

CODE OF ETHICS 道德准则

CGR GROUP

赛捷弹簧制造有限公司

Each employee and manager of the
CGR Group commits to:
赛捷弹簧制造有限公司的每位员
工和经理承诺:

**RESPECTING INDIVIDUALS AND THEIR
ENVIRONMENT**

尊重个人及其环境

**MAINTAINING ETHICALLY EXEMPLARY
PROFESSIONAL CONDUCT**

维护道德规范的职业行为

**BUILDING TRUSTWORTHY RELATIONSHIPS WITH
COMMERCIAL PARTNERS**

与商业伙伴建立值得信赖的关系

PREAMBLE

序言

As a general rule and in all circumstances, all CGR Group employees must comply with international, national and local regulations as well as the rules of professional ethics relating to their activities.

作为一般规则，在任何情况下，赛捷弹簧制造有限公司的所有员工必须遵守国际、国家和地方法规以及与其活动相关的职业道德规则。

The purpose of this code of ethics is to define the principles of conduct that must be applied on a daily basis in our internal and external relations.

本道德准则的目的是界定在我们内部和外部关系中日常必须适用的行为原则。

The principles listed in this code of ethics are not exhaustive.

本道德规范中列出的原则并非详尽无遗。

Each employee and manager of the CGR Group commits to:

赛捷弹簧制造有限公司的每位员工和经理承诺：

1) RESPECTING INDIVIDUALS AND THEIR ENVIRONMENT

1) 尊重个人及其环境

a) Respecting fundamental human rights

a) 尊重基本人权

The CGR Group's policy is to fully comply with the United Nations Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organisation (ILO).

赛捷弹簧制造有限公司的政策是充分遵守《联合国世界人权宣言》和国际劳工组织（ILO）的基本公约。

Each employee undertakes, in particular, not to employ child labour, not to engage in any form of forced labour, not to tolerate human trafficking and to uphold freedom of expression and representation. They must ensure that these rights are respected within their area of responsibility and asks their partners and suppliers to have the same high standards.

每位员工特别承诺不雇用童工，不从事任何形式的强迫劳动，不容忍人口贩运，并维护言论自由和表达自由。每位员工必须确保在其职责范围内尊重这些权利，并要求其伙伴和供应商达到同样的高标准。

b) Combating child labour

b) 打击童工现象

The CGR Group prohibits the employment of children in violation of the conventions of the International Labour Organisation (ILO Conventions No. 138 and No. 182). The minimum age for employment must comply with the legal minimum age in the respective country or the age at which compulsory schooling ends (whichever is higher).

赛捷弹簧制造有限公司禁止违反国际劳工组织公约（劳工组织第138号和第182号公约）雇用儿童。最低就业年龄必须符合有关国家的法定最低年龄或义务教育结束年龄（以较高者为准）。

CGR undertakes to comply with the provisions of ILO Conventions No. 155 and No. 187 concerning health, safety and moral standards for all its employees (for example, but without limitation, CGR ensures that workers under the age of 18 do not exceed designated working hours in accordance with the regulations of the countries in which they operate).

CGR 承诺遵守国际劳工组织关于其所有员工的健康、安全和道德标准的第155号和第187号公约的规定（例如但不限于，CGR 确保18岁以下的工人工作时间不超过其经营所在国规定的指定工作时间）。

NOTE, in the event of an identified violation:

注：如果发现违规行为：

- Possible remediation plan for child labour: the company helps to find and contact the child worker's guardians, to bring them together, and then to continue the child's education until completion of their studies.

-可能的童工补救计划：公司帮助寻找并联系童工的监护人，将他们联系在一起，然后继续进行其教育，直到童工完成学业。

- Possible remediation plan for modern slavery/forced labour/human trafficking: remove the worker from their job, contact the local NGO/regulatory agency that supports victims in their rehabilitation, maintain contact with the NGO to monitor the individual's welfare (and if possible, help the worker find another job).

