

# Code of

**CODE OF CONDUCT** 行为准则

WE PROTECT OUR COMMON VALUES.

我们保护我们共同的价值观

# con- duct



# Trust and Integrity

Dear colleagues , 致各位同事：

Besides entrepreneurship and passion, trust and integrity are the main pillars of Vaillant Group's corporate values. In our daily work, mutual trust and integrity mean that we can rely on each other, act responsibly and comply with laws and regulations, and that we take decisive action against any violation of laws and internal directives. By adhering to these values and principles, we are also able to maintain the trust that our customers and business partners place in us. This is the only way to prevent financial losses and reputational damage and to guarantee the long-term and sustainable success of our family business.

除企业家精神和激情外，信任和诚信亦是威能集团企业价值观的主要支柱。在我们的日常工作中，互信和诚信意味着我们可彼此信赖、负责任地行事、遵守法律和法规、对违反法律和内部指令的任何行为采取果断行动。通过坚持该等价值观和原则，我们亦能维护我们的客户和业务伙伴对我们的信任。这是防止财务损失、名誉损害和保证我们家族企业长期和可持续成功的唯一途径。

Of course, any kind of violation of the law also constitutes a violation of our corporate values and will not be tolerated. To prevent such violations, we have implemented a Compliance Management System that is based on our values and makes a significant contribution to the success and growth of our company. This Code of Conduct is an important component of the Vaillant Group's Compliance Management System. It is mandatory for everyone at Vaillant Group – for both employees and management. The content of the Code of Conduct sends a clear message about our commitment and our obligation to comply with internal and external rules.

当然，任何违反法律的行为亦构成违反我们的企业价值观，并将不可容忍。为避免该违反行为，我们已实施合规管理体系，该制度建立在我们的价值观之上，并对我们公司的成功和成长做出巨大贡献。本行为准则是威能集团合规管理体系的重要组成部分，其对威能集团的每个人（包括员工和管理层）均是强制性的。本行为准则的内容对我们承诺遵守及务必遵守内部和外部规则发出清晰的信号。

Our compliance rules create a safe framework that serves as a binding compass for all employees of the Vaillant Group. A compass which helps us to live compliance in our daily work.

我们的合规规则创建了一个安全的框架，其对威能集团的所有员工发挥具约束力的指令作用。该指令有助于我们在日常工作中合规行事。

If there are doubts in certain situations, ask yourself:

Would the behavior cause negative attention if it were made public?

在某些情况下如有疑问，请自问：

如该行为为公众所知悉，是否会引起负面评价？

For information on the topics contained in the Code of Conduct, please address the relevant contact persons. We have also set up a compliance organization that serves as an additional point of contact in the event of further questions. Please do not hesitate to ask your colleagues for advice if you are unsure about your actions or correct behavior.

关于本行为准则所述主题之信息，请联系有关联系人。我们亦建立合规组织，作为提供咨询的额外联络方。如您对您的行动或恰当行为有疑问，敬请咨询您的同事，以获取建议。

Remscheid, 1 July 2019

雷姆沙伊德, 2019年7月1日

Yours sincerely

顺祝商祺

The Management Board

管理委员会



WE PROTECT OUR

COMMON VALUES.

我们保护我们共同的价值观

COMPLIANCE: WITH RESPONSIBILITY.

WITH DEPENDABILITY. TOGETHER.

合规：具责任、具信赖。携手。



# Our social responsibility

## 我们的社会责任

PROTECTION OF HUMAN RIGHTS

AND WORKERS' RIGHTS

保障人权和职工权利

WE RESPECT THE APPLICABLE REGULATIONS REGARDING THE PROTECTION OF HUMAN RIGHTS AND WORKERS' RIGHTS WORLDWIDE. FOR THE VAILLANT GROUP, THE "UNIVERSAL DECLARATION OF HUMAN RIGHTS OF THE UNITED NATIONS" REPRESENTS THE BASIS FOR HUMAN RIGHTS AND WORKERS' RIGHTS.

我们尊重世界范围内有关保障人权和职工权利的适用法规。对于威能集团而言，“联合国世界人权宣言”是人权和职工权利的基础。

As a globally active family business, we at Vaillant have a global social responsibility. The United Nations have defined ten principles for social responsibility – in the areas of human rights, labor standards, environmental protection and the fight against corruption. The Vaillant Group has recognized the Global Compact principles since 2011. An important Global Compact principle is dedicated to the protection of human rights. We respect internationally recognized human rights and are committed to complying with human rights at all our sites. We reject all forms of slavery and child labor. No one must be employed against their will or forced to work.

作为一家全球活跃的家族企业，我们威能具有全球社会责任感。联合国在人权、劳动标准、环境保护和反腐败等领域已界定十项社会责任原则。自2011年以来，威能集团已承认全球契约原则。一项重要的全球契约原则致力于保障人权。我们尊重国际公认的人权，并努力在我们的所有场所均遵守人权。我们拒绝一切形式的奴隶制和童工。任何人不得违背自己的意愿或被迫工作。

In addition, Vaillant respects the right of all employees to form or join trade unions and employee representations within the framework of the applicable legal provisions, as well as the right to negotiate and conclude collective agreements and take collective action. Members of workers' organizations face neither advantages nor disadvantages.

此外，威能尊重所有员工在适用的法律条款框架内组建或加入工会和担任员工代表的权利，以及协商和签订集体协议和采取集体行动的权利。职工组织的成员既不面临优势亦不面临劣势。

We grant and protect the freedom of opinion of our employees and the right to freedom of expression.

我们授予和保护我们员工发表意见的自由和自由表达意愿的权利。

Vaillant observes the applicable laws and regulations regarding remuneration and ensures that its employees are adequately remunerated. We comply with the applicable safety and working time regulations worldwide.

威能遵守有关薪酬的适用法律和法规，并确保其员工获得充分的薪酬。我们遵守全球适用的安全和工作时间规定。

We also expect our suppliers to acknowledge the ten principles of the UN Global Compact. This is laid down in our General Purchasing Terms and is checked as part of supplier audits.

我们亦期望我们的供应商承认联合国全球契约的十项原则。这在我们的一般采购条款中有规定，并作为供应商审计的一部分进行核查。



## CORPORATE SOCIAL RESPONSIBILITY

### 企业社会责任

WE CONSIDER OURSELVES A GOOD CORPORATE CITIZEN AND A FAMILY-RUN COMPANY THAT IS COMMITTED TO SOCIAL CHANGE.

我们认为我们是优秀的企业公民和致力于社会变革的家族企业。

In its sustainability vision, the Vaillant Group aims to set standards regarding all aspects of a sustainable business. With this vision in mind, we are committed to our Corporate Social Responsibility (CSR). We make a positive contribution to social progress and the welfare of the people in the countries in which we operate. We focus on supporting family, educational and social institutions. Our commitment to SOS Children's Villages is particularly important to us and is part of a long-term partnership to which many employees show great dedication.

威能集团在可持续发展愿景中，其目标是为可持续业务的各个方面制定标准。考虑到这一愿景，我们致力于企业社会责任（CSR）。我们为我们企业运营所在国家的社会进步和人民福利做出积极贡献。我们专注于支持家庭、教育和社会机构。我们对SOS儿童村的承诺对我们来说尤其重要，这是我们长期合作伙伴关系的一部分，许多员工对此表现出极大的奉献精神。

## PRODUCT SAFETY AND QUALITY

### 产品安全 and 质量

WE CONTINUOUSLY WORK ON IMPROVING OUR PRODUCTS AND PROCESSES IN ORDER TO BE ABLE TO OFFER OUR CUSTOMERS THE BEST POSSIBLE SOLUTIONS ALONG WITH HIGH-QUALITY AND SAFE PRODUCTS.

我们不断改进我们的产品和工艺，以便为客户提供最好的解决方案以及高质量和安全的产品。

We consider the customer's demand for quality wherever quality is generated in the development of new products and continuously learn from the behavior of our analog and digital products with regard to the customer. We do this together in an integrated control loop over the entire product life cycle – from development to purchasing, production and use, all the way through to service and recycling.

在新产品开发过程中我们无时无刻不在考虑客户对质量的需求，并且我们会不断地从我们关于客户的模拟和数字产品中学习。我们在整个产品生命周期内，从开发到采购、生产和使用，一直到服务和回收利用，在一个集成的控制回路中共同完成这项工作。

The Vaillant Group has implemented management systems for the control of corporate processes with regard to environmental protection, occupational safety and quality, all of which are determined by standards valid throughout Europe.

威能集团已实施环境保护、职业安全 and 质量方面的企业流程控制管理体系，所有该等体系均依据欧洲有效的标准确定。

The application of these standards is regularly reviewed by independent institutions as part of a multi-site certification process.

独立机构定期审查该等标准的适用，这是多场所认证过程的一部分。

Our guidelines for environment and quality are derived from the vision of the Vaillant Group. They also form the basis for the design of the integrated management system which shapes our processes.

我们对环境和质量的指导方针来源于威能集团的愿景。该等方针亦构成统一的管理体系设计的基础，该体系塑造我们的流程。



# ENVIRONMENTAL PROTECTION

## 环境保护

THE VAILLANT GROUP TAKES ECOLOGICAL RESPONSIBILITY AND IS ACTIVELY COMMITTED TO CLIMATE AND ENVIRONMENTAL PROTECTION.

威能集团承担生态责任，并积极致力于气候和环境保护。

With the Paris Agreement in 2015, for the first time (with a few exceptions), the countries of the world reached a binding agreement to limit global warming to less than two degrees.

随着2015年《巴黎协定》的签署，世界各国首次（除少数例外）达成一项具有约束力的协议，将全球变暖限制在2度以下。

As a provider of highly efficient heating, ventilation and air-conditioning technology, we are able to contribute to achieving this goal with energy-saving and intelligent solutions that increasingly use renewable energy sources. More than 40 percent of primary energy in the EU is consumed in and for buildings. The core business of the Vaillant Group is, thus, one of the biggest factors for the energy transition. This is reflected both in our vision “Taking care of a better climate. Inside each home and the world around it.”, as well as in our strategic orientation.

作为高效供热、通风和空调技术的供应商，我们能够通过越来越多地使用可再生能源的节能和智能解决方案来实现这一目标。欧盟40%以上的一次性能源消耗在建筑物上。因此，威能集团的核心业务是能源转型的最大要素之一。这反映在我们“在每个家庭和外部世界均关注良好气候”的愿景和我们的战略方向上。



# Our behavior towards

## HEALTH AND SAFETY

### AT WORK

### 工作中的健康和安全

HEALTHY EMPLOYEES ARE AN ESSENTIAL PREREQUISITE FOR THE ECONOMIC SUCCESS OF THE VAILLANT GROUP.

健康的员工是威能集团经济上成功的重要前提。

All employees of the Vaillant Group are actively involved in shaping occupational health and safety. Everyone in the company is obliged to consistently ensure that accidents and work-related illnesses are prevented in all operational activities.

威能集团所有员工均积极参与打造职业健康和安全。公司的每个人均须一致确保在全部运营活动中防止事故和职业病的发生。

With a proactive occupational health and safety management, potential hazards and weaknesses are detected at an early stage and mitigated using suitable measures.

Corresponding processes, procedures and methods have been implemented and are continuously improved.

通过积极主动的职业健康安全管理，在早期发现潜在的危害和弱点，并采取适当的措施加以控制。相应的过程、程序和方法已经实施并不断改进。



## EQUAL OPPORTUNITIES AND RESPECTFUL TREATMENT

### 平等机会和尊重

WE DO NOT TOLERATE DISCRIMINATION AND TREAT  
EACH OTHER FAIRLY AND RESPECTFULLY.  
我们不会容忍歧视，并公平及尊重地彼此对待。

We judge all employees and applicants solely on their qualifications and ability, suitability, attitude and whether they share our corporate values. We base our actions on this judgment. 我们仅根据所有员工和申请人的资格和能力、匹配度、态度以及他们是否共享我们的企业价值观来判断他们。我们的行动建立在该判断基础之上。

We do not tolerate discrimination or harassment based on characteristics such as gender, age, race, religion, sexual orientation or political opinion. Any form of discrimination and harassment in the workplace is unacceptable. 我们不容忍基于性别、年龄、种族、宗教、性取向或政治观点等特征的歧视或骚扰。在工作场所发生的任何形式的歧视和骚扰均不可接受。



# Our handling of company resources & information

## 我们对公司资源和信息的处理

### INTELLECTUAL PROPERTY 知识产权

WE PROTECT BUSINESS AND TRADE SECRETS AND TREAT THEM IN STRICT CONFIDENCE.

我们保护商业秘密并对其严格保密

Business and trade secrets, such as inventions and knowledge, are essential for an efficient and successful company. Therefore, we use this information only for business purposes and in the interests of the Vaillant Group. We keep confidential information a secret and do not pass it on to unauthorized or external persons.

