

CODE OF BUSINESS CONDUCT 商业行为准则

INTRODUCTION

概述

The Code of business conduct (hereafter « the Code ») is designed to set certain standards of conduct for all employees of the Surys Group (hereafter « the Group ») as well as representatives, agents, consultants and all persons that provide goods and services on behalf of the Group or its various entities. These principles do not cover every issue that may arise but set out basic principles to guide all employees and officers in carrying out their business duties.

商业行为准则（以下简称《准则》）旨在为Surys公司集团（以下简称“集团”）的所有员工以及代表集团或其各种实体提供商品和服务的代表、代理人、顾问和所有人员设定特定行为标准。此类原则并不涵盖所有可能出现的问题，但规定指导所有员工和高级职员履行其业务职责的基本原则。

These principles form the basis of compulsory application. They might be adapted, as the case may be, depending on local laws and regulations. However, if a local custom or policy conflicts with the Code, the employee or officer must comply with the Code. If any aspect of the Code is unclear or is not precise enough, the employee should ask her/his supervisor as to how to handle the situation. Finally, because certain principles set out in the Code are derived from legal and regulatory duties, failure to comply with certain aspects of the Code could subject the offender to civil or even criminal liability.

此类原则构成强制适用原则的依据。可能会依据当地法律法规采用此类原则，视情况而定。但是，如果当地习俗或政策与《准则》相冲突，则员工或高级职员必须遵守《准则》。如果《准则》的任何方面不清楚或不够准确，则员工应询问其主管如何处理这种情况。最后，由于《准则》中规定的某些原则源于法律职责和监管职责，因此未能遵守《准则》的某些方面可能会使违法者承担民事责任或甚至承担刑事责任。

Every employee and officer of the Group acts with fairness, integrity and a sense of responsibility, in accordance with the commitments of the Group. Regardless of its position, she/he must comply, within the limit of their duties, with the rules set forth below, that form part of their normal duties of loyalty and good faith, and ensure that they are also complied with by all persons in their teams or under their supervision. Every company controlled by the Group and every employee and officer is expected to behave in a way that does not elevate the objectives and interests of the company over the objectives and interests of the Group taken as a whole.

集团每位员工和高级职员均按照集团的承诺，在行事时公平公正、诚信以及有责任感。无论其职位如何，其必须在其职责范围内遵守下述规则，此类规则构成其一般忠诚和诚信职责的一部分，并确保其团队中或受其监督的所有人员也遵守此类规则。受集团控制的每家公司以及每位员工和高级职员的行为不应将公司的目标和利益提升至高于集团的整体目标和利益。

COMPLIANCE WITH LAWS AND REGULATIONS

遵守法律和法规

Compliance with the law is the basic principle underlying the Group's policies. All employees and officers are expected to respect and comply with laws and regulations that apply to her/him.

遵守法律是集团政策的基本原则。所有员工和高级职员均应遵循和遵守适用于自己的法律法规。

As a result of its presence throughout the world, the Group's operations are subject to laws and regulations of many countries and supranational organizations such as the European Union.

由于集团存在于世界各地，因此集团的运营受到许多国家和超国家组织（如欧盟）的法律法规约束。

Moreover, these principles refer to the following international agreements:

此外，此类原则参考以下国际协定：

- the Universal Declaration of Human Rights ;
- 《世界人权宣言》；

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- the international conventions of the International Labour Organisation;
– 《国际劳工组织公约》；
- the guiding principles of the OECD for multinational companies;
– 《OECD跨国公司指南》；
- the charter of the International Holographic Manufacturers Association (IHMA)...
– 国际全息制造商协会（IHMA）章程...

Beyond compliance with the relevant laws and regulations, all employees and officers are expected to carry out their duties with integrity and meet the highest standards of professional conduct in their dealings with the Group's client, suppliers, governmental bodies or partners of the Group. Employees and officers should ensure that all partners and suppliers are treated with fairness, with selection criteria being objective and transparent such as quality, cost or delivery times with respect to a supplier.

