

Group Guideline No. 5: Whistleblowing

Procedure for Brose Sitech Group Companies

集团第5号指南：Brose Sitech集团公司举报程序

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1. Definitions 定义

Capitalized terms in the Guideline have the following meanings:

本指南中的术语具有如下含义：

Compliance Officer	The person entrusted with the duties of Compliance Officer in accordance with the Brose Sitech Group's Compliance Policy;根据“Brose Sitech集团合规政策”，被受托履行合规官职责的人员；
Retaliatory Actions	Direct or indirect acts or omissions in a work-related context that (i) infringe or may infringe the rights of the Whistleblower, Persons Assisting the Whistleblower in Making the Report or Persons Related to the Whistleblower or (ii) cause or may cause unjustified damage to the persons indicated above;在工作相关环境中的直接或间接行为或疏忽：(i) 侵犯或可能侵犯举报人、协助举报者及举报人相关人的权益，或 (ii) 对上述人员造成或可能造成不合理损害；
Brose Sitech Group	For the purposes of this guideline, “Brose Sitech Group” shall mean: Brose Sitech sp. z o.o. and other entities for which this Company is the parent company (subsidiaries), i.e. those in which it holds directly or indirectly all of shares in the share capital;在本指南中，「Brose Sitech Group」是指: Brose Sitech sp. z o. o. 以及该公司作为母公司（子公司）的其他实体，即该公司直接或间接持有其全部股本股份的实体。
Brose Sitech集团	
Violation	An actual or potential breach or abuse that may be the subject of a Report, as further defined in Chapter 3 of the Guideline;是指可能成为举报对象的实际或潜在违规或滥用行为，具体定义参见指南第3章；
Persons Assisting in Making the Report	An individual who assists a Whistleblower with a Report and whose assistance should not be disclosed;是指协助举报人进行举报且其协助情况应保密的个人；
Associated Person of the Whistleblower	An individual who is likely to experience Retaliatory Actions, including a co-worker or next of kin of the Whistleblower, i.e., a spouse, ascendant, descendant, sibling, relative in the same line or degree, a person in an adoption relationship and their spouse, and a person in cohabitation;可能遭受报复行为的个人，包括举报人的同事、近亲属，即配偶、长辈、后代、兄弟姐妹、直系或旁系亲属、收养关系人及其配偶，以及同居者；
Guideline	This Whistleblowing Guideline for the Companies in the Brose Sitech Group;是指本Brose Sitech集团公司举报指南；
指南	

Receiver of the Report	The person responsible for receiving Report and for taking other actions in accordance with the Guideline, appointed in accordance with Chapter 5;
举报受理人	根据第5章指定的, 负责受理举报并按指南采取其他行动的人员;
Parent Company 母公司	Brose Sitech sp. z o.o. with its registered office in Polkowice; 注册办事处位于波尔科维采的Brose Sitech Sp. z o.o.;
Company 公司	Any company forming part of the Brose Sitech Group, i.e. the Parent Company and each of its subsidiaries; 是指构成Brose Sitech集团组成部分的任何公司, 即母公司及其各子公司;
Whistleblower 举报人	The individual making the Report; 提交举报的个人;
Whistleblowing System 举报系统	All available channels for Whistleblowers to report Violations including: email and Anonymous Whistleblowing System; 所有举报人举报违规可使用的渠道包括: 邮件和匿名举报系统
Anonymous Whistleblowing System 匿名举报系统	An internal system available on the Company's website that allows Whistleblowers from inside as well as outside the Brose Sitech Group to anonymously report Violations both electronically and via a telephone line; 公司网站上提供的一个内部系统, 可供博泽西德科内外部的举报人通过电子和电话线路两种方式进行匿名举报
Designated Management Board Member 指定管理委员会成员	Chief of the Parent Company's Management Board responsible for overseeing the Compliance Officer; 母公司管理委员会主席, 负责监督合规官;
Member of the Management Board for Compliance Violations 合规部门违规管理委员会成员	Member of the Management Board for Human Resources responsible for taking Violation Reports relating to the Compliance department; 由人力资源管理委员会成员组成, 负责处理涉及合规部门的违规举报;
Report 举报	Information on a Violation, obtained in connection with the work, provided by the Whistleblower in accordance with the Guideline. 举报人依据本指南提供的, 与工作相关的违规信息。

2. Principles and purpose of the Guideline 指南的原则与宗旨

1. Compliance with statutory provisions and accepted standards (*Compliance*) are fundamental principles of our Company and are given absolute priority. They form the basis for a high market position, trust among customers and business partners, employee welfare and sustainable business success.