商业秘密，比如发明和知识，对高效和成功的公司至关重要。因此，我们仅为业务目的和符合威能集团利益的情况下使用该等信息。我们对保密信息予以保密，并不向未经授权的或外部的人士传递。

### INSIDER INFORMATION 内幕信息

WE RESPECT THE RULES GOVERNING THE HANDLING OF INSIDER INFORMATION AND OBSERVE OUR DUTIES OF CONFIDENTIALITY.

我们遵守内幕信息的处理规则并遵守我们的保密义务

Insider information is information which is not publicly known, but which, if it becomes known, may significantly influence the stock market price of a company.

内幕信息是不为公众所知的信息，而该信息一旦为公众知悉，其可对公司的股票市价产生重大影响。

Even though the Vaillant Group, as a family business, is not subject to any capital market regulations, we treat any insider information that we may receive about listed business partners confidentially. We do not use information that may influence the market price of our business partners for our own benefit and do not pass it on to third parties.

尽管作为家族企业的威能集团不受任何资本市场监管，但是我们对可收到的关于上市业务伙伴的任何内幕信息予以保密。我们不为我们自己的利益而使用可能影响我们业务伙伴市价的信息，并不向第三方传递。



## USE OF COMPANY

## RESOURCES 使用公司资源

WE TREAT COMPANY RESOURCES WITH CARE AND DO NOT WASTE OR MISUSE THEM.

我们审慎对待公司资源，并不浪费或滥用公司资源

The company resources provided serve to achieve the objectives of the Vaillant Group and are therefore only to be used for this purpose. The efficient use of resources contributes to the company's success. Therefore, we act in a cost-conscious manner, handle company property carefully and protect it from damage, destruction and theft.

所提供的公司资源旨在实现威能集团的目标，因此，仅为此目的方可利用该资源。有效利用资源助力公司成功。因此，我们以成本意识的方式行事，审慎处理公司财产，并保护其免受损害、破坏和盗窃。



# Our behavior in the business context

## 我们在商业环境中 的行为

### ANTITRUST 反垄断

WE ARE COMMITTED TO FAIR COMPETITION AND TO COMPLYING WITH ALL LEGAL PROVISIONS RELATING TO ANTITRUST LAW.

我们致力于公平竞争，努力遵守有关反垄断的法律条款。

Antitrust law protects free markets and equal competitive conditions for all market participants. It prohibits behavior by companies that hinders, restricts or distorts free competition.

反垄断法保障了自由市场竞争，并确保所有市场竞争者享有平等的竞争条件。反垄断法禁止公司实施阻碍、限制或歪曲自由竞争的行为。

Fair competition is a prerequisite for free market development and the associated social benefits. We are committed to fair competition and therefore to ensuring that prices, conditions or market divisions are not agreed upon and that sensitive information is not exchanged with competitors, customers or suppliers. In the event that Vaillant Group companies have a significant market share in a particular market, antitrust law imposes a specific responsibility on them and particularly strict standards apply.

公平竞争是自由的市场发展和相关社会利益的前提。我们致力于公平竞争，并因此确保不对价格、条件或市场划分达成一致，不与竞争对手、客户或供应商交换敏感信息。如威能集团在特定市场有重要市场份额，反垄断法对其施加特定责任，并适用特别严格的标准。

Antitrust violations can have serious consequences both for the Vaillant Group and for the employees involved. Vaillant Group employees are informed about antitrust regulations via internal directives which are designed to raise awareness and enable employees to identify antitrust issues and contact the responsible Compliance Officer in the event of critical situations. 违反反垄断法对威能集团和涉及的员工可产生严重后果。我们通过内部指令向威能集团员工告知反垄断法规，该指令旨在提高意识、使员工能识别反垄断问题并在紧急情况下联系负责的合规官。



## ANTI-CORRUPTION 反腐败

WE STRONGLY OBJECT TO ANY FORM OF CORRUPTION AND WOULD RATHER REFUSE A BUSINESS OPPORTUNITY THAN BREAK THE LAW.

我们强烈反对任何形式的腐败，宁愿拒绝业务机会也不违反法律。

The maintenance of existing or potential customer relationships is an essential part of our business and indispensable for the continued success of our company. It is therefore important that the maintenance of customer relationships takes place within a legal framework. The reason for this is that corruption may have serious consequences for the companies and employees involved. It is therefore very important that employees of the Vaillant Group are always able to assess which principles must be considered when maintaining any existing or potential relationships with private business partners and public officials.

维护现有或潜在的客户关系是威能集团业务的一个基础部分，也是我们公司持续成功的必要条件。在法律框架内维护客户关系非常重要，因为腐败行为会给公司和员工造成严重后果。因此，威能集团的员工应始终能评估在维护与私营业务伙伴和国家工作人员的现有或潜在关系时需要考虑哪些原则。

Corruption can occur in active form (granting benefits) and passive form (accepting benefits). In most countries, these are criminal offences. Benefits can be granted to or received by public officials and persons from the private sector.

腐败可以以主动形式（给予利益）和被动形式（接受利益）发生。在大多数国家，这些都是刑事犯罪。该等利益可能向国家工作人员和私营部门人员给与或由其接受。

For the Vaillant Group, a good relationship with customers, suppliers and other business partners is very important. In most countries, occasional invitations, hospitality, gifts and other benefits, within reasonable limits, are a generally accepted means of maintaining business relationships. In order to avoid the appearance of corruption, it is essential to observe binding principles when granting benefits.

对于威能集团而言，与客户、供应商和其他业务伙伴建立良好的关系非常重要。在大多数国家，偶尔的邀请、款待、礼物和其他利益，在合理的范围内，是保持业务关系的一般可接受的方式。为了避免腐败的出现，在给予利益时必须遵守约束性的原则。

Internal directives and the approval requirements contained therein ensure that only admissible benefits are granted or received. Therefore, our internal directives also serve to protect our employees from criminal consequences.

内部指令和其中包含的批准要求，确保只有被准许的利益方可授予或接受。因此，我们的内部指令亦有助于保护我们的员工避免招致刑事后果。



## DATA PROTECTION & DATA SECURITY

### 数据保护和数据安全

WE HANDLE PERSONAL DATA CAUTIOUSLY AND RESPONSIBLY.

我们谨慎地及负责任地处理个人数据。

The Vaillant Group is aware of the importance of data protection, especially with regard to extensive data protection requirements, e.g. by the EU General Data Protection Regulation (GDPR). Violations of data protection regulations may have significant consequences and result in considerable fines.

威能集团意识到数据保护的重要性，尤其是关于广泛的数据保护要求，例如欧盟《通用数据保护条例》（GDPR）。违反数据保护法规可能会造成严重后果，并导致巨额罚款。

Therefore, we collect and process the personal data of our employees, customers and business partners only in accordance with the law and without unreasonably impairing their privacy. We protect the confidentiality of personal data and only transfer personal data within the Vaillant Group if it is required in order to process data in accordance with its intended purpose. The Data Protection Handbook and the Group Directive Data Protection implement the legal requirements within internal processes and define internal rules for processing personal data. WE PROTECT THE DATA ENTRUSTED TO US AND IMPLEMENT THE NECESSARY TECHNICAL AND ORGANIZATIONAL MEASURES.

我们保护委托给我们的数据，并实施必要的技术和组织措施。因此，我们只根据法律收集和处理员工、客户和业务伙伴的个人数据，而不会不合理地侵犯其隐私。我们保护个人数据的保密性，仅在需要时在威能集团内部传输个人数据，以便按照其预期目的处理数据。数据保护手册和集团数据保护指令在内部流程中落实法律要求，并确定处理个人数据的内部规则。

WE PROTECT THE DATA ENTRUSTED TO US AND IMPLEMENT THE NECESSARY TECHNICAL AND ORGANIZATIONAL MEASURES.

我们保护委托给我们的数据，并实施必要的技术和组织措施。

The Vaillant Group has implemented a number of technical and organizational measures to protect data from unauthorized access, unauthorized or improper use, loss and destruction. These measures take into account the legal framework, which is also incorporated into internal directives and manuals.

威能集团已实施一系列技术和组织措施，保护数据免遭未经授权的访问、未经授权的或不当的使用、丢失和破坏。该等措施考虑了法律框架，该框架亦纳入内部指令和手册。

## ANTI-MONEY LAUNDERING 反洗钱

WE DO NOT PARTICIPATE IN MONEY LAUNDERING ACTIVITIES AND ARE COMMITTED TO PREVENTING MONEY LAUNDERING.

我们不参与洗钱活动，并致力于防止洗钱。

Money laundering generally means the processing of the proceeds of criminal activities to disguise their illegal origin and to make them appear legal.

洗钱一般是指对犯罪活动收益进行处理，以掩盖其非法来源并使其合法化。

We take all necessary measures to mitigate the risk of money laundering activities in our business operations. In the event of unusual financial transactions that may lead to a suspicion of money laundering, our employees are requested to exercise anti-money laundering due diligence on the business partner. If such due diligence cannot eliminate the suspicion, the responsible Compliance Officer must be involved. These provisions are established in internal directives regarding anti-money laundering.

我们采取一切必要措施，以降低我们业务运营中洗钱活动风险。如果发生可能导致嫌疑的异常金融交易，我们的员工需对业务伙伴进行反洗钱尽职调查。如该尽职调查不能消除怀疑，则负责的合规官须参与进来。该等规定在有关反洗钱的内部指令中确立。



## TAX COMPLIANCE 税务合规

WE FULFILL OUR TAX OBLIGATIONS AND COMPLY WITH THE TAX REGULATIONS OF EACH COUNTRY IN WHICH WE OPERATE.

我们履行我们的税务义务，并遵守我们运营所在的每个国家的税务法规。

Non-compliance with tax obligations can lead to financial risks from payments of tax arrears and fines. However, it can also result in consequences under regulatory or criminal law and long-term damages to our reputation. In order to ensure compliance with tax obligations and requirements, we have implemented a Tax Compliance Management System, particularly for VAT, which regularly monitors and constantly improves existing management and reporting processes on the basis of the continuous monitoring of changes in legislation, administrative opinions and case law.

不遵守税务义务可能会导致支付拖欠税款和罚款的财务风险。但是，这亦可能导致监管或刑法规定的后果，并对我们的声誉造成长期损害。为确保遵守税务义务和要求，我们已实施税务合规管理体系（特别是对增值税），该制度在持续监控立法变化、行政指导意见和判例法的基础上，定期监控并不断改进现有的管理和报告流程。

## FOREIGN TRADE COMPLIANCE/ EXPORT CONTROL 外贸合规/出口管制

WE OBSERVE ALL PROVISIONS OF FOREIGN TRADE LAW RESULTING FROM NATIONAL OR INTERNATIONAL LEGAL REGULATIONS APPLICABLE TO US.

我们遵守对我们适用的各国家的外贸法律或国际法律法规。

As an internationally active company, free trade in accordance with the applicable legislation is of great importance to us. Misconduct can lead to restrictions on our trade activities with third countries (e.g. by withdrawing our export privileges) as well as to fines and penalties. In our daily business – especially regarding cross-border transactions – it is therefore essential that the necessary export control checks are performed. These checks are defined in internal directives and are performed using a software module.

作为一家国际性活跃的公司，根据适用的法律进行自由贸易对我们至关重要。不当行为会限制我们与第三国的贸易活动（例如取消我们的出口特权）以及招致罚款和处罚。因此，在我们的日常业务中，尤其在跨境交易中，进行必要的出口管制核查是重要的。该等核查在内部指令中确定，并使用软件模块进行。

## CONFLICTS OF INTEREST 利益冲突

As employees of the Vaillant Group, we must not engage in any activities that constitute a conflict between our personal interests and those of the Vaillant Group. In order to avoid conflicts of interest, we disclose such circumstances at an early stage.

作为威能集团的员工，我们不得从事任何构成我们个人利益与威能集团利益相冲突的活动。为避免利益冲突，我们在早期就披露了该等情况。

In our professional activities and in business decisions, we neither pursue personal interests nor use the business opportunities of the company to our personal advantage or to the advantage of persons close to us.

在我们的职业活动和业务决策中，我们既不追求个人利益，也不利用公司的商业机会为我们的个人利益或我们身边的人带来利益。



COMPLIANCE WITH THE  
CODE OF CONDUCT  
遵守行为准则

This Code of Conduct is a central component of the Vaillant Group's Compliance Management System which is designed to ensure compliance with all applicable laws and internal directives. The Compliance Management System protects the Vaillant Group and its employees and partners from misconduct.

本行为准则是威能集团合规管理体系的核心组成部分，旨在确保遵守所有适用法律和内部指令。合规管理体系保障威能集团及其员工和合作伙伴避免做出不当行为。



## WHISTLEBLOWER SYSTEM 举报系统

If you become aware of violations of applicable law, this Code of Conduct or our internal rules and regulations, the relevant contact persons can be addressed.

