

# 行为规范

我们的行为规范



**KNORR-BREMSE**



## Dear colleagues,

Increasing globalization, growing competition as well as social and climate policy challenges worldwide: It has never been so important for an international company to operate by unified standards. Acting with integrity, responsibility and in an exemplary manner is a part of Knorr-Bremse Group's company concept as a global technology leader. Therefore, in addition to our corporate values, we have adopted a Code of Conduct, the binding principles and rules of which apply to all of us as Knorr-Bremse employees.

### A policy for all employees worldwide

This Code of Conduct is designed to provide guidance for all of us in our interactions with employees, colleagues, as well as with our customers, business partners and for our behaviour in the social environment in which we operate. It sets standards of an integrated and correct business conduct and helps us maintain an ethical and legitimate behaviour in our daily work. We expect all employees not only to observe internal regulations, but also to comply with all laws, avoid conflicts of interest, safeguard the company's assets, support workplace safety, ensure high product quality, respect climate and environmental protection and to operate in conformity with our corporate values and principles. Over the past few years, the Code of Conduct has enabled us to create a working environment at Knorr-Bremse that is characterized by integrity, respect and fair and responsible behaviour. We would like to maintain and further strengthen this success. Therefore, please continue to complete the eLearning on this Code of Conduct every two years.

## 亲爱的同事们：

在全球化的时代里，竞争压力日益加剧，社会和气候政策对世界构成挑战，国际性公司须以统一的标准来引领其经营活动，这一点至关重要。作为一家技术在全球领先的企业，克诺尔集团的诚信和负责之行事方式，实在起到表率作用。正因为此，我们在确立了企业价值观之外，亦制定了一份《行为规范》，作为克诺尔集团每位员工都需要遵守的具有约束力的原则和规范。

### 面向全球员工的政策

本《行为规范》为我们提供了如何处理与员工、同事、客户、商业伙伴以及所处社会环境等各种关系的指南。它制定出行为标准来帮助我们做到商务活动行为得体、诚实正直，并使我们以符合道德和法律的标准来处理 and 对待日常工作。我们希望所有员工不仅遵守企业的内部规章，也要守法，竭力避免利益冲突，保护公司财产，维护工作场所的安全，确保好的产品品质，尊重气候和环境保护，以我们的企业价值观和原则作为自身行为的准则。多年以来，《行为规范》帮助克诺尔创建了诚信、互敬、公平、重责任感的工作环境。我们希望维持并加强这方面的成功，因此，要求员工每隔两年进行一次有关《行为规范》的在线学习。

**Pursuing values and principles: The foundation of our coexistence**

Whether in person at one of our locations worldwide or in digital communication: All our activities affect the daily interaction at Knorr-Bremse, but also the corporate culture and reputation of our company. It is therefore up to all of us to live up to our values and fundamental principles and to let them guide our actions. Every manager and every employee is responsible for ensuring that their conduct complies with the principles set out in this Knorr-Bremse Code of Conduct.

Your Executive Board



Marc Llistosella



Dr. Nicolas Lange



Dr. Claudia Mayfeld



Bernd Spies



Frank Markus Weber

**追求价值观和原则：我们共存的基础**

在我们全球办事处任一地点的面对面交流和数码沟通中，我们的所有行为不仅会影响克诺尔内部的互动，还会影响企业的文化和声誉。因此，我们所有人均须遵守我们的价值观和基本原则，并以之作为我们行为的指引。不管是管理人员还是普通员工，均有责任确保其行为符合克诺尔集团《行为规范》的原则。

集团执行董事会

# 行为规范



## Preamble

This Code of Conduct contains important fundamental principles and provides guidance on appropriate handling of day-to-day business as well as strategic action and planning. It is based not only on our corporate values, but also on the initiative of the UN Global Compact. The Code of Conduct is an expression of our determination to observe fair and sustainable business practices and to base our actions on ethical and responsible principles.