遵守法律法规和公认标准（“合规”）是本公司基本原则，也是本公司绝对优先考虑的事项。这些原则构成了我们赢得市场尊重、客户与业务伙伴信任、员工福祉及企业持续繁荣的基石。

The Brose Sitech Group places its trust in all its employees. It expects them to be guided by ethical principles in their actions, in particular to conduct themselves in an impeccable manner, to fulfil their obligations under their employment contracts, to treat each other and their customers and business partners fairly, to comply with the laws and rules of the Brose Sitech Group as well as the general rules of conduct required by business partners in accordance with the provisions of their contracts. Management is expected to be a model of good conduct. Brose Sitech集团信任其每位员工。我们期望员工在行动中秉持道德准则，特别是以无可挑剔的方式履行职责，遵守雇佣合同规定的义务，公平对待同事、客户及业务伙伴，遵循法律、Brose Sitech集团的规章制度以及业务伙伴根据合同规定要求的一般行为准则。管理层应树立良好行为的典范。

Any Violations will not be tolerated. It is imperative that all employees are vigilant and ready in the event of a concrete suspicion to signal Violations and that Reports are dealt with efficiently and objectively.

我们对任何违规行为零容忍。所有员工均需保持高度警觉，一旦发现可疑情况，应立即发出违规预警，并确保对举报的处理既高效又客观。

2. With this in mind, this Guideline shall be implemented to regulate the reporting of Violations and the management of such Reports.
鉴于此，本指南旨在规范违规行为的举报流程及其管理。
3. The Guideline shall apply in each Company.
本指南适用于集团的每一家公司。

3. **Violations** 违规行为

1. Violations within the meaning of this Guideline are actual or potential violations or abuses of the law (including suspicions), the Brose Sitech Group's and the Companies' corporate rules, procedures, policies, standards, as well as general rules of conduct required by business partners in accordance with contractual provisions. Violations are also situations of dereliction of duty, abuse of authority, breach of precaution, the commission of a criminal offence, misconduct, harassment, discrimination or other undesirable behaviour.
本指南所界定的违规行为涵盖了实际或潜在的违反或滥用法律（含可疑行为）、违背Brose Sitech集团及各公司规定、程序、政策、标准，以及合作伙伴根据合同规定所要求的一般行为准则等行为。此外，违规行为还包括玩忽职守、滥用职权、违反预防措施、实施刑事犯罪、不当行为、骚扰、歧视或其他不良行为。
2. A suspected or potential Violation occurs if there are sufficient factual indications that a breach of the applicable rules may have occurred.
如有充分事实依据表明可能发生了违反相关规定的行时，即视为涉嫌或潜在违规行为。
3. A Violation will be, in particular, any breach of the rules:
违规行为尤其是指以下行为：

- damaging to a serious degree the interests of the Brose Sitech Group or any of the Companies, in particular interests relating to reputation and image or financial interests, or
严重损害Brose Sitech集团或其任何公司的利益，无论是关乎声誉、形象还是财务利益，或
- seriously damaging the fundamental ethical principles applicable to the Brose Sitech Group.
严重违背Brose Sitech集团基本道德原则。

Examples of events that may in principle qualify as Violations within the meaning of the Guideline are:

以下是一些可能构成本指南下违规行为的示例：

- economic, corruption and tax offences;
经济、腐败及税务相关犯罪；
- environmental offences;
环境犯罪；
- human rights violations (e.g. prohibition of child labour);
侵犯人权行为（如非法使用童工）；
- violation of labour rights;
劳工权益侵害；
- violations of anti-cartel and competition laws;
反卡特尔法与竞争法的违反；
- money laundering and terrorist financing;
洗钱及资助恐怖主义活动；
- violations of product safety and permitting regulations;
产品安全及许可法的违反；
- material breaches of health and safety legislation;
严重违反健康与安全法律；
- material breaches of data protection law;
严重违反数据保护法；
- a circumstance giving rise to a high risk of sanctions in connection with a material breach of the rules (e.g. fines and fees, exclusion from transactions with state bodies and authorities, loss of licences for activities requiring authorisation).
因严重违反规定而极可能遭受的制裁的情形（如罚款和费用支出、被禁止与政府机关及当局交易、授权活动的执照被吊销等）；
- violations of laws prohibiting discrimination against Whistleblowers;
违反禁止歧视举报人的法律；
- abuse of the Whistleblowing System through intentional false blaming against reasonable judgment;
基于不合理判断滥用举报系统，故意捏造事实诬告他人；

