



我们的行为准则

致全体

Fronius员工并与其共事人士



We act

in line with  
our values.

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合规

此 PDF 的指导规范文档：

CCI\_CC\_Fronius\_Code of Conduct\_General (ZH), 版本 1 (01/25)

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## 目录

1	世代相传的价值观.....	5
2	本行为准则的适用对象.....	6
3	合法合规、诚实守信.....	7
4	以人为本.....	8
5	反腐败、反洗钱.....	9
6	妥善保管财产和数据.....	10
7	公平竞争.....	11
8	慎重遴选合作伙伴.....	12
9	公开透明、言行一致.....	13

# 1 世代相传的价值观

Fronius 行为准则涵盖了对全体 Fronius 员工或与其共事的人士 ( Fronius

公司的商业伙伴 ) 具有约束力的规则。无论职位、部门或地点，我们致力于在全球范围内遵守这些标准，促进正确和负责任的行为。如此，我们为符合我们价值观和原则的专业决策提供了普遍有效的指南。

我们的员工是公司成功的重要组成部分，是我们获得名誉声望的基石。除本行为准则外，我们的 "Fronius 合规政策

"也是日常工作中做出合规决策和行为的指南和依据：其涵盖了具有约束力的规则，并提供了具体的案例研究。

我们以社区、创新与创意、可持续发展、品质意识和经济效益为核心企业价值观，这些价值观是我们的指导方针，也是我们日常活动的核心。在商业决策中遵守法律和道德规范既是我们的首要任务，也是我们成功的一部分。在法律和道德方面，我们绝不妥协，并在商务生涯中制定明确原则。

我们也希望我们的商业伙伴能够按照我们Fronius的价值观、适用法律和道德标准行事。因此，我们在专门的 "Fronius商业伙伴行为准则 "中概括了我们以诚信负责的合作原则。

在解释行为准则的规则时，每个人都应以自己的判断为指导，批判性地审查某项具体行动在伦理或道德上是否存在问题，是否会引起批评。作为Fronius价值观的一部分，还包括礼貌、常识和得体。如果您有任何疑问或不确定之处，我们的管理层和法律合规团队，将随时为您提供建议和支持。

感谢您对我们价值观的承诺和奉献。我们将携手并进，继续延续 Fronius 的成功。

**这就是我们。我们是Fronius。**

## 2 本行为准则的适用对象

我们在本行为准则概括了具有约束力的规则，并希望全体 Fronius 员工或与其共事人士均能遵守这些规则。

因此，这包括全体员工，不论其就业类型（员工、工人、学徒、实习生、临时工）和在公司的职位如何。在这一方面，我们的管理人员具有特殊的榜样作用。

始终以认真负责和诚信的态度行事符合我们所有人的利益。我们严禁任何滥用职权谋取私利的行为，或绝不容忍不符合本行为准则的行为。

我们还希望我们的商业伙伴在整个价值链中的行为都能遵守本准则，遵纪守法，诚实守信。

在我们开展业务的各国中，适用的规则可能比我们在此制定的标准更为严格。此处原则始终以适用更严格之规定为准。

**所有为Fronius工作的人员都有义务遵守适用法律以及我们的内部原则和指导方针。**

### 3 合法合规、诚实守信

Fronius为其做出的决策和开展的活动，对社区、经济和环境的影响承担责任。诚实守信是我们行动的基础。

为了维护商业伙伴和其他利益相关者对我们的信任，每个人的诚信都至关重要。

**因此，我们全力以赴致力于遵守适用法律和内部规定。**

这为所有业务活动和决策提供了基础依据。

此外，**每个人都必须**了解各自领域的创新和适用法规。

**不言而喻，所有为 Fronius工作的人员都有义务遵守适用法律和内部规定。**

## 4 以人为本

作为一家家族企业，人员是我们一切工作的核心。社区和团队合作是 Fronius 的核心价值观，也是我们组织成功的关键因素。每个人独特而宝贵，有权得到尊重和尊严。宽容和欣赏是我们互动的核心。大大加强了社区的凝聚力和对公司的忠诚度。

我们谴责任何形式的歧视、欺凌或性骚扰。在 Fronius，我们将多元化视为一种机遇，促进员工拥有不同的视角、经验和技能。我们平等对待每个人，无论其性别、年龄、出身、宗教信仰、性取向或不同的身心特征或能力如何。我们为有特殊需求的员工考虑周全。

员工的**健康和安全**

对我们尤为重要。因此，我们的所有运营设施都采用了最高安全标准。必须始终遵守所有职业安全规定。

我们视自己为公平的雇主。尊重人权以及对《联合国人权宪章》和国际劳工组织核心劳工标准的承诺对于 Fronius 而言至关重要。我们致力于确保适当和安全的工作条件、支付适当的工资、尊重结社自由和集体谈判权。Fronius 严禁且绝不姑息组织内部和供应链中出现不公平、剥削虐待性的劳动行为，以及雇佣童工和强迫劳动等行为。