如您知悉违反适用法律、本行为准则或我们的内部规则和规定的行为，您可联系有关联系人。

It is also possible to use the web-based whistleblower system of the Vaillant Group ( "BKMS" ). Via BKMS whistleblower system, (alleged) violations can be reported, anonymously or by stating a name. 您亦可使用威能集团网上举报系统 ( "BKMS" )。通过BKMS网上举报系统，可匿名或实名举报（指控的）违规行为。

The BKMS whistleblower system is available on the Internet at <https://www.bkms-system.net/vaillant>.

BKMS举报系统可于以下网址访问：

<https://www.bkms-system.net/vaillant>.

All incoming tip-offs will be treated strictly confidentially.

所有收到的举报将严格保密。

## CONTACT INFORMATION 联系信息

For further information on the Compliance Management System of the Vaillant Group, please contact the responsible Compliance Officers ([compliance@vaillant-group.com](mailto:compliance@vaillant-group.com)).

如欲获取威能集团合规管理体系的进一步信息，请联系负责的合规官 ([compliance@vaillant-group.com](mailto:compliance@vaillant-group.com))。

Vaillant GmbH Berghauser Straße 40  
42859 Remscheid [compliance@vaillant-group.com](mailto:compliance@vaillant-group.com)

威能有限公司  
德国雷姆沙伊德  
伯豪斯大街40号  
邮编 42859  
[compliance@vaillant-group.com](mailto:compliance@vaillant-group.com)



## Whistleblower System

### 举报系统

Fact Sheet

概览

With the compliance whistleblower system, all our employees, business partners and customers have access to a tool which they can use to make our Compliance team aware of potential violations of laws or internal guidelines.

通过合规举报系统，我们的所有员工、业务伙伴和客户都可以使用一种工具，使我们的合规团队了解可能违反法律或内部规定的行为。

The first points of contact for employees when reporting these kinds of violations are superiors, the person responsible for the relevant topic or the responsible Compliance Officer. Reports may be made by telephone, via email, letter or in person. In addition, violations may be reported using the web-based whistleblower system ("BKMS").

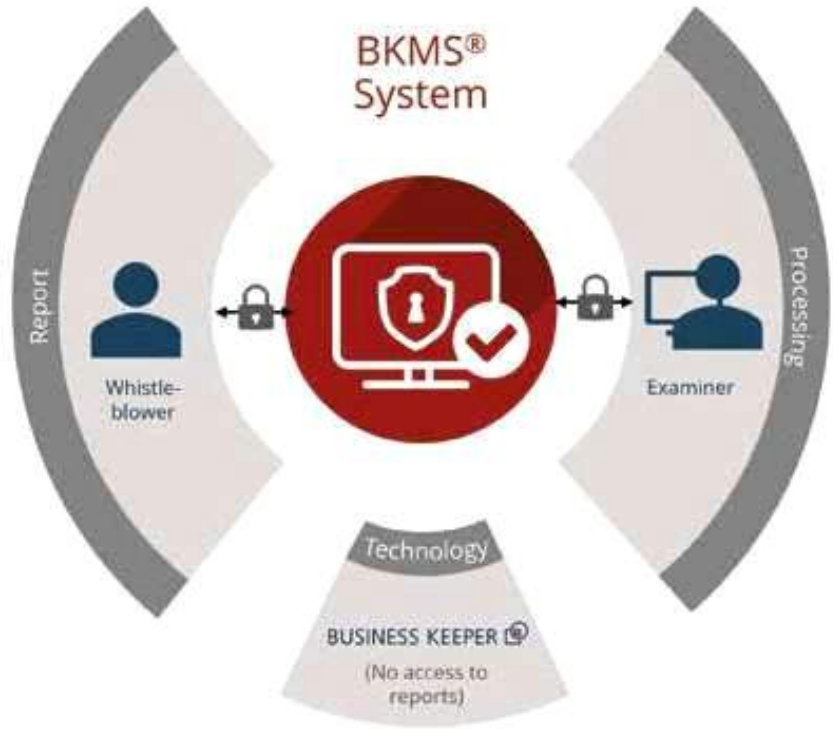
报告此类违规行为时，员工的第一联系人是上级、相关问题负责人或负责的合规官。报告可以通过电话、电子邮件、信件提交或个人亲自提交。此外，还可以使用基于网络的举报系统（“BKMS”）举报违规行为。

This online tool is an external, secured communication platform, which gives a whistleblower the opportunity to submit confidential reports to Vaillant. The system called "Business Keeper Monitoring Systems" (BKMS) enables anonymous dialog between the whistleblower and the Compliance department. It works like an electronic mailbox. The whistleblower decides whether they wish to remain anonymous or whether they wish to reveal their identity. All tip-offs are treated in strict confidence. The IT system used is certified and ensures the anonymity of the whistleblower at all times.

这个在线工具是一个外部的、安全的通信平台，它使举报人有机会向威能提交保密的报告。这个名为“业务管理员监控系统”（BKMS）的系统可以在举报人和合规部门之间进行匿名对话。它就像一个电子邮箱。举报人决定他们是否愿意保持匿名，或者他们是否愿意透露自己的身份。所有的举报都是严格保密的。这个在线工具所使用的IT系统是经过认证的，并且会确保举报人在整个过程中保持匿名。

Via BKMS a whistleblower can report potential violations, worldwide and on a 24/7 basis, as well as in several languages.

通过BKMS，举报人可以在世界各地、全天候、使用多种语言报告潜在的违规行为。



With the whistleblower system, the Vaillant Group ensures that potential deficiencies are mitigated and violations are prevented. At the same time, it ensures compliance with our values entrepreneurship, trust, integrity and passion.

通过举报系统，威能集团确保能够减少潜在的缺陷并防止违规行为。同时，它确保符合我们企业家精神、信任、诚信和激情的价值观。

Please support us in our efforts to remain a reliable business partner and successful service provider for our customers in the future by reporting violations of laws or our internal guidelines.

请支持我们通过举报违反法律或我们的内部规定的行为，尽最大的努力在未来使我们仍然是可靠的业务伙伴和成功的服务提供商来为我们的客户服务。

BKMS can be accessed using the following link: <https://www.bkms-system.net/vaillant>.

BKMS可以通过下面的链接进入：<https://www.bkms-system.net/vaillant>.

Further information on this topic can also be found on the Group Net under Knowledge/Legal & Compliance. If you have any further questions, please contact the responsible Compliance Officer.

在集团网站的知识/法律与合规版块可以找到有关这个话题的更多信息。如果您还有任何问题，请联系负责的合规官。



Anti-Corruption

反腐败

Fact Sheet

概览

Corruption may either be active, such as when a benefit is granted, or passive when a benefit is accepted. In most countries, corrupt practices are criminal offences. Benefits may be granted to or received by public officials and people in the private sector. Benefits include gifts, invitations to events or business lunches or other benefits to which the beneficiary is not entitled. In principle, benefits must comply with the following requirements, otherwise they may neither be accepted nor granted:

给予利益时，腐败以主动的形式发生；接受利益时，腐败以被动的形式发生。在大多数国家，腐败行为是刑事犯罪。国家工作人员、相关方和私营部门的人士可能被给予或接受利益。利益指受益人无权享有的礼物、活动邀请、商务餐或其他利益。原则上，利益必须符合下列要求和原则，否则不得接受或给予利益：

Dos THE FOLLOWING APPLIES:	DON'Ts THE FOLLOWING MUST AVOIDED:
<p><b>Approval and documentation principle:</b></p> <ul style="list-style-type: none"><li>- Benefits above thresholds are documented in writing and archived</li><li>- If relevant thresholds are exceeded , approval by the superior and/or the Compliance Officer is required (before the event takes place)</li><li>- Documentation and approval procedure in general via the ESS Tool;exceptions for events of Vaillant Dtl.GmbH Co.KG (Event Booking Tool)</li></ul> <p><b>Transparency principle:</b></p> <ul style="list-style-type: none"><li>- Incitations and gifts should be sent (if possible in writing) to the beneficiary's official business address</li></ul> <p><b>Principle of social adequacy:</b></p> <ul style="list-style-type: none"><li>- A benefit must be socially adequate in relation to the beneficiary's position</li><li>- Invitations should have a predominant business relation to vaillant Group and/or its products</li><li>Benefits with a low value (e.g. promotional gifts) are regularly permitted; however, pay attention with regard to public officials as lower thresholds apply!</li></ul>	<p><b>Separation principle:</b></p> <ul style="list-style-type: none"><li>- Benefits shortly before or after the conclusion of a business transaction</li></ul> <p><b>Principle of social adequacy:</b></p> <ul style="list-style-type: none"><li>- All kinds of cash gifts</li><li>- Benefits of a sexual or immoral nature</li></ul>

强制要求 须遵守以下规定：	禁止行为 须避免以下情形：
<p><b>批准及记录原则：</b></p> <p>超过一定价值的馈赠须做书面记录并存档</p>	<p><b>违反独立原则：</b></p> <p>商业交易前后短时间内发生收授馈赠的行为</p>

<p>如果价值超出一定界限，须事先取得上级和/或合规官批准（在活动进行前）</p> <p>记录和批准手续通常可使用 ESS 工具完成（Vaillant Dtl. GmbH &amp; Co. KG 公司除外，该公司使用事项登记工具 Event Booking Tool)</p> <p><b>透明原则：</b></p> <p>邀请及礼物应（尽可能以书面形式）寄至受益人的正式工作地点</p> <p><b>适度原则：</b></p> <p>馈赠价值须与受益人的职位相符</p> <p>发出的邀请必须与威能集团和/或其产品有密切关联</p> <p>价值较低的馈赠（例如促销礼品）一般是允许的；但</p> <p>请注意与国家工作人员之间的馈赠，因为法律对其价值的相关规定更加严格！</p>	<p>出于某种回报而给予馈赠</p> <p>主动要求得到馈赠</p> <p>向国家工作人员支付疏通费</p> <p><b>违反适度原则：</b></p> <p>现金形式的馈赠</p> <p>色情性质或有违道德的馈赠</p>
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If certain thresholds are reached, the benefit must be documented - in principle prior to acceptance or granting - and the approval of the superior and, if applicable, the responsible Compliance Officer must be obtained :

如果超过某一价值界限，则必须将利益记录在案，并获得上级和负责的合规官（如适用）的批准。原则上在给予和接受利益之前，必须记录并得到批准:

	BENEFITS (ACCEPTANCE & GRANTING)	
SCOPE	Senior Management (VG Management Board + M1-Level)	All other employees
PRIVATE SECTOR	≤ 150 EUR: No approval & documentation required	≤ 75 EUR: No approval & documentation required
	> 150 EUR: Approval by the Compliance Officer, documentation & information of the superior	> 75 EUR: Approval by superior & documentation
		> 150 EUR: Additional approval by the Compliance Officer & documentation
PUBLIC OFFICIALS	≤ 10 EUR: No approval & documentation required	
	> 10 EUR: Approval by superior & documentation	
	> 25 EUR: Additional approval by the Compliance Officer & documentation	

	利益（接受&给与）	
范围	高级管理层（威能集团管理委员会+ M1级别）	所有其他员工
企业 业务 伙伴	≤150欧元；无需批准与记录	≤75欧元；无需批准与记录
	>150欧元；经合规官批准，记录&经上级批准	>75欧元；经上级批准与记录
国家 工作 人员	>150欧元：经合规官额外批准&记录	
	≤10欧元：无需批准与记录	
	>10欧元：经上级批准&记录	
	>25欧元：经合规官额外批准&记录	

The Group Directive Anti-Corruption, as well as further information on the topic, is available on the Group Net under Knowledge/Legal & Compliance/Anti- Corruption.

在集团网站的知识/法律与合规/反腐败版块中可以找到集团反腐败指令以及有关这个话题的更多信息。



GROUP DIRECTIVE

ANTI-CORRUPTION

集团反腐败指令

WE PROTECT OUR COMMON VALUES

我们保护我们共同的价值观



## Objective and purpose

### 一、 目标与目的

The maintenance of existing or potential customer relationships is an essential part of the Vaillant Group's business and is imperative for the continued success of our company. It is important that the maintenance of customer relationships takes place within the lawful framework. The reason for this is that corrupt behavior can have serious consequences for companies and employees. Therefore, employees of the Vaillant Group should always be able to assess what principles need to be considered when maintaining such existing or potential relationships with private business partners and public officials. This Group Directive serves this purpose.

维护现有或潜在的客户关系是威能集团业务的一个基础部分，也是我们公司持续成功的必要条件。在法律框架内维护客户关系非常重要，因为腐败行为会给公司和员工造成严重后果。因此，威能集团的员工应始终能评估在维护与私营业务伙伴和国家工作人员的现有或潜在关系时需要考虑哪些原则。此乃本集团指令所服务的目的。

This Group Directive cannot answer every question that arises during daily work. However, it provides the main basic rules for the maintenance of business relationships with business partners, in particular with regard to granting and receiving of benefits such as invitations and gifts. It is intended to raise awareness and enable employees of the Vaillant Group to identify potential corruption issues and approval requirements and, if necessary, to obtain advice and necessary approvals from the responsible Compliance Officer.