4. Scope of application

适用范围

1. The Guideline sets out the rules for the acceptance and follow-up of Reports.
本指南详细规定了举报的受理和跟踪流程。
2. A Whistleblower may be, in particular:
举报人包括，特别是：
 - a) any employee or collaborator;
任何雇员或合作伙伴；
 - b) a temporary employee;
临时雇员；
 - c) a proxy;
代理人；
 - d) a member of a body;
机构成员；
 - e) an intern, volunteer, trainee;
实习生、志愿者及见习生；
 - f) as well as any other person, including those outside the organisational structure of the Brose Sitech Group and the Companies, who becomes aware or suspects that a Violation has occurred.
以及其他任何人，包括 Brose Sitech 集团和公司组织结构之外的人员，只要其发现或怀疑有违规行为发生。
3. Reports of Violations of which the Whistleblower has received information without any work-related connection will be dealt with in accordance with the Guideline with appropriate application of the provisions of the Procedure with regard to the receipt of Reports and follow-up.
对于举报人收到的与工作无直接关联的违规举报，将同样根据本指南处理，并适当引用指南中关于受理举报及后续行动的相关规定。
4. The Compliance Officer shall ensure that any employee or associate of the Brose Sitech Group is informed of the possibility and rules for making Reports in accordance with the Guideline.
合规官需确保 Brose Sitech 集团全体员工或相关人员了解依据本指南提交举报的可能性及规则。
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5. Any person applying to perform work on the basis of an employment relationship or any other legal relationship giving rise to the provision of work or services shall be informed of the Guideline by each Company at the commencement of recruitment or pre-contractual negotiations.
在招聘流程启动或合同谈判初期，各公司应将本指南明确告知所有基于雇佣关系或任何其他提供工作及服务的法律关系而申请加入的求职者。

5. Receiver of the Report

举报受理人

1. The Compliance Officer of the Brose Sitech Group is the Receiver of the Report.
Brose Sitech 集团合规官是所有举报的受理人。
2. The Compliance Officer may delegate the tasks arising from the Procedure to a person designated by him or her in the relevant Company and to the extent indicated by him or her. In such a case, the duties of the Receiver of the Report, as defined in the Procedure, shall be performed by this person, unless the Procedure expressly provides otherwise.
合规官有权在其指定的范围内，将程序规定的任务委托给其在相关公司内指定的人员。在此情况下，除非程序另有明确规定，否则程序中规定的举报受理人职责应由该受托人员履行。
3. Direct supervision of the performance of the duties of the Receiver of the Report under the Procedure shall be exercised:
举报受理人职责的履行情况将根据程序进行直接监督：
 - a) with respect to the Compliance Officer: Designated Management Board Member;
指定管理委员会成员对合规官进行监督；
 - b) with respect to the person to whom the Compliance Officer has delegated the tasks of the Receiver of the Report: Compliance Officer.
对于受合规官委托执行举报受理任务的人员，则由合规官负责监督。
4. In the event of prolonged absence of the Receiver of the Report or other impediments to the performance of this function, the person authorised to supervise the Receiver of the Report shall appoint a substitute.
若举报受理人长期缺席或在履行职务时遇到其他障碍，其直接监督者应迅速指定一名替代者。
5. With regard to Reports relating to the Compliance Officer, the duties of the Receiver of the Report arising from the Guideline shall be applied accordingly by the Member of the Management Board for Compliance Violations.
对于涉及合规官的举报，合规部门违规管理委员会成员应根据指南要求履行举报受理人职责。

6. Rules for the acceptance of Reports

接受举报的规则

1. Submissions can be made anonymously. It is up to the Whistleblower whether they choose to disclose their personal data.
我们接受匿名举报，举报人可自行决定是否公开其个人信息。
2. Reporting may be done by the following means of communication:
举报可通过以下方式提交：
 - a) By email sent to: compliance@brose-sitech.com, received by the Compliance Officer;
发送电子邮件至：compliance@brose-sitech.com，由合规官直接受理；
 - b) Through the Anonymous Whistleblowing System for electronic reporting of Violations, available at: <https://report.whistleb.com/zh/brose-sitech>;
通过匿名举报系统电子举报违规，访问网址：<https://report.whistleb.com/zh/brose-sitech>；

c) Orally:

口头举报:

- i. by telephone: via the telephone answering service provided by the Anonymous Whistleblowing System at telephone number: 400-120-3520

通过电话: 通过匿名举报系统提供的电话应答服务, 电话号码: 400-120-3520

- ii. in the course of a meeting with the Receiver of the Report (in person or by videoconference), with the Whistleblower having the right to request an in-person meeting to be held within 14 days of receipt of the request.

举报人可选择与举报受理人会谈（现场或视频会议），并有权要求在收到请求后的 14 天内安排面谈。

3. Only the Compliance Officer has access to Reports transmitted via the Whistleblowing System, except where a Report relates to a Compliance Officer (option: 'Violations of the Compliance Department') - such a Report is received only by the Member of the Management Board for Compliance Violations excluding the Compliance Officer.

仅合规官有权查阅通过举报系统提交的举报, 但举报内容涉及合规官自身时除外（选项: “合规部门违规行为”），此时举报将转交至合规部门违规管理委员会成员（排除合规官）处理。

4. Reports received by the Compliance Officer shall be forwarded to the person to whom the Compliance Officer has delegated the tasks of the Receiver of the Report, unless the Report relates to that person or there are other grounds for follow-up by the Compliance Officer to the exclusion of that person.