除遵守相关法律法规外，所有员工和高级职员在与集团的客户、供应商、政府机构或合作伙伴交往时，均应诚信履行其职责，并满足最高专业行为标准。员工和高级职员应确保公平公正地对待所有合作伙伴和供应商，且选择标准客观透明，如供应商的质量、成本或交付时间。

COMPLIANCE WITH COMPETITION AND TRADE LAWS

遵守竞争法与贸易法

Competition is necessary to achieve economic efficiency and constitutes such a key element of free enterprise which the Group believes in. Most countries have implemented competition laws that prohibit unfair practices such as collusion, dumping...

竞争是实现经济效率的必要条件，并构成集团所信奉的自由企业的关键要素。大多数国家均实施竞争法，以禁止串通、倾销等不公平做法

Surys has defined a policy on competition and trade issues that complies with the relevant regulations applicable in the various countries where it operates. In case of breach, legal action could be taken in accordance with applicable laws and regulations. All employees and officers involved in competition and trade issues must inform themselves as to the Group's policies on competition and trade laws and abide by such policies during her/his business activities. Each employee or officer must refer to the relevant supervisors any enquiries relating to the implementation of such policies in individual situation.

Surys公司已制定有关竞争和贸易问题的政策，这项政策符合其运营所在国适用的相关法规。如有违反，则可根据适用法律法规采取法律行动。涉及竞争和贸易问题的所有员工和高级职员均必须了解集团有关竞争和贸易法律的政策，并在开展其业务活动期间遵守此类政策。每位员工或高级职员均必须将与在个别情况下实施此类政策相关的任何询问提交给相关主管。

COMPLIANCE WITH LAWS ON CORRUPTION

遵守反腐败法

It is prohibited for any person to offer, promise or give any undue pecuniary or other advantage to a public and/or private official, in order to obtain a favourable treatment or to influence the outcome of a negotiation in which the Group is interested. Doing so is illegal in most countries and would be violating the international convention combating bribery of foreign public officials in force in many countries. An employee or officer who commits bribery while on duty could be subject to criminal penalties and termination of her/his employment contract.

禁止任何人向公共高级职员和/或私人高级职员提供、承诺或给予任何不当金钱或其他好处，以获得优惠待遇或影响集团相关的谈判结果。这种行为大多数国家均属非法，且将违反在许多国家生效的《反对行贿外国公职人员公约》。在职期间行贿的员工或高级职员可能会受到刑事处罚，并终止其雇佣合同。

PREVENTING CONFLICTS OF INTEREST

防止利益冲突

RELATIONSHIPS WITH A COMPETITOR, CLIENT OR SUPPLIER

与竞争对手、客户或供应商的关系

A conflict of interest exists when a person's private interest is in conflict with the interests of the Company in a given professional engagement. Conflicts of interest arise when an employee, an officer or one of their family members has a business relationship with a competitor, client or supplier of the Group in the context of the negotiation or performance of an agreement or in carrying out an assignment for a Group entity.

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在给定专业参与中，个人的私人利益与公司的利益相冲突时，存在利益冲突。在谈判或履行协议或为集团实体执行转让的情况下，员工、高级职员或其家庭成员与集团的竞争对手、客户或供应商有业务关系时，产生利益冲突。

To receive advances, loans, guarantees or services in order to influence a decision to be taken by the Group would also constitute a conflict of interest, as well as for an employee or officer to work simultaneously for a competitor, client or supplier or to hold significant interests in such companies. Each employee and officer must prevent conflicts of interest situations by avoiding permanent financial interest with a competitor, client or supplier of the Group outside of its professional activities.

