

GROUP POLICY

集团规则

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TABLE OF CONTENTS / 目录

1. A MESSAGE FROM THE EXECUTIVE BOARD.....	5
来自执行董事会的信息.....	5
2. INTRODUCTION.....	7
介绍	7
3. OUR CORE VALUES.....	8
我们的核心价值观.....	8
4. THE ANDRITZ CODE OF BUSINESS CONDUCT ETHICS.....	11
4.1. In the Workplace with Our Employees.....	11
我们员工的工作场所.....	11
4.1.1. <i>Health and Safety / 健康和安全</i>	11
4.1.2. <i>Diversity and Inclusion / 多元化和包容</i>	11
4.1.3. <i>Discrimination and Fair Treatment / 歧视和公平对待</i>	11
4.1.4. <i>Harassment / 骚扰</i>	12
4.1.5. <i>Use of Drugs or Alcohol / 毒品或酒精的使用</i>	13
4.1.6. <i>Personal Responsibility / 个人的责任</i>	13
4.2. In the Marketplace with Our Customers and our Competitors.....	13
我们客户和竞争者所在的市场.....	13
4.2.1. <i>Product Quality and Safety / 产品质量和安全</i>	13
4.2.2. <i>Antitrust and Fair Competition / 反垄断和正当竞争</i>	14
4.2.3. <i>Business Gifts, Meals and Entertainment / 商业礼物、餐饮和娱乐</i>	14
4.2.4. <i>Export Controls and Trade Restrictions / 出口控制和贸易限制</i>	15
4.2.5. <i>Bribery, Kickbacks, Fraud, and Corruption / 贿赂、回扣、欺诈和腐败</i>	16
4.2.6. <i>Transactions and Relationships with Suppliers, Agents, Consultants and Third Parties / 与供应商、代理人、顾问和第三方的交易和关系</i>	16
4.3. With Our Company and Our Shareholders.....	16
我们的公司和股东.....	16
4.3.1. <i>Accounting and Financial Reporting / 会计和财务报告</i>	17
4.3.2. <i>Fraud and Misrepresentation / 欺诈和错误陈述</i>	17
4.3.3. <i>Conflicts of Interest / 利益冲突</i>	17
4.3.4. <i>Insider Information and Trading in ANDRITZ Stock / 安德里茨股票的内幕消息和交易</i>	18
4.3.5. <i>Protecting Company Assets (property, facilities, books, records) / 保护公司资产 (财产、设施、账簿和记录)</i>	18

4.3.6.	<i>Protection of Intellectual Property and Confidential Information / 保护知识产权和保密信息</i>	20
4.3.7.	<i>Data Privacy and Protection / 数据隐私和保护</i>	20
4.3.8.	<i>Use of E-mail, Voice Mail and Company Networks / 电邮、录音和公司网络的使用</i>	20
4.3.9.	<i>Document Retention / 文件保留</i>	21
4.3.10.	<i>Media and Public Inquiries / 媒体和公众质询</i>	21
4.4.	<i>In Our Communities / 在我们的社区</i>	22
4.4.1.	<i>Environmental Protection / 环境保护</i>	22
4.4.2.	<i>Sustainability / 可持续性</i>	23
4.4.3.	<i>Principles related to profit-making / 获取利润相关的规则</i>	23
4.4.4.	<i>Community Involvement / 社会活动</i>	23
4.4.5.	<i>Political Activity and Contributions / 政治活动与捐献</i>	23
4.5.	<i>With Our Governments and the Law / 我们的政府和法律</i>	24
4.5.1.	<i>Compliance with Laws, Regulations and Customs / 遵守法律、法规和惯例</i>	25
4.5.2.	<i>Doing Business with Governments and Public Officials / 与政府和公共官员做生意</i>	25
5.	ASKING QUESTIONS AND RAISING CONCERNS / 提出问题 and 疑虑	26
5.1.	<i>Open Communication – Open Door Policy / 公开沟通 - 开门规则</i>	26
5.2.	<i>Violations / 违反</i>	26
6.	WHERE TO GO FOR HELP / 到何处寻找帮助	27
7.	ORGANIZATIONAL AND CONTACT INFORMATION / 组织结构和联系信息	28
7.1.	<i>Members of the Compliance Committee / 合规委员会成员</i>	28
7.2.	<i>Regional Compliance Officers / 地区合规专员</i>	28
8.	RELEASE / 发布	29

Finding the ANDRITZ GROUP Policies referenced in this Code of Business Conduct and Ethics:
 寻找在本商业行为和道德准则中提及的安德里茨集团规则：

All ANDRITZ GROUP Policies that relate to this Code can be found in the ANDRITZ Corporate Manual. Go to <http://intranet.andritz.com/> and in the left hand column, click on the blue button link to Corporate Manual. From the Corporate Manual home page, in the 'Content Overview / Presentation' section in the middle of

the page, click on 'Chapter 5: Group Policies and Guidelines'. From there, you can locate the Policy by name from those listed.

与本准则相关的所有安德里茨集团规则可在安德里茨公司手册中找到。访问 <http://intranet.andritz.com/> 网站，在其左手边专栏点击蓝色的按钮以连接公司手册。在公司手册主页中部的“内容概括与综述”一栏中点击“第 5 章：集团规则与指导”，从那你可以查看列出的规则名称。

1. A MESSAGE FROM THE EXECUTIVE BOARD

来自执行董事会的信息

Dear Colleagues,
亲爱的同事们：

At ANDRITZ, we have long been committed to integrity, respect, reliability and sustainability. This commitment is embodied in a number of the Group Policies we have adopted and is at the core of how we conduct ourselves. Given the tremendous growth of the ANDRITZ GROUP, we want to make sure that these common values are well understood by all of our employees and others who represent ANDRITZ as well as by those with whom we conduct business. Thus, we have prepared this ANDRITZ Code of Business Conduct and Ethics (the “Code”).

在安德里茨，我们长期致力于维护正派、尊敬、可靠和持续性。这种承诺包含在我们已经通过的一系列集团规则中，并构成了我们如何管理自身的核心。鉴于安德里茨集团的迅速增长，我们希望确保这些共同的价值能够很好地被我们所有的员工、其他代表安德里茨的人员以及与我们有业务关系的人员所理解。因此，我们准备了安德里茨商业行为和道德准则（简称“准则”）。

At the same time we are creating a Compliance Committee to take steps to make sure that you receive adequate training on the Code and to ensure compliance with it. Making sure that we operate with a common understanding of what behaviour is expected of all of us will form an important foundation as we move forward with our commitments of providing solutions to our customers, providing profitable growth to our shareholders and providing a rewarding work environment for all of us.

与此同时，我们建立了合规委员会，并采取行动来确保你接受到本准则的适当的培训以便遵守。确保我们所有人达成共识，即明白何种行为才是合适的，是我们在履行我们的承诺（向我们客户提供解决方案、向我们股东提供产生利润的增长以及向我们所有人提供一个有益的工作环境）时是一项重要的基础。

Please read the Code thoroughly and keep it available as a reference. It defines how we should conduct ourselves with integrity, respect, reliability and sustainability. Although it covers a number of ethical and legal issues, it can not address every situation you may encounter. In those situations, seek advice. You can consult the detailed policies in our Corporate Manual. Additionally, members of the Compliance team are available to answer your questions. When in doubt, remember that ethical behaviour takes precedence over all other goals.