我们相互尊重、相互欣赏，营造安全健康的工作环境。



## 5 反腐败，反洗钱

我们反对一切形式的腐败，绝不容忍贿赂行为。赠送或接受与义务或期望挂钩的任何礼物都与我们格格不入，我们绝不容许此等行为。

即使出现不当或可疑行为，也应采取相应的抵制措施。因此，如果赠送或接受任何利益的行为，可能会造成业务活动给人留下不良印象，则应予以禁止此等行为。

我们的行动始终以 Fronius

的利益为导向。我们公正、客观、客观地做出决定，不允许自己受到个人利益或关系的影响。

然而，在日常工作中，我们可能会遇到个人利益或经济利益与公司利益相冲突的情况，例如与第二职业或家庭或朋友关系有关的情况。我们应当自觉立刻向管理人员全面披露此类 **利益冲突**。

我们承诺遵守所有适用的 **反洗钱法规**。不得接受可能与洗钱有关的现金流。如有疑问，必须进行仔细审查。

我们反对腐败行为和洗钱。我们客观行事，不允许自己受到不当影响。我们应立即披露**利益冲突**。

## 6 妥善保管财产和数据

任何类型的机密信息，如财务数据、合同、信件或在专业活动中获得的技术数据，仅供内部使用和执行任务之用。禁止用于谋求个人利益或未经授权向外部第三方披露。

我们始终保护**公司信息**的安全，防止未经授权人员访问。我们还保护 Fronius 的（知识）产权，确保未经授权的第三方无法获得此专有知识。

我们谨慎保守地处理**公司资源**。

即使在雇用关系终止后，保密义务依然存在。我们尊重他人的知识产权。绝不容忍任何未经授权使用第三方知识产权的行为。

我们以

**最敏感的方式处理委托给我们的个人数据**，并且只在法律允许的范围内进行处理。我们为此将采取适当的措施。

我们高度重视

**开诚布公的沟通交流，以及真实的举报**，妥善正确、完整及时地披露相关信息。在准备记录和报告时，我们确保信息不被篡改或误导。

**必须对所有公司和商业机密以及与公司相关的话题严格保密。谨慎处理相关数据和信息。**

## 7 公平竞争

我们秉承透明、公平且专业的市场行为，不仅维护了自身的长期利益，也帮助公司实现了安全且长期的成功。

因此，我们希望有关 **竞争和反垄断法** 的适用国家、欧洲和国际法规得到遵守。

我们深知作为技术领导者的责任重大，因此绝不会滥用这一市场支配地位。

我们不参与任何限制竞争的活动，如分割市场或客户或操纵价格。特别是，我们不会与竞争对手讨论内部事务，也不会分享可能影响市场行为的信息。包括有关价格和销售条件、成本和计算、库存清单和产能、生产计划、各类战略信息以及机密或专有信息的讨论。

我们从不故意提供有关我们产品和服务的误导性或虚假信息。我们完全基于客观标准做出采购决策。

**我们尊重公平竞争，不采取任何可能扭曲市场的行动。我们不会与竞争对手交换敏感信息，如价格或成本计算。**

## 8 慎重遴选合作伙伴

我们深信，长期业务关系的基础是建立在信任之上。我们也意识到我们在整个价值链中的责任。因此，我们在选择商业伙伴时十分慎重，并获取足够的信息以审查其诚信度和可靠性。

我们采取措施确保在与第三方合作时，不会违反现有的制裁、禁运或有关 **出口管制** 或**洗钱**的法律规定。

我们确保只为实际提供的服务支付报酬，而且该报酬与所提供的服务相称。如有发现可疑交易或付款，我们将立即实施内部举报，以便采取适当措施。

我们商业伙伴的行为也会直接影响人们对Fronius的印象。这就是我们慎重遴选的原因。我们获取足够的信息审查其诚信度。

## 9 公开透明，言行一致

在日常工作中，我们可能会遇到不知道如何做才是最好的情况。在这种情况下，请直接联系直接领导或法律合规部 (compliance@fronius.com)。

我们以公开透明的方式处理问题和错误，这是我们不断改进的唯一途径。

违反本行为准则不仅会造成严重后果，也会损害整个公司。然而，严重的制裁和后果也威胁着每一个人。

我们严肃对待任何违规行为，并采取适当措施澄清事实。除劳动法规定的后果外，我们还保留根据刑法和民法采取行动的权利。

如果发现或怀疑有违反法律或内部规定的行为，全体人员都必须及时举报。除上述举报方式外，还可通过我们网站上的 Fronius 举报渠道进行举报。

我们会对所有举报进行保密并认真调查。

为了促进开放和相互信任的交流，我们在此明确指出，真诚提交举报的人不必担心任何负面后果。这也适用于为调查此类不当行为提供重要信息的其他人员。

**可自由选择举报渠道：**

- 直接经理
- 法律合规部
- 管理层
- 举报渠道



**Our Code of Conduct**  
for all persons  
working for and with Fronius



we act

in line with  
our values.