接受预付款、贷款、担保或服务以影响集团将作出的决定，以及员工或高级职员同时为竞争对手、客户或供应商工作或在这些公司中拥有重大利益，也将构成利益冲突。每位员工和高级职员必须避免在其专业活动之外与集团的竞争对手、客户或供应商保持长期经济利益关系，以防止出现利益冲突。

To establish whether she/he is in conflict of interest or not, the employee must ensure that she/he acts in the best interests of the Group, regardless of any other consideration, personal preference or specific benefit. As conflicts of interest are not always clear-cut, each employee or officer should consult its supervisor in case of doubt in a given situation.

为确定其是否存在利益冲突，员工必须确保其行为符合集团的最佳利益，无论任何其他考虑、个人偏好或特定利益如何。由于利益冲突并不总是很明确，因此每位员工或高级职员如果在特定情况下存有疑问，则应咨询其主管。

SPECIAL BENEFITS FROM WHICH EMPLOYEES COULD BENEFIT

员工可以从受益的特殊福利

Employees undertake not to use the staff, the equipment and other assets of their company or of the Group for personal needs (direct or indirect) for a purpose other than of the attainment of the objectives of their company or of the Group.

员工承诺不将公司或集团的职员、设备和其他资产用于个人需求（直接或间接），以实现公司或集团目标以外的目的。

Employees undertake, for themselves, their spouses, their family and the people in their entourage, not to accept from any person or company having – or seeking to develop – business relations with the company or the Group:

员工为自己、配偶、家人和随行人员承诺，不接受来自与公司或集团有-或寻求发展-业务关系的任何个人或公司的以下物项：

- rebates, commissions or other forms of remuneration,
回扣、佣金或其他形式报酬，
- loans or advances, other than those obtained from banking or financial establishments at market conditions,
贷款或预付款，但以市场条件从银行或金融机构获得的贷款或预付款除外。
- goods, equipment, services or improvement work without payment or the invoices prices for which would not reflect those which are normally applied in the market,
无需付款的货物、设备、服务或改进工程，或不反映市场通常适用价格的发票价格。
- travel invitations or vouchers of an excessive value which would represent to an individual operation or an operation reserved for a very limited number of people,
价值过高的旅行邀请或代金券，其指向个人业务或是保留用于非常有限人数的业务，
- gifts other than of symbolic value.
具有象征价值以外的礼物。

To receive gifts that are not excessive in value, do not constitute cash gifts, are consistent with customary business practices and do not violate any laws or regulations, is permitted.

允许接受价值不高、不构成现金礼物、符合传统商业惯例且不违反任何法律法规的礼物。

POLITICAL INVOLVEMENT

政治参与

The Group respects the fact that its employees and officers, in their capacity as citizens, participate or may wish to participate in community activities. All relevant employees and officers should however ensure that this participation does not encroach on the working hours that they must reserve for the Group, and avoid to morally or financially commit the Group in these activities. When an employee believes that his/her activities take a share of the working hours that he/she must reserve for the company of the Group which employs him/her or risks entailing a request for financial or other support from the latter, he/she

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must obtain prior authorization from his/her management. Furthermore, an employee or officer who happens to be involved in decisions to be taken by a State, a governmental agency or a public body must refrain from taking part in a decision of that body that affects the Group.

集团尊重其员工和高级职员以公民身份参与或可能希望参与社区活动的事实。但所有相关员工和高级职员均应确保这一参与不会侵占其必须为集团保留的工作时间，并避免在道德或财务上使集团承担这些活动。当员工认为其活动占用了其必须为其雇用集团公司保留的部分工作时间，或有可能请求公司提供财务或其他支持时，其必须事先获得其管理层的授权。此外，碰巧参与国家、政府机构或公共机构决定的员工或高级职员必须避免参与影响集团的机构决定。

RELATIONS WITH THIRD PARTIES, COMMITMENTS AS REGARDS ITS CUSTOMERS, ITS EMPLOYEES AND ITS ENVIRONMENT

与第三方的关系，对客户、员工和环境的承诺

RELATIONS WITH THIRD PARTIES

与第三方的关系

Employees and officers represent their company and the Group and, as a result, affect its image and its reputation. They must refrain from making unreasonable commitments in relation to their function.