## Scope

As a responsible company, Knorr-Bremse actively encourages the observance and compliance with the following principles. This Code of Conduct applies to all employees of the Knorr-Bremse Group worldwide. Regional codes and guidelines within the Group may specify these, as long as they do not contradict the following basic principles.

## 1. Compliance with laws and directives

We observe the statutory and corporate regulations that apply to our work. Furthermore, we examine carefully which good company practices should be used in support of responsible corporate governance.

## 2. Integrity and corporate governance

Our actions are based on generally accepted values and principles in particular on integrity, transparency, respect, openness and non-discrimination. Knorr-Bremse pursues reputable and acknowledged business practices and promotes fair competition.

## 3. Dealings with one another and working conditions

We intend to create a safe and attractive working environment in which trust, teamwork, diversity, acceptance of responsibility as well as a fair and respectful interaction with each other are valued and pursued. We support and respect the protection of international human rights in line with the United Nations Universal Declaration of Human Rights and ensure that these are complied with.

### a) Personal rights and privacy

We respect and protect the dignity, personal rights, privacy and personal data of each individual.

### b) Health and safety

We make ongoing efforts to improve the health and occupational safety for our employees, in particular by ensuring a safe working environment. In order to minimize the risks for employees, we are committed to taking the best possible measures to prevent accidents and occupational illnesses.

## 序文

《行为规范》包含了重要的基本原则，并为正确处理日常商务活动，制订行动策略及规划提供了指南。它不仅基于我们的企业价值观，也基于联合国全球契约的原则。制订《行为规范》表达了我们遵守公平和可持续商务实践并以合乎道德和责任准则规范我们行为的决心。

## 适用范围

作为一家负责任的企业，克诺尔积极鼓励全体员工尊重并遵守下列规范准则。此《行为规范》适用于世界各地克诺尔集团的所有员工。集团内的地区性规范和指引可在不违背以下基本原则的前提下制定。

## 1. 遵守法律和规定

我们遵守适用于我们工作的法律法规和企业规章。此外，我们认真研究哪些良好的做法应当被选用以支持我们作为负责任企业的公司治理。

## 2. 诚实正直与公司治理

我们的行为基于普遍接受的价值观和原则，尤其是正直、透明、诚实、尊重、公开和不歧视。克诺尔追求受尊敬和被认可的商业实践及促进公平竞争。

## 3. 人与人的相处与工作环境

我们力图创造出安全且吸引员工的工作环境，当中大家共同看重的是信任、团队合作、多样性和负责任，并以这些原则指导自己的行为，同时以公平、互敬的原则处理人与人之间的关系。我们尊重并支持联合国《世界人权宣言》关于国际人权保护的规定，并承诺予以遵守。

### A) 个人权利和隐私

我们尊重并保护每个人的尊严、个人权利、隐私和个人资料。

### B) 健康和安全

我们不断努力改善员工的健康与职业安全，尤其保证员工拥有一个安全的工作环境。为了最大限度地降低员工风险，我们承诺采取最好的措施预防事故和职业病的发生。

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## c) Ban on discrimination and protection against harassment

We are committed to equal opportunities and equal treatment for all employees. We offer our employees equal career opportunities and do not tolerate discrimination or harassment of any kind. Every employee is obliged to respect the personal sphere of the other employees. Sexual harassment and bullying are not tolerated.

## d) Freedom of expression

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

## e) Ban of child labour and forced labour

We observe the ban on child labour in accordance with the International Labour Organization (ILO) standards. No one must be forced into employment or work against their will.

## f) Remuneration and working time

We observe the current laws and regulations on remuneration and ensure that employees receive an appropriate pay. We adhere to the relevant protective regulations and working hours regulations worldwide.

## g) Employee rights

We respect the employees' freedom of association, freedom of assembly and their right to collective wage bargaining, provided that this is legally permissible and possible in the respective country. Members of employee organizations or trade unions are neither favoured nor disadvantaged.