请仔细阅读本准则并以其作为随时的参考。该规则对我们应如何管理自身以保证正派、尊敬、可靠和可持续性做出了界定。虽然该准则包含了一系列道德和法律问题，但其并不能涵盖你可能遇到的所有情况。在情况发生时，你应该寻找建议。你可以在公司手册中查询具体的规则。此外，合规委员会的成员们可以回答你们提出的问题。如有疑问，请记住，符合道德规范的行为优先于所有其他目标。

Thank you for your continued commitment to ANDRITZ.
感谢你对安德里茨一如既往的贡献。

The image shows five handwritten signatures in blue ink, arranged horizontally. From left to right, they are: a signature that appears to be 'W. Leitner', a signature that appears to be 'F. Papst', a signature that appears to be 'F. Hofmann', a signature that appears to be 'K. Hornhofer', and a signature that appears to be 'H. Köfler'. Each signature is distinct and clearly legible.

(Dr. W. Leitner)

(F. Papst)

(Dr. F. Hofmann)

(K. Hornhofer)

(H. Köfler)

2. INTRODUCTION

介绍

This Code of Business Conduct and Ethics (the “Code”) serves to present and promote the values and business principles that form the backbone of ANDRITZ. These values and principles of integrity, respect, reliability and sustainability apply to everyone who works for or represents ANDRITZ. Adhering to these values and principles is not just the responsibility of our Executive Board or our Division Managers, but is the responsibility of every one of us, every day.

本商业行为和道德准则（简称“准则”）用于展现和推广构成安德里茨“脊柱”的价值观和商业规则。这些价值观和正派、尊敬、可靠和可持续性的规则适用于每一位为安德里茨工作或代表安德里茨的人。遵守这些价值观和规则不仅是我们执行董事会或部门经理的职责，同时也是我们每个人、每一天的职责。

The Code is organized into five sections that address how we at ANDRITZ conduct ourselves with the highest degree of integrity, transparency, reliability and respect:

本准则由 5 部分组成，分别指导我们在安德里茨时如何以最高程度的正派、透明、可靠和尊敬为行为准则来规范自身：

- I. In the Workplace with Our Employees / 我们员工的工作场所
- II. In the Marketplace with Our Customers and our Competitors / 我们客户和竞争者所在的市场
- III. With Our Company and Our Shareholders / 我们的公司和股东
- IV. In Our Communities / 我们的社会
- V. With Our Governments and the Law / 我们的政府和法律

The last section of the Code provides information on resources available to you if you have questions or concerns.

如果你有问题或不安，可参考本准则的最后一部分所提供的你可寻求帮助的信息。

All ANDRITZ employees must follow this Code. None of us is exempt, regardless of our position or whether we work on a full or a part-time basis. We also expect all ANDRITZ contractors, consultants, representatives, agents and others who may be temporarily assigned to work for or provide services to ANDRITZ to comply with this Code in connection with any work or services performed on our behalf.

所有安德里茨员工必须遵守本准则。无论我们是何种职位或无论我们是全职工作还是兼职工作，没有人可以免除遵守本准则的义务。同时，我们也希望所有安德里茨的承包商、顾问、代表人、代理人和其他可能暂时被安排为安德里茨工作或提供服务的人在代表安德里茨工作或提供服务时都遵守本准则。

We reserve the right to modify or revise this Code at any time, with or without notice.

我们保留随时修改或变更本准则的权利，无论是否予以通知。

Managers have a special responsibility with regard to this Code. They must lead by example and set the tone from the top of compliance.

经理们有对于本准则的特殊职责。他们应该做出表率并为遵守本准则定下基调。

Making the right decisions may be confusing at times, but if you are ever in doubt as to what is the right way to conduct yourself, ask yourself how you would feel if you read about your actions on the front page of the newspaper? What would your family and friends think? Did your actions demonstrate compliance to this Code and the values and principles that it represents? If you are still in doubt, you will want to consult the resources described at the end of this Code.

有时候做出正确的决定时可能会迷糊，但如果你对于自己如何行为才是正确的持有疑问，你应该问自己当你在报纸第一版面读到自己行为时会有怎样的感觉？你的家人和朋友会怎么想？你的行为表现了对本准则及其所展示的价值观和规则的遵守吗？如果你仍有疑问，你应向本准则最后所提供的渠道寻求帮助。

Failure to comply with the Code can have serious consequences. It could result in disciplinary action up to and including termination of employment and in certain instances, criminal prosecution. It could mean that more training is required. And if the failure is on the part of contractors, consultants or others providing services to ANDRITZ, ANDRITZ will terminate those services if they fail to comply with our Code.

不遵守本准则可能会导致严重的后果。该后果包括惩戒措施（在某些情况下甚至会导致劳动关系的终止），刑事起诉。这意味着需要更多的培训。同时，如果我们的承包商、顾问或其他向安德里茨提供服务的人员未能遵守本准则，安德里茨将终止与他们的服务关系。

3. OUR CORE VALUES

我们的核心价值观

- **Integrity** (Ethics / Transparency / Compliance)

正派 (道德/透明/合规)

We are committed to maintaining high ethical standards in all of our business dealings. We are accountable to our various stakeholders (customers, shareholders, employees, business partners, authorities, competitors, the media, etc.) and towards society as a whole for achieving our goals while protecting our Company's reputation and assets. We will not sacrifice integrity for profit. We are committed to a constructive, open and transparent dialogue with our stakeholders. We recognize the importance of all applicable laws as well as internal and external regulations, guidelines and standards, and we comply with them.

我们一直致力于在我们所有的商业交易中保持高度的道德标准。作为一个整体，我们对我们的权益相关方（客户、股东、员工、商业合作伙伴、管理机关、竞争者、媒体等）和社会负有责任，在实现我们目标的同时又保护好我们公司的声誉和资产。我们将不会为了利润而牺牲正派性。我们一直致力与我们的权益相关方保持有建设性的、公开的和透明的对话。我们承认所有适用法律、内外部规章制度、指导和标准的重要性，并遵守它们。

- **Respect** (Responsibility / Fairness/Respect / Teamwork/Performance)

尊敬 (职责/公正/尊敬/团队合作/执行)

We treat all our stakeholders with respect and dignity. We respect all people's values and cultures and value the difference in people's thinking and backgrounds. We provide a safe and healthy working environment for our employees, applying the principle of equal treatment and avoiding any form of discrimination, harassment or retaliation. We believe in working in teams across divisional and geographic and cultural boundaries to achieve common goals. Our leaders embody a spirit of teamwork and support to all employees. We are committed to the development of all team members. We collaborate with each other. We help each other. We lead by example and coach those we lead to strive to attain their maximum potential. We focus our efforts on taking action and making decisions. We work to serve the needs of our customers, investors and employees. We empower our employees to seize opportunities to take action and make decisions. We value performance and results above politics or bureaucracy. We seek to identify best practices and implement them globally.