本集团指令无法回答日常工作中出现的每一个问题。但是，它为维护与业务伙伴的业务关系提供了主要的基本规则，特别是在给予和接受诸如邀请和礼物等利益方面。它旨在增强威能集团员工的意识并使其能够识别潜在的腐败问题和明确批准要求，并在必要时从负责的合规官那里获得建议和必要的批准。

## ADDRESSEES AND SCOPE

### 二、 适用人群与范围

This Group Directive is addressed to all companies of the Vaillant Group, i.e. to Vaillant GmbH and to all companies in which Vaillant GmbH directly or indirectly holds the majority of shares or voting rights and / or controls them or can exercise a controlling influence over minority interests ("Vaillant Group"), as well as to their employees and board members ("VG employees").

本集团指令适用威能集团的所有公司，即威能有限公司和威能有限公司直接或间接持有多数股份

或投票权和/或行使控制权或可对少数股东权益施加控制性影响的所有公司（“威能集团”），以及他们的员工和董事会成员（“威能员工”）。

This Group Directive ensures a group-wide minimum standard in the Vaillant Group. If additional or deviating specific regulations are applicable or appropriate for individual countries, these can be agreed upon with the prior consent of the Chief Compliance Officer. This requires a written application by the Vaillant Group employee to the responsible Compliance Officer, who forwards it to the Chief Compliance Officer for review. If the Chief Compliance Officer approves, specific local regulations can be taken into account.

本集团指令确保了威能集团范围内的最低标准。如果附加的或背离的特殊规定适用于或适合个别国家，该等规定可在获得首席合规官事先同意的情况下获准适用。这需要威能集团员工向负责的合规官提交书面申请，由其转交首席合规官审查。如果首席合规官批准，可以考虑特殊的地方规定。

## SUMMARY

### 三、 概述

Corruption can occur either in active form when a benefit is granted or in passive form when a benefit is accepted. In most countries, these are criminal offences. Benefits can be granted to or received by public officials, related parties and persons from the private sector.

给予利益时，腐败以主动的形式发生；接受利益时，腐败以被动的形式发生。在大多数国家，这些都是刑事犯罪。国家工作人员、相关方和私营部门的人士可能被给予或接受利益。

Benefits are gifts, invitations to events or business lunches or other benefits to which the beneficiary is not entitled.

利益指受益人无权享有的礼物、活动邀请、商务餐或其他利益。

In principle, benefits must comply with the following requirements and principles, otherwise they may neither be accepted nor granted (see further details in Chapters 2 and 3 of this Group Directive):

原则上，利益必须符合下列要求和原则，否则不得接受或给予利益（详情请见本集团指令第2和第3章）：



Dos THE FOLLOWING APPLIES:	DON'Ts THE FOLLOWING MUST AVOIDED:
<p><b>Approval and documentation principle:</b></p> <ul style="list-style-type: none"><li>- Benefits above thresholds are documented in writing and archived</li><li>- If relevant thresholds are exceeded , approval by the superior and/or the Compliance Officer is required (before the event takes place)</li><li>- Documentation and approval procedure in general via the ESS Tool;exceptions for events of Vaillant Dtl.GmbH   Co.KG (Event Booking Tool)</li></ul> <p><b>Transparency principle:</b></p> <ul style="list-style-type: none"><li>- Incitations and gifts should be sent (if possible in writing) to the beneficiary's official business address</li></ul> <p><b>Principle of social adequacy:</b></p> <ul style="list-style-type: none"><li>- A benefit must be socially adequate in relation to the beneficiary's position</li><li>- Invitations should have a predominant business relation to vaillant Group and/or its products Benefits with a low value (e.g. promotional gifts) are regularly permitted; however, pay attention with regard to public officials as lower thresholds apply!</li></ul>	<p><b>Separation principle:</b></p> <ul style="list-style-type: none"><li>- Benefits shortly before or after the conclusion of a business transaction</li></ul> <p><b>Principle of social adequacy:</b></p> <ul style="list-style-type: none"><li>- All kinds of cash gifts</li><li>- Benefits of a sexual or immoral nature</li></ul>

强制要求 须遵守以下规定：	禁止行为 须避免以下情形：
<p><b>批准及记录原则：</b></p> <p>超过一定价值的馈赠须做书面记录并存档</p> <p>如果价值超出一定界限，须事先取得上级和/或合规官批准（在活动进行前）</p> <p>记录和批准手续通常可使用 ESS 工具完成（Vaillant Dtl. GmbH &amp; Co. KG 公司除外，该公司使用事项登记工具 Event Booking Tool)</p> <p><b>透明原则：</b></p> <p>邀请及礼物应（尽可能以书面形式）寄至受益人的正式工作地点</p> <p><b>适度原则：</b></p> <p>馈赠价值须与受益人的职位相符</p> <p>发出的邀请必须与威能集团和/或其产品有密切关联</p> <p>价值较低的馈赠（例如促销礼品）一般是允许的；但请留意与国家工作人员之间的馈赠，因为法律对其价值的相关规定更加严格！</p>	<p><b>违反独立原则：</b></p> <p>商业交易前后短时间内发生收授馈赠的行为</p> <p>出于某种回报而给予馈赠</p> <p>主动要求得到馈赠</p> <p>向国家工作人员支付疏通费</p> <p><b>违反适度原则：</b></p> <p>现金形式的馈赠</p> <p>色情性质或有违道德的馈赠</p>

Before a benefit is granted or accepted, it needs to be ensured that these principles are met. This applies regardless of the value of the benefit.

在给予或接受利益之前， 需要确保满足这些原则。不论利益的价值如何， 它都适用。

In case of doubt, advice must be sought from the responsible Compliance Officer. If certain thresholds are exceeded, the benefit must be documented and the approval of the superior and, if applicable, the responsible Compliance Officer must be obtained. The documentation and approval of benefits must be performed before granting and receiving of benefits.

如有疑问， 必须向负责的合规官征求意见。如果超过某一价值界限， 则必须将利益记录在案， 并获得上级和负责的合规官（如适用）的批准。在给予和接受利益之前， 必须记录并得到批准。

	BENEFITS (ACCEPTANCE & GRANTING)	
SCOPE	Senior Management (VG Management Board + M1-Level)	All other employees
PRIVATE SECTOR	≤ 150 EUR: No approval & documentation required	≤ 75 EUR: No approval & documentation required
	> 150 EUR: Approval by the Compliance Officer, documentation & information of the superior	> 75 EUR: Approval by superior & documentation
		> 150 EUR: Additional approval by the Compliance Officer & documentation
PUBLIC OFFICIALS	≤ 10 EUR: No approval & documentation required	
	> 10 EUR: Approval by superior & documentation	
	> 25 EUR: Additional approval by the Compliance Officer & documentation	

	利益（接受&给与）	
范围	高级管理层（威能集团管理委员会+ M1级别）	所有其他员工
企业 业务 伙伴	≤150欧元；无需批准与记录	
	> 150欧元；经合规官批准，记录&经上级批准	≤75欧元；无需批准与记录
		> 75欧元；经上级批准与记录
国家 工作 人员	> 150欧元： 经合规官额外批准&记录	
	≤10欧元： 无需批准与记录	
	> 10欧元： 经上级批准&记录	
	> 25欧元： 经合规官额外批准&记录	

In the event that a spontaneous invitation is issued by / to the business partner or the acceptance of a gift cannot be refused, subsequent approval shall take the place of prior approval. However, this does not replace the necessary assessment that the relevant principles (in particular the principle of social adequacy and the separation principle) are met. If these principles are not met, spontaneous benefits need to be rejected or may not be granted. Scheduled events are usually not covered by this exception.

如果无法拒绝（向）业务伙伴发出的自发邀请或接受礼物， 后续批准应取代事先批准。但是， 这并不取代需要满足相关原则（特别是适度原则和独立原则）的必要评估。如果不满足这些原则，



则需要拒绝或不可给予自发利益。此例外通常不适用于预先安排好的活动。

The thresholds mentioned above refer to the gross amount of a benefit. Frequently, the value of a benefit received is not obvious and asking a question may be perceived as impolite. In this case, the VG employee should make a realistic estimate of the value of the benefit (e.g. in the case of lunch / dinner based on the menu, in the case of a gift with the help of the Internet). Outside the euro zone, the exchange value in the respective national currency applies. The thresholds mentioned above apply per person.

上述提及的价值界限是指利益的总额。很多时候，接受的利益的价值并不明显，询问又可能会被视为不礼貌。在这种情况下，威能集团员工应对利益的价值进行实际评估（例如，如果是午餐/晚餐，可以根据菜单；如果是礼物，可以借助互联网）。在欧元区以外，适用各自国家货币的汇率。上述提及的价值界限按每人计。

EFFECTIVE DATE

四、生效日期

The Group Directive Anti-Corruption will enter into force on 01.07.2019. It replaces the Group Directive 02/2014, the framework approval on business meals with certain public sector employees by the Compliance Officer and the framework approval for one- and / or two-day factory visits and product training by the Compliance Officer. The aforementioned documents will expire at the same time.

本集团反腐败指令将于2019年7月1日生效。它取代了集团指令02/2014，合规官对与某些公职部门的员工共进商务餐的框架批准，以及合规官对为期一天和/或两天的工厂参观和产品培训的框架批准。上述文件将在同一时间失效。

In case of questions regarding the Group Directive, the responsible Compliance Officer is the first point of contact. Further information on this topic can also be found on Group Net under Legal & Compliance.

如果对集团指令有疑问，负责的合规官是第一联系人。有关这个话题的更多信息也可以在集团网站法律与合规版块找到。

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1 | GENERAL PRINCIPLES

1. 总则

1.1 | Basic information

1.1 基本信息

Corruption is attempting to obtain a material or immaterial advantage by influencing a public official or a private business partner (including managing directors, other board members, employees or agents) to which no legally justified claim exists. Influence is exerted by means of a benefit which is intended to induce the recipient to violate his obligations. Benefits are, for example, gifts, invitations to events or business lunches and other benefits to which the recipient is not entitled. Intangible benefits are also covered by this definition. Thus, corruption refers to the abuse of a position in business, administration, politics, justice or non-economic organizations.

腐败是指通过影响国家工作人员或私营业务伙伴（包括董事总经理、其他董事会成员、员工或代理人）试图获得没有合法理由主张的物质或非物质好处。影响可通过旨在诱使接受者违反其义务的利益来施加。利益是指接受者无权享有的诸如礼物、活动邀请、商务餐和其他利益。该定义也涵盖了无形利益。因此，腐败是指在商业、行政、政治、司法或非经济组织中滥用职权。

For the Vaillant Group, a good relationship to customers, suppliers and other business partners is very important. In most countries, occasional invitations, hospitality, gifts and other benefits within reasonable limits are a generally accepted means of maintaining business relationships. In order to avoid the appearance of corruption, it is essential to observe binding principles when granting benefits.

对威能集团来说，与客户、供应商和其他业务伙伴建立良好的关系是非常重要的。在大多数国家，合理范围内的偶尔邀请、款待、礼物和其他利益是维护业务关系的一种普遍被接受的方式。为避免出现腐败现象，在给予利益时遵守具有约束力的原则是非常重要的。

1.2 | Prevention of corruption

1.2 防止腐败

Preventing corruption is important for the Vaillant Group because

防止腐败对威能集团来说非常重要，因为：

-The Vaillant Group is fully committed to fulfilling and complying with legal provisions, regulatory standards and internal ethical requirements, including those relating to anti-corruption.



-威能集团完全致力于履行和遵守法律规定、监管标准和内部道德要求，包括与反腐败有关的法律法规与要求。

-The authorities may impose fines for non-compliance.

-政府机构可能会对违规行为处以罚款。

-Violations of corruption laws can result in substantial claims for damages by our customers and suppliers. The amounts to be paid often exceed the amount of the fines imposed by authorities.

-违反反腐败法会导致客户和供应商提出大量索赔。要支付的金额往往超过政府机构规定的罚款数额。

-Administrative and legal proceedings for violations of corruption laws and claims for damages by customers are cost-intensive and time-consuming and tie up valuable corporate resources.

-违反反腐败法的行政和法律程序以及客户提出的损害赔偿诉讼费高且耗时，并会占用宝贵的公司资源。

-Illegal agreements are usually null and void and unenforceable. Benefits received may have to be returned.

-违法协议通常是无效且不可执行的。可能需要退回接受的利益。

-Companies that have committed violations of corruption laws can be excluded from the award of public contracts. In addition, private customers and suppliers are increasingly demanding declarations and proof of legally compliant conduct.