合规官受理的举报需转交给其授权处理此类举报的人员, 除非举报与该人员直接相关或合规官有其他合理的理由采取后续行动, 将该人员排除在外。

5. The person who accepts a Report made verbally shall document its course in the form of a record of the conversation drawn up by him/her, reproducing its exact course. Irrespective of the form of the oral notification, the Signatory has the right to verify, correct and approve the minutes of the conversation by signing them.

对于口头举报, 受理人需将谈话过程记录在案, 并确保记录无误。无论口头举报的采取何种形式, 签字人都有权签字核实、更正并批准该谈话记录。

6. Where a face-to-face meeting takes place at the request of the Whistleblower, a searchable recording of the conversation may take place with the Whistleblower's consent.

若应举报人要求安排面对面会谈, 且经举报人同意, 会谈内容可进行录音以备检索。

7. The Receiver of the Report shall, within 7 days of the Report being made, confirm to the Whistleblower the acceptance of the Report, unless the transmission of the confirmation is not possible due to the lack of contact details of the Whistleblower.

举报受理人应在收到举报后 7 天内向举报人确认举报已受理, 除非因缺乏举报人的详细联系方式而无法发送确认信息。

8. The Report, depending on the knowledge held by the Whistleblower, may include, inter alia:
举报内容可根据举报人掌握的情况, 包含以下信息:

- a) the details of the Whistleblower (name, surname, department in which he/she works), if the Report is not anonymous;

非匿名举报人的详细信息（姓名、工作部门）;

- b) the date and time of the detection of the Violation;

违规行为发生的日期和时间;

c) the date and time of the occurrence of the Violation or the period of time over which the Violation occurred;

违规行为发生的日期和时间或违规行为发生的期间;

d) a description of the circumstances of the Violation, including the identity of the person who contributed to the Violation;

对违规行为的描述，包括涉嫌协助违规者的身份;

e) identification of other persons who may have knowledge of the Violation;

可能了解违规情况的其他人员身份;

f) as far as the information is available, a description of the effects / consequences of the Violation.

基于现有信息，说明违规行为的影响或后果。

9. Submission of a Report without the complete information referred to above shall not exclude the obligation to take action with respect to the Report under the Guideline.
即便提交的举报未包含上述全部信息，也不妨碍我们依据本指南对举报采取相应行动。

7. **Follow-up actions**

后续行动

1. Follow-up of the Report shall include:
举报的后续处理行动应包括:
 - a) preliminary qualification of the Report;
对举报进行初步定性;
 - b) the investigation; and
开展调查；及
 - c) if necessary: further follow-up to the Report as a result of the investigation, in particular decisions on the scope of corrective, preventive or offensive actions and their implementation.
如有必要：根据调查结果进一步采取行动，特别是决定纠正、预防或处罚措施的范围及其实施。
2. The entities authorised and required to take follow-up action are:
负责授权并需要后续行动的实体为:
 - a) with regard to the initial qualification of the Report and the conduct of investigations: The Receiver of the Report;
举报的初步定性及调查工作：由举报受理人负责；
 - b) as regards further follow-up: The Management Boards of the Companies to which the recommendations of the Receiver of the Report to take these actions are addressed;
进一步的后续行动：由举报受理人提交至采取相关行动的公司管理委员会负责解决；

8. **Preliminary classification of the Report**

举报的初步分类

1. As part of the preliminary classification of the Report, the Receiver of the Report shall assess it as:

作为举报初步分类的一环，举报受理人应对其进行评估，判定：

- a) not involving a Violation,
不涉及违规行为，
- b) potentially related to the Violation.
可能涉及违规行为。

2. Where the Report does not relate to the Violation, the Receiver of the Report may decide to:

若举报不涉及违规行为，举报受理人可决定：

- a) to close the Reporting;
关闭举报；
- b) to forward the Report to the relevant Company or business unit within the Brose Sitech Group for further analysis within its competence;
转交举报至 Brose Sitech 集团内相应公司或业务部门，以便在其职责范围内进一步分析；
- c) to refer the Report for investigation under the terms of the Guideline if there is a particularly important interest of the Company concerned or of the Brose Sitech Group in doing so.
若涉及有关公司或 Brose Sitech 集团特别重大的利益，则将举报依据指南条款提交调查。

3. If the Report potentially concerns a Violation, the Receiver of the Report shall initiate an investigation.

若举报可能涉及违规行为，则举报受理人应立即启动调查程序。

9. Investigation: General principles and safeguards

调查：一般原则与保障措施

The following principles and safeguards shall be observed at every stage of the investigation:

在调查的每一阶段，均应恪守以下原则与保障措施：

1. All activities undertaken in the investigation shall be conducted with due regard to the principles of fair and equitable conduct. Persons concerned by the Report and witnesses and other persons providing information shall be treated fairly and with respect.
所有调查活动均应适当遵循公正、公平原则，确保举报涉及人员、证人及其他信息提供者受到公平对待与尊重。
2. The investigation shall be conducted in a neutral and objective manner, respecting the principle of the presumption of innocence. Both evidence incriminating the person concerned by the Report and evidence that may exonerate him/her shall be examined. A key purpose of the investigation is to objectively determine whether a Violation has occurred.
调查应秉持中立立场，以客观的方式进行，遵守无罪推定原则，既要审查对举报所涉人员不利的证据，也要审查可证明其无罪的证据。调查的一个主要目的是客观判定是否发生违规行为。
3. The investigation shall not be limited to the scope of the events described in the Report itself.
调查范围不应局限于举报本身所描述的事件。
4. Investigations shall be carried out in accordance with the principle of proportionality, i.e. they must be appropriate, necessary and relevant to the purpose of the investigation.
调查应根据相称性原则进行，即调查必须适当、必要且与调查目的相关。

5. Persons concerned by a Report in the course of investigations will be informed of the proceedings in their case as soon as and insofar as this does not endanger the object of the proceedings and the achievement of their objectives.
在调查过程中,只要不损害调查目的及其目标的实现,应尽快向举报涉及人员通报其案件调查进展。
6. Persons concerned by the Report will be given the opportunity to comment on the findings of the investigation at the latest before the conclusion of the proceedings.
最迟在调查程序结束前,举报涉及人员应有机会就调查结果发表意见。
7. If the investigation shows at an early stage that no Violation has been identified, the Report may then be closed and the person concerned by the Report will not be informed or given the opportunity to comment.
但若调查早期发现不存在违规行为,则举报可结案,无需告知举报所涉人员或向其提供发表意见的机会。
8. Upon completion of the investigation, the Receiver of the Report will ensure that the persons found to be in breach of the Code of Conduct are duly informed.
调查结束后,举报受理人应确保违反行为准则的人员收到适当通知。
9. Persons in respect of whom the investigation has not revealed a breach of the rules qualifying as a Violation shall be informed thereof.
调查未发现违规者,无需告知其被误指违规的情况。
10. Informing the persons referred to in points 6, 8 and 9 shall not take place if the interests of the investigation could be prejudiced thereby, in particular if this could endanger the effective clarification of all the circumstances, the implementation of preventive, corrective and disciplinary measures or the conduct of proceedings by competent authorities or courts that could be initiated after the investigation has been completed.
若第6点、第8点和第9点所述人员的利益可能因调查受到损害,特别是可能危及有效澄清所有情况、执行预防、纠正和纪律措施或主管当局或法院在调查结束后可能启动的诉讼程序,则不应将情况通报所涉及的人员。
11. The Receiver of the Report and any other person involved in the investigation is obliged to treat the information obtained within the framework of the Report as information of the highest degree of confidentiality. This applies in particular to the personal data of the Whistleblower and the person concerned by a Report, as well as to the course of the investigation and the findings therein. Informing other persons within the scope of the investigation may only take place on an absolute need-to-know basis, within the limits justified by the law.
举报受理人及参与调查的任何其他人都有义务将在举报框架内获得的信息视为最高保密级别的信息,特别是举报人及举报所涉人员的个人信息、调查过程及结果。只有在绝对有必要知悉的情况下,方可再法律允许范围内向调查相关人员透露。
12. The decision as to whether Reports will be investigated and whether consequences, including disciplinary action, will be taken if a Violation is found is not a matter of discretion, but an objective recommendation supported by the evidence.
至于是否调查举报以及发现违规后是否采取包括纪律处分在内的措施,应基于证据支持的客观建议,而非自由裁量。
13. If, as a result of the investigation, no Violation is found to have occurred, the person concerned by the Report will, at his or her request, be given appropriate support by the Receiver of the

Report in explaining the situation in a suitable and appropriate form within his or her immediate working environment to prevent reputational damage. In such a situation, the reported person shall decide in particular whether his or her supervisor is to be informed, if he or she has not previously obtained knowledge of the situation. At the request of the person concerned by the Report, his/her supervisor or another member of management will clearly explain and confirm that the person concerned by the Report has been wrongly suspected of Violation.

若调查确认未发现任何违规行为，则应被举报人的要求，举报受理人将向其提供适当的支持，在其直接工作环境中以适当方式解释有关情况，以避免其声誉受损。在这种情况下，如果被举报人的上司事先不了解情况，被举报人应特别决定是否通知其上司。在被举报人的要求下，其上司或其他管理人员应明确解释并确认被举报人被错误地怀疑有违规行为。

14. Restricting or interfering with the investigation of the Violation, in particular influencing witnesses and withholding or tampering with documentation or other evidence, is not acceptable and will also be considered a breach of the Code of Conduct and possibly subject to liability, including disciplinary action.