我们尊重我们的权益相关方。我们尊重所有人的价值观、文化以及人们思考方式和背景的不同。我们通过采取平等对待和避免任何形式的歧视、骚扰或报复的方式向我们的员工提供一个安全健康的工作环境。我们相信，通过跨越不同部门、不同地域和不同文化界限的团队合作，我们能够实现共同目标。我们的领导者向所有员工展示了团队合作和支持的精神。我们致力于促进所有团队成员的发展。我们彼此合作。我们互相帮助。我们做出表率并教导遵循我们领导的人们发挥其最大潜能。我们专注于采取行动和做出决定。我们为满足我们客户、投资人和员工的需求而工作。我们授权我们的员工抓住机会来采取行动并做出决定。我们重视执行并终结政治或官僚作风。我们寻求最好的实践并在全球范围内执行它们。

- **Reliability** (Respect / Customer Orientation / Quality)

可靠 (尊重/客户定位/质量)

We fulfill our commitments and take personal responsibility for our actions. We promise only what we can deliver, and we keep our promises. In all of our work we are focused on our customers' needs. We listen to our customers, we make sure we understand their needs, and, based on this understanding, we work out the best possible solution for each application meeting the individual goals of our customers. We have a profound knowledge of all of our customers' core processes which is reflected in our products, technical support, and employee training. We are committed to providing world class quality products. We continually search for new and better ways of doing things.

我们实现我们的承诺，并对我们的行为承担个人责任。我们仅对我们能够做到的进行承诺，并遵守我们的承诺。在我们的工作中我们专注于客户的需求。我们倾听客户的要求，我们确保我们理解它们的需要，并在该理解的基础上，我们创造出最好的、可行的解决方案以帮助我们的客户实现其各自的目标。我们对我们的客户的核心程序拥有足够的了解，该了解反映在我们的产品、技术支持和员工培训上。我们致力于提供世界一流质量的产品。我们继续寻求新的、更好的处理事务的方式。

- **Sustainability**

可持续性

We are committed to promoting environmental, social and economic sustainability. We offer technologies that either prevent pollution or minimize waste by re-using by-products from other processes, and develop systems that make the best possible use of resources. We seek to constantly

optimize utilization of energy and other resources at our own facilities and focus on the elimination of waste and the protection of the environment. We are committed to our communities and support and nurture sustainable local development.

我们致力于推广环境的、社会的和经济的可持续性。我们提供防止污染、或通过重复使用其他加工过程产生的副产品的方式将废弃物减少到最低程度的技术，并完善能够创造最好的、可行的资源利用的系统。我们寻求坚持不懈地在我们的厂房内将能源和其他资源的利用的最优化，并注重废弃物的消除和环境的保护。我们对我们的社会做出贡献，支持并帮助当地的可持续发展。

4. THE ANDRITZ CODE OF BUSINESS CONDUCT ETHICS

安德里茨商业行为和道德准则

4.1. In the Workplace with Our Employees

我们员工的工作场所

We are a company that satisfies our customers, values each of our employees and performs responsibly for our shareholders. As we challenge ourselves to be the best place to work, we are mindful that it depends on how we treat and respect each other. This section of the Code describes what is expected from each of us in our personal conduct and treatment of others.

我们是一家可以满足我们的客户、重视我们的员工并对我们的股东履行职责的公司。因为我们希望公司成为最好的工作场所，我们知道这取决于我们如何对待彼此。本部分描述了我们每个人应如何行为以及对待彼此。

4.1.1. Health and Safety / 健康和安全

When it comes to workplace safety, our goal is simple - we do not want injuries or accidents at any time. Safety begins with each individual employee. You should never take risks that could endanger yourself or others during their jobs. We strive to eliminate accidents in all of our facilities by ensuring a safe and healthy work environment and by looking for ways to continuously improve. We comply with all safety laws and believe that safety comes before anything else.

当谈及到工作场所的安全时，我们的目标很简单，即任何时候我们都不希望发生人身伤害或意外事故。安全工作应从每一位员工做起。你绝不能冒险使自己或别人在工作中处于危险境地。我们努力通过确保一个安全健康的工作环境和寻求持续改善工作方式来消除发生在我们设施内的意外事故。我们遵守所有安全法律并相信安全胜过一切。

4.1.2. Diversity and Inclusion / 多元化和包容

We appreciate the diversity of one another in all its forms. As a global company, we come from many different walks of life, each of us bringing different perspectives and experiences to ANDRITZ. This diversity of people and ideas provides us with a competitive business advantage. We truly believe that by being more diverse and inclusive, we can make ANDRITZ more successful in the marketplace, increase our ability to innovate, be more responsive to our customers, increase shareholder value and become an even better place to work.

我们平等对待以及尊重彼此的多元化。作为一个全球的公司，我们来自各行各业，每一个人都为安德里茨带来了不同的视角和经验。员工和想法的多元化为我们提供了具有竞争力的商业优势。我们相信，通过多元化和包容，我们能够使安德里茨在市场上更成功，提高我们的创新能力，对我们客户的需求反应更为迅速，增加股东的利益并成为更好的工作场所。

4.1.3. Discrimination and Fair Treatment / 歧视和公平对待

We do not tolerate discrimination. Our goal is to provide a positive environment where everyone is treated with respect, dignity and fairness.

我们不能容忍任何歧视。我们的目标是提供一个正面的环境，每个人都能在此得到尊重、有尊严并得以公平对待。

4.1.4. Harassment / 骚扰

Each of us should be treated and is expected to treat others with respect and dignity. There is no room in our culture for harassment, bullying or violence of any kind, in any work-related setting. Harassment comes in many forms - verbal, non-verbal, physical and sexual. It is any behavior that is intended to make others feel unwelcome, uncomfortable or is intended to intimidate or prevent them from effectively performing their job. We encourage employees, who see mistreatment, to speak out and we protect them from retaliation if they do.

我们每一个人都应受到尊重，同时也应尊重他人。我们的公司文化禁止在与工作相关的场合内存在任何形式的骚扰、恐吓或暴力。骚扰由很多形式，如口头的、非口头的、身体的以及性方面的。骚扰是一种让他人感觉讨厌的、不舒服的或为了威胁或阻止他人有效地执行其工作的行为。我们鼓励看到骚扰的员工大胆说出来，同时我们保护他们不受到报复。

4.1.5. Use of Drugs or Alcohol / 毒品或酒精的使用

We are required to work free from the influence of illegal drugs or alcohol. We are prohibited from possessing, selling or using illicit drugs while we are performing our work. The consumption of alcohol at our work sites is prohibited except where consistent with local culture.

我们的工作被要求远离非法的毒品或酒精的影响。我们在工作中不能加工、出售或使用违法的毒品。除非与当地的文化风俗一致，我们在工作场所不应饮酒。

4.1.6. Personal Responsibility / 个人的责任

The way we conduct ourselves in the workplace or in any other work-related setting, including while on business trips, at business meetings and at business-related social events, directly affects the reputation of ANDRITZ. We are expected to conduct ourselves in a responsible, respectful and honest manner at all times. Care should also be taken when we are on-line and in web-based forums or networking sites to present ourselves in a manner becoming of an ANDRITZ employee. We are expected to exercise good judgment in our decisions and our actions.