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Version 01/01-2025

Compliance

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## Table of Contents

1	Values that last for generations.....	5
2	To Whom this Code of Conduct applies .....	6
3	Legally Compliant and With Integrity .....	7
4	People at the Centre .....	8
5	Against Corruption and Money Laundering .....	9
6	Careful treatment of property and data .....	10
7	Fair in Competition .....	11
8	Picky Regarding Partnerships .....	12
9	Open and Consistent .....	13

# 1 Values that last for generations

The Fronius Code of Conduct outlines binding rules for everyone who works for and with Fronius - from employees to business partners. Regardless of position, department or location, we are committed to complying with these standards worldwide to promote correct and responsible conduct throughout the Fronius company. Thus, we offer a universally valid point of reference for professional decisions in accordance with our values and principles.

Our core corporate values of Community, Innovation, Creativity, Sustainability, Quality Awareness and Cost Effectiveness guide us and are at the centre of our daily activities. Legally compliant and ethical behaviour in business decisions is both a top priority for us and part of our success. We cut no corners when it comes to law and ethics and define clear principles in business life.

Our employees are an essential part of the company's success. They are the reason for the trust placed in us and our reputation. In addition to this Code of Conduct, our "Fronius Compliance Policy" serves as a guideline and basis for compliant decisions and behaviour in everyday working life: It contains binding rules and offers concrete case studies.

We also expect our business partners to act in accordance with our Fronius values, applicable laws and ethical standards. Therefore, we have summarised our principles for working together with integrity and responsibility in a special "Code of Conduct for our Fronius Business Partners".

When interpreting the rules of the Code of Conduct, everyone should be guided by their own judgement and critically examine whether a specific course of action is ethically or morally questionable or could give rise to criticism. As part of our Fronius values, this also includes politeness, common sense, and appropriateness. If you have any questions or uncertainties, our managers and our Legal Compliance Team are always available to provide advice and support.

We thank you for your commitment and dedication to our values. Together we will continue to build the success of Fronius.

**This is who we are. We are Fronius.**

## 2 To Whom this Code of Conduct applies

In this Code of Conduct, we have summarised binding rules and we expect everyone who works for and with Fronius to comply with them.

Therefore, this includes all employees, regardless of the type of employment (salaried employees, workers, apprentices, interns, leasing personnel) and position in the company. In this context, our managers have a special function as role models.

Acting responsibly and with integrity at all times is in the interests of us all. We strictly reject any abuse of one's own position for personal gain or the toleration of behaviour that is not in line with this Code of Conduct.

We also expect our business partners to behave in accordance with this code, in compliance with the law and with integrity across our entire value chain.

In individual countries in which we operate, stricter rules may apply than those included in the standard set-out herein. In such a case, the stricter regulations must always be applied.

**All persons working for Fronius are obliged to comply with applicable laws and our internal principles and policies.**

### 3 Legally Compliant and With Integrity

Fronius takes responsibility for the impact of decisions and activities on society, the economy, and the environment. Honesty and integrity form the basis of our actions.

The integrity of each and every individual is essential in order to maintain the trust of our business partners and other stakeholders.

Therefore, we are fully committed to complying with the applicable laws and our internal rules.

This forms the basis for all business activities and decisions.

In addition, each and every individual is required to inform themselves about innovations and regulations applicable in their own area

It is a matter of course for us that all persons acting on behalf of Fronius comply with applicable laws and internal rules.

## 4 People at the Centre

For us as a family business, people are at the centre of everything we do. **Community and teamwork** are core values at Fronius and key success factors for our organisation. Every person is unique and valuable and has the right to be treated with respect and dignity. Our corporate culture is characterised by tolerance and appreciation. This strengthens the community feeling and loyalty to our company.

**We condemn any form of discrimination, bullying or sexual harassment.** At Fronius, we see diversity as an opportunity and promote the different perspectives, experiences, and competences of our employees. We treat everyone equally, regardless of gender, age, origin, religion, sexual identity or different mental or physical characteristics or abilities. We are considerate of our employees with special needs.

**The health and safety** of our employees is particularly important to us. That is why the highest safety standards apply in all our operating facilities. All occupational safety regulations must be complied with at all times.