-针对现代奴隶制/强迫劳动/人口贩运补救计划：将工人从工作岗位上解雇，与支持受害者康复的当地非政府组织/监管机构取得联系，并与非政府组织保持联系，以监督个体福利（如果可能，帮助工人找到另一份工作）。

c) Combating forced labour

c) 打击强迫劳动

The CGR Group undertakes not to engage in any form of forced or compulsory labour. Forced labour includes work or services imposed on individuals under threat of punishment, against their will. This includes practices such as restricting movement, withholding wages or identity documents to coerce individuals into continuing work, trapping individuals in unmanageable debt or imposing wage deductions, creating dependency through in-kind payments, denying basic necessities such as food or housing, imposing excessive overtime, or causing a loss of social status, among other practices (in reference to ILO Conventions No. 29 and No. 105).

赛捷弹簧制造有限公司承诺不从事任何形式的强迫或强制劳动。强迫劳动包括违背个人意愿，在受到惩罚威胁的情况下强迫的劳动或服务。这包括限制行动、扣留工资或身份证件以强迫个人继续工作、使个人陷入无法管理的债务或扣减工资、通过实物付款造成依赖、拒绝提供食物或住房等基本必需品、强加超时工作或造成社会地位丧失等做法（参照劳工组织第29号和第105号公约）。

The CGR Group will take measures to ensure that workers understand their rights regarding wage payment, overtime compensation, retention of personal identification documents and other related rights.

赛捷弹簧制造有限公司将采取措施确保工人了解其在工资支付、加班补偿、保留个人身份证件和其他相关权利方面的权利。

Recognising that some groups, such as migrant workers, historically marginalised groups, young people, unskilled or illiterate workers, may not be fully aware of their legal rights, CGR will ensure that their rights are treated fairly and respected.

意识到一些群体，如移民工人、历史上被边缘化的群体、年轻人、非技术工人或文盲工人可能不完全了解他们的合法权利，CGR 将确保他们的权利得到公平对待和尊重。

In cases where workers are recruited by third parties, CGR will ensure diligent monitoring to guarantee that these principles are respected at all times.

如果工人是由第三方招聘，则 CGR 将确保尽职监督，以确保始终遵守上述原则。

d) Respecting individuals' free choice of employment

d) 尊重个人的自由就业选择

No one may be employed against their will: no one may be forced, enslaved (including debt bondage) or subjected to slavery. Human trafficking is strictly prohibited, and coercion in employment decisions is forbidden.

任何人不得违背自身意愿而被雇用：任何人不得被强迫、奴役（包括债役）或遭受奴役。严格禁止人口贩运，禁止强迫就业决定。

All employees must retain their freedom, dignity and freedom of movement, and must have access to employment contracts that are clear and understandable in their native language.

所有员工必须保持其自由、尊严和行动自由，并且必须能够获得以其母语表述的清晰易懂的雇佣合同。CGR Group employees must have the ability to leave their jobs in compliance with the legally required notice period, without penalties or obstruction.

赛捷弹簧制造有限公司员工必须能够按照法律规定的通知期而离职，而不会受到处罚或妨碍。

The CGR Group must not retain the original documents of employees (migrants or other types of workers) nor withhold their wages.

赛捷弹簧制造有限公司不得保留员工（移民或其他类型工人）的原始文件，也不得扣留其工资。

e) Respecting working hours

e) 尊重工作时间

Working hours, including overtime, as well as scheduled breaks and rest days, comply with the relevant laws, regulations, local standards, collective agreements and international conventions.

工作时间，包括加班，以及预定的休息和休息日，应符合相关法律、法规、当地标准、集体协议和国际公约。

Overtime work is voluntary and appropriately compensated. No worker will be forced to work or provide services outside regular hours under threat of sanctions because of their vulnerable position.

加班应是自愿的，并得到适当补偿。任何工人不得因其弱势地位而在受到制裁威胁的情况下被迫在正常工作时间以外进行工作或提供服务。

f) Ensuring fair wages

f) 确保公平工资

The CGR Group complies with all relevant local laws, regulations and customs, covering aspects such as minimum wages, overtime regulations and legally mandated benefits (in accordance with ILO Convention No. 100).

赛捷弹簧制造有限公司遵守所有相关的当地法律、法规和习俗，包括最低工资、加班规定和法定福利等（根据国际劳工组织第100号公约）。

g) Respecting equal opportunities and non-discrimination

g) 尊重平等机会和不歧视

The CGR group does not tolerate any form of sexual, physical or psychological harassment (as defined in ILO Convention No. 190 (Violence and Harassment)). If an employee witnesses or is a victim of any form of such abuse, they must report it through the whistleblowing procedure (see paragraph 5) to the appropriate persons. No retaliatory action may be taken against any employee who reports such incidents in good faith.