## 4. Dealing with suppliers, customers and other business partners

We are aware that we represent the company through our behaviour, thereby shaping its reputation externally, and influencing its culture on the inside. All employees treat others in the same way as they expect to be treated themselves and act in accordance with this Code of Conduct.

### a) Competitions and antitrust law

We are committed to complying with the rules of Fair Competition. In particular to avoid antitrust violations, it is not permitted to conclude agreements with competitors on

- prices, margins, costs, volumes, production performance, tenders, distribution or other factors that affect the company's conduct,
- non-competition, submission of sham offers or
- apportionment out of customers, markets, areas, production programs or similar.

## C) 禁止歧视和杜绝骚扰

全体员工机会均等，都应受到平等的对待。我们向员工提供平等的职业机会，且严厉禁止以任何形式歧视和骚扰员工。每位员工都应尊重其同事的私人领域。我们绝不允许性骚扰和恃强凌弱行为的存在。

## D) 言论自由

我们授予并保护员工的言论自由以及其表达言论的权利。

## E) 禁止雇用童工和强迫劳动

我们根据国际劳工组织（ILO）的标准遵守有关禁止使用童工的规定。任何人均不得违背员工意愿强迫其劳动或工作。

## F) 劳动报酬和工作时间

我们遵守现行法律法规中关于劳动报酬的规定，并确保每一位员工都能得到适当的薪酬。我们遵守每个地方相关的保护及工时法规。

## G) 员工权利

在相关国家法律许可的范围内，员工拥有结社自由、集会自由以及集体协商工资的权利，对此我们予以尊重。员工组织或工会成员均得到平等的对待。

## 4. 处理与供应商、客户和其他商业伙伴的关系

我们知道我们的行为代表公司，将直接关系到公司的外部声誉及影响内部的企业文化。全体员工之间应推己及人，将心比心，并切实遵守《行为规范》的规定。

### A) 竞争和反垄断法

我们承诺遵守公平竞争的法规。为了避免触犯反垄断法，禁止与竞争对手就下列事项达成协议：

- 价格、利润、成本、产量、生产绩效、招标投标、销售或其他能够影响公司行为的因素，
- 竞业禁止、虚假招投标，或
- 客户、市场、地区和生产计划等的分配。

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Further details are provided in [KB Group Compliance Guideline on fair Competition](#).

## b) Ban of corruption and bribery

We reject all forms of corruption, including blackmail and bribery. This applies to individuals, companies, as well as to authorities and other institutions. Therefore, employees must not demand, accept, offer or grant any unauthorized benefits during the course of their business activities. This does not include occasional gifts of symbolic value or appropriate event or meal invitations. Please refer to [KB Group Compliance Guideline on Gifts and Invitations](#) for valid value limits. Further details are provided in [KB Group Compliance Guideline on Anti-Corruption](#). Employees must immediately reject any demand for bribes or other benefits, both for business and private purposes.

## c) Avoiding conflicts of interest

Conflicts of interest resulting from the employment relationship must be avoided. Such a conflict exists when the personal interests of an employee or a third person compete with those of Knorr-Bremse. If a conflict of interest arises or exists, the employee must inform his or her manager or KB Group Compliance ([compliance@knorr-bremse.com](mailto:compliance@knorr-bremse.com)).

Employees are not allowed to run or work for a company that competes with or has a business relationship with Knorr-Bremse. Excluded are activities that have demonstrably no influence on the activity at Knorr-Bremse. Nevertheless, they require prior written approval by KB Group Compliance.

Employees must not conduct business on behalf of a Knorr-Bremse Group company with companies in which they, their immediate family members or their spouses are involved. Employees may own shares in a competitor company, supplier or customer, as long as the share does not allow influence on the management of the company. For publicly traded companies, this only applies if the share exceeds 5% of the share capital.

