Payments of significant amounts; or
- 支付巨额款项；
- Payments made repeatedly to the same officials; or
- 反复向同一官员支付款项；
- Payments of a type and nature which is treated as illegal by local law enforcement authorities.
- 被当地执法部门视为非法类型和性质的款项支付。

Facilitation payments should be distinguished from situations of true extortion, e.g. a direct threat of an unlawful tortious act vis-à-vis Gränges' property or employees in a situation that Gränges could not foresee and where Gränges is not able "to turn its back and walk away from the situation". Further, necessary payments to ensure personal health or safety are generally legitimate as an act of necessity.

应将疏通费与真正敲诈勒索的情况区分开来，例如区分直接威胁格朗吉斯财产或雇员安全，并且格朗吉斯无法预见，也无法“转身离开”的非法行为。此外，为确保个人健康或安全而支付的必要款项通常列为合法必要行为。

Any payments related to facilitation payments or extortion, shall, when possible, be properly authorized in advance through management in consultation with the regional President in the respective business unit. It shall always be reported to the regional President and documented and recorded in accordance with normal company accounting and control procedures. Gränges will also, when required, file a police report.

在支付任何与疏通费或敲诈勒索有关的款项时，如有可能，应事先经管理层与格朗吉斯地区总裁协商后进行适当授权。应始终向地区总裁报告，并按照正常的公司会计和控制程序形成文件和记录。必要时，格朗吉斯将向警方提交报告。

6 Relations with Agents and Other Representatives 与代理人和其他代表的关系

Gränges does not tolerate corrupt activities undertaken by its agents or representatives. Agents and other representatives acting on behalf of Gränges shall uphold the same standards of anti-corruption compliance as Gränges.

格朗吉斯严禁其代理人或代表进行腐败活动。代表格朗吉斯行事的代理人和其他代表应遵守与格朗吉斯相同的反腐败合规标准。

Gränges entities shall always undertake due care and take appropriate steps to ensure that Gränges' agents and other representatives comply with Gränges' anti-corruption standards. The requirement of due care will vary depending on the circumstances, but will always include the following steps:

格朗吉斯旗下实体应始终采取适当的谨慎措施，确保格朗吉斯的代理人和其他代表遵守格朗吉斯的反腐败标准。根据具体情况，谨慎性要求会有所不同，但必须包括以下措施：

- Conducting a documented due diligence screening of potential agents/representatives before engagement.
- 在约定前，对潜在代理人/代表进行书面尽职调查筛选。
- Formalizing the engagement by a written contract including a clear description of the agent's performance of work, provisions prohibiting corrupt activities and appropriate monitoring mechanisms.
- 签订书面合同，正式确定关系。合同内容应包括对代理人工作表现的清晰描述、禁止腐败活动的条款和适当的监督机制。
- Ensuring that the payment for the services rendered is reasonable in relation to the services to be performed. The methods of payment shall be transparent and in accordance with applicable law and good business standards. Payments in cash and payments to third parties are generally not permissible. Any payments to accounts in a country other than the country in which the representative operates must be treated with utmost caution and appropriate verification must be obtained to ensure that Gränges does not contribute to tax evasion, corruption, fraud or other illegitimate business practices.
- 确保针对所提供服务的付款应合理，并且应与所提供的服务相关。支付方式应透明，符合适用法律和良好的业务标准。一般不允许以现金形式支付款项，也不允许向第三方支付付款。在向代表开展业务国之外的其它国家账户支付任何款项时，必须极其谨慎，同时必须进行充分核查，以确保格朗吉斯不会助长逃税、腐败、欺诈或其他非法商业行为。

The risk of possible corruption issues is generally higher in countries with less government and corporate transparency and in cases where an agent serves as Gränges' sole representative in a particular area.

