

Guideline
Reporting Indications and Concerns
举报可疑迹象和疑虑
说明指南



1. Introduction

介绍

The PWO Group is committed to honest and ethical conduct for all of its business activities. We support open communication and expect all of our employees to maintain high standards while complying with applicable laws and our internal code of conduct.

配伟奥集团致力于以诚信、道德为准则，进行所有商业活动。我们支持员工开放交流，期待我们所有的员工在保持高标准的同时，依据适用法律和我们内部的行为手册进行活动。

Nonetheless, all companies are faced with the risk that various situations will not go properly or that unlawful or unethical acts will knowingly or unknowingly be committed. A culture of openness and accountability is essential in avoiding and responding to such situations. This guideline explains how to react to suspected misconduct or dangers in the workplace and describes how to report such matters using the whistleblower portal.

尽管如此，所有公司都面临着存在不正常情况，或存在有意或无意地违法或不道德的行为的风险。开放和问责的文化对于避免和迅速应对上述情况是十分必要的。本指南将会说明，在工作场合发现可疑不当行为或危险时应当怎样反应，怎样使用举报入口进行举报等等。

2. Purpose of a Whistleblower System

设立举报体制的目的

The purpose of a whistleblower system is to report violations of our internal code of conduct, our business partner code of conduct and / or possible violations of the applicable laws and regulations.

设立举报体制的目的，是举报违反我们内部行为手册、商业伙伴的行为手册和/或有可能违反适用法律法规的行为。

A whistleblower system is an early warning system designed to prevent or at least quickly detect irregularities and / or the misconduct of individuals, entire groups or even companies as a whole, thereby avoiding serious reputational damage and financial loss.

举报体制是一种早期警告系统，设计的目的是阻止或至少快速应对存在违规行为和/或不当行为的个人、整个团体、甚至是整个公司，从而避免公司遭受严重的声誉和经济损失。

A whistleblower system also provides greater security for whistleblowers, as no data are stored with the anonymous input of suspicions that would lead to conclusions about the whistleblower. No IP addresses are logged, no cookies are set, and no location data are retrieved. The inputs made by the whistleblower are stored and encrypted in a high-security environment. The login data with which the whistleblower can access the system is generated by the system and only visible to the whistleblower. The company does not have access to the login data.

举报体制也能为举报者提供更大的安全保障，因为数据没有和匿名输入的举报内容储存在一起，因此不会产生与举报者相关的结论。不记录 IP 地址。不设置 cookies，也不储存位置数据。举报者提供的内容在高安全的环境中储存加密。举报人访问举报体制的登陆数据由系统直接生成，仅举报者可见，公司无权访问。

3. Who is allowed to report indications and concerns within the company?

谁有权举报公司内部的可疑迹象和疑虑？

All persons at all levels inside and outside of the company, such as Management Board members, department heads, employees, consultants, subcontractors, trainees, full-time and part-time employees, support and temporary workers as well as external contractors (*collectively referred to herein as "persons"*) may report indications and concerns.

Guideline
Reporting Indications and Concerns
举报可疑迹象和疑虑
说明指南



公司内外所有级别所有人，如董事会成员、部门主管、员工、顾问、分包商、受训人员、全职和兼职员工、后勤和临时工，及外部承包商（以下简称为所有人）都可以举报可疑迹象和疑虑。

4. Examples of relevant incidents / irregularities

相关事件/违规行为举例

Examples include the following:

其中包含以下情况:

- Competitive violations, breaches of antitrust law
不正当竞争, 违反反垄断法
- Bribery, corruption
贿赂, 腐败
- Financial offenses, e.g., fraud, theft, embezzlement
金融犯罪, 如欺诈、盗窃、贪污
- Occupational safety, health protection
职业安全、健康保护
- Data security and protection
数据安全和保护
- Discrimination, harassment and bullying
歧视、骚扰和欺凌
- Securities trading and insider transactions
证券交易和内幕交易

5. Whistleblower support and protection

举报体制的支持和保护

Employees who report a suspected violation **in good faith** need not fear any discrimination from either **PWO or third parties**, even when the suspicion is unconfirmed or proves to be false. The term "discrimination" includes dismissal, disciplinary action, threats and other negative treatment in connection with the reporting of indications and concerns.