Please refer to [KB Group Compliance Guideline on Conflict of Interests](#).

## d) Expectations of business partners

We expect our business partners to act in accordance with the principles of this Code of Conduct and to observe all statutory requirements – in particular those relating to avoidance of corruption, respect for human rights, compliance with the laws against child labour, taking responsibility for the health and safety of their employees and compliance with the relevant laws and standards on environmental protection.

详情请参见《[克诺尔集团公平竞争合规指引](#)》。

## B) 禁止腐败和贿赂行为

我们反对任何形式的腐败行为，包括敲诈和贿赂。这适用于任何个人、公司以及政府机关和其他机构。鉴于此，任何员工在进行商业活动期间，不得索取、接受或提供任何未经授权的利益，但一些偶然的、仅具有象征价值的礼品或适当的活动或宴请不在此列。请参阅《[克诺尔集团礼品和邀请合规指引](#)》，了解价值限制规定。更多详细信息请参见《[克诺尔集团反腐合规指引](#)》。任何出于商业和私人目的对贿赂或其他利益的索取，员工都必须当即回绝。

## C) 避免利益冲突

因员工与公司雇佣关系而产生的利益冲突应避免。当员工或第三方的个人利益与克诺尔的利益出现了竞争，即表示产生了利益冲突。如果出现或存在利益冲突，员工应及时通知其部门管理人员或克诺尔集团合规部门（[compliance@knorr-bremse.com](mailto:compliance@knorr-bremse.com)）。

任何员工不得为克诺尔的竞争对手或与克诺尔有商务关系的公司运作或工作。可证明不会对其为克诺尔工作造成影响的工作不在此列，但需事先获得克诺尔集团合规部门的书面批准。

任何员工不得代表克诺尔与其本人、近亲属或配偶拥有股份的公司从事商业活动。克诺尔允许员工持有竞争对手公司、供应商或客户公司的股份，前提是员工不会因该种持股获得影响该公司管理的能力。如果是上市公司，持有的股份应不超过总股本的5%。

请参阅《[克诺尔集团利益冲突合规指引](#)》。

## D) 对商业伙伴的期望

我们期望我们的商业伙伴也能依照本《行为规范》约束其自身行为，同时遵守所有法律要求，尤其是要做到避免腐败、尊重人权、遵守禁用童工的法律、对其员工的健康与安全负责，并遵守环境保护方面的相关法规和标准。

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## 5. Protection of company property / confidentiality

Company property may only be used for business purposes, unless otherwise arranged in individual cases. Employees are required to protect the company's property from loss, theft or misuse. Employees must maintain confidentiality of all company and business secrets both during and after the termination of the employment relationship.

## 6. Product safety and quality

Knorr-Bremse stands for products and services of the highest quality. We are determined to meet the high expectations of our customers and partners in terms of quality, safety and functionality of our products and services. At the same time, we strive to continuously improve the quality of Knorr-Bremse products and services.

## 7. Export control

We comply with the export controls and customs laws in each country of our business. All employees involved in the import and export of goods, services, software or technology must observe the relevant export control laws and import/export regulations.

## 8. Climate and environmental protection

We observe the regulations and standards for the protection of the environment and implement appropriate measures and mechanisms at our sites. Furthermore, we as a company are committed to making an effective contribution to the reduction of CO2 emissions. Our aim is to minimize any environmental impact from our business activities as far as possible and to continuously expand our activities to protect the climate and the environment.

We support climate and environmental protection through a precautionary approach and take initiatives to further strengthen the sense of responsibility of employees and suppliers. We consistently promote the development and dissemination of climate and environmentally friendly technologies, also by expanding our business areas to include processes for environmental and resource conservation and by increasing the energy efficiency of our products in production and application.