我们在工作场所或任何与工作相关的设施内（包括出差途中，商业会议中以及与业务相关的社会活动中）如何行为将直接影响到安德里茨的声誉。我们在任何时候都应以负责的、有礼貌的和诚实的方式来指导自己的行为。我们在上网和网络论坛或交际场所时也应我们以我们是安德里茨员工的标准来要求自己。我们对自己的决定和行为应该能够做出正确的判断。

4.2. In the Marketplace with Our Customers and our Competitors

我们客户和竞争者所在的市场

We must conduct business with transparency that can stand the test of anyone's scrutiny. In addition to being the best place to work, we challenge ourselves to be the most customer-responsive company in our industry, as determined by our customers. Our products and services are aimed at meeting customer requirements and promoting the achievement of customers' targets in the best possible way. To achieve this, we compete fairly, with the highest level of integrity, in every market in which we operate. We know this is key to our long term success. This section of the Code describes what is expected from each of us to accomplish this.

我们必须以透明公开的方式经营业务。除了成为一个最好的工作场所，我们正努力成为行业中对我们客户的需求反应最为迅速的公司。我们产品和服务是为了以最好并可行的方式来满足客户的需求以及帮助客户达成其目标。为了实现这个目的，我们在我们经营的每一个市场都秉承着最高诚信原则进行公平竞争。我们知道这对我们长期的成功最关键。本部分描述了我们每一个人应如何实现这个目标。

4.2.1. Product Quality and Safety / 产品质量和安全

To be a responsible corporate citizen means that we must provide quality products that are safe to use. The products we manufacture should meet all applicable laws, regulations and standards for use in their markets. We strive to exceed customer expectations at every opportunity.

作为一家负责任的企业市民意味着我们必须提供可以安全使用的产品。我们生产的产品应符合所有相关法律、法规和行业标准的要求。我们正致力于利用每一个机会来超越客户的期待。

4.2.2. *Antitrust and Fair Competition / 反垄断和正当竞争*

We are committed to competing honestly and fairly, and we support and comply with all antitrust and fair competition laws in all markets where we do business. These laws vary by country, but are designed to stop competitors from making agreements that prevent, restrict or distort free competition. Compliance with these laws is important to our success as they foster legitimate, fair, and open markets ensuring that business is won based on quality and merit and not on improper behavior.

我们致力于诚实与公平地竞争，同时我们也支持并遵守适用于我们所处的所有市场的反垄断和公平竞争法律。这些法律根据国家的不同有所不同，但都是用于阻止竞争者间达成阻碍、限制或歪曲自由竞争的协议。遵守这些法律对我们的成功至关重要，因为他们建立了合法的、公平的和开放的市场，以确保业务的成功建立在质量和信誉上，而非不当行为上。

All of us and any agents or third parties acting for us must adhere strictly to the letter and the spirit of these laws. To ensure this, we have implemented a Group-wide compliance policy dealing with antitrust that prohibits each of us from

我们和每一个代表我们行为的代理人或第三方必须严格遵守这些法律的规定和精神。为了实现这个目的，我们在全球推广反垄断的合规规则，从而使我们每一个人不会：

- Working with competitors to fix prices or allocate markets or customers
与竞争者合作以锁定价格或分割市场或客户
- Setting, dictating or controlling the resale prices set by our distributors or other customers.
设定、指示或控制我们经销商或其他客户的转售价格

If we find ourselves in a situation where we may be more likely to interact with competitors, such as at trade shows or trade association meetings or other industry events, it is important that we avoid even the appearance of impropriety. Sometimes even innocent conversations can be misconstrued.

若我们发现自己处于与竞争者相互影响的情况中，例如在贸易展示会上或同业公会或其他行业活动上，很重要一点就是我们要避免即便是表面上的不当行为。有时候甚至是一些无心的对话也可能导致误解。

Violating antitrust laws is a serious matter and can result in significant financial penalties as well as criminal prosecution. If you have any questions about dealings with competitors, contact the Legal Department. More detailed information is also available in our '**Antitrust Policy**' posted in the Corporate Manual.

违反反垄断法是一件严重的事情，会导致巨额的罚款以及刑事处罚。若你有任何关于与竞争者交易的问题，请联系法务部。你还可以在公司手册上的“反垄断规则”中找到更多详细的信息。

4.2.3. *Business Gifts, Meals and Entertainment / 商业礼物、餐饮和娱乐*

To avoid conflicts of interest, we do not accept (or allow family members to accept) gifts, entertainment or preferential treatment from anyone doing business with ANDRITZ other than gifts or entertainment of such a value that the gift or entertainment could not reasonably be expected to influence our judgment or actions. In circumstances where refusing to accept a gift or offer of entertainment would be considered rude or give affront, we know to contact our immediate supervisor. Gifts of cash or securities of any amount may not be accepted. Remember, wherever we work in our company and whatever we do, we always want to avoid anything that might give even the appearance that we could be influencing someone's judgment or making the person feel obligated to give us their business in return for the business courtesy.

为了防止出现利益冲突，我们不接受（或允许家庭成员接受）除了那些不被认为会影响我们判断或行为的礼物或娱乐活动之外的、其他来自与安德里茨有业务往来的人的礼物、娱乐活动或优惠待遇。若拒绝接受礼物或娱乐邀请会被视为无礼或冒犯，我们应知道联系我们的直接上司。禁止接受现金礼物或任何金额的证券。请记住，不论我们在哪里工作和做何种职务，我们应永远防止出现下列情况的发生：我们能影响别人的判断或让他人觉得有义务向我们提供业务以作为商业礼仪的回报。

4.2.4. *Export Controls and Trade Restrictions / 出口控制和贸易限制*

Export control laws apply when we ship our equipment, parts, technology, services, software, manuals or even a gift from one country to another or when we allow visitors from another country into one of our facilities. Many countries have export control laws. The European Union has its own export control laws applicable to all EU member countries and member nations. The U.S. has trade restrictive laws in place as well that impose specific restrictions on U.S. citizens and permanent U.S. residents. Other countries in which we regularly work, such as Australia and Brazil, also have their own export laws.

出口控制法律适用于下列情况：我们从一个国家向另一个国家运送我们的设备、备件、技术、服务、软件、手册或甚至一个礼物；或我们允许来自另一个国家的访问者进入到我们的设施之一。很多国家有出口控制法律。欧盟有适用于所有欧盟成员国的出口控制法律。美国有贸易限制法律以及对美国国民和永久居住者有特殊限制的法律。其他我们有业务存在的国家，诸如澳大利亚和巴西，亦有其自己的出口法律。

Export control laws and sanctions can restrict the export of goods and services to certain countries, individuals or entities. They can restrict imports from certain countries. They can restrict travel to and investment in certain countries. And they can restrict export and re-export of goods and services where the end use may involve missile technology, nuclear devices, or other nuclear activity.

出口控制法律和制裁能够限制货物和服务出口至某些国家、个人或实体。他们亦能够限制从某些国家进口。他们能够限制到某些国家去旅游或投资。同时他们能够限制出口或再出口那些最终会涉及导弹技术、核装置或其他核活动的货物和服务。

Trade restrictions may also include boycotts. A boycott is a refusal to do business with someone as a means of protest or coercion.