在政府和企业透明度较低的国家，以及在某一特定领域由代理人担任格朗吉斯唯一代表的情况下，出现腐败问题的风险通常较高。

The risk may also depend on the services being rendered by the agent (e.g. advisors interacting with local authorities as well as lobbying and closing of high value sale contracts may be considered to be especially exposed).

腐败风险也可能取决于代理人所提供的服务（例如，与地方当局互动及游说和敲定大额销售合同的顾问是腐败高危人群）。

For you this means: / 这要求您:

- If using agents or other intermediaries, make sure they conduct business with the same high ethical standards as Granges.
- 如果使用代理人或其他中间商，确保他们按照格朗吉斯的道德标准开展业务。

7 Relations with Minority Owned Companies, Joint Ventures and M&A 与少数族裔开设的公司、合资企业及并购对象的关系

Prior to any merger or acquisition of another company, Granges companies must perform thorough due diligence research to rule out any outstanding anti-corruption liabilities. Similarly, before entering partnerships, Granges entities shall always undertake due care and take appropriate steps to ensure that Granges' partners uphold, and that the contemplated partnership will uphold the same standards as Granges in relation to anti-corruption. The requirement of due care will vary depending on the circumstances, but will always include:

在对另一家公司进行并购之前，格朗吉斯公司必须进行全面尽职调查研究，以排除任何悬而未决的反腐败责任。同样，在建立伙伴关系之前，格朗吉斯旗下实体应始终采取适当的谨慎措施，以确保格朗吉斯的合作伙伴及潜在合作伙伴遵循与格朗吉斯在反腐败方面相同的标准。根据具体情况，谨慎性要求会有所不同，但必须包括以下措施：

- Conducting a documented due diligence screening of potential partners before entering any partnership.
- 在建立任何合伙关系之前，对潜在合伙人进行书面尽职调查筛选。
- Formalizing the partnership by a written contract, including provisions prohibiting corrupt activities and appropriate monitoring mechanisms.
- 签订书面合同，正式确定合作关系。合同内容应包括禁止腐败活动的条款和适当的监督机制。

Granges entities must exercise special care when entering joint ventures or other partnerships with local entities mandated by local law. Such partnerships may involve payments by the local company to persons or entities with close ties to the government. Granges' entities contemplating involvement in such partnerships must first guard against any improper payments or any suspicion of improper benefit which may derive as a result of the contemplated partnership.

在与当地法律授权的当地实体建立合资企业或开展其他伙伴关系时，格朗吉斯旗下实体必须特别小心谨慎，因为在此类合作关系中，当地公司可能需向与政府关系密切的个人或实体支付款项。当格朗吉斯旗下实体计划建立此类合作关系时，必须首先防范可能会因该伙伴关系导致的任何不正当款项支付或任何疑似不正当利益。

Gränges shall, whenever applicable, use its influence in minority-owned affiliates and joint ventures to prevent or discourage corrupt activities by those entities in accordance with this Anti-Corruption Policy.

如适用，格朗吉斯应根据本反腐败政策，利用其在少数族裔开设的附属公司和合资企业中的影响力，防止或阻止这些实体实施腐败活动。

It is important that any financial information included in Gränges' books and records is audited and confirmed as accurate. Prior to relying on or including any affiliate information in any Gränges report or statement, Gränges' employees shall take all reasonable steps under the circumstances to confirm that such information is accurate and complete.

重要的是，格朗吉斯的账簿和记录中所含任何财务信息均须经审计，并确认准确无误。格朗吉斯在其任何报告或声明中依据或纳入附属公司的任何信息之前，格朗吉斯的员工应根据具体情况，采取一切合理措施，确认该等信息的准确性和完整性。

8 Legislation and Ethical Rules 法律和道德准则

Gränges complies with all applicable laws and regulations. International conventions and agreements of the United Nations, the World Bank, the IMF, the WTO, the Organization of American States, the OECD and the EU require participating countries to implement comprehensive national legislation against corruption.