员工和高级职员代表其公司和集团，因此也将影响公司和集团的形象和声誉。其必须避免对其职能做出不合理承诺。

COMMITMENTS AS REGARDS ITS CUSTOMERS

对客户的承诺

The Group bases its success on its capacity of innovation, on the quality of its products and on the satisfaction of its customers. Attentive to their needs and their expectations, the Group undertakes to provide them with transparent information. Each company of the Group has the adequate quality structure and tools to ensure the right monitoring of its production, and the compliance of its obligations in terms of security.

集团的成功以创新能力、产品质量和客户满意度为基础。因重视客户需求和期望，集团承诺为其提供透明信息。集团的每家公司均拥有足够的质量结构和工具以确保正确监控其生产，并遵守其在安全方面的义务。

HEALTH AND SAFETY

健康和安

To ensure the health and safety of its employees and officers is a Group priority. All employees and officers are entitled to work in a safe and healthy environment and are expected to participate in such efforts by acting in a responsible manner. The Group's health and safety policy applies to all of its employees, officers, sub-contractors and other third Party service providers. Such policy is managed and monitored actively so as to improve the safety and health conditions of its employees, officers and sub-contractors on a continuing basis. Each employee and officer must perform their duties consistently with the health and safety rules applicable at her/his workplace and participate in such training programs as may be organized from time to time.

确保员工和高级职员的健康和安全是集团的优先事项。所有员工和高级职员均有权在安全且健康的环境中工作，并期望以负责任的方式参与此类努力。集团的健康和安全政策适用于其所有员工、高级职员、分包商和其他第三方服务提供商。积极管理和监控此类政策以持续改善员工、高级职员和分包商的安全和健康状况。每位员工和高级职员均必须根据适用于其工作场所的健康和安全规则履行职责，并参加可能不时组织的此类培训计划。

PREVENTING DISCRIMINATORY ACTIONS AND HARASSMENT

防止歧视和骚扰

The diversity of employees and cultures represented within the Group is a tremendous asset. As part of its employer commitments, the Group is determined to offer its employees and officers' equal opportunity in terms of recognition, progression and career path, irrespective of their origin or beliefs and does not tolerate any discrimination or harassment of any kind. These rules are applicable to recruitments made by the Group.

集团内的员工和文化多样性是一项巨大资产。作为其雇主承诺的一部分，集团决定在认可、晋升和职业道路方面为员工和高级职员提供平等机会，无论其出身或信仰如何，并且不容忍任何种类的歧视或骚扰。这些规则适用于集团进行的招聘。

Examples include derogatory comments based on racial, ethnic, gender characteristics, age or religion, or to adopt an unwelcome attitude with a sexual connotation. Such acts are prohibited within the Group.

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示例包括基于种族、民族、性别特征、年龄或宗教的负面评论，或采取带有性暗示的不受欢迎态度。集团内部禁止此类行为。

ENVIRONMENT 环境

As part of its commitment in relation to sustainable development, the Group integrates environmental aspects in its strategy and culture. The Group's commitments in this respect cover the mitigation of climate change, the conservation of nature, a more efficient use of energy and natural resources, the fact of minimizing the production of waste, harmful air emissions and water discharges, the preservation of heritage, landscape and biological diversity. Every employee and officer must, within the limits of her/his duties, participate in the Group's efforts and commitments by complying with applicable regulations and Group's environmental policies. Each employee or officer must report to the persons responsible for these matters, any compliance failures or possible exposures of which he becomes aware. 作为可持续发展相关承诺的一部分，集团将环境方面融入其战略和文化。集团在此方面的承诺涵盖减缓气候变化，保护自然，更有效地利用能源和自然资源，尽量减少废物产生、有害空气排放和水排放，保护遗迹、景观和生物多样性。每位员工和高级职员均必须在其职责范围内，通过遵守适用法规和集团的环境政策参与集团的努力和承诺。每位员工或高级职员均必须向这些事项的负责人报告其意识到的任何违规或可能风险。