赛捷弹簧制造有限公司不容忍任何形式的性、身体或心理骚扰（具体定义见国际劳工组织第190号公约（暴力和骚扰））。如果员工目击或遭受任何形式的虐待，他们必须通过举报程序（见第5段）向有关人员报告。不得对善意报告此类事件的员工采取报复行动。

CGR Group employees must comply with laws and regulations prohibiting any discrimination based on age, race, colour, gender, ethnic origin, nationality, religion, health status, disability, marital status, sexual orientation, political or philosophical beliefs, trade union membership, or any other characteristic protected by applicable law.

赛捷弹簧制造有限公司员工必须遵守法律法规，禁止基于年龄、种族、肤色、性别、民族血统、国籍、宗教、健康状况、残疾、婚姻状况、性取向、政治或哲学信仰、工会会员资格或适用法律保护的任何其他特征的任何歧视。

This applies to all aspects of recruitment and employment practices, including, but not limited to, applications, promotions, rewards, training opportunities, job assignments, remuneration, benefits, disciplinary measures, dismissal and retirement (in reference to ILO Conventions No. 100 and No. 111).

这适用于招聘和雇用实践的所有方面，包括但不限于申请、晋升、奖励、培训机会、工作分配、薪酬、福利、纪律措施、解雇和退休（参照劳工组织第100号和第111号公约）。

The recruitment process is based exclusively on the candidate's qualifications and skills. Remuneration is determined solely on the basis of the employee's professional contribution to the Group.

招聘过程完全基于候选人的资格和技能。薪酬仅根据员工对集团的专业贡献确定。

h) Freedom of association

h) 结社自由

The CGR Group respects workers' rights to freely associate, form and join labour organisations of their choice, seek representation and engage in collective bargaining, as permitted by and in accordance with applicable laws and regulations. The CGR Group ensures that representatives of such associations are not subjected to discrimination, have access to the workplace, and are provided with adequate workspace to operate effectively and without hindrance (in reference to ILO Conventions No. 98 and No. 87). In cases where legal restrictions exist regarding freedom of association and collective bargaining, the CGR Group shall establish

alternative mechanisms to ensure that workers can communicate their views to management and that these views are duly considered.

赛捷弹簧制造有限公司尊重工人自由结社、组建和加入其选择的劳工组织、寻求代表和参与集体谈判的权利，但须符合适用法律法规的许可。赛捷弹簧制造有限公司确保此类协会的代表不受歧视，能够进入工作场所，并为他们提供足够的工作空间，以便有效和无障碍地开展工作（参照劳工组织第98号和第87号公约）。如果存在关于结社自由和集体谈判的法律限制，赛捷弹簧制造有限公司应建立替代机制，以确保工人能够向管理层传达其意见，并确保这些意见得到适当考虑。

i) Respecting health and safety

i) 尊重健康和安全

The CGR Group must minimise health and safety risks for employees, subcontractors and the public arising from its operations as far as possible (ILO Convention No. 155).

赛捷弹簧制造有限公司必须尽可能减少其运营给员工、分包商和公众产生的健康和安全风险（国际劳工组织第155号公约）。

Each workstation must be maintained in compliance with health, safety and ergonomic standards. All employees are required to wear personal protective equipment in accordance with the requirements of their respective positions (e.g. safety shoes, hearing protection, goggles, gloves, etc.).

每个工作场所必须按照健康、安全和人体工程学标准进行维护。所有员工均应按照各自岗位要求穿戴个人防护设备（例如：安全鞋、听力保护装置、护目镜、手套等）。

Each employee has an obligation to report any dangerous situations they witness or incidents that reveal such situations, and to contribute to the implementation of preventive measures. Compliance with safety instructions is a strict obligation.

每位员工都有义务报告其目睹的任何危险情况或揭示此类情况的事件，并协助实施预防措施。遵守安全说明是一项严格的义务。

j) Respecting the environment

j) 尊重环境

Each employee contributes, within the scope of their duties, to the CGR Group's environmental efforts and commitments. Employees must comply with the Group's policies on natural resource conservation. They ensure that the Group's partners and suppliers adhere to equivalent environmental standards.