-不会考虑与违反反腐败法的公司签订公共合同。此外，私营客户和供应商越来越多地要求合法合规行为的声明与证明。

-Criminal proceedings damage Vaillant Group's good reputation towards customers, suppliers, employees, investors, banks, other business partners and the public sector. As a consequence, the Vaillant Group may have considerable economic disadvantages, e.g. regarding the creditworthiness.

-刑事诉讼损害威能集团在客户、供应商、员工、投资者、银行、其他业务伙伴和公职部门中的良好声誉。因此，可能会让威能集团在经济上处于相当大的劣势，例如在信用方面。

Preventing corruption is important for employees because:

防止腐败对员工来说非常重要，因为：

-Persons who behave corruptly may be held personally liable for their actions.

-行为腐败的人需要对其行为承担个人责任。

-Sanctions, including fines, in severe cases even imprisonment and, in some cases, occupational bans are possible.

-会面临制裁，包括罚款，严重的情况下甚至监禁。在某些情况下，也可能是职业禁令。

-Vaillant Group will take appropriate disciplinary action against any employee who violates the

Vaillant Group's business principles.

-威能集团将对违反威能集团商业原则的员工采取适当的纪律处分。

-Employees can protect themselves already from the suspicion of corrupt behavior.

-员工可以保护自己免受腐败行为的嫌疑。

## 1.1 | Scope of the Group Directive

### 1.3 集团指令的范围

This Group Directive applies to relations with private business partners and public officials. However, it does not cover Vaillant Group's-internal processes. For example, the Group Directive does not apply if a Vaillant Group employee of a Vaillant Group company is invited to dinner by a Vaillant Group employee of another Vaillant Group company. In these cases, the admissibility depends on the applicable personnel and tax law principles.

本集团指令适用于与私营业务伙伴和国家工作人员的关系。但是，它不包括威能集团的内部流程。例如，如果一家威能集团公司的员工被另一家威能集团公司的员工邀请共进晚餐，则本集团指令不适用。在这些情况下，是否允许取决于适用的人员和税法原则。

Furthermore, this Group Directive does not apply to services under a customer loyalty program adopted and approved according to the applicable regulations, insofar as the business partner has demonstrably acquired claims that are quantifiable (e.g. points acquired as part of the VEP Vaillant Excellence Partner Program); because, under this authorization process, it will also be ensured that the customer loyalty program is not a form of corruption. Customer loyalty programs may therefore provide no direct benefits to specific employees or representatives of business partners. If a specific quantification of claims within the framework of the customer loyalty program is not possible, the relevant benefits must be approved (currently e.g. in the East region). In case of doubt, this must be clarified with the responsible Compliance Officer.

此外，本集团指令不适用于根据适用法规采纳和批准的客户忠诚度计划项下的服务，只要业务伙伴已明确获得可量化的要求（例如，作为VEP威能卓越伙伴计划的一部分获得的积分）；因为，在这个授权过程中，还将确保客户忠诚度计划不是腐败的一种形式。因此，客户忠诚度计划可能不会向特定员工或业务伙伴的代表提供直接利益。如果无法在客户忠诚度计划的框架内对要求进行具体的量化，则必须批准相关的利益（目前例如在东部区域）。如有疑问，必须向负责的合规官澄清。

Exceptions may also exist for benefits granted to business partners due to previous contractually agreed sales targets or bonus schemes.

由于之前的合同约定的销售目标或奖金计划而给予业务伙伴利益可能会存在例外情形。



When granting or accepting benefits, a distinction is made as follows between the private sector (business partners) and the public sector (public officials).

在给予或接受利益时，私营部门（业务伙伴）和公职部门（国家工作人员）之间的区别如下：

## 2 | RECEIVING AND GRANTING OF BENEFITS IN THE PRIVATE SECTOR

### 2. 在私营部门接受和给予利益

#### 2.1 | Principles

##### 2.1 原则

Irrespective of the value of a benefit, each benefit granted or received must be checked in accordance with the principles of social adequacy, separation and transparency (see "Do's and Don'ts", III summary). This also applies to low value or intangible benefits that are below the approval and documentation thresholds specified in this Group Directive (see overview of threshold values, III summary).

不论利益的价值如何，每一项给予或接受的利益都必须根据适度原则、独立原则和透明度原则（参见“三、概述”中的“行为准则”）加以核查。这也适用于低于本集团指令中规定的批准和记录价值界限的低价值或无形利益（参见“三、概述”中的价值界限概述）。

##### 2.1.1 | Principle of social adequacy

##### 2.1.1 适度原则

If a business partner is granted a benefit, it must be socially adequate. This applies both to the decision of whether and to whom a benefit is to be granted, as well as its frequency and its scope. In addition, the significance of the business relationship (e.g. turnover) and the position of the recipient must be taken into account when assessing the social adequacy of a benefit. There may be local differences with regard to social adequacy. It is necessary to consider what is socially accepted and customary in the particular circumstances of each case. The following requirements must be taken into account when making this assessment:

如果给予业务伙伴利益，那么它必须具备社会适当性。这既适用于是否给予利益以及向谁给予利益，也适用于其频率和范围。此外，在评估利益的社会适当性时，必须考虑业务关系（如营业额）的重要性和接受者的地位。在社会适当性方面，可能存在地方差异。在每种情况的特定情形下，有必要考虑什么是社会可接受和习惯的。在进行这项评估时，必须考虑下列各项要求：

-Invitations should generally have a predominant business relation to the Vaillant Group and / or its products. A predominant business relation can be assumed, for example, at factory visits,

trade fairs and product training courses organized by the Vaillant Group, in which the business content lasts approximately five hours per event day.

-邀请一般应与威能集团和/或其产品有重要的业务相关性。

例如，重要的业务关系可以是工厂参观、交易会 and 威能集团组织的 product 培训课程，在每个活动日其业务内容要持续约五个小时。

-Any cash or cash-like benefits, e.g. cash vouchers, are generally prohibited. Vouchers can only be benefited in justified individual cases with the prior consent of the responsible Compliance Officer. Without exception, benefits of a sexual or immoral nature are prohibited.

-一般禁止任何现金或类似现金的利益（如现金券）。只有在负责的合规官事先同意的情况下，券才能在合理的个案中接受。性或不道德的利益一律禁止。

-Recurring benefits within a shorter period (12 months), which are not critical individually, can in total exceed the appropriate limit and must therefore be considered altogether.

-在较短期间（12个月）内的经常性利益，虽然单个来说并不重要，但总额可能超过适当的限额，因此必须一并加以考虑。

-Benefits to spouses, life partners or relatives of the business partner may be socially adequate and permissible. The invitation of several family members of the business partner to a multi-day, leisure-oriented trip abroad, including First Class flight tickets, is, for example, not socially adequate. The total value must be taken into account when assessing the social adequacy of benefits paid to spouses, life partners or relatives. The proportion of the benefit paid to the spouse, life partner or relative of the business partner is to be assigned to the business partner him-/herself. The responsible Compliance Officer will be happy to assist you in checking social adequacy. If the total value of the benefit exceeds EUR 75 or EUR 150, the documentation and approval requirements must always be complied with (see 2.1.4).

-给业务伙伴的配偶、生活伴侣或亲属的利益应是具备社会适当性且被允许的。

例如，邀请业务伙伴的几位家庭成员参加为期多天的国外休闲旅行，包括头等舱机票，是不具备社会适当性的。在评估支付给配偶、生活伴侣或亲属的利益是否具备社会适当性时，必须考虑总价值。支付给业务伙伴的配偶、生活伴侣或亲属的利益比例应分配给业务伙伴本人。负责的合规官非常乐意帮助您核查社会适当性。如果利益的总价值超过75欧元或150欧元，则必须始终遵守记录和批准要求（参见2.1.4）。

-The payment of the business partner's accommodation and travel expenses may be socially adequate and permissible, in particular for events with a predominant business focus (e.g.



factory visits or product training). The respective travel policy of the Vaillant Group entity can be taken into account as a rule of thumb, in case the business partner's accommodation and travel expenses are considered to be reimbursed. The total value of the benefit must be taken into account when checking the social adequacy regarding reimbursement of accommodation and travel costs. The responsible Compliance Officer will be happy to assist you in checking social adequacy. If the benefit exceeds EUR 75 or EUR 150, the documentation and approval requirements must always be complied with (see 2.1.4).

-支付给业务伙伴的住宿费和差旅费应是具备社会适当性且被允许的，特别是主要以业务为中心的活动（如工厂参观或产品培训）。在业务伙伴的住宿费和差旅费是可以报销的情况下，可以将威能集团实体的相应差旅政策视为经验法则。在审查有关住宿费和差旅费用的报销的社会适当性时，必须考虑利益的总价值。负责的合规官非常乐意帮助您核查社会适当性。如果利益超过75欧元或150欧元，则必须始终遵守记录和批准要求（参见2.1.4）。

-In the case of invitations to events or business meals, the inviting person or a representative of the Vaillant Group should always attend.

-邀请出席活动或商务餐时，邀请人或威能集团的代表应始终出席。

-Private invitations from / to business partners who have no business reason, but a private reason, are not prohibited. However, this must not lead to circumvention of this Group Directive.

-不禁止出于私人原因而非商业理由的业务伙伴的私人邀请或对业务伙伴的私人邀请。但是，这不应作为规避本集团指令的手段。

### 2.1.2| Separation principle

#### 2.1.2 独立原则

The separation principle prohibits the establishment of a connection between a benefit and a specific business decision; even the mere appearance of a conflict of interest must be avoided. The business decision must be taken independently from any benefit. Conversely, no benefit must be granted with the intention to ensure that a particular business decision is taken. For this reason, there should be an appropriate period of time between the completion of a transaction and a benefit. Past transactions are generally not problematic.

独立原则禁止在利益和特定商业决策之间建立联系；即使只是出现利益冲突，也必须避免。商业决策的作出必须独立于任何利益。相对地，不得给予任何利益意图确保作出特定的商业决策。因此，在完成一项交易和接受一项利益之间应该有适当的时间段。过去的交易通常是没有问题的。

### 2.1.3 | Transparency principle

#### 2.1.3 透明度原则

According to the transparency principle, benefits must be disclosed, regardless of whether they are received or granted. Benefits may never be secretly received or granted. Therefore, 根据透明度原则，不论是接受还是给予利益，都必须披露利益。利益绝不能秘密地接受或给予。因此，

### 2.1.4 | Approval and documentation principle

#### 2.1.4 批准和记录原则

Provided that the principles of social adequacy, separation and transparency are met, the following applies:

如果满足了适度原则、独立原则和透明度原则，以下内容适用：

-Benefits with a value of up to EUR 75 (EUR 150 for senior management) gross per person (or equivalent value in local currency) do not need to be documented and approved.

-人均价值最高达75欧元（高级管理层150欧元）（或等值的当地货币）的利益无需记录和批准。

-Benefits exceeding EUR 75 gross per person (or equivalent value in local currency) must be documented in the ESS or event booking tool and approved by the superior. If the benefit exceeds the value of EUR 150, the approval of the responsible Compliance Officer must be obtained in addition to the approval of the superior. By observing these requirements, the approval and documentation principles are taken into account.

-人均超过75欧元（或等值的当地货币）的利益必须记录在ESS或活动预订工具中，并经上级批准。如果利益超过150欧元的价值，除了上级的批准外，还必须获得负责的合规官的批准。对这些要求的遵守考虑了批准和记录原则。

-Benefits of up to EUR 150 gross per person to / from senior management do not have to be documented and approved.

-给高级管理层或高级管理层提供的人均最高达150欧元的利益无需记录和批准。

-Benefits exceeding EUR 150 gross per person to / from senior management must be documented in the ESS or event booking tool and approved by the Compliance Officer. These requirements are taking the approval and documentation principle into account. In addition, the superior must be informed in writing of the benefit.



-给高级管理层或高级管理层提供的人均超过150欧元的利益必须记录在ESS或活动预订工具中，并经合规官的批准。这些要求考虑了批准和记录原则。此外，必须以书面形式通知上级有关利益。

-Approvals must always be obtained in advance for events and benefits that can be planned. The event must be registered in good time, ideally before inviting business partners, but at least 4 working days before the event takes place. In cases of doubt, the responsible Compliance Officer is available in order to obtain advice.

-可计划的活动和利益必须提前获得批准。活动必须及时注册，最好在邀请业务伙伴之前，但必须至少在活动开始前4个工作日。如有疑问，可向负责的合规官寻求意见。

The respective documentation and approval must always be carried out using the ESS tool (accessible via the Employee Self Service on Group Net: ESS tool /myAdmin /Recording of given and received benefits), unless special regulations apply in individual cases. Instructions on how to use the ESS tool can also be found on Group Net. In case the respective thresholds are exceeded, the approval request is automatically forwarded to the superior (> EUR 75 gross per person) and to the responsible Compliance Officer (> EUR 150 gross per person). The costs per person are relevant for this purpose and must therefore be stated. If the ESS tool is not available in individual cases, for example due to a technical malfunction, an Excel form (available on the Group Net under Knowledge/Legal&Compliance/Compliance/Anti-Corruption) must be used. The required approvals from the superior and, if necessary, from the responsible Compliance Officer need to be obtained via e-mail.