善意举报涉嫌违规的员工不必担心任何**配伟奥或第三方**的区别对待，即使其怀疑未经证实或被证明是假的。“区别对待”一词包括解雇、纪律处分、威胁及与举报可疑迹象和疑虑相关的其他消极处理。

When an employee believes that he or she has experienced such discrimination, he or she must report that incident via the whistleblower portal, to the immediate supervisor, to the Compliance Officer.

如果员工认为他或她经历过这种区别对待，他或她须通过举报入口，直接向主管、合规专员报告该事件。

Employees must not in any way threaten or retaliate against a whistleblower. Anyone behaving in such a manner will be disciplined.

员工不得以任何方式威胁或报复举报人。任何以这种方式行事的人都将进行纪律处分。

Guideline
Reporting Indications and Concerns
举报可疑迹象和疑虑
说明指南



6. False or malicious claims

虚假或恶意索赔

PWO assumes that all reports are made in good faith.

配伟奥假定所有报告都是出于善意。

PWO will consider **reports by employees that are knowingly false or malicious** as serious offenses resulting in disciplinary action, including dismissal or the termination of the existing employment contract and, if appropriate, further legal action, including but not limited to criminal proceedings or claims for damages, among other things.

配伟奥会将员工**故意虚假或恶意举报的行为**视作严重的违法行为，并会对其进行纪律处分，包括解雇或解除现有劳动合同，并会在适当情况下采取进一步的法律行动，包括但不限于刑事诉讼或追索赔偿等等。

7. Reporting of indications or concerns

举报可疑迹象或疑虑

Generally, as a company, we want our employees to express their concerns or indications openly.

作为公司，我们通常希望员工，公开表达他们感觉可疑的迹象或疑虑。

At the same time, we fully understand if you prefer to protect your identity.

但同时，如果您希望保护您的个人身份信息，我们完全理解。

The web-based whistleblower system, which is protected by special encryption and security technologies, gives you the opportunity to report information both anonymously and with your personal details. All reports are received and processed exclusively by the Compliance Officer.

本举报体制以网络为基础，受特别加密和安全技术保护，使您有机会匿名举报个人发现的细节信息。所有信息均由合规专员专门受理。

The whistleblower portal is available 24 hours a day, seven days a week. The portal can be used from any computer or mobile device.

举报入口全天 24 小时开通。您可通过任意一台电脑或手机登录。

The link below takes you to the whistleblower portal. This link can also be found on the PWO homepage, on the intranet and in the PWO process house.

以下是举报入口的登录链接。您也可以从配伟奥的主页，企业内网和配伟奥的车间找到本链接。

<https://pwo-progresswerk-oberkirch.integrityline.org>

When you enter the link, you will be forwarded directly to the homepage of the whistleblower portal and can immediately start the reporting process. The system automatically guides you through all the required questions.

登录链接后，您会直接进入举报入口的主页上，可以立即开始进行举报流程。系统会自动引导您完成所有需要回答的问题。

At the end of the reporting process, you will receive an automatically generated incident number and asked to create a password.

在完成举报后，您会收到系统自动生成的事件编号，并被要求自行创建一个密码。

Guideline
Reporting Indications and Concerns
举报可疑迹象和疑虑
说明指南



With the login data, you can log back into the system at any time and answer questions from the Compliance Officer about the situation you described, or you can provide additional information about the incident yourself. The company has no access to the login data; this data is only visible to you.

您可以使用登录数据，在任何时候重新登录系统，回答合规专员根据您的描述提出的问题。或者，您也可以自行添加该事件的附加信息。公司无权访问登录数据，该数据仅有您自己可见。



Please note the incident number and the password. Further communication via the portal is important for investigating and clarifying the incident in the event of questions or further information needed. Here you can also track the processing status.

请小心保存事件编号和密码。通过登录入口进一步回答问题或交流信息，这对调查和澄清事件十分重要。您可以在这里跟进事件处理状态。

For all reports, it is important that the following questions are answered in a comprehensible manner:

在书写任何举报内容时，请务必注意以易于理解的方式回答以下问题：

Who?
谁？

Should you choose to report an indication stating your personal data, the report's sender must be clearly identifiable. Effective communication can only begin when the sender is clearly identifiable.