每位员工在其职责范围内为赛捷弹簧制造有限公司的环保努力和承诺做出贡献。员工必须遵守集团的自然资源保护政策，并确保集团的合作伙伴和供应商遵守同等环境标准。

2) MAINTAINING ETHICALLY EXEMPLARY PROFESSIONAL CONDUCT

2) 维护道德规范的职业行为

a) by protecting personal information

a) 保护个人信息



赛捷弹簧制造有限公司-塑造你的世界

The CGR Group and each of its employees are particularly committed to complying with laws and regulations regarding confidentiality and the protection of personal information relating to individuals, employees and third parties.

赛捷弹簧制造有限公司及其每位员工特别承诺遵守与个人、员工和第三方相关的保密和保护个人信息法律和法规。

Only those whose positions and responsibilities explicitly require the processing of said information have access to personal employee data.

只有其职位和职责明确要求处理上述信息的人员才能访问个人员工数据。

Access is granted according to the nature and scope of the position and the responsibilities of each employee. 应根据职位的性质和范围以及每位员工的职责而授予访问权限。

The CGR Group does not communicate personal information to third parties, except when necessary and when current laws and regulations allow.

除非必要且现行法律法规允许，否则赛捷弹簧制造有限公司不会将个人信息提供给第三方。

b) protecting the assets of the CGR Group

b) 保护赛捷弹簧制造有限公司的资产

Each CGR Group employee must make every effort to protect the company's assets. Company funds and assets must never be used for illegal purposes or for activities unrelated to CGR Group's business operations.

每位赛捷弹簧制造有限公司员工必须尽一切努力保护公司的资产。公司资金和资产不得用于非法目的或与赛捷弹簧制造有限公司业务运营无关的活动。

No employee may appropriate any CGR Group property for personal use.

任何员工不得将任何赛捷弹簧制造有限公司的财产挪作个人使用。

Similarly, employees must not use CGR Group assets for personal gain, nor allow their use by unauthorised individuals who are not employed by or authorised by the company.

同样，员工不得将赛捷弹簧制造有限公司的资产用于谋取个人利益，也不得允许未经公司雇用或授权的未经授权的个人使用这些资产。

Misappropriation or theft of these assets constitutes an offence and may result in sanctions and, in cases of violations of applicable laws, civil or criminal prosecution.

侵占或盗窃这些资产构成犯罪，可能受到制裁，如果违反适用法律，则可能受到民事或刑事起诉。

c) by respecting the rules of confidentiality

c) 遵守保密规则

Any CGR Group employee who has access to confidential information or information owned by the CGR Group must ensure that it remains confidential and is used only for authorised purposes.

有权访问保密信息或赛捷弹簧制造有限公司拥有的信息的任何赛捷弹簧制造有限公司员工必须确保这些信息保持保密状态且仅用于授权目的。

An employee who is unsure whether they may disclose or use certain information in their possession must seek advice from their supervisor.

不确定是否可以披露或使用其所拥有的某些信息的员工必须向其主管寻求建议。

CGR Group employees remain bound by these confidentiality obligations even after leaving the company.
赛捷弹簧制造有限公司员工即使在离开公司后仍受这些保密义务的约束。

d) by respecting intellectual property

d) 尊重知识产权

The CGR Group's intellectual property rights include patents, know-how, trade secrets, trademarks, domain names, industrial concepts and copyrights.

赛捷弹簧制造有限公司的知识产权包括专利、专有技术、商业秘密、商标、域名、工业概念和版权。

These elements constitute one of the company's most valuable assets and, as such, are legally protected wherever possible. It is a duty for all employees to preserve this property.

上述元素构成公司最有价值的资产之一，因此，在任何可能的情况下都受到法律保护。所有员工都有义务保护上述财产。

The CGR Group pledges to respect the intellectual property of others and ensure that its employees do not infringe their rights.

赛捷弹簧制造有限公司承诺尊重他人的知识产权，并确保其员工不侵犯其权利。

e) by respecting the company's communication tools

e) 尊重公司的通信工具

The communication tools provided by the company - email, voicemail, internet, telephones (including mobile phones), and other communication systems - are the property of the CGR Group and must be used for professional purposes.