格朗吉斯遵守所有适用的法律法规。联合国、世界银行、国际货币基金组织、世界贸易组织、美洲国家组织、经合组织和欧盟的国际公约和协定均要求各参与国在国家层面执行全面的反腐败法律。

Corruption is prohibited in most countries around the world. It is important to be aware that Swedish, US, Chinese, German and French and other national anti-corruption legislation applies regardless of where the actions have been carried out and regardless of the legality of corruption in that country. In practice, citizens and companies may be prosecuted according to national anti-corruption legislation for acts committed anywhere in the world. Notably, the United States Government enforces extraterritorial jurisdiction to prosecute corrupt activities anywhere in the world according to the U.S. Foreign Corrupt Practices Act (the FCPA) and the United Kingdom applies a similar regime through the UK Bribery Act.

全球绝大多数国家都严禁腐败。需要认识到，无论腐败行为发生在何地，并且无论腐败行为在当地国家是否合法，瑞典、美国、中国、德国和法国等国家的反腐败法律均适用。实际上，公民和公司在全球任何地方，只要触犯了反腐败法律，都可能根据国家反腐败法律受到起诉。值得注意的是，美国政府根据美国《反海外腐败法》(FCPA)，对全球任何地方的腐败活动实施域外管辖，英国通过《反贿赂法》实施了类似的制度。

Gränges also complies with the "Code to Prevent Corruption in Business" (Business Code) by The Swedish Anti-Corruption Institute (Swedish: Institutet Mot Mutor) and supports international standards on human rights, labour conditions, the environment and anti-corruption, including but not limited to the UN Global Compact and its set of ten principles.

格朗吉斯还遵守瑞典反腐败研究所（瑞典语：Institutet Mot Mutor）的“防止商业腐败准则”（商业准则），并支持与人权、劳动条件、环境和反腐败相关的国际标准，包括但不限于联合国全球契约及其十项原则。

9 Risk Assessment 风险评估

Gränges strives to identify, assess and reduce risks related to bribes and other types of corruption within Gränges business and operations, in the markets where Gränges operates.

格朗吉斯致力于在格朗吉斯经营的市场中，识别、评估和减少与贿赂和其他类型腐败有关的风险。

Risks are managed and controlled by the corporate functions and operating units in accordance with established guidelines and procedures. Risks are managed as a part of daily operations with key risks being raised to the regional management team and mitigation measures being implemented.

风险由公司职能部门和经营单位按照现有方针和程序进行管理和控制。风险管理是日常运营组成部分，关键风险将提交至区域管理团队，并采取风险消减措施。

Risk assessments are also performed as part of Gränges' supplier evaluation process. Transparency International's Corruption Perception Index is a starting point for the risk assessment performed on a country level and this index currently indicates that some of the countries from which Gränges sources metals are at a higher risk for corruption.

风险评估也用于格朗吉斯供应商评估程序。透明国际腐败感知指数是在国家层面对风险的初步评估，该指数目前显示，格朗吉斯金属来源国家存在更高的腐败风险。

10 Roles and Responsibility 职务与责任

- **The SVP Sustainability** is ultimately responsible for issuing and updating this Anti-Corruption Policy.
- **可持续发展高级副总裁**全权负责本反腐败政策的发布及其更新。
- **The regional Presidents** are responsible for implementing the measures described in the policy and for providing relevant training.
- **地区总裁**负责实施本反腐败政策中所述的措施，并提供相应的培训。
- **Each manager** is responsible for making the content of the policy known in their organization and ensuring that the employees have read and understood the meaning of the Anti-Corruption Policy and promote a culture where everyone is aware of and complies with this.
- **各经理**负责将本反腐败政策内容传达至整个组织，确保员工已经阅读并理解了本反腐败政策的含义，并推动建立一种人人知晓并遵守本政策的文化。
- **All employees and all other individuals covered** by this policy have a personal responsibility to comply with applicable laws and regulations and to read, understand and follow the Anti-Corruption Policy and act in the spirit of the policy.
- **本政策涉及的所有员工和所有其他个人**均有责任遵守相关法律法规，阅读、理解并遵守本反腐败政策，同时本着该政策的精神行事。