We see ourselves as a fair employer. Fronius attaches great importance to **respect for human rights** and its **commitment to the UN Human Rights Charter and the ILO core** labour standards. We are committed to ensuring appropriate and safe working conditions, paying appropriate wages, respecting freedom of association and the right to collective bargaining. Unfair, exploitative, and abusive labour practices as well as child and forced labour are prohibited both within our organisation and across our supply chain and are unacceptable to Fronius.

**We treat each other with respect and appreciation and promote a safe and healthy working environment.**

## 5 Against Corruption and Money Laundering

We reject all forms of corruption and do not tolerate bribery. Giving or accepting gifts of any kind that are linked to obligations or expectations is alien to us and will not be accepted.

Even the mere appearance of improper or dubious behaviour should be counteracted accordingly. Any granting or acceptance of benefits is therefore prohibited if it could give the impression of undue influence on business activities.

Our actions are always orientated towards the interests of Fronius. We take our decisions impartially, led by business interests and objectively and do not allow ourselves to be influenced by personal interests or relationships.

However, in everyday working life, we may find ourselves in situations in which our personal or economic interests come into conflict with the interests of the company, for example in connection with secondary employment or family or friendly relationships. We disclose such conflicts of interest to our supervisors immediately and in full, without being asked to do so.

We are committed to complying with all applicable anti-money laundering regulations. No cash flows that could be associated with money laundering may be accepted. In case of doubt, a careful check must be carried out.

We reject corrupt behaviour and money laundering. We act objectively and do not allow ourselves to be unduly influenced. We disclose conflicts of interest immediately.

## 6 Careful treatment of property and data

Confidential information of any kind, such as financial data, contracts, correspondence or technical data obtained in the course of professional activities, is intended exclusively for internal use and for the fulfilment of professional tasks. Its use for the pursuit of personal interests or disclosure to external third parties without authorisation is prohibited.

We always store **company information** securely and protect it from access by unauthorised persons. We also protect the (intellectual) property of Fronius and ensure that unauthorised third parties do not gain access to this exclusive knowledge.

We use **company resources** carefully and sparingly.

The obligation to maintain confidentiality shall continue to apply even after the termination of the employment relationship. We respect the intellectual property of others. Any unauthorised use of third-party intellectual property will not be tolerated.

We handle the personal data entrusted **to us with the utmost sensitivity** and only process it in a lawful manner. We are taking appropriate measures to achieve this.

We attach great importance to **transparent communication and truthful reporting** and disclose relevant information properly, correctly, completely, and in good time. When preparing records and reports, we ensure that the information is not manipulated or misleading.

**Strictest confidentiality must be maintained with regard to all company and business secrets as well as with regard to topics relevant for the company. We handle data and information with care.**

## 7 Fair in Competition

Through our transparent, fair and professional behaviour on the market, we not only safeguard our interests in the long term, but also help our company to remain competitive and successful in the long term. We therefore expect the applicable national, European and international rules on **competition and antitrust law** to be complied with.

We are aware of the responsibility that comes with being a technological leader and do not abuse this position.

We do not engage in any activities that would restrict competition, such as in particular the allocation of markets or customers or the fixing of prices. In particular, we do not discuss internal matters with our competitors or share information that could influence market behaviour. This includes discussions about prices and sales conditions, costs and calculations, stock lists and capacities, production plans, strategic information of all kinds, as well as confidential or proprietary information.

We never deliberately provide misleading or false information regarding our products and services. We make our purchasing decisions exclusively on the basis of objective criteria.

**We respect fair competition and do not take any actions that could distort the market. We do not exchange sensitive information, such as prices or cost calculations, with competitors.**



## 8 Picky Regarding Partnerships

We are convinced that long-term business relationships are based on trust. We are also aware of our responsibility across the entire value chain. **Therefore, we select our business partners carefully and obtain sufficient information in order to check their integrity and reliability.**

We take measures to ensure that existing sanctions, embargoes or legal regulations on **export control** or money laundering are not violated when working with third parties.

We ensure that remuneration is only paid for services actually rendered and is proportionate to the service provided. We immediately report suspicious transactions or payments internally in order for appropriate measures to be taken.

**The behaviour of our business partners also has a direct influence on the image of Fronius. That is why we select them with great care. We obtain sufficient information and verify its integrity.**

## 9 Open and Consistent

In the course of our day-to-day business, situations can arise in which we do not know how best to behave. The first points of contact in such cases are the direct supervisors or the Legal Compliance department ([compliance@fronius.com](mailto:compliance@fronius.com)).

We deal with concerns and mistakes openly and transparently – this is the only way we can improve continuously.

Violations of our Code of Conduct can have serious consequences and damage our entire company. However, each and every individual can also face sanctions and consequences.

We take any offence seriously and will take appropriate