贸易限制也包括抵制。抵制是指出于抗议或施压而拒绝与他人进行贸易往来。

The list of countries, individuals, and entities that are subject to economic sanctions or that require export licenses changes from time to time. Violations of export control laws, trade restrictions, and economic

sanctions are serious and can result in criminal prosecution, significant financial penalties, and loss of business. We adhere to all export control laws and trade restrictions.

列有那些受限于经济制裁或需要出口许可的国家、个人和实体的清单会随时更改。违反出口控制法律、贸易限制和经济制裁的后果是严重的，会导致刑事起诉、巨额罚款以及业务的丢失。我们应遵守所有的出口控制法律和贸易限制。

4.2.5. Bribery, Kickbacks, Fraud, and Corruption / 贿赂、回扣、欺诈和腐败

We are committed to competing honestly and fairly, and we support and comply with all applicable anti-corruption laws. We do not condone, under any circumstances, the offering, authorizing, receiving of bribes or kickbacks or any other improper or unlawful payments for the purpose of obtaining or retaining business or for any other reason related to our business. None of us must ever accept, give, offer or promise anything of value that could be interpreted as an attempt to improperly influence a commercial or governmental transaction. The use of intermediaries, agents, contractors, distributors, freight forwarders or other third parties, subsidiaries, joint ventures to do what ANDRITZ itself cannot do is prohibited.

我们致力于诚实、公平地竞争，同时我们支持并遵守所有适用的反垄断法律。我们在任何情况下均不宽恕为了获得或保持业务或为了其他与我们业务有关的原因而提供、授权、接受贿赂或回扣或其他任何不正当的或违法的付款。我们不能接受、给予、提供或承诺支付任何有价值的物品，而这些物品被理解为是为了不正当地影响一笔商业或政府交易。禁止通过中介、代理人、承包商、经销商、快递或其他第三方、分支机构、合资企业做安德里茨自身不能做的事情。

Violating anti-bribery laws is a serious matter and can result in significant financial penalties as well as criminal prosecution. If you have any questions about dealings with customers, and particularly with governmental customers, contact the Legal Department. More detailed information is also available in our 'Anti-Bribery Policy' posted in the Corporate Manual.

违反反贿赂法是一件严重的事情，会导致巨额罚款以及刑事起诉。若你有任何关于与客户（特别是政府客户）打交道的问题，请联系法务部。你亦可在公司手册上的“反贿赂规则”中找到更多详细的信息。

4.2.6. Transactions and Relationships with Suppliers, Agents, Consultants and Third Parties / 与供应商、代理人、顾问和第三方的交易和关系

We treat our business partners fairly. We act in an honest and transparent way when making up contracts and prices and in billing. We rely on qualified sub-suppliers for the procurement of less essential components for our plants and systems. These sub-suppliers are subjected to regular quality checks and performance monitoring. The sub-suppliers are expected to act in a manner consistent with this Code.

我们公平对待我们的生意伙伴。我们以诚实、透明的方式签署合同、制定价格和付款。我们依赖于并从合格的次供应商处采购我们设备和系统的次关键部件。这些次供应商会受到定期的质量检查和履行监督。次供应商应遵守本准则规定。

4.3. With Our Company and Our Shareholders

我们的公司和股东

4.3.1. Accounting and Financial Reporting / 会计和财务报告

All business transactions must be fully and clearly in accordance with legal and other regulations applicable to the ANDRITZ GROUP. We do not maintain any sub-ledgers or secondary records. All of us involved in accounting / controlling are committed to proceeding in a careful, transparent, and accurate way. Detailed information is available in the '**Accounting Policy (IAS/IFRS)**' and in the '**Transfer Pricing Policy**' posted in the Corporate Manual.

所有的商业交易必须完全遵守适用于安德里茨集团的法律和其他规定。我们不保留任何次账目或第二本账目。设计会计和审计的人员承诺以仔细、透明和正确的方式处理工作。详细信息请见公司手册中的“会计规则 (IAS/IFRS)”以及“转让定价规则”。

We are committed to equal treatment of shareholders as well as the provision of transparent, detailed, and simultaneous information to all market participants. We have installed a database for ANDRITZ shareholders as well as for all people interested in automatically receiving regular updates on the Group's development (registration via the ANDRITZ website). Participants are regularly sent Group information, such as press releases, links to quarterly and annual reports as well as other Group relevant information. We readily and frequently participate in road shows to provide investors with up-to-date and detailed information about the Group. We are committed to complying with the Austrian Corporate Governance Code.

我们平等对待每一位股东并向所有市场参与者提供透明、详细和及时的信息。我们为安德里茨的股东和所有对定期接收到有关集团发展的新闻有兴趣的人们（在安德里茨网上登记）建立了一个数据库。参与者会定期发送集团信息，例如新闻公报、季度和年度报告的链接以及其他集团相关信息。我们亦时刻准备着并经常参与各种路演来向投资者提供最新、详细的集团信息。我们遵守奥地利公司管理法规。

4.3.2. Fraud and Misrepresentation / 欺诈和错误陈述

Fraud involves deliberate, intentional deception or misrepresentation of information. Fraudulent activity is never acceptable at ANDRITZ. Most fraud can be avoided by carefully following the systems and controls ANDRITZ has in place to prevent individuals from having total control over money, supplies or records. If any of us should learn of a potential fraud, the fastest way to stop it is to report it promptly. We should not try to cover it up. The company will be much better off confronting and correcting the problem early on than if it is hidden and discovered later.

欺诈指有预谋的、故意的欺骗或错误陈述信息。安德里茨从来不会容忍欺诈行为。许多欺诈可以通过遵守安德里茨设立的、用于防止个人对现金、供应品或记录拥有完全控制权的系统来避免。如果任何人发现了潜在的欺诈，阻止其的最快方式就是立即报告。我们不应试图去掩盖它。及时面对并纠正问题相对于将其掩盖从而事后才发现对公司更有好处。

4.3.3. Conflicts of Interest / 利益冲突

Each of us must take care to avoid any situation that involves an actual or apparent conflict between our personal interests (or those of members of our family) and those of the Group. We are committed to conducting our business in an ethical manner that avoids all appearances of impropriety.

我们每一个人都必须尽量避免个人利益（或家庭成员的利益）与集团利益之间产生实质性的或明显的冲突的情况发生。我们致力于以道德规范来约束自己的商业活动，从而避免不适当行为的发生。

With regard to investments and employment, unless approved in advance by our supervisor, we understand that neither we nor any member of our immediate family may directly or indirectly have a financial interest (whether as an investor, lender, employee or other service provider) in a competitor, or in a customer or supplier if we or our subordinates deal directly or indirectly with that customer or supplier in the course of our job with ANDRITZ. An exception to this rule is an immaterial financial interest as an investor. Whether a financial interest is meaningful depends on individual circumstances. Therefore, we understand that the better decision is to disclose any such situation to our immediate supervisor and the head of the local Human Resources Department.