For you this means: / 这要求您:

- You have a personal responsibility to comply with laws, regulations and the Anti-Corruption Policy and act in the spirit of the policy.
- 您个人有责任遵守法律法规和本反腐败政策，并本着该政策的精神行事。
- If you are involved in corrupt activities, you may be subject to criminal sanctions as well as disciplinary action up to and including dismissal.
- 如果参与腐败活动，您可能会遭受刑事制裁和纪律处分，直至被解雇。

11 Consequences of Non-Compliance 不合规的后果

The potential consequences of non-compliance with applicable anti-corruption laws are substantial:

若未能遵守相关反腐败法律，将招致严重的潜在后果：

11.1 For the company - 对于公司

- Gränges could be subject to costly penalties and government-ordered compliance costs as a result of corruption allegations.
- 一旦受到腐败指控，格朗吉斯可能会遭受代价高昂的惩罚，以及政府施加的合规成本。
- Gränges may be prohibited from doing business in certain countries or industries, with certain governments or from participating in public tenders.
- 格朗吉斯可能被禁止在某些国家或行业开展业务、被禁止与某些政府合作，或被禁止参与公开招标。
- Gränges may be liable for damage claims by third parties disadvantaged by the corrupt activity, such as competitors claiming to have lost business.
- 第三方企业（比如声称已失去业务的竞争对手）可能会以腐败行为导致其处于不利地位为由提起诉讼，使格朗吉斯承担损害赔偿赔偿责任。
- Gränges' reputation and business relationships could be damaged due to negative publicity.
- 格朗吉斯的声誉和商业关系可能会因为负面宣传而受损。
- Gränges could be damaged by the mere decision by relevant authorities to initiate investigation of suspected corruption.
- 只要有关部门决定对涉嫌腐败的案件展开调查，就可能对格朗吉斯造成损害。

11.2 For the individual 对于个人

- Individuals involved in corrupt activities may be subject to criminal sanctions, including fines, imprisonment, and in certain jurisdictions even corporal punishment.
- 参与腐败活动的个人可能会受到刑事制裁，包括罚款、监禁，在某些司法管辖区甚至会受到体罚。
- Individuals involved in corrupt activities may be subject to disciplinary action up to and including dismissal.
- 参与腐败活动的个人可能会受到纪律处分，甚至被解雇。

11.3 For agents and other representatives 对于代理人和其他代表

- Individuals involved in corrupt activities may be subject to criminal sanctions.
- 参与腐败活动的个人可能会受到刑事制裁。
- Gränges will end commercial agreements.
- 格朗吉斯将终止商业协议。

12 Training 培训

Gränges has developed an e-learning training for anti-corruption to improve awareness of corruption risks. The training is targeted at applicable employees working in sales, purchasing and senior executives who have external contacts, who shall all complete annual anti-corruption training. An assessment of anti-bribery and anti-corruption procedures is also integrated into Gränges' internal audit.

格朗吉斯开发了一套反腐败在线学习培训，以提高对腐败风险的认识。培训对象包括销售、采购等相关工作人员，以及从事外联工作的高管，上述人员均须接受年度反腐败培训。格朗吉斯的内部审计涵盖了对反贿赂和反腐败程序的评估。

For you this means: / 这要求您:

- If you are working in sales, purchasing or are a senior executive who have external contacts, you must complete annual anti-corruption training.
- 如果您是销售、采购人员，或者是从事外联工作的高管，您必须接受年度反腐败培训。

13 Reporting Improper Benefits and Gifts – Speak Up! - 报告不正当利益和礼物——大声讲出来!

Gränges supports a culture that encourages every individual to speak freely. If you observe or suspect misconduct that is in violation of this Anti-Corruption Policy, we encourage you to speak up and react quickly. By reporting wrongdoing, you can make Gränges an even better

place to work. Often, if misconduct is detected at an early stage, there is a better chance to limit the damage not only for the benefit of Gränges, but also for our employees and other stakeholders.