任何限制或干扰调查的行为，尤其是影响证人、扣留或篡改文件或其他证据，均不可接受，也将被视为违反行为准则，并可能被追究责任（包括纪律处分）。

10. The conduct of the investigation

调查的进行

1. The conduct of the investigation shall consist in taking measures adapted to the nature and circumstances of the reported Violation. To this end, the Receiver of the Report shall in particular:

调查工作需根据所举报违规行为的性质与情节，采取相应措施。为此，举报受理人尤其应：

- a) Analyse the Report for plausibility, in particular to determine whether an event covered by the Report has occurred or whether the Report is unfounded or unsubstantiated (which includes signals that are a manifest error, arising from a desire to start a dispute or quarrel);
分析举报的可信度，特别是确认举报所涉及的事件是否真实发生，或举报是否存在毫无根据或未经证实的成分（包括因纠纷或争执而给出的明显错误的信息）；
- b) clarify the circumstances of the incident and its actual and potential consequences;
阐明事件的情况及其实际和潜在后果；
- c) secure any material that may provide evidence of the occurrence of the Violation;
保护所有可能作为违规行为证据的材料；
- d) if necessary, informs about the Report or consults the circumstances described therein with the Designated Member of the Management Board, including with a view to enabling the involvement in the investigation of specialists (auditors) from the chosen field whose participation will guarantee a reliable assessment of the reported Violation;
如有必要，向管理委员会指定成员通报举报内容或咨询举报中描述的情况，包括让所选领域的专家（审计员）参与调查，从而确保对所举报的违规行为进行可靠的评估；
- e) if necessary, makes contact with the Whistleblower to obtain additional information;
如有必要，与举报人沟通，以获取更多信息；
- f) assesses, as far as possible, the impact of the Violation on the Brose Sitech Group's and the Companies' activities and the appropriateness of remedial, corrective and disciplinary measures;
尽可能评估违规行为对 Brose Sitech 集团及公司活动的影响，以及补救、纠正和惩戒措施的适宜性；
- g) is entitled to request information, data, explanations and documents from the employees and associates of each Company;

有权要求各公司员工及相关人员提供信息、数据、解释和文件;

h) document the course and outcome of the investigation and archive the materials and documents collected in the course of the investigation.

记录调查全过程及结果，并将调查过程中收集的材料与文件归档保存。

2. All employees and associates are obliged to cooperate with the Receiver of the Report, including providing him without delay with all necessary information and handing over documents and information carriers and data indicated by him.

所有员工及相关人员均有义务配合举报受理人，包括即时提供所有必要信息，并移交指定文件、信息载体及数据。

3. Upon completion of the investigation, the Receiver of the Report shall prepare a summary report containing:

调查结束后，举报受理人应编制总结报告，内容涵盖：

a) a report on the actions taken in the investigation and an assessment of the Report;

有关调查所采取的行动和举报评估的报告；

b) if necessary: recommendations on how to deal with the identified Violation, including a proposal of actions to remove or minimise the Violation or its consequences;

如有必要，针对已查实的违规行为提出处理建议，包括消除或最大限度减轻违规行为及其后果的行动提议；

c) if necessary, also a recommendation for further follow-up action, including remedial, preventive or disciplinary measures;

如有必要，进一步建议后续行动，包括补救、预防或纪律处分措施；

4. Where the Report relates to an event deemed to be a Violation and the occurrence of such event has been confirmed or made probable, the Receiver of the Report shall provide a summary report to the Management Board of the Company(s) affected by the Report. In particularly justified cases, the Receiver of the Report may decide to provide only an extract of the report to the extent determined by him or her.

若举报涉及被认定为存在违规行为的事件，且该事件已被证实发生或可能发生，举报受理人应向受举报影响公司的管理委员会提交总结报告。在特别合理情况下，举报受理人可在其决定的范围内仅提供报告的摘录。

5. Upon submission of the summary report, the Receiver of the Report shall enter it in the relevant records and close the Report.

提交总结报告后，举报受理人应将其记录于相关档案，并关闭举报。

6. Where, as a result of the investigation, the occurrence of the Violation has not been confirmed or substantiated, the Receiver of the Report shall, after providing a summary report, enter the Report in the appropriate records and close the Report. If warranted, the Receiver of the Report may also provide the Management Board of the relevant Company or Companies with a summary report or recommendations for appropriate further follow-up action.

若调查结果显示违规行为未获确认或证实，举报受理人应在提交总结报告后，将举报归档并关闭。如有必要，举报受理人还可向相关公司的管理委员会提交总结报告，或就后续行动提出适当建议。

7. Where the Report relates to a member of the Management Board of any Company, the summary report of the Receiver of the Report shall be presented to the Supervisory Board of the relevant Company or, if no Supervisory Board has been established in the Company – to the Supervisory Board of the Parent Company.