关于投资和雇佣，我们或我们直系家庭成员不得直接或间接地在竞争对手中拥有财务利益，如果我们或我们的下属在为安德里茨工作的过程中直接或间接地与客户或供应商打交道，我们或我们直系家庭成员亦不得在客户或供应商中拥有财务利益，除非事先得到我们上司的同意。但作为一位投资者的非实质性的财务利益可以除外。一项财务利益是否有意义取决于不同的情况。因此，最好的决定就是将任何该种情况告知我们的直接上司以及当地人事资源部门的主管。

4.3.4. *Insider Information and Trading in ANDRITZ Stock / 安德里茨股票的内幕消息和交易*

The shares of ANDRITZ AG are listed for official trading on the Vienna Stock Exchange. As a publicly listed company, our company is subject to several laws and stock exchange regulations affecting the disclosure of information to the public. Certain of us have access from time to time to information that, if it became public, may affect the value of ANDRITZ shares, options or other securities. Such information is considered 'inside information' and, pursuant to the ANDRITZ Policy prohibiting the misuse of insider information, we are required to keep such information confidential until it is made public by ANDRITZ AG. Similarly, we are forbidden from trading or otherwise taking improper advantage of such inside information. Buying or selling ANDRITZ AG stock based on information that has not been made public, but that you have access to as an 'insider', is against the law. Detailed information is available in the '**ANDRITZ GROUP Insider Trading Policy**' in the Corporate Manual.

安德里茨股份有限公司的股票在维也纳证券交易所上市交易。作为一家上市公司，我们要遵守一些对向公众透露信息有影响的法律和证券交易所规章制度。我们中的一部分人不时可以接触到那些一旦公布于众就会影响安德里茨股票、期权或其他证券的价值的信息。一些信息被认定为“内幕信息”，根据安德里茨关于禁止滥用内幕信息的规章制度，我们应对这些信息进行保密，直至安德里茨股份有限公司将其公开。同样，我们不应交易或利用这些内幕信息获取不正当利益。作为一名内幕人士，根据那些尚未公布的信息而购买或出售安德里茨股份有限公司的股票的行为是违法的。详细规定可见公司手册中的“安德里茨集团内幕交易规则”。

4.3.5. *Protecting Company Assets (property, facilities, books, records) / 保护公司资产 (财产、设施、账簿和记录)*

We are all responsible for protecting Company assets against loss, theft, damage or misuse. Company assets include case and other financial assets, facilities, equipment, and supplies. We should also always treat Company assets with care and respect and guard against waste and abuse.

我们对保护公司资产，防止公司资产遭受丢失、偷窃、损坏或滥用均负有责任。公司资产包括项目和其他财务资产、设施、设备和供给。我们任何时候都应仔细照管公司资产，尊重并防止其被浪费和滥用。

4.3.6. *Protection of Intellectual Property and Confidential Information / 保护知识产权和保密信息*

We are constantly engaged in actions to safeguard our proprietary technology and know-how through patents, trademarks, trade secrets and other intellectual property rights. Similarly, we respect the intellectual property rights of others, including the proper treatment of confidential and proprietary information. All of us are responsible for the proper use of ANDRITZ's proprietary and other confidential information. Any of us who comes into possession of confidential proprietary information must keep such information confidential and use it only for authorized purposes. Detailed information is available in the '**Intellectual Property Protection Policy**' in the Corporate Manual.

我们一直致力于保护我们的专有技术、专利、商标、商业秘密和其他知识产权。同样，我们尊重他人拥有的知识产权，包括正确处理保密和专有信息。任何持有保密专有信息的人必须对该信息进行保密，并在授权目的范围内使用该信息。详细规定可见公司手册中的“知识产权保护规则”。

4.3.7. *Data Privacy and Protection / 数据隐私和保护*

ANDRITZ respects the privacy of its employees' personal data and will collect and retain personal data only as required to operate efficiently or as required by law. Access to personal data is restricted to employees who have appropriate authorization and a legitimate business need.

安德里茨尊重其员工的个人隐私数据，只有在为了高效运营或法律要求的情况下方收集员工的个人数据。只有获得适当授权并具备合法商业需要的员工方能接触到个人数据。

Many countries where we do business have privacy or data protection laws requiring the responsible handling of personally identifiable information, including the transmission or data across country borders or to third parties. ANDRITZ is committed to handling personal data with care and to safeguarding and protecting such information to ensure it is not lost, misused, accessed without authorization, disclosed, altered or destroyed.

在我们拥有业务的许多国家都制定了保护隐私或数据的法律，这些法律要求对个人的信息（包括跨越国界或发给第三方的数据传输）进行合理处置。安德里茨一直致力于小心谨慎地处理个人数据，并保护个人数据不被丢失、误用、无权限的接触、透露、更改或销毁。

4.3.8. *Use of E-mail, Voice Mail and Company Networks / 电邮、录音和公司网络的使用*

As ANDRITZ employees, we have many means of communication available to us, such as e-mail, voice mail, internet, telephone (including mobile phone) and other information technology assets (the 'IT System') that are the property of ANDRITZ. Subject to rules or procedures issued for individual companies or the applicable IT Policies, incidental use for private purposes is allowed as being beneficial to both ANDRITZ and us, provided that such use is limited to what is reasonable and is not used for any of the following improper purposes:

作为安德里茨的员工，我们有多种可供选择的交流工具，例如电邮、录音、网络、电话（包括手机）和其他属于安德里茨所有的信息技术资产（简称“IT系统”）。在遵守公司的规章制度或IT规则外，为了个人目的偶尔使用上述交流工具是被允许的，只要该使用是合理的、且不是为了下列不正当目的：

- Soliciting for commercial, charitable, religious or political causes 为了商业、慈善、宗教或政治原因进行招揽
- Sending chain mail letters or broadcast personal messages 群发信件或散播个人消息
- Sending inappropriate, offensive or disruptive messages 发布不适当的、冒犯的或引起混乱的信息
- Gaining unauthorized access to databases or information sources at ANDRITZ or any other site 获得安德里茨或其他网站上的数据库或信息库的未授权的存取
- Damaging computer equipment, software or data 毁坏电脑设备、软件或数据
- Interfering with or disrupting network users, services or equipment 干扰或中断网络用户、服务或设备
- Sexually-related or pornographic messages or material 与性相关的或淫秽的信息或资料
- Violent or hate-related messages or material 暴力或憎恶相关的信息或资料
- Bigoted, racist or other offensive messages aimed at a particular group or individual 针对一个特定团体或个人的偏执的、种族主义的或其他冒犯性的信息
- Malicious, libelous or slanderous messages or material 恶意的、诽谤的或中伤的信息或资料
- Subversive or other messages or material related to illegal activities 危险的或其他与非法行为相关的信息或资料

We understand that ANDRITZ reserves the right to periodically monitor, access, and disclose the contents of the IT System to block access to non-business related Internet sites, all in accordance with applicable law. Additional information is available in the '**IT Usage Policy**' and other IT Policies posted in the Corporate Manual.