格朗吉斯鼓励每个人畅所欲言。如果您发现或怀疑有违反反腐政策的不当行为，我们鼓励您勇敢讲出来，并迅速采取行动。举报不当行为，可以让格朗吉斯成为一个更好的工作场所。通常，若能在早期发现不当行为，就有可能将损害将至最低程度，这不仅有益于格朗吉斯，也有益于我们的员工和其他利益相关者。

Managers, white collars in positions of responsibility, personnel in purchasing and sales, and other individuals who have external contacts, must take reasonable measures to ensure that Gränges' business partners, including suppliers, do not engage in corrupt activities or other illegal or unethical activities. Gränges employees who suspect that independent business partners are involved in corrupt activities must report and seek advice in the matter according to the procedures below.

经理、承担相关责任的白领、采购和销售人员以及其他从事外联工作的人员，必须采取合理措施，确保格朗吉斯的业务合作伙伴（包括供应商）不参与腐败活动或其他非法或不道德的活动。格朗吉斯员工如果怀疑独立业务伙伴参与腐败活动，必须按照以下程序进行举报，同时征询主管意见。

13.1 Raising concerns is encouraged 鼓励引起关注

If you want to report irregularities or misconduct that possibly violates applicable law, Gränges' Anti-Corruption Policy or other Gränges' policies or if you have concerns about how we or our suppliers, customers or other business partners conduct business, you can reach out to:

如果您想举报可能违反适用法律、格朗吉斯《反腐败政策》或其他格朗吉斯政策的违规行为或不当行为，或者您对我们或我们的供应商、客户或其他业务合作伙伴如何开展业务存有疑问，您可以联系：

Your manager or your manager's manager.
您的经理或您经理的上级经理。

Sofia Hedevåg, SVP Sustainability.
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13.2 The Whistleblower function 检举功能

If you want to report a serious violation anonymously, you can use the Granges' Whistleblower function at:

如果您想匿名举报严重违规行为，您可以使用格朗吉斯的举报功能：

- Granges' intranet: <http://inside.granges.com/en/security/whistleblower/>
- 格朗吉斯内网： <http://inside.granges.com/en/security/whistleblower/>
- Granges' website: <https://www.granges.com/about-granges/corporate-governance/whistleblower/>
- 格朗吉斯官网： <https://www.granges.com/about-granges/corporate-governance/whistleblower/>

Through the Whistleblower function, which is managed by an external party, you can provide information and be guaranteed full anonymity without fear of retaliation. It is however encouraged that you provide your contact details, as this allows for follow-up questions. All reports will be received and investigated by an external party.

举报功能由第三方管理，通过该功能，您可以放心提供举报信息，确保完全匿名，而不用担心遭到报复。同时，我们鼓励您提供详细的联系方式，以便就后续问题进行联系。所有报告将由第三方收到并调查。

More information: / 更多信息：

<http://inside.granges.com/en/security/whistleblower/>

<https://www.granges.com/about-granges/corporate-governance/whistleblower/>

For you this means: / 这要求您：

- If you observe or suspect misconduct that is in violation of this Anti-Corruption Policy, you should report this immediately.
- 如果您发现或怀疑违反本反腐败政策的不当行为，应立即报告。
- You can talk to your manager, the local Legal department or use the Whistleblower function at Granges' intranet or the website.
- 您可以向您的经理、当地法务部门举报，也可以在格朗吉斯的内网或官网上使用举报功能。

14 Deviations - 背离

Any deviation or exemption from this Anti-Corruption Policy must be approved or resolved in advance, in writing, by Granges' SVP Sustainability.

任何对本反腐败政策的背离或豁免，必须事先得到格朗吉斯可持续发展高级副总裁的书面批准或事先决定。