公司提供的通信工具-电子邮件、语音邮件、互联网、电话（包括移动电话）和其他通信系统-是赛捷弹簧制造有限公司的财产，必须用于职业目的。

However, personal use must remain within reasonable and necessary limits dictated by the circumstances.

但是，个人使用必须保持在情境规定的合理和必要的限制范围内。

Employees are strictly prohibited from using email, the company's internet network, or any other means of communication for improper purposes, including transmitting or receiving messages or images that could be considered offensive, abusive or disrespectful of human dignity.

严禁员工将电子邮件、公司互联网或任何其他通信手段用于不当目的，包括发送或接收可能被视为冒犯、侮辱或不尊重人类尊严的信息或图像。

f) by combating fraud

f) 打击欺诈

Fraudulent activity is defined as any deception, abusive practice or breach of trust that is intentionally committed for financial gain or to obtain an unfair or dishonest advantage.

欺诈活动是指为了经济利益或获得不公平或不诚实的利益而故意实施的任何欺骗、滥用行为或违反信托的行为。

This includes, but is not limited to, falsification of information, intentional omission, false pretence and deliberate misuse of qualified resources or certifications/qualifications/authorisations.

这包括但不限于伪造信息、故意遗漏、虚假伪造和蓄意滥用符合资质的资源或认证/资质/授权。

3) BUILDING TRUSTWORTHY RELATIONSHIPS WITH ITS COMMERCIAL PARTNERS

3) 与其商业伙伴建立值得信赖的关系

a) by basing them on mutual respect

a) 基于相互尊重

=> *Customers*

=> 客户

CGR must treat all its customers fairly, whatever the size of their business. The Group undertakes to provide its customers with quality products and services that meet their requirements.

CGR 必须公平对待所有客户，而无论其业务规模如何。集团承诺向其客户提供符合其要求的优质产品和服务。

Employees responsible for contract negotiations must ensure that all statements, communications and representations made to customers are accurate and trustworthy.

负责合同谈判的员工必须确保向客户做出的所有声明、通信和陈述均准确可靠。

Confidential customer information must never be disclosed by a CGR Group employee, except when required or authorised as part of a project or contract.

除非项目或合同要求或授权，否则赛捷弹簧制造有限公司员工不得披露客户保密信息。

=> *External service providers*

=> 外部服务提供商

The contributions of external service providers significantly impact the value of CGR's products and services and play an important role in customer satisfaction.

外部服务供应商的贡献显著影响 CGR 的产品和服务的价值，并在客户满意度方面发挥重要作用。

Purchasing decisions must be based on an objective evaluation of the external service provider's reliability and integrity, as well as the overall competitiveness of their offer, considering both short- and long-term factors. 采购决策必须基于对外部服务提供商的可靠性和完整性以及其报价的整体竞争力的客观评估，且同时考虑短期和长期因素。

The CGR Group requires its external service providers to strictly comply with all legal provisions related to their activities and professional environment.

赛捷弹簧制造有限公司要求其外部服务提供商严格遵守与其活动和专业环境有关的所有法律规定。

b) by prohibiting anti-competitive agreements

b) 禁止反竞争协议

The CCGR Group is committed to strict compliance with the competition laws and regulations applicable within the European Union and in each country where the Group operates.

赛捷弹簧制造有限公司致力于严格遵守欧盟和集团运营所在国家/地区适用的竞争方面的法律和法规。

Fair and open competition is in the best interest of its customers. No CGR employee may enter into agreements with competitors intended to fix prices, manipulate bidding processes, divide market shares, limit production or boycott a customer or external service provider.

公平和公开的竞争符合客户的最大利益。CGR 员工不得与竞争对手签订旨在确定价格、操纵投标流程、分割市场份额、限制生产或抵制客户或外部服务提供商的协议。

c) by prohibiting any act of corruption

c) 禁止任何腐败行为

The CGR Group's policy is to strictly prohibit illicit payments and corrupt practices. The Group complies with the laws of the countries in which it operates.