根据相关法律的规定，安德里茨保留定期监控、查看以及透露 IT 系统的内容的权利，以便阻止连接与业务不相关的网站。其他信息详见公司手册中公布的“IT 使用规则”和其他 IT 规则。

4.3.9. Document Retention / 文件保留

There are many laws that specify how long we need to keep certain documents, including paper documents, audio and video tapes, microfilm, voice mail, computer-based information such as e-mail, computer files on disks, servers or tape, and on any other medium that has information about the Company or its business activities. We strive to comply with all applicable record retention laws and regulations. Before any record or document is thrown away, it is important to check whether there is an ANDRITZ record retention policy that may be applicable. Also, whenever it becomes apparent that documents will be required in a government investigation or a lawsuit, all documents must be preserved and all ordinary disposal of documents that may pertain to the litigation or investigation in any way must be suspended.

许多法律特别规定了我们应该保留文件多长时间，包括纸面文件，录像带，微缩胶卷，电话录音，电脑上的信息（如电邮），硬盘、服务器上的电脑文档，及其他载有关于公司或其业务活动之信息的媒介体。我们努力遵守所有适用的、有关记录保存的法律法规。在将任何记录或文件丢弃前，确认一下安德里茨是否有关于记录留存的规则是很重要的。同时，在一项政府调查或法律诉讼中需要哪些文件这一问题变得明朗前，所有文件都应被保存，而所有处理与诉讼或调查有关的文件的行为都必须中止。

4.3.10. Media and Public Inquiries / 媒体和公众质询

We acknowledge the importance of the media and are committed to providing fast and complete information to journalists to support them in their duty to report objectively about our Group. In order to promote consistency and transparency, we understand that all contact with the media is to be made exclusively with the involvement of the Corporate Communications & Investor Relations Department.

我们承认媒体的重要性，并致力于向记者提供快速和完整的信息以便其能公正客观地报道关于我们集团的信息。为了提升一致性和透明性，所有与媒体的接触应由公司交流和投资者关系部门单独进行。

4.4. In Our Communities / 在我们的社区

4.4.1. Environmental Protection / 环境保护

We are committed to promoting environmental protection and conserving natural resources. We provide technologies that maximize generation of energy from renewable sources; approximately 50% of our total sales are derived from technologies and systems that generate energy from water power and biomass. This supports international efforts for climate protection. All of our business areas support their customers in their sustainability efforts by providing products and services that reduce consumption of energy and other raw materials to the lowest possible levels, and minimize emissions and waste. Our research and development activities, often in cooperation with our customers or other partners, also focus on continuously enhancing the environmental performance and energy efficiency of our products. Also, in our operations worldwide, we strive to constantly improve environmental sustainability by reducing waste and emissions, saving energy and raw materials, and reducing traffic load.

我们一直致力于推广环境保护和保存自然资源。我们提供可将可再生资源变为能源的技术；我们销售总额的50%来源于那些能够将水和生物燃料用于产生能源的技术和设备。这支持了国际上保护环境的努力。我们所有的业务领域向我们客户提供能够减少能源和其他原材料的消耗并减少污染物和废弃物的排放的产品和服务，从而都我们客户的可持续性努力。我们与客户或其他合作伙伴共同进行的研发活动也一直着重于继续提高我们产品的环保程度和能源利用率。同时，在我们全球范围内的经营活动中，我们也努力通过减少废弃物和排放量、节约能源和原材料来提高可持续发展的环保事项。

We are good global, national, and local citizens. We are committed to full compliance with both the spirit and the letter of all environmental laws and regulations in every country in which we operate. Our commitment to protecting the environment is a responsibility shared by each of us.

我们是全球的、国家的和当地的好公民。我们遵守我们业务所在的每一个国家的所有环保法律法规及其精神。保护环境是我们每一个人的责任。

4.4.2. Sustainability / 可持续性

We are committed to a sustainable development, in the sense of meeting the needs of the present without compromising the ability of future generations to meet their needs. We aim to achieve economic growth while promoting environmental sustainability through the efficient use of energy and other resources as well as minimization of emissions and waste, both within the plants supplied to our customers and in our manufacturing facilities. We respect human rights and support the principle of equal opportunities regardless of race, nationality, gender, sexual orientation, religion, disability, or age.

我们致力于可持续地发展。我们旨在取得经济增长，同时通过在我们向客户提供的项目和我们的生产设施中充分利用能源和其他资源以及将排放量和废弃物减少至最低，以提高环境的可持续性。我们尊重人权，并支持不论人种、国籍、性别、性取向、宗教、是否残疾或年龄的差别都应得到同等的机会。

4.4.3. Principles related to profit-making / 获取利润相关的规则

We aim to conduct our business to achieve a sustainable profitability, to maintain a strong financial basis and to keep risks at an appropriate level. Achieving profits can, however, never justify the violation of a law, regulation, or principle of conduct.

我的目标是通过经营，来获取可持续的盈利性，维持强有力的财务基础并将风险保持在一个适当的水平。但是，获取利润的方式绝不能违反法律、法规或行为准则。

4.4.4. Community Involvement / 社会活动

We are privileged to do business in over 125 communities around the world. As citizens of those communities, we must always act responsibly. This means conducting our operations safely and being prepared for any emergencies that may occur. When we make our communities a better place, we make our business a better place.

我们有权在全球 125 个地区进行经营活动。作为这些地区的公民，我们必须一直对自己的行为负责。这就意味着我们应当安全经营并对可能发生的任何突发事件做好准备。当我们将我们的社区建设成为一个美好的地方，我们的业务就能经营得更好。

In general, as a company, we do not engage in donations or sponsoring. Requests for exceptions for special cases can be directed to the Executive Board and must follow legal regulations.

一般来说，作为一家公司，我们不做捐赠或赞助。特殊情况需要特殊处理的，可直接请示执行董事会，并应遵守相关法律规定。

4.4.5. Political Activity and Contributions / 政治活动与捐献

We respect the right of each of us to participate in political activities; however, any decision to be involved in entirely a personal and voluntary one. We understand that we must at all times make it clear that our views are our own and not those of the Company.

我们尊重每一个人参与政治活动的权利。但是，任何相关决定完全是个人的和自愿的。我们在任何时候都必须清楚，我们的观点是我们自己的，而非公司的。

Strict limits on corporate political activity mean that employees may not make any direct or indirect political contribution on behalf of ANDRITZ or with company funds unless authorized in advance.

公司政治活动的严格限制是指员工不得以安德里茨的名义或用公司基金做任何直接或间接的捐献，除非事先得到了授权。

4.5. With Our Governments and the Law / 我们的政府和法律

We conduct business in many countries around the world. As a result, our operations are subject to the laws of many countries, provinces, states, municipalities and organizations, such as the European Union. It is important for us to understand how these laws apply to our operations.

我们在世界上的很多国家经营业务。所以，我们的经营应当遵守不同国家、省份、州、市和组织（例如欧盟）的法律法规。了解适用于我们经营的这些法律对我们来说是很重要的。

4.5.1. *Compliance with Laws, Regulations and Customs / 遵守法律、法规和惯例*

We are committed to operating with the highest level of ethical behaviour and to complying with both the spirit and letter of all applicable laws and regulations of our home countries and of the other countries where we do business. We will not engage in unlawful conduct or fraud through third parties. To make sure that we do not violate any such laws, we have implemented Group-wide compliance policies to ensure that employees are aware of, understand, and act in conformity with various laws including anti-bribery and antitrust laws.