PROTECTION OF THE GROUP'S ASSETS 保护集团资产

ACCURACY AND PROTECTION OF INFORMATION 信息的准确性和保护

A good management of the Group requires that reliable information be conveyed to authorized recipients so as to enable them to carry out objective analysis and controls. It also implies that such information be protected to the extent that it is to remain confidential

集团的良好管理要求向授权接收方传达可靠信息，以便其能够进行客观分析和控制。这意味着此类信息应受到保护以保持机密

Every employee is obliged not to disclose confidential information to third Parties outside of the Group and/or to other employees of the Group, except if she/he is certain (notably by experience) that this transmission is necessary for the execution of her/his mission and complies with the interests of the company.

每位员工均有义务不向集团以外的第三方和/或集团的其他员工披露机密信息，但其确定（特别是根据经验）必须传递此信息以执行其工作和符合公司利益的情况除外。

Confidential information includes all non-public strategic, financial technical or business information such as formulas, processes, industrial know-how, industrial or business plans, financial and strategic plans, financial forecasts, business negotiations, marketing studies or client and supplier files, the disclosure of which would be harmful to the Group. Likewise, personal information regarding the Group's employees and officers, clients and suppliers must be handled with care so as to prevent any alteration or improper disclosure in accordance with the applicable law. The obligation to preserve confidential information also applies to information received from partners of the Group. The confidentiality obligation continues even after the employment ends.

机密信息包括所有非公开战略、财务技术或商业信息，例如配方、流程、工业专有技术、工业或商业计划、财务和战略计划、财务预测、商业谈判、营销研究或客户和供应商档案，披露此类信息将对集团有害。同样，必须谨慎处理有关集团员工、高级职员、客户和供应商的个人信息，以便根据适用法律防止任何变更或不当披露。机密信息保护义务还适用于获得自集团合作伙伴的信息。保密义务即使在雇佣关系结束后仍有效。

PROTECTION OF THE GROUP'S ASSETS AND RESOURCES 保护集团资产和资源

Each employee and officer is responsible for the proper use of the Group's assets and resources and their protection. These include intellectual property such as trade secrets, patents, trademarks as well as installations, equipment and the assets and financial resources of the Group. These assets and resources must be used in accordance with their business destination or within the framework set, as the case may be, by the various Group entities. They may not be used for non-company business except where such use has been explicitly authorized by established procedures. Each employee and officer should endeavour to protect the Group's assets against any deterioration, alteration, fraud, loss or theft.

每位员工和高级职员均有责任正确使用集团资产和资源，并对其实施保护。这些资产和资源包括知识产权，例如商业秘密、专利、商标以及集团装置、设备、资产和财务资源。这些资产和资源必须根据其业务目的地或在框架集内

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（视情况而定），由各集团实体使用。除非经既定程序明确授权，否则集团资产和资源不得用于非公司业务。每位员工和高级职员均应努力保护集团资产免受任何损坏、变更、欺诈、损失或盗窃。

Employees and officers undertake not to use funds or other assets of their company or of the Group for a purpose other than in the context of the activities and objectives of the Group in compliance with the following conditions:

员工和高级职员承诺遵守以下条件，不会将公司或集团的资金或其他资产用于集团活动和目标以外的目的：

- Transactions correspond to a service or supply of goods;

-与服务或货物供应相对应的交易；

- Prices are not knowingly falsified compared with market conditions or normal practices,

-与市场条件或正常惯例相比，价格并未经故意伪造，

- Payments are made directly to the co-contracting individual or company.