赛捷弹簧制造有限公司的政策是严格禁止非法付款和腐败行为。集团遵守其经营所在国家的法律。

CGR Group employees are required to comply with the legislation of the country in which they work. Employees must not offer or provide, directly or indirectly, any form of financial or other advantage to a government official, a political party, an employee or agent of a public or private customer, a representative of a lending institution or bank in violation of legal obligations or the ethical principles of CGR, solely to secure or maintain a business transaction or obtain any form of favour that involves violating regulations.

赛捷弹簧制造有限公司员工必须遵守其工作所在国家的法律。员工不得违反法律义务或 CGR 的道德原则，为确保或维持业务交易或获得涉及违反法规的任何形式的优惠而向政府官员、政党、公共或私人客户的雇员或代理人、贷款机构或银行代表直接或间接提供任何形式的经济利益或其他利益。

d) by prohibiting money laundering

d) 禁止洗钱

Money laundering is a criminal offence that involves concealing funds derived from illegal activities

洗钱是一种涉及隐瞒非法活动所得资金的刑事犯罪

Each employee must exercise vigilance regarding financial transactions to detect any irregularities, particularly when dealing with business partners whose conduct raises suspicions.

每位员工必须对金融交易保持警惕，以发现任何违规行为，特别是在与行为令人怀疑的业务合作伙伴打交道时。

e) by avoiding any conflict of interest

e) 避免任何利益冲突

CGR Group employees must avoid any situation that creates or could create a conflict between their personal interests (or those of their family members) and those of the Group.

赛捷弹簧制造有限公司员工必须避免在其个人利益（或其家庭成员利益）与集团利益之间造成或可能造成冲突的任何情况。

To protect employees and CGR from a conflict of interest, employees must not hold any interest or investment in the business of an external service provider, customer, competitor or consultant, or in a partner company. If such a situation arises, the employee must transparently inform their supervisor and obtain a written exemption.

为保护员工和 CGR 免受利益冲突，员工不得在外部服务提供商、客户、竞争对手或顾问的业务中，或在合作伙伴公司中持有任何利益或投资。如果出现这种情况，员工必须如实告知其主管，并获得书面豁免。

f) by adopting a "responsible" gifts and hospitality policy

f) 采取“负责任”的礼品和招待政策

CGR employees must not offer, accept, or allow a family member to accept gifts, money, loans, invitations, or any special treatment from anyone engaged in a business relationship with the Group, if the real intention is to influence a business decision. However, an employee may occasionally accept a non-monetary symbolic gift of small value or a business lunch invitation, provided they could reciprocate under similar circumstances.

如果其真正意图是影响业务决策，则 CGR 员工不得提供、接受或允许家庭成员接受与集团有业务关系的任何人的礼物、金钱、贷款、邀请或任何特殊待遇。但是，员工偶尔可以接受价值不高的非货币象征性礼物或商务午餐邀请，条件是在类似情况下，他们可以同样予以回赠。

CGR applies its policies and standards in all countries where the Group operates.

CGR 在集团运营的所有国家/地区均适用其政策和标准。

4) CONSEQUENCES OF NON-COMPLIANCE WITH THE COMPANY'S CODE OF ETHICS

4) 不遵守公司道德准则的后果

Each employee is responsible for ensuring that their own conduct and that of their team is fully aligned with the Code of Ethics and all applicable Group policies.

每位员工有责任确保其自身及其团队的行为完全符合道德准则和所有适用的集团政策。

Some violations of these rules can have severe and lasting consequences on CGR's reputation, business relationships, and financial standing. Therefore, CGR may initiate civil, criminal, or disciplinary actions and take appropriate internal and legal measures

某些违反这些规则的行为可能会对 CGR 的声誉、业务关系和财务状况造成严重而持久的后果。因此，CGR 可能会启动民事、刑事或纪律行动，并采取适当的内部和法律措施

Fraud can impact physical safety (e.g. defective delivered equipment) and may also result in criminal penalties for both the company and individual employees involved (counterfeiting, forgery, deception, aggravated fraud, endangering lives, etc.).