若举报涉及任何公司管理委员会成员，举报受理人的总结报告应提交至相关公司监事会；若公司未设监事会，则提交至母公司监事会。

11. Further follow-up

进一步的后续行动

1. On receipt of recommendations for further follow-up action, the Management Board of the Company to which such recommendations have been made:
在收到需采取进一步后续行动的建议后，收到建议的公司管理委员会应：
 - a) decides on the scope of implementation of these actions and implements them in accordance with the decision taken;
决定这些行动的实施范围，并依据决定付诸执行；
 - b) inform the Receiver of the Report of the decisions taken and the actions implemented, within the time limit set by the Receiver of the Report;
在举报受理人设定的时限内，向其通报所作决定及采取的行动；
 - c) in the event of a decision not to implement or to implement a recommendation with a different scope than that indicated by the Receiver of the Report within the aforementioned time limit, the Company's Management Board shall provide the Receiver of the Report with information to that effect and the reasons for it,
若在上述期限内决定不实施或执行与举报受理人提议范围不符的建议，公司管理委员会应向举报受理人提供相关信息并给出理由，
2. The Management Board of the Company to which the recommendations have been communicated may also request the Receiver of the Report, and the Designated Member of the Management Board may instruct the Receiver of the Report, to carry out additional checks as part of the investigation, e.g. to have the case examined by a relevant law firm or an audit firm or other expert with appropriate competence.
收到建议的公司管理委员会亦可要求举报受理人及管理委员会指定成员指示举报受理人在调查过程中进行补充检查，例如聘请相关律师事务所、审计事务所或其他具备适当能力的专家对案件进行审查。

12. Final feedback

最终反馈

1. Within 3 months of the date of the acknowledgement of the Report or, if this acknowledgement is not provided, within 3 months of the expiry of 7 days from the date on which the Report was made by the Whistleblower, the Receiver of the Report shall provide the Whistleblower with final feedback on the follow-up actions planned or taken and the reasons for such actions.
举报受理人应在举报确认之日起 3 个月内，或若未确认，在举报人提交举报之日起 7 天后的 3 个月内，向举报人提供关于计划或已实施的后续行动及其原因的最终反馈。

13. Recording and documentation of Reports

举报的记录与存档

1. The course of the internal investigation shall be recorded by the Receiver of the Report by means that correspond, inter alia, to the nature of the Report and the degree of complexity of the case. The Receiver of the Report may decide to take notes of conversations with

employees, preserve e-mail correspondence and copies of other evidence gathered during the course of the investigation.

举报受理人应根据举报性质及案件复杂程度等情况记录内部调查过程。举报受理人可决定记录与员工谈话内容、保存电子邮件通信及调查过程中收集的其他证据副本。

2. The Receiver of the Report shall maintain, either electronically or in writing, a record of Reports which, following the investigation, shall indicate:

举报受理人应在调查后以电子或书面形式保存举报记录，该记录应指明：

- a) the serial number of the Report;

举报的编号；

- b) a brief description of the findings in relation to the Report including what is the subject of the Report;

举报相关调查结果的简要说明（包括举报主题）；

- c) personal data of the Whistleblower and the person to whom the Report relates;

举报人与被举报人的个人信息；

- d) contact address of the Whistleblower;

举报人的联系地址；

- e) information on the classification of the event covered by the Report as involving or not involving Violations, including whether the Report was unfounded or unsubstantiated;

举报所涉事件是否涉及违规行为的分类信息，包括举报是否毫无根据或证据不足；

- f) the date on which the internal Report was made;

内部举报编制日期；

- g) a summary of the actions taken in relation to the Report as part of and as a result of the investigation;

作为调查的一部分及结果而采取的与举报相关的行动摘要；

- h) post-investigation recommendations;

调查后的建议；

- i) the date on which the case was closed;

结案日期；

14. Protection of Whistleblowers

保护举报人

1. If the Report has been made anonymously, no action is taken to establish the identity of the Whistleblower. However, it is not excluded that in the course of the investigation this identity will become known to the investigators.

对于匿名举报，不会采取任何措施以确定举报人身份，但不排除在调查过程中调查人员可能会知晓其身份。

2. The Whistleblower's data or other information allowing the identification of the Whistleblower may be disclosed to unauthorised persons only with the Whistleblower's express consent. Authorised persons are those taking follow-up action and other persons authorised by name by the Compliance Officer in a specific situation. The Whistleblower's personal data may only be provided to them if they are necessary for the performance of their duties.

举报人的资料或其他可识别其身份的信息，仅在举报人明确同意的情况下，方可向未经授权的人员披露。被授权人员包括负责后续行动的人员及在特定情况下由合规官指名授权的其他人员。举报人的个人信息仅在有关人员履行职责必要时方可提供。

3. Notwithstanding the obligation to maintain the confidentiality of the Whistleblower, the Whistleblower is entitled to the protection set out in this chapter from the moment of making the Report, provided that the Whistleblower had reasonable grounds to believe that the information being reported was true at the time of making the Report and that it constitutes information about the Violation. The Whistleblower is not entitled to protection in particular if he/her acts in bad faith, i.e. in particular if he/her makes the Report knowing that the Violation did not occur or that the person named in the Report is not responsible for the Violation. 尽管有为举报人保密的义务，但举报人在提交举报时有合理理由相信所举报信息属实且构成违规行为时，自举报之时起即有权享有本章规定的保护。若举报人行为出于恶意，尤其是明知违规行为未发生或被举报人无责而故意举报，则不享有此保护。