除非个别情况适用特殊规定，否则必须始终使用ESS工具（可通过集团网站的员工自助服务访问：利益给予和接受的ESS工具/myAdmin/记录）进行相应的记录和批准。如何使用ESS工具的说明也可以在集团网站找到。如果超过了相应的价值界限，批准请求将自动转发给上级（人均利益超过75欧元时）和负责的合规官（人均利益超过150欧元时）。每人的费用与此目的有关，因此必须加以说明。如果ESS工具在个别情况下不可用，例如技术故障，则必须使用Excel表格（在集团网站知识/法律与合规/合规/反腐败项版块可以找到）。需要通过电子邮件获得上级和负责的合规官（如必要）的必要批准。

A special regulation applies to customer invitations, so-called events, which are carried out by Vaillant Deutschland GmbH & Co. KG. In these cases, the event booking tool (Eventbuchungstool) must be used. Questions regarding the event booking tool can be addressed to the assistant of the Managing Director of Vaillant Deutschland GmbH & Co. KG. The same approval thresholds apply to the event booking tool. If employees of Vaillant

Deutschland GmbH & Co. KG are granting or receiving benefits which must not be recorded by the event booking tool, they must be documented and approved via the ESS tool as soon as the thresholds are exceeded.

德国威能有限公司对客户的邀请（即所谓的活动）适用一项特殊规定。在这些情况下，必须使用活动预订工具（Eventbuchungstool）。有关活动预订工具的问题可咨询德国威能有限公司的董事总经理助理。相同的批准价值界限在活动预订工具上也适用。如果德国威能有限公司的员工给予或接受活动预订工具不得记录的利益，则必须在超过价值界限时立即通过ESS工具进行记录和批准。

In case benefits are granted to spouses, life partners or relatives of a business partner, this benefit needs to be assigned to the business partner him-/herself (see. 2.1.1). In the ESS or event booking tool, the value of the benefit granted to the spouse, life partner or relative must be added to the total value of the business partner's benefit in order to maintain the correct approval workflow in the tool.

如果向业务伙伴的配偶、生活伴侣或亲属给予利益，则需要将该利益分配给业务伙伴本人（参见2.1.1）。在ESS或活动预订工具中，必须将向业务伙伴的配偶、生活伴侣或亲属给予的利益添加到业务伙伴的利益的总价值中，以便在工具中保持正确的批准流程。

Example:

例子：

A benefit must be approved by the superior and the responsible Compliance Officer if a Vaillant Group employee invites a business partner and his wife to dinner which, in total (for the business partner and his wife), exceeds EUR 150 gross.

如果一位德国威能有限公司的员工邀请一位业务伙伴及其妻子共进晚餐，总额（业务伙伴及其妻子的费用）超过150欧元，则该利益必须得到上级和负责的合规官的批准。

Upon completion of the approval process, the requesting Vaillant Group employee receives an e-mail confirming the approval or rejection of the benefit. It is the responsibility of each Vaillant Group employee to obtain approval in good time. If necessary, the Vaillant Group employee needs to work towards the approval, e.g. by promptly answering questions. Otherwise, the benefit may not be granted or accepted, except in the case of spontaneous invitations (see above page 3). If the approval has



not yet been obtained, the responsible Compliance Officer must be contacted for clarification.

在完成审批流程后，请求审批的威能集团员工将收到一封确认批准或拒绝利益的电子邮件。每位威能集团员工都有权及时获得批准。如有必要，威能集团的员工需要付出努力以获得批准，如及时回答问题。否则，除非是自发邀请（参见上文第3页），不得给予或接受利益。如果尚未获得批准，则必须联系负责的合规官进行澄清。

Receiving of benefits may result in taxable wage. The tax treatment of benefits is not covered by this Group Directive. Every employee is required to comply with any tax obligations arising from benefits.

接受利益可能导致应税工资。本集团指令不涉及利益的税收处理。每位员工都必须遵守因利益而产生的任何纳税义务。

## 2.2 | Examples of regularly permitted or not permitted benefits

### 2.2 通常允许或不允许的利益的例子

It is generally **permitted**

通常**允许**

-to offer benefits with a low value. They usually include promotional gifts such as a simple pen, a small notepad or an invitation to a cup of coffee.

-提供低价值的利益。通常包括促销礼品，如一支简单的钢笔、一个小记事本或邀请喝杯咖啡。

-to offer water, coffee and similar beverages as well as cookies to business partners during meetings or customer events.

-在会议或客户活动期间为业务伙伴提供水、咖啡和类似饮料以及饼干。

-to pay the accommodation and travel expenses of a business partner - taking into account the requirements of the respective travel policy of the Vaillant Group company  
- following an event with a predominant business relation.

-在有重要业务关系的活动之后支付业务伙伴的住宿费和差旅费-需考虑威能集团公司各自的差旅政策要求

-to make an invitation to dinner beyond the above-mentioned value limits to a managing director of a large company with which the Vaillant Group has achieved considerable sales for many years.

-向威能集团多年来已取得可观销售业绩的大公司的董事总经理发出超出上述价值限制的晚宴邀请。

-to make an invitation to a leisure-oriented event to a sole owner, possibly accompanied by the spouse.

-邀请独资所有人（可能有配偶陪同）参加以休闲为目的的活动。

Nevertheless, the above-mentioned principles must always be observed, especially with regard to documentation and approval of the benefits.

然而，必须始终遵守上述原则，特别是在利益的记录和批准方面。

It is generally **not permitted**

通常**不允许**

-to offer benefits to business partners that are closely linked to a tender procedure in which the Vaillant Group participates.

-向与威能集团参与的投标过程密切相关的业务伙伴提供利益。

-to offer invitations to a clerk of a potential customer, with whom only a small turnover is expected, and his / her entire family to a mere leisure-oriented event (e.g. tickets for a football match).

-邀请潜在客户（预计与其的营业额很小）的职员及其全家参加纯休闲活动（如足球比赛的门票）。

-to pay travel expenses of a business partner for a first class ticket and / or for a one-week holiday.

-为业务伙伴支付头等舱机票和/或一周假期的差旅费。



### 3 | RECEIVING AND GRANTING OF BENEFITS IN THE PUBLIC SECTOR

#### 3 在公职部门接受和给予利益

##### 3.1 | Definitions

##### 3.1 定义

The term “public official” must be interpreted broadly. A public official is anyone who is a civil servant or a judge, who has another official relationship under public law, or who is otherwise appointed to perform public administrative duties with or on behalf of an authority or another body. Other bodies are institutions, regardless of their organizational form, which are not public authorities but are legally authorized to participate in the implementation of laws. Private institutions and companies may also be considered if they are controlled by the state and therefore appear in an overall assessment "as an extended arm of the state".

“国家工作人员”一词应作广义解释。国家工作人员是指公务员或法官，根据公法有另一种官方关系的人员，或以其他方式被任命与政府机构或另一机构或代表政府机构或另一机构履行公共行政职责的人员。其他机构指非公共机构，但在法律上有权参与执法的机构（不论其组织形式）。私营机构和公司如果受国家控制并因此而出现在整体评估中的也可被视为“国家的一个延伸部门”。

Persons with special obligations in the public sector are also treated as public officials. They are employed by a public authority or other body, association or company performing public administrative functions. Those persons are formally obliged by law to perform their duties conscientiously. Employees of privately organized companies are also regarded as public officials, if the public sector has a majority holding in them, otherwise has control (e.g. in the case of a minority holding through veto rights) or if they overall appear as an "extended arm of the state". This must be assessed on a case-by-case basis. In case of doubt, such employees must be qualified as public officials.

在公职部门负有特殊义务的人员也被视为国家工作人员。他们受雇于公共机构或其他履行公共行政职能的机构、协会或公司。法律正式规定这些人必须认真履行其职责。如果公职部门持有私营企业的多数股份或以其他方式控股私营企业（如通过投票权持有少数股份），或私营企业整体被视为“国家的一个延伸部门”而出现，则其员工也可被视为国家工作人员。这必须根据具体情况进行评估。如有疑问，该等员工必须视作具备国家工作人员的资格。

Within the whole Vaillant Group, this definition of public official applies. Should a deviating country-specific definition and / or deviating regulations be applicable, these can be used after

prior consultation with the Chief Compliance Officer. Examples of public officials (Germany) can be found in Annex 1.

在整个威能集团内，国家工作人员的这一定义都适用。如果某一偏离的特定国家的定义和/或偏离的规定适用，可在与首席合规官协商后使用该等定义和规定。附录1中载有国家工作人员（德国）的例子。

In case of doubt regarding the official status of a beneficiary, the responsible Compliance Officer must always be consulted.

如果对受益人的公务身份有疑问，必须始终咨询负责的合规官。

##### 3.2| Narrow interpretation

##### 3.2 狭义解释

Regarding the receiving and granting of benefits in the public sector, the above-mentioned principles concerning the private sector (see Chapter 2) must also be considered, even if the benefit is minor or intangible. If these principles are violated, the benefit may not be granted.

关于在公职部门接受和给予利益，即使利益微不足道或无形，也必须考虑上述有关私营部门的原则（参见第2章）。如果违反了这些原则，则可能无法给予利益。

However, for the granting of benefits to public officials and equivalent persons, the above-mentioned principles must be interpreted even more narrowly than in the private sector, in order to grant the independence of public decisions:

但是，在给予国家工作人员和同等人员利益时，为赋予公共决策的独立性，必须对上述原则作出比私营部门更狭义的解释：

- The public official must not be personally obliged or made dependent by accepting the benefit (separation principle). Furthermore, the benefit to the public official must not constitute a consideration for an action which he performed or which he is expected to perform. Even the appearance must be avoided. If an official decision is imminent concerning the Vaillant Group, the benefit must not be granted in order to avoid the suspicion of a causality between the benefit and the official decision.

-国家工作人员不得因接受利益而负有个人义务或被依赖（独立原则）。此外，给予国家工作人员的利益不应构成其采取或期待其采取行动的对价。甚至露面也必须避免。如果即将就威能集团做出正式决定，为避免质疑利益与官方决定之间的因果关系，不得授予利益。



-In order to comply with the principle of social adequacy and the transparency principle, the thresholds for benefits to public officials are significantly lower than in the private sector. Generally, solely leisure-oriented benefits to public officials must be avoided. The responsible Compliance Officer must be contacted sufficiently ahead of time to clarify any potential exceptions.

-为遵守适度原则和透明度原则，给予国家工作人员的利益门槛明显低于私营部门。一般来说，必须避免向国家工作人员提供纯以休闲为目的的利益。必须提前联系负责的合规官，以澄清任何潜在的例外情形。

-The granting of a benefit must be made transparent and properly documented. In some cases, the benefit must be approved not only internally by Vaillant Group but also by the competent office of the public official.

-利益的给予必须透明并妥善记录。在某些情况下，利益不仅必须得到威能集团的内部批准，还必须得到国家工作人员主管办公室的批准。

-Benefits to / from public officials with a value of up to EUR 10 gross (or equivalent value in local currency) do not have to be documented in the ESS or event booking tool and do not have to be approved by the superior. This threshold corresponds to the value limit that is often set by the authorities for their employees themselves.

-给予国家工作人员或国家工作人员提供的价值最高达10欧元（或等值的当地货币）的利益无需记录在ESS或活动预订工具中，亦无需经上级批准。这个价值界限与政府机构通常为其员工设定的价值限制相对应。

-Benefits exceeding EUR 10 (or equivalent value in local currency) per person must be documented in the ESS or event booking tool and approved by the superior.

-人均超过10欧元（或等值的当地货币）的利益必须记录在ESS或活动预订工具中，并经上级批准。

-If the benefit exceeds the value of EUR 25, the approval of the responsible Compliance Officer must be obtained in addition to the approval of the superior. After consulting the responsible Compliance Officer, the Vaillant Group employee must send the invitation or the gift to the competent office of the public official in order to ask for their approval. The approval should indicate to what it refers to and that the office is authorized to give an approval.

-如果利益超过25欧元的价值，除上级的批准外，还必须获得负责的合规官的批准。在咨询了负责的合规官后，威能集团员工必须将邀请函或礼物发送到国家工作人员的主管办公室，以获得他

们的批准。批准应指明所涉事项以及该办公室授权予以批准。

-The documentation and approval must be carried out as described above using the ESS tool or, if this is not available, by using the Excel form and via e-mail (see 2.1.4). In addition, the entry "public official" must be made and the deviating thresholds mentioned above apply.