-直接向共同签约的个人或公司付款。

Employees undertake not to use the funds or other assets of their company or of the Group, directly or indirectly, for the benefit of associations and/or bodies without the formal agreement of the management.

未经管理层正式同意，员工承诺不会直接或间接出于协会和/或机构的利益，使用公司或集团的资金或其他资产。

FAIRNESS IN FINANCIAL REPORTING

财务报表的公平性

The integrity of financial reporting is crucial to ensure the proper management of the Group as well as fair and accurate financial disclosures. Records, books and accounts as well as the financial statements of the various entities of the Group must appropriately reflect the transactions carried out by such entities and must conform to applicable legal requirements, to applicable generally accepted accounting principles and to the Group's system of internal control. Similarly, accounting and financial information provided under the Group's reporting procedures must present a full and accurate disclosure of the financial situation of the relevant entities.

财务报表的完整性是确保集团管理正确以及财务披露公平准确的关键要素。集团各实体的记录、账簿和账目以及财务报表必须适当反映此类实体开展的交易，并且必须符合适用的法律要求、公认会计原则和集团的内部控制制度。同样，根据集团报告程序提供的会计和财务信息必须全面准确地披露相关实体的财务状况。

Employees and officers who prepare accounting records must act with precision, honesty and ensure that each entry is duly documented. Each and every employee and officer is expected to follow the rules and guidelines that apply to the booking and documentation of invoices, expenses and other items accounted for in the books. Unrecorded funds or assets should be maintained unless permitted by applicable law or regulation, and reviewed by outside auditors, in accordance with generally accepted accounting principles.

编制会计记录的员工和高级职员必须准确、诚实地行事，并确保每个条目均有适当记录。每位员工和高级职员均应遵守适用于发票、费用和账簿中其他项目的记账和记录规则和指南。除非适用法律或法规允许，并由外部审计师根据公认会计原则进行审查，否则应保留未记录的资金或资产。

The Group ensures compliance with the financial regulations and the principles of corporate governance. The periodic reports published by Surys or other Group entities or reports prepared for governmental authorities must present full, fair, accurate, timely and understandable disclosures of the situation of the Group or its various entities.

集团确保遵守财务法规和企业管治原则。Surys公司或其他集团实体发布的定期报表或为政府当局准备的报表必须全面、公正、准确、及时且可理解地披露集团或其各实体的情况。

IMPORTANCE OF INTERNAL CONTROLS

内部控制的重要性

Internal control plays an essential role in companies. It is designed to provide reasonable assurance to group management as regards the reliability of financial and business information, the protection of assets, compliance with regulations and internal rules and procedures as well as the efficiency and relevance of the management and monitoring of Group operations.

内部控制在公司中起着至关重要的作用。其旨在就财务和商业信息的可靠性、资产保护、法规和内部规则与程序的合规性以及集团运营管理和监控的效率和相关性，为集团管理层提供合理保证。

Responsibility, for the establishment, implementation and continued management of the internal controls processes lies with the management of each entity of the Group. These processes include the maintenance of an appropriate control environment, the assessment of general and financial risks, the completion of controls, the sharing of information within the Group and

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outside the Group as well as the general monitoring of the process.

集团各实体的管理层负责建立、实施和持续管理内部控制流程。这些流程包括维护适当的控制环境、评估一般风险和财务风险、完成控制、共享集团内外的信息以及常规监控流程。

Each Group employees and officers must cooperate with the persons performing internal controls and properly respond to potential information requests. Furthermore, it is prohibited to hinder in any way the internal control process, including those carried out by external auditors, or to hide any information in this respect.