欺诈可能影响人身安全（例如交付的设备有缺陷），并且还可能导致涉及的公司和个人员工的刑事处罚（伪造、假冒、欺骗、严重欺诈、危及生命等）。

5) WHISTLEBLOWING PROCEDURE

5) 举报程序

a) filing a report

a) 提交报告

Any CGR Group employee who becomes aware of a violation of one or more rules defined in this Code must report it via email, letter or telephone to:

任何赛捷弹簧制造有限公司员工如果发现违反本准则规定的一个或多个规则，则必须通过电子邮件、信函或电话向以下人士报告：

- Ms Sandrine DA ROVARE (email: sandrine.darovare@cgr-international.com, Address: 2 Rue Henri Poincaré 93270 SEVRAN, telephone: 01.49.36.58.26)

-Sandrine DA ROVARE 女士（电子邮件：sandrine.darovare@cgr-international.com，地址：塞夫朗市亨利·庞加莱路2号，邮编93270，电话：01.49.36.58.26）

- Mr David CABALLOL (email: david.caballol@cgr-international.com, Address: 2 Rue Henri Poincaré 93270 SEVRAN, telephone: 06.07.45.67.17)

-David CABALLOL 先生（电子邮件：david.caballol@cgr-international.com，地址：塞夫朗市亨利·庞加莱路2号，邮编93270，电话：06.07.45.67.17）

b) interim measures

b) 临时措施

The designated whistleblower recipients undertake to acknowledge receipt of the report within five (5) days. 指定的举报接收人承诺在五（5）天内确认收到报告。

c) corrective measures

c) 纠正措施

After analysing the reported situation and consulting all relevant parties, any necessary measures will be taken within a reasonable and appropriate timeframe.

在分析所报告的情况并咨询所有相关方后，将在合理和适当的时间范围内采取任何必要的措施。

6) PROTECTION OF WHISTLEBLOWERS

6) 举报人保护

The CGR Group undertakes to guarantee whistleblower protection as follows (in accordance with the Wasserman Act of 21 March 2022):

赛捷弹簧制造有限公司承诺（根据2022年3月21日的《Wasserman 法案》）保证对举报人的保护如下：

a) General protection against retaliation or reprisals

a) 防止报复的一般保护

Whether outside or within the workplace, whistleblowers must not suffer retaliation or reprisals as a result of their whistleblowing. No action may be taken by the employer against the employee as a result of the report. 无论是在工作场所外还是在工作场所内，举报人都不得因举报而受到报复。雇主不得因该报告对雇员采取任何行动。

b) Protection in the workplace

b) 工作场所的保护

Whistleblowers may not be dismissed, punished or discriminated against in any way, directly or indirectly. 不得直接或间接解雇、惩罚或歧视举报人。

c) Criminal immunity

c) 刑事豁免

If a whistleblower discloses legally protected confidential information (except national security, medical secrecy or attorney-client privilege), they will not be held criminally liable.

如果举报人披露了受法律保护的保密信息（国家安全、医疗保密或律师-委托人特权除外），则不承担刑事责任。

d) Guaranteed confidentiality of the whistleblower's identity

d) 确保举报人的身份保密

CGR guarantees strict confidentiality of the whistleblower's identity. Unauthorised disclosure of a whistleblower's identity is subject to criminal penalties.

CGR 保证对举报人的身份严格保密。未经授权披露举报人的身份将受到刑事处罚。

e) Civil and criminal penalties for retaliation against whistleblowers

e) 对报复举报人的民事和刑事处罚

Disclosing the identity of a whistleblower, preventing them from reporting an issue, or abusively prosecuting them for defamation is subject to criminal penalties.

披露举报人的身份、阻止他们举报问题或以诽谤罪对他们进行滥用起诉，将受到刑事处罚。

Our Values

Equality: Give everyone the chance to evolve and to be treated with the same consideration.

Respect and listening to others: Show consideration for colleagues and their opinions.

Honesty / Integrity: Respect the rules, laws and CGR values.

Solidarity: Help and support each other.

Responsibility: Use our skills to the best of our ability to fulfil our mission.

我们的价值观

平等: 给每个人一个发展机会，并给予同等的对待。

尊重和倾听他人: 体谅同事并尊重他们的意见。

诚实/正直: 尊重规则、法律和 CGR 价值观。

团结: 互相帮助、互相支持。

责任: 最大限度地运用我们的技能完成我们的使命。



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www.cgr-international.com