-必须使用ESS工具按照上述方式进行记录和批准。如果ESS工具不可用，则使用Excel表格并通过电子邮件进行（参见2.1.4）。此外，必须填写“国家工作人员”条目，并适用上述偏离价值界限。

-The event booking tool of Vaillant Deutschland GmbH & Co. KG must also be used accordingly for the participation of public officials in corresponding events. The extent to which it is possible to invite public officials to the event must then be clarified in each individual case with the responsible Compliance Officer. Otherwise, the ESS tool must be used.

-相应地，也必须使用德国威能有限公司的活动预订工具以便国家工作人员参加相应的活动。如果有可能邀请国家工作人员参加活动，在每个个案中必须向负责的合规官进行澄清。否则，必须使用ESS工具。

-In the case of benefits in the public sector a timely registration and approval must be ensured. Due to the possibly existing official approval requirements, this must take place before the public official is invited or a gift is granted.

-就向公职部门给予利益，必须确保及时登记和批准。由于可能存在官方批准要求，登记和批准必须在邀请国家工作人员或给予国家工作人员礼物之前进行。

### 3.3 | Examples of generally permitted or not permitted benefits to public officials

#### 3.3 通常允许或不允许给予国家工作人员利益的例子

It is generally **permitted**

通常**允许**

-to offer benefits of low value. They usually include promotional gifts such as a simple pen, a small notepad or an invitation to a cup of coffee.

-提供低价值的利益。通常包括促销礼品，如一支简单的钢笔、一个小记事本或邀请喝杯咖啡。

-to offer water, coffee and similar beverages as well as cookies to public officials during meetings or customer events.



-在会议或客户活动期间为国家工作人员提供水、咖啡和类似饮料以及饼干。

-that benefits are exceeding the thresholds mentioned above, provided the approval of the relevant authority has been obtained.

-如已取得相关政府机构的批准，则利益可超过上述价值界限。

-to make invitations to business meals to certain public sector employees (e.g. social housing), see chapter 3.4.

-向某些公职部门（如社会福利住房）员工发出商务餐邀请，参见第3.4章。

Nevertheless, the above-mentioned principles must always be observed, especially with regard to documentation and approval of the benefits.

然而，必须始终遵守上述原则，特别是在利益的记录和批准方面。

It is generally **not permitted**

通常**不允许**

-to offer benefits to public officials that are closely linked to a public tender in which the Vaillant Group participates.

-向与威能集团参与的公开招标密切相关的国家工作人员提供利益。

-to offer benefits to a "simple public official".

-向“普通国家工作人员”提供利益。

-to pay travel expenses of a public official or the invitation of relatives of the public official.

-支付国家工作人员的差旅费或邀请国家工作人员的亲属。

### 3.4| Business meals with certain public sector employees

#### 3.4 与某些公职部门员工共进商务餐

The invitation of employees of the social housing industry, project development companies or state energy suppliers to business meals is generally permitted, provided the following rules are met:

通常允许邀请社会福利住房行业、项目开发公司或国家能源供应商的员工共进商务餐，但必须符合下列规则：

-The invitation to a business meal (lunch or dinner) takes place in relation to a business meeting in which the recipient will participate or has participated. A product training, a factory visit, a sales event or the inauguration of a new Vaillant Group office are considered as equivalents to business meetings.

-商务餐（午餐或晚餐）的邀请与接受者将参加或已参加的商务会议有关。产品培训、工厂参观、销售活动或威能集团新办公室的成立都视为等同于商务会议。

-The value of a business meal granted to the recipient must not exceed EUR 40 per person.

-给予每位接受者的商务餐的价值不得超过40欧元。

-Not more than three business meals may be granted to the same recipient within a twelve month period by VG employees. No additional benefit (for instance an additional gift or extending the invitation to the recipient's spouse or life partner) may be granted to the recipient in connection with the business meal.

-威能集团员工在12个月内给予同一接受者的商务餐不得超过三次。不得给予接受者与商务餐有关的额外利益（例如额外的礼物或邀请接受者的配偶或生活伴侣）。

-Any connection between the business meal granted and a decision taken by the business partner regarding a business transaction is forbidden. If this cannot be ruled out because of a short time period between the business meal and the business decision, for example, the invitation should not be issued.

-禁止给予的商务餐与业务伙伴就商业交易作出的决定之间存在任何联系。例如，如果由于商务餐和商务决策之间的时间较短而不能排除这种可能性，则不应发出邀请。

-Prior approval has been obtained from the external company (e.g. the project development company).

-已获得外部公司（如项目开发公司）的事先批准。

-The benefit must be documented in the ESS or event booking tool and approved by the superior.

-利益必须记录在ESS或活动预订工具中，并经上级批准。

-If the benefit exceeds the thresholds mentioned above, a separate approval must be obtained from the responsible Compliance Officer.

-如果利益超过上述价值界限，则必须获得负责的合规官的单独批准。



3.5 | Differing thresholds for public officials

3.5 针对国家工作人员的不同价值界限

Differing thresholds for countries with stricter local requirements can be found in Annex 2 (currently Switzerland).

附录2列出了具有更严格当地要求的国家的不同价值界限（目前是瑞士）。

3.6 | Special regulation: Facilitation payments to public officials

3.6 特殊规定：给予国家工作人员的疏通费

Facilitation payments are small amounts of money or low-value gifts that are given to public officials to ensure the proper and, in particular, prompt issuance of official approvals to which they are entitled. Examples are customs clearances or issuing of licenses for the execution of individual business transactions or the commissioning of a production plant. The Vaillant Group does not tolerate the promotion of this practice and does not make any facilitation payments, either directly or through third parties.

疏通费是给予国家工作人员的一小笔钱或低价值礼物，以确保适当地，特别是及时地发布他们有权获得的官方批准。例如清关或为进行个人商业交易或生产工厂的调试签发许可证。威能集团不会容忍推广这种做法，亦不会直接或通过第三方支付任何疏通费。

4 | RULES FOR DONATIONS AND SPONSORING

4 捐赠与赞助规则

4.1 | Donations and social sponsoring

4.1 捐赠与社会赞助

Donations are voluntary and unpaid contributions to third parties for the promotion of initiatives, groups, projects or organizations in non-profit areas. In contrast to sponsoring, donations are based on the principle of performance without return. Non-exhaustive examples of a donation can be: Transfer of an amount of money to a kindergarten ("donation of money"), free provision of Vaillant products ("donation in kind") and free provision of an employee's work performance ("donation of services").

捐赠是自愿且无偿地向第三方提供捐款，用于推动非营利领域的倡议、团体、项目或组织。不同于赞助，捐赠基于不图回报的原则。非详尽的捐赠例子有：向幼儿园转一笔钱（“捐款”），免费提供威能产品（“实物捐赠”）以及员工做义工（“服务捐赠”）。

In case of donations, the general requirements and, if available, the local special regulations for the approval of business transactions must be taken into account, including, inter alia, the consideration of approval limits and four-eyes-principles.

捐赠时，必须考虑常规要求和批准商业交易的当地特殊规定（如有），尤其包括考虑审批额度和四眼原则。

Donations are not permitted if they constitute a criminal offence under applicable law. In particular, donations may not be offered, promised or given for the purpose of influencing the decisions of business partners or public officials, regardless of the person or organization of the recipient. There must be no compulsion to make a donation. The donation may not be made as a condition for the initiation / execution of a business transaction or the performance of an action.

如果根据适用法律构成刑事犯罪，则不允许捐赠。尤其是，不论接受者是个人还是组织，都不得为了影响业务伙伴或国家工作人员的决策而提供、承诺或给予捐赠。不得强迫进行捐赠。捐赠不得作为发起/完成商业交易或采取行动的条件。

Example of a donation that is **not permitted**:

**不允许**捐赠的例子：



*The daughter of a project manager (customer of Vaillant Group) attends the 9th grade of a grammar school in Remscheid. The project manager, who is an important decision-maker in his company for the awarding of major projects, contacts the responsible Vaillant sales representative and asks for a donation from Vaillant for the grammar school in need of renovation. Once the donation has been made by Vaillant, Vaillant is awarded the contract for the customer's major project, which had previously been put out to tender.*

项目经理（系威能集团的客户）的女儿就读于雷姆沙伊德的一所文法学校的九年级。项目经理是其公司重大项目的重要决策者，他与负责的威能销售代表联系要求威能为需要翻新的文法学校捐款。一旦威能给予捐款，威能就会获得客户重大项目的合同，而该项目威能此前已经投标。

Social sponsoring refers to all activities that deal with the donation of funds, goods and / or services by companies (sponsor) to organizations in the social and ecological sector (sponsorship recipient), in return for the granting of the rights to use the organization or its activities in its communication. The sponsoring activities are based on a contractual agreement that regularly pursues the sponsor's own (company-related) advertising or public relations objectives. As a rule, social sponsoring is, in particular, aimed at demonstrating social commitment and assuming social responsibility. In contrast to donations, sponsoring always involves an exchange of performance with return.

社会赞助指企业（赞助商）向社会和生态领域的组织（赞助接受者）捐赠资金、商品和/或服务，以换取在其传播过程中使用组织或其活动的权利的所有活动。赞助活动基于定期追求赞助商自身（与公司相关的）广告或公共关系目标的合同协议。一般来说，社会赞助尤其旨在体现社会承诺和承担社会责任。与捐赠不同，赞助总是涉及投入与回报之间的交换。

Social sponsoring includes, inter alia, the Vaillant Group's partnership with the SOS Children's Villages, according to which Vaillant Group pays a fee to use the SOS Children's Villages logo. Social sponsoring includes Vaillant Group's partnership with SOS Children's Villages. According to this partnership, Vaillant Group pays a fee to use the SOS Children's Villages logo.

Donations and social sponsoring activities exceeding EUR 5,000  
-per year or  
-per donation or social sponsoring activity

must be approved separately by Head of Sustainability Management. For this purpose, the applicant must complete the request form regarding donations and social sponsoring (see Annex 3) and send it to ([claudia.altenrath@vaillant-group.com](mailto:claudia.altenrath@vaillant-group.com)).

每年超过5000欧元的捐赠和社会赞助活动或超过5000欧元的每项捐赠或社会赞助活动必须由可持续发展管理负责人单独批准。为此，申请人必须填写有关捐赠和社会赞助的申请表（参见附录3）并将该申请表发送到[claudia.altenrath@vaillant-group.com](mailto:claudia.altenrath@vaillant-group.com)。

In case of doubt, the responsible Compliance Officer is available to answer questions regarding the admissibility of donations or social sponsoring.  
如有疑问，负责的合规官可以回答有关允许捐赠或社会赞助的问题。

In case of donations and social sponsoring activities, in addition to the requirements of this Group Directive Anti-Corruption, the locally applicable processes and requirements regarding tax and commercial law need to be taken into account. In this regard, the responsible departments are the first point of contact.

如果有捐赠和社会赞助活动，除本集团反腐败指令的要求外，还需要考虑适用于当地的有关税收和商法的流程与要求。在这方面，负责部门是第一联系人。

#### 4.2 | Other forms of sponsoring activities

#### 4.2 其他形式的赞助活动

Sponsoring is both an instrument of corporate communication and an instrument of marketing. The term sponsoring refers to the planning, organization, implementation and control of all activities that involve the provision of funds, goods and / or services by companies (sponsors) to individuals, a group of individuals or an organization (sponsorship recipient) against the granting of rights for the communicative use of individuals, organizations and / or activities of the sponsorship recipient. The sponsoring activities are based on a contractual agreement that regularly pursues the sponsor's own (company-related) advertising or public relations objectives.

赞助既是企业传播的工具，也是营销的工具。“赞助”一词是指所有活动的筹划、组织、实施和控制，该活动涉及企业（赞助商）向个人、个人群体或组织（赞助接受者）提供资金、商品和/或服务，以换取被授予交际使用个人、组织和/或赞助接受者的活动的权利。赞助活动基于定期寻求赞助商自身（与公司相关的）广告或公共关系目标的合同协议。

In addition to social sponsoring, Vaillant distinguishes between the following types of sponsoring:  
除社会赞助外，威能还区分以下类型的赞助：



1.Event sponsoring

活动赞助

These are events which are supported by cash or non-cash contributions without Vaillant itself being the organizer.

现金或非现金捐助支持的活动，而威能本身并不是组织者。

An example of event sponsoring would be the support of a golf event by Vaillant with cash benefits and the opportunity to advertise for itself during the golf event (e.g. via a banner with Vaillant logo).

活动赞助的例子：威能以现金为高尔夫赛事提供支持并获得在高尔夫赛事期间为自己做广告的机会（如通过带威能标志的横幅）。

2.Sports sponsoring

体育赞助

These sponsorships are a form of sporting commitment by companies based on contractually agreed support for individual athletes, sports teams, clubs or sporting events.