我们一直以最高的道德标准来约束我们的经营活动，同时遵守相关国家的所有法律法规及其精神。我们绝不通过第三方实施非法行为或欺诈。为了确保我们不违反这些法律，我们实施了集团范围内的合规规则，确保员工意识到、了解并遵守不同的法律（包括反贿赂法和反垄断法）以约束其日常行为。

4.5.2. *Doing Business with Governments and Public Officials / 与政府和公共官员做生意*

Operating with integrity also applies to our dealings with public officials. We do not make, promise or authorize payments or the giving of anything of value, directly or indirectly, to any public official without the prior written approval of the Compliance Officer. Who is a 'public official' is broadly defined and includes, for example, employees of government agencies and state-owned entities, any person acting in an official government capacity, employees of joint ventures in which the government is a partner, a political appointee, and family members of public officials.

诚信经营同样适用于与公共官员之间的交易。在没有获得合规专员的事先书面同意前，我们不直接或间接向任何公共官员或承诺或授权向任何公共官员支付钱款或给予由价值的物品。公共官员的定义很广泛，包括政府机构和国有企业的员工、履行政府要职能的任何人、政府为一方投资者的合资企业中的员工、政治候选人、以及公共官员的家庭成员。

When third parties, such as sales agents, distributors, brokers, and freight forwarders, work with public officials on our behalf, liability may result to us from the actions of these third parties. Due diligence about a third party's ownership and reputation must be conducted and documented before we enter into a new business relationship with any such third party intermediary.

当代表我们的第三方（如代理人、经销商、经纪人和承运人）与公共官员打交道时，这些第三方的行为所产生的责任就可能影响到我们。在我们与任何上述第三方建立业务关系前，我们必须对他们的所有权结构和声誉进行调查并存档。

Laws concerning appropriate gifts and business courtesies with respect to government and public officials can vary from country to country, and even within a country as between local and national laws. Violations of these laws can have serious consequences, including possible criminal prosecution and/or fines. Therefore, the Compliance Officer must pre-approve, in writing, providing or agreeing to provide gifts, hospitality or other business courtesies to public officials.

与公共官员有关的适当礼物和商业礼仪的相关法律根据国家的不同而有所不同，有时甚至在同一个国家内，地方和国家层面的法律亦有不同。违法这些法律会招致严重的后果，包括可能的刑事起诉和/或罚款。因此，向或同意向公共官员提供礼物、招待或其他商业礼仪必须先得到合规专员的书面同意。

5. ASKING QUESTIONS AND RAISING CONCERNS / 提出问题和疑虑

No Business Conduct Policy can cover every conceivable situation to which we could be exposed. Each of us must use our common sense and judgment in applying these principles and seek advice.

没有任何商业行为规则能够涵盖每一个我们可能遇到的情况。我们每一个人应当在适用这些规则时运用我们的常识和判断，并寻求建议。

This Code does not replace any of the Policies and Guidelines in the Corporate Manual, which provide further rules of conduct for several of the matters addressed in this Policy. Each of us is expected to be familiar with the Policies and Guidelines set forth in the ANDRITZ Corporate Manual, which is located on the ANDRITZ Intranet.

本准则并不取代公司手册中对本准则提及的事项做进一步规定的任何规则和指南。我们每一个人应当熟悉安德里茨公司手册中规定的规则和指南（见安德里茨网站）。

5.1. Open Communication – Open Door Policy / 公开沟通 - 开门规则

You should always feel secure in seeking advice or raising concerns without fear of reprisal. If you have concerns or are in doubt about how to resolve a situation, you are encouraged to speak directly to your supervisor or manager. If this may not be appropriate, given the particular circumstances, you can contact a member of the Compliance Committee, a local Compliance Officer, or the ANDRITZ Legal Department for assistance. All questions and concerns are taken seriously, will be treated confidentially to the fullest extent possible under the circumstances and will be promptly investigated.

你不应该对寻求建议或提出疑虑存有害怕报复的心理。如果你对如何处理情况持有疑虑或不确定，你应直接与你的上司或经理交流。如果在某些特殊情况下直接交流不适合，你可以联系合规委员会的成员、当地的合规专员或安德里茨法务部以寻求帮助。我们会对所有问题和疑虑严肃对待，以最大程度进行保密并及时调查。

5.2. Violations / 违反

Each of us is responsible for understanding this Code and ensuring that our and the conduct of our direct reports fully complies with this Code of Conduct and all applicable ANDRITZ Policies and Guidelines.

Violations of the Code of Conduct and certain Policies and Guidelines may have a severe and/or lasting negative impact on ANDRITZ's image, commercial relations, and financial situation. Where circumstances warrant, ANDRITZ may seek civil or criminal prosecution and dismissal of any employee(s) involved.

我们每一个人都应了解本准则，并确保我们及我们下属的行为完全遵守本准则和其他所有适用的安德里茨规则和指南。违反本准则和其他规则及指南会对安德里茨的形象、商业关系以及财务状况造成严重的和/或持续性的负面影响。如果条件允许，安德里茨将对那些涉案的员工提起民事或刑事诉讼并予以解雇。

6. WHERE TO GO FOR HELP / 到何处寻找帮助

If you have reason to believe that a law, regulation, this Code, or related ANDRITZ Policy is being violated, you may, according to the rules applicable in the country where you live or work, inform your direct supervisor as soon as possible. You may also use the Code of Conduct Notification Procedure if you have reason to believe that anti-corruption or antitrust laws, rules or policies are being violated.

如果你有理由相信法律、法规、本准则或相关的安德里茨规则被违反了，你可以根据所在国的相关规则及时告知你的上司。当你有理由相信反腐败或反垄断法律、法规或规则被违反了，你亦可以使用行为准则通知程序。

The Code of Conduct **Notification Procedure** should only be used when you have reason to believe that first informing your direct supervisor may cause greater difficulties or have reason to believe that the proper follow-up may not be given as result of reporting the alleged irregularity. In this case, you may contact any member of the Compliance Committee or a local Compliance Officer, who will deal with the matter. All reasonable measures will be taken to respect your wishes for confidentiality.

只有当你有理由相信首先通知你的直接上司可能会导致更大的困难，或举报不正当行为的结果是没有得到应有的追踪调查的情况下，行为准则通知程序方可使用。在这种情况下，你可以联系合规委员会的任何成员或当地的合规专员。我们会根据你的要求采取一切合理措施对举报行为进行保密。

You also may express your concerns in an e-mail message sent to the official compliance e-mail address: compliance@andritz.com. The related mailbox will be managed by the Chairman of the Compliance Committee. All messages will be handled with a maximum of secrecy.

你也可以将你的疑虑发送至下列合规专用电邮地址：compliance@andritz.com。该电邮将由合规委员会的主席管理。所有信息将会被严格保密。

Retaliation is strictly prohibited. / 严厉禁止报复

No employee will suffer a change of status, harassment or any other form of discrimination as result of using the Code of Conduct Notification Procedure and disclosing information in good faith. Retaliation in any form is strictly prohibited.

没有员工会因为使用行为准则通知程序并在诚信的基础上透露信息而遭至职位的变化、骚扰或其他形式的歧视。任何形式的报复都是被严格禁止的。