## 5. 保护公司财产/机密

除非根据个案另作安排，公司财产只能用于商业目的。员工必须保护公司财产，避免遗失、被盗或误用。员工在雇佣期间及离职后均不得泄露任何公司和商业机密。

## 6. 产品安全和质量

克诺尔高质量的产品和服务在业内享有盛誉。我们决心在产品和服务的质量、安全和功能方面满足客户和商业伙伴对我们的高期待。与此同时，我们以持续提高克诺尔的产品和服务质量为目标。

## 7. 出口管制

我们遵守商业活动所在国的出口管制和海关方面的法律。所有从事货物、服务、软件或技术进出口的员工都要遵守相关的出口管制法律和进/出口法规。

## 8. 气候和环境保护

我们遵守环境保护方面的法规和标准，并在所有经营场所内实施适当的措施和机制。此外，我们承诺为减少二氧化碳的排放做出有效贡献。我们的目标是尽量减少我们商业活动对环境可能造成的影响，不断推进气候和环境保护事业。

我们通过预防措施支持气候和环境保护，并采取行动加强广大员工及供应商的责任感。我们一贯支持气候和环保技术的开发和应用，一方面不断扩大业务领域，并引入保护环境和资源的工艺，一方面不断提高我们的产品在制造与应用过程中的能源效率。

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## 9. Social commitment

Knorr-Bremse supports social and charitable institutions and encourages voluntary commitment of its employees. Through Knorr-Bremse Global Care, with its independent non-profit organizations in Germany, Hong Kong and the USA, we additionally support people in need all over the world who suffer from environmental disasters, accidents, military conflicts, poverty and disease. For this purpose, we are focusing on projects in the areas of education and WASH (water, sanitation and hygiene) as well as on emergency aid after natural disasters.

## 10. Infringements

Employees are required to report any infringements of the Code of Conduct principles summarized herein to their manager or KB Group Compliance ([compliance@knorr-bremse.com](mailto:compliance@knorr-bremse.com)). All violation reports are consistently followed up and proven misconduct is sanctioned appropriately.

It is the responsibility of every manager in the Knorr-Bremse Group to ensure that all employees are familiar with this Code of Conduct and to comply with its provisions at all times. If you have any questions regarding this Code of Conduct, please contact your manager for further guidance. You can also contact KB Group Compliance, which is entrusted with the implementation and enforcement of the Code of Conduct, via the [Intranet](#) or directly via the e-mail address [compliance@knorr-bremse.com](mailto:compliance@knorr-bremse.com). For sharing information on serious violations anonymously with KB Group Compliance you can also use our external notification system, which can be called up worldwide at <https://knorr-bremse.integrity-platform.org>.

## 9. 社会承诺

克诺尔一贯支持社会和慈善机构，并鼓励员工参与志愿工作。同时，通过克诺尔全球慈善基金会及其在德国、香港和美国的独立非营利组织，我们向世界各地因环境灾害、意外事故、军事冲突、贫困和疾病而需要帮助的人们提供支援。为此，我们注重教育和WASH（水、环境和个人卫生）项目，并在自然灾害发生后提供紧急援助。

## 10. 严格遵守，勿有违犯

员工如遇到任何违反本《行为规范》所述原则的行为，请向部门管理人员或克诺尔集团合规部门 ([compliance@knorr-bremse.com](mailto:compliance@knorr-bremse.com)) 报告。我们将以一致的标准跟进所有违规举报，不当行为一经证实，必予以适当处罚。

克诺尔集团的每位管理人员都有责任确保每位员工了解本《行为规范》并时刻遵守其规定。如对本《行为规范》有任何疑问，请联系部门管理人员，寻求进一步指导。您亦可通过[内联网](#)或直接发送邮件至[compliance@knorr-bremse.com](mailto:compliance@knorr-bremse.com)，联系负责本《行为规范》实施与执行事宜的克诺尔集团合规部门。如欲向集团合规部门匿名举报严重违规行为，可使用我们的外部通告系统<https://knorr-bremse.integrityplatform.org> 在世界上任何地方在线提交。