4. The Brose Sitech Group and each of the Companies shall take all possible measures to protect the Whistleblower against Retaliatory Actions. In this context, any direct or indirect acts or omissions caused by the Report in a work-related context which infringe or are likely to infringe the rights of the Whistleblower or cause or are likely to cause the Whistleblower unjustified damage are prohibited. Such acts or omissions are considered to be, in particular:

Brose Sitech 集团及其各下属公司应采取一切可能的措施，确保举报人免受任何未经授权的报复行为。在此情况下，严禁因举报而在工作环境中发生任何直接或间接行为或疏忽侵犯或可能侵犯举报人的权益，或造成或可能给其带来不合理的损害。此类行为或疏忽尤其包括：

- a) refusal to enter into an employment or cooperation relationship;
拒绝建立雇佣或合作关系;
- b) suspension from duties, non-renewal of an employment contract or termination of an employment or co-operation contract;
停职、不续签雇佣合同或终止雇佣/合作合同;
- c) demotion or withholding of promotion;
降职或不予晋升;
- d) change of duties or place of work, reduction of salary, bonus or other remuneration component;
调整职务、工作地点，减少工资、奖金或其他福利待遇;
- e) change of working hours;
改变工作时间安排;
- f) withholding of training;
不予培训;
- g) unjustified negative performance evaluation;
进行不合理的负面绩效评估;
- h) termination or non-renewal of the employment contract;
终止或不续签雇佣合同;
- i) other deterioration of working conditions or cooperation;
恶化工作条件或合作;
- j) taking bullying, intimidating, discriminatory actions;
实施欺凌、恐吓、歧视行为;
- k) violation of personal rights, in particular of one's good name;
侵犯个人权利，特别是损害个人名誉;
- l) unjustifiably initiating proceedings against the signatory;
对举报人无理提起法律诉讼;

5. A person who uses unlawful Retaliatory Actions against a Whistleblower may be subject to disciplinary liability.

对举报人实施非法报复行为者，将可能面临纪律处分。

6. A Whistleblower who has experienced any Retaliatory Actions may contact the Receiver of the Report for assistance.

举报人若遭受任何未经授权的报复行为，可联系举报受理人寻求帮助。

7. The provisions of the Guideline relating to the protection of the Whistleblower shall apply mutatis mutandis to the Persons Assisting in Making the Report and the Whistleblower's Associated Person.

本指南中关于举报人保护的规定，同样适用于协助举报者及举报人的相关人。

15. Confidentiality and protection of personal data

个人信息的保密与保护

1. Personal data collected in the course of performing the activities indicated in this Guideline shall be protected in accordance with the data protection regulations of the Brose Sitech Group and the individual Companies.

在执行本指南所述活动过程中收集的个人信息，应严格按照 Brose Sitech 集团及各公司的数据保护规章制度进行保护。

2. Personal data obtained in connection with a Report shall be processed to the extent necessary to accept the Report or to take follow-up action. Personal data that are not relevant for the processing of a Report shall not be collected and, if accidentally collected, shall be deleted immediately. The deletion of such personal data shall take place within 14 days of the determination that it is not relevant.

在受理举报或采取后续行动时，应在必要的范围内处理与举报直接相关的个人信息。严禁收集与举报处理无关的个人信息，若不慎收集到，应立即予以删除。此类个人信息应在确认无关后 14 天内删除。

3. The personal data processed in connection with the acceptance of a Report or follow-up and the documents related to the Report shall be retained for a period of 3 years after the end of the calendar year in which the follow-up is completed or the proceedings initiated by the follow-up are terminated.

因举报受理或后续处理而收集的个人信息以及举报相关文件，应在后续行动完成或由此启动的法律程序结束的日历年后的三（3）年内保存。

16. Possibility of external Reports

外部举报的可能性

1. Irrespective of reports made on the basis of the Guidelines, the Whistleblower is entitled to make a so-called external Report, consisting of submitting information on a Violation of law to the Ombudsman or other public authorities, as well as institutions or organisational units of the European Union, which accept such reports within their competences. The modalities of external reporting are set out in the procedures established and made public by the abovementioned bodies, institutions or entities.

无论是否根据本指南进行举报，举报人都有权进行所谓的外部举报，包括向监察机构或其他公共当局，或在其职权范围内接受此类举报的欧盟机构或组织单位提交有关违规行为的信息。上述机关、机构或实体已制定并公布的程序中规定了外部举报的方式。

17. Final provisions

最后条款

1. The provisions of this Guideline shall in no way affect any rights and obligations relating to disclosure, reporting and handling of breaches established by applicable law.
本指南的规定不得影响适用法律规定的与违规行为披露、举报及处理相关的任何权利和义务。