选择举报可疑迹象时，如果选择公开您的个人信息，举报的发送者必须明确说明自己的身份。仅在发送者明确确认的情况下，有效交流才会展开。

Should you choose to make an anonymous report, please remember to record the incident number generated by the whistleblower system and the password you are assigned, so that communication can continue to take place anonymously via the portal.

选择举报可疑迹象时，如果选择隐藏您的个人信息，请注意保存举报体制生成的事件编号，和您自行创建的密码，这样就可以通过登录入口继续匿名交流。

What?
什么内容？

The wording of a report must state the facts underlying the report. Please take into consideration that the Compliance Officer requires a full explanation of the facts. Additional information may also be needed for the report (files, documents, etc.). It is possible to upload files to the whistleblower portal.

举报内容必须陈述有关举报的事实。请记住，合规专员需要看到对举报事件的完整阐述。您也可以为举报内容添加附件（文件、文档等等）。您可以通过举报入口将文档上传。

When?
什么时间？

It is important to describe the facts as precisely as possible in terms of time so that responsibilities and other circumstances can be assigned. The report should be made on a

Guideline
Reporting Indications and Concerns
举报可疑迹象和疑虑
说明指南



timely basis (usually within a few days). There can only be a limited response to incidents occurring in the distant past.

请尽可能精确地描述举报事件发生的时间，以便明确责任或其他需要。遇到可疑事件应及时举报（通常是在事件发生的几天之内）。事件发生过久再举报，可能只能得到有限的回应。

Where?

什么地点？

The location of the report should be formulated as precisely as possible. If possible, please indicate the country, location, plant, division and department.

请尽可能精确地描述举报事件发生的地点。如果可以，请指明事件发生的国家、地区、工厂、部门和科室。



In the case of anonymous reports, the information should be precise but stated in a manner that makes conclusions about your identity difficult to impossible.

如果选择匿名举报，应提供精确信息，但在陈述中也应注意避免他人从举报内容中猜测到您的身份。

If you have any questions about the whistleblower system or the protection of your rights, please refer to the helpful FAQs on the first page of the whistleblower portal.

如果您对举报体制或对个人权利的维护存在疑惑，请查看举报入口主页上的帮助问答（FAQ）。

Alternatively, indications and concerns may be reported to the immediate supervisor or to the 或者，您也可以选择直接向主管或合规专员举报您认为可疑的迹象或您的疑虑

PWO AG Compliance Officer

配伟奥合规专员

姓名: Christian Bühler

Industriestr. 8

77704 Oberkirch

地址: 德国奥博基尔希

Industriestr 街 8 号

邮编 77704

Tel 电话: 07802-84178

Fax 传真: 07802-8488178

邮箱: compliance@progress-werk.de.



The identity of the whistleblower is treated confidentially, even when the report is made directly to the immediate supervisor or compliance officer.

举报人的身份是完全保密的，即便举报人选择直接向主管或合规专员举报。

8. Investigation and investigative results

Guideline
Reporting Indications and Concerns
举报可疑迹象和疑虑
说明指南



调查与调查结果

Once an employee has reported his or her concern, the Compliance Officer conducts a preliminary review to define the scope of any investigation and determine whether an investigation is appropriate and how it should be performed.

员工将他或她的疑虑提交后，合规专员将对其进行初步判断，确定调查的范围，调查是否有必要，及调查进行的方式。

Some reports may also be clarified without conducting an investigation.

也可能有部分举报无需调查便能澄清。

The actions we take in response to a report of an indication or concern will depend on the nature of the concern and the outcome of the further investigation. The Management Board is regularly informed about indications and reports, as well as about the results of the investigation and subsequently about the measures taken.

我们会依据疑虑的性质和调查后的结果，对举报的可疑迹象和疑虑采取措施。我们会定期将收到的举报和发现的可疑迹象、调查的结果及后续采取的措施告知董事会。



The whistleblower may retrieve the case status or the investigation's result via the portal. Naturally, any related information is provided only in compliance with the applicable data protection regulations and other laws.

举报人可以登录入口，检索举报处理状态或调查结果。当然，所有相关信息只会依据适用数据保护管理规定或其他法律规定给出。

Should under certain circumstances it be necessary to involve an external institution such as a supervisory authority, the Compliance Officer will arrange for this in coordination with the Management Board.

在特定情况下，有必要让外部机构（如监管机构）参与，合规专员将与董事会就相关事宜协调安排。