这些赞助是公司基于合同约定支持个体运动员、运动队、俱乐部或体育赛事的一种体育承诺形式。

When performing sponsoring activities, the general requirements and, if available, the local special regulations for the approval of business transactions must be taken into account, including, inter alia, the consideration of approval limits and four-eyes-principles.

在进行赞助活动时，必须考虑常规要求和批准商业交易的当地特殊规定（如有），尤其包括考虑审批额度和四眼原则。

Sponsoring activities are not permitted if they constitute a criminal offence under the applicable law. In particular, no improper motives, namely no personal preferences, may be pursued when performing sponsoring activities. Sponsoring activities may not be offered, promised or granted for the purpose of influencing the decisions of business partners or public officials, regardless of the person or organization of the recipient. There shall be no compulsion to the sponsoring activity. The sponsoring activity may not be made a condition for the initiation / execution of a business transaction or the performance of an action.

如果根据适用法律构成刑事犯罪，则不允许进行赞助活动。尤其是，在进行赞助活动时，不得追求任何不正当的动机，即不允许存在个人偏好。不论接受者是一个人还是组织，都不得为了影响业务伙伴或国家工作人员的决策而提供、承诺或给予赞助活动。不得强迫进行赞助活动。赞助活动不得作为发起/完成商业交易或采取行动的条件。

Example of a **not permitted** sponsoring activity:

**不允许**赞助活动的例子：

*The son of a project manager (customer of Vaillant Group) plays in the e-youth of FC Remscheid. The project manager, who is an important decision-maker for the awarding of major projects in his company, contacts the responsible Vaillant sales representative and asks for a sponsorship of new shirts for FC Remscheid. After Vaillant has sponsored the shirts, Vaillant is awarded the contract for the customer's major project, which had previously been put out to tender.*

项目经理（系威能集团的客户）的儿子是雷姆沙伊德足球俱乐部中的一员。项目经理是其公司重大项目的重要决策者，他与负责的威能销售代表联系要求威能为雷姆沙伊德足球俱乐部赞助新T恤。在威能公司赞助新T恤后，威能就会获得客户重大项目的合同，而该项目威能此前已经投标。

For each sponsoring activity, a documented agreement must be concluded between the sponsor and the sponsorship recipient. In addition, the costs for each sponsorship must be matched by an equivalent return. This can be the case, for example, when marketing or advertising rights are granted.

对于每一项赞助活动，必须在赞助商和赞助接受者之间签订文件协议。此外，每项赞助的成本必须与相应的回报相匹配。例如，在授予营销或广告权时，情形就可能会是这样。

Event or sports sponsoring activities exceeding EUR 25.000

-per year or

-per sponsoring activity

are to be approved separately by Director Group Marketing. For this purpose, the applicant must complete the request form for regarding sponsoring activities (see Annex 4) and send it to ([christian.sieg@vaillant-group.com](mailto:christian.sieg@vaillant-group.com)).

每年超过25000欧元的活动或体育赞助活动或超过25000欧元的每项赞助活动将由集团营销总监单独批准。为此，申请人必须填写有关赞助活动的申请表（参见附录4）并将该申请表发送到 [christian.sieg@vaillant-group.com](mailto:christian.sieg@vaillant-group.com)。

In addition, the general approval and documentation principles of this Group Directive must be complied with if, within the scope of sponsoring activities, a benefit is made to third parties (e.g. sponsoring golf event including invitation of business partners) whose per head costs exceed



the thresholds of the Group Directive Anti-Corruption (EUR 75 in the private sector or EUR 10 in case of benefits to public officials).

此外，在赞助活动范围内，如果向第三方提供利益（例如赞助高尔夫活动，包括邀请业务伙伴），且人均成本超过本集团反腐败指令的价值界限（私营部门75欧元或国家工作人员10欧元的利益），必须遵守本集团指令的一般批准和记录原则。

If further questions arise regarding sponsoring activities, the responsible Compliance Officer will be available to answer any queries.

如对赞助活动有进一步疑问，负责的合规官可以回答有关问题。

## 5 | IMPLEMENTATION OF THIS GROUP DIRECTIVE

### 5. 本集团指令的实施

The rules of this Group Directive may not be circumvented, for example by private invitations, donations or sponsoring activities, or by the involvement of third parties. The benefit may also not be concealed, for example by a consultancy or other service contract. A commercial agent may not be paid an excessive commission in order to give him the financial opportunity to make bribes. On the contrary, the Vaillant Group must ensure that its representatives do not commit corruption either.

诸如私人邀请、捐赠或赞助活动或第三方的参与等不得规避本集团指令的规则，亦不得通过咨询或其他服务合同隐藏利益。不得向商业代理人支付过高的佣金，使其具备经济上行贿的机会。相对地，威能集团必须保证其代表亦不会贪腐。

#### 5.1 | Responsibility for implementation

##### 5.1 实施责任

Each individual Vaillant Group employee is responsible for the implementation of this Group Directive. In the event of questions or doubts regarding the implementation of this Group Directive, the superior or the responsible Compliance Officer must be contacted.

每一位威能集团员工都有责任实施本集团指令。如果对本集团指令的实施有任何问题或疑问，必须联系上级或负责的合规官。

#### 5.2 | Specific local regulations

##### 5.2 特殊的地方规定

Specific local regulations may be created for individual countries with the prior consent of the Chief Compliance Officer. This requires a written application by the Vaillant Group employee to the responsible Compliance Officer, who forwards it to the Chief Compliance Officer for review. If the Chief Compliance Officer approves, specific local regulations can be taken into account. 经首席合规官事先同意，可以为个别国家制定特殊的地方规定。这需要威能集团员工向负责的合规官提交书面申请，由其转交首席合规官进行审查。如果首席合规官批准，可以考虑特殊的地方规定。



### 5.3 | Violations of this Group Directive

#### 5.3 违反本集团指令

VG employees are requested to inform the responsible Compliance Officer of suspected violations of this Group Directive or applicable local anti-corruption laws. Reports can also be submitted anonymously via the BKMS whistleblower system, which can be accessed on the Internet at (<https://www.bkms-system.net/vaillant>).

要求威能集团员工将涉嫌违反本集团指令或适用的当地反腐败法律的行为通知负责的合规官。报告也可通过BKMS举报系统匿名提交，该系统可以通过网络访问（网址：<https://www.bkms-system.net/vaillant>）。

Violations of the applicable local anti-corruption laws and / or violations of the requirements stated in this Group Directive can lead to serious consequences for VG employees, e.g. disciplinary measures, and for the Vaillant Group.

违反适用的当地反腐败法律和/或违反本集团指令中规定的要求可能会对威能集团员工和威能集团造成严重后果（如惩戒措施）。

### 5.4 | Responsibilities and further information

#### 5.4 责任与进一步信息

The Group Directive is a binding component of the Vaillant Group Compliance Management System, which is designed to ensure compliant behavior in accordance with all applicable laws and internal regulations.

本集团指令是威能集团合规管理体系中一个具有约束力的组成部分，旨在确保合规行为符合所有适用法律和内部规定。

For further information on our Compliance Management System, please contact the responsible Compliance Officer ([compliance@vaillant-group.com](mailto:compliance@vaillant-group.com)).

有关合规管理体系的更多信息，请联系负责的合规官（[compliance@vaillant-group.com](mailto:compliance@vaillant-group.com)）。

The Chief Compliance Officer is, on behalf of the Board of Management, responsible for the preparation, implementation and any changes to the Group Directive. The Chief Compliance Officer will continuously adapt the Group Directive to the legislation and regularly update it.

首席合规官代表管理委员会负责本集团指令的编制、实施和任何变更。首席合规官将不断调整本

集团指令使之与法律相适应，并定期更新。

This Group Directive may, when required, be amended from time to time to reflect changes in the organization of the Vaillant Group, to conduct editorial updates or minor process adjustments. Such amendments may be carried out by Group Compliance without further notice of the Group Managing Directors. The Managing Director Finance & Services is entitled to approve all measures in order to carry out the implementation of the Group Directive.

如有需要，本集团指令可不时修订以反映威能集团组织的变化，进行编辑更新或微小的流程调整。该等修订可由集团合规部门进行，无需另行通知集团董事总经理。财务与服务董事总经理有权批准所有措施以实施本集团指令。



6 | ANNEXES

6 附录

6.1 | Annex 1 - Examples of public officials (Germany)

6.1 附录1 国家工作人员的例子（德国）

The stricter principles set out above (see point 3 above, pp. to 27) must be observed when dealing with public officials. The following examples can be used to differentiate between public officials in Germany:

在与国家工作人员打交道时，必须遵守上述更严格的原则（参见上文第3点，第21-27页）。下列例子可用于区分德国的国家工作人员：

Public officials are usually:

国家工作人员通常为：

- President and employees of the Chamber of Crafts
- 手工艺商会会长及员工
- Employees of the technical inspection authority (“TÜV”)
- 技术检察机关（“TÜV”）的员工
- Employees of universities / colleges (e.g. professors)
- 大学/学院的员工（如教授）
- District chimney sweeper
- 区域烟囱清扫工
- Persons with dual function, even if there is no public official status in one of the functions (e.g. district chimney sweeper and state guild master of chimney sweeper North-Rhine Westfalia)
- 具有双重职能的人员，即使其中一项职能并非国家工作人员身份（如区域烟囱清扫工和北莱茵-威斯特伐利亚州烟囱清扫工行业协会会长）

Public officials maybe (individual case examination):

国家工作人员可以是（个案审查）：

- Employees of social housing companies (social housing industry and project development companies)
- 社会福利住房公司（社会福利住房行业和项目开发公司）的员工

- Employees of research institutions (for example: GWI, Kiwa Gastec, VDE, DVGW-cert, SZU, Fraunhofer Institute; in each case, if public administration tasks are performed)
- 研究机构的员工（例如GWI、Kiwa Gastec、VDE、DVGW-cert、SZU、弗劳恩霍夫研究所；在每种情况下，如果执行了公共管理任务）
- Employees of associations (in each case, if public administration tasks are performed)
- 协会的员工（在每种情况下，如果执行了公共管理任务）
- Employees of guilds (as far as corporations under public law are concerned; if applicable also individual regional associations of the SHK)
- 行会的员工（就公法下的公司而言，也适用于SHK的个别地区协会）
- Employees of municipal energy suppliers (e.g. public utilities) or of state-controlled energy suppliers
- 市政能源供应商（如公共事业）或国家控制的能源供应商的员工

Usually, public officials are not:

通常，国家工作人员不是：

- State Guild Master Sanitary and Heating NRW (state guild organized under private law)
- 北莱茵-威斯特伐利亚州卫生和供热行会会长（根据私法而组织的国家行会）
- Managing Director of the “Fachverband Heizung und Sanitär NRW” (Heating and Sanitary Association NRW)
- 北莱茵-威斯特伐利亚州供暖和卫生协会的董事总经理

Insofar as persons exercise a dual function (e.g. district chimney sweepers and state guild master of chimney sweepers NRW), they are generally to be classified as public officials, at least as far as the focus of the activity lies there. In case of doubt, a case-by-case assessment must always be carried out.

对行使双重职能的人员而言（如区域烟囱清扫工和北莱茵-威斯特伐利亚州烟囱清扫工行业协会会长），一般将他们归类为国家工作人员，至少就活动的重点而言是如此。如有疑问，必须进行个案评估。

In the event of queries and in cases of doubt, the responsible Compliance Officer must always be contacted.

如需询问或如有疑问，请务必联系负责的合规官。



**6.2 | Annex 2 - Differing thresholds / Specific local regulations**

**6.2 附录2 不同的价值界限/特殊的地方规定**

Switzerland:

瑞士：

Due to stricter legislation in Switzerland, the Vaillant Group defines deviating thresholds for benefits to Swiss public officials in the following.

由于瑞士的立法更加严格，威能集团在下文为瑞士国家工作人员的利益定义了不同的价值界限。

All gifts to Swiss public officials are forbidden and cannot be approved.

所有给瑞士国家工作人员的礼物都是禁止的，亦无法得到批准。

Catering or refreshments for Swiss public officials below a total value of EUR 5 are allowed and do not require approval. Otherwise, the approval requirements for public officials stipulated in this Group Directive (in particular approval of the public official's office respectively the substitute defined in writing by the responsible Compliance Officer) apply.

允许为瑞士国家工作人员提供总价值低于5欧元的餐饮或点心，且无需经过审批。否则，适用本集团指令中规定的对国家工作人员的审批要求（特别是负责的合规官书面定义的国家工作人员办公室的批准）。

**6. 3| Annex 3 - Request form for donations or social sponsoring**

**6.3 附录3 捐赠或社会赞助的申请表**



**6.4| Annex 4 – Request form for sponsoring activities**

**6.4 附录4 赞助活动的申请表**



## CONTACT

### 联系方式

If you have further questions, please contact the responsible Compliance Officer or the Head of Group Compliance.

如果您有任何疑问，请联系

负责的合规官或集团合规负责人。

Vaillant Group

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