每位集团员工和高级职员均必须与内部控制执行人员合作，并适当回应潜在的信息请求。此外，禁止以任何方式阻碍内部控制程序（包括外部审计员开展的程序），并且禁止隐藏此方面的任何信息。

IMPLEMENTATION OF PROCEDURES AND VIOLATIONS

程序执行和违规

IMPLEMENTATION

实施

The implementation of the rules of business conduct is based on an organization and procedures combining flexibility and consistency. Each entity of the Group is responsible for implementing these rules taking into consideration any local constraints that may be applicable as a result of local laws and regulations or the legal status of its employees. The Group also seeks to enter into partnerships with clients, suppliers and industrial associates who share the same principles. 商业行为规则的实施以兼具灵活性和一致性的组织和程序为基础。集团各实体负责实施这些规则，并考虑当地法律法规或其员工的法律地位可能导致的任何当地限制。此外，集团还寻求与拥有相同原则的客户、供应商和工业联营公司建立伙伴关系。

ALERTNESS

警觉性

Employees should see that these rules are complied with both by themselves and other employees.

员工应保证，自己和其他员工均遵守这些规则。

When the situation requires so, identity of an employee who has reported a violation shall be kept confidential. No entity of the Group will be permitted to take retaliation measures against an employee who has reported a violation in good faith.

如果情况需要，则应对举报违规行为的员工的身份保密。任何集团实体均不得对善意举报违规行为的员工采取报复措施。

RECOMMENDED APPROACH IN CASE OF DOUBT

存在疑问时的建议方法

In certain situations, having to make a decision in compliance with the Group's rules of business conduct may turn out to be difficult or complicated. In these situations, it is important to have a way to approach the different issues at stake:

在某些情况下，必须根据集团的商业行为规则做决定可能变得困难或复杂。在这些情况下，具有一种方法以处理不同利害攸关的问题非常重要：

- Make sure you have all the facts: it is preferable to be fully informed of the situation before taking a decision;
- 确保您掌握所有事实：最好在做出决定之前充分了解情况；
- Ask yourself what precisely is expected from you: this will enable you to distinguish between the objective and the means to achieve the objective and consider the alternatives you have;
- 询问您自己的确切期望：这将使您能够区分目标和实现目标的手段，并考虑您具有的选择；
- Clarify your role and responsibility: in most situations, there is shared responsibility. Discuss the issues with your colleagues;
- 明确您的角色和责任：大多数情况下存在共同责任。与同事讨论这些问题；
- Discuss the problem with your supervisor: this is the basic guidance for all situations. Remember that it is your supervisor's responsibility to help solve problems;
- 与主管讨论问题：这是所有情况的基本指导。请记住，帮助解决问题是您主管的责任；
- Seek help from Group resources: in case you are in doubt regarding the implementation of a specific law or regulation, you can contact the group's legal resources. Considering the numerous laws and regulations to which the Group is subject, you

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may be redirected to an outside counsel.

-寻求集团资源的帮助：如果您对特定法律或法规的实施存在疑问，您可联系集团的法律资源。考虑到集团受制于众多法律法规，可能为您推荐外聘顾问。

VIOLATION OF THE CODE

违反《准则》

The Code set forth rules which all employees and officers are required to follow, within the limits of their duties. More precise description of certain principles set forth in this Code is contained in the policies, charters and other codes prepared by the Group. For any question regarding the implementation of the rules of business conduction in specific situations, employees and officers are to contact their supervisor who will inform the Director of the Group. In case the situation makes it difficult for an employee to contact her/his supervisor, the dedicated line should be used.

《准则》规定了要求所有员工和高级职员在其职责范围内均应遵守的规则。《准则》所载某些原则的更准确描述见集团制定的政策、章程及其他守则。对于特定情况下的任何商业行为规则实施相关问题，员工和高级职员均应联系其主管，并由主管通知集团董事。如果情况使得员工难以联系其主管，则应使用专线。

Failure to comply with the rules set forth in the Code will be considered as misconduct and subject to an employee or officer legal action in accordance with applicable laws and regulations.

未能遵守《准则》中规定的规则将视为失职行为，且根据适用法律法规，员工或高级职员将受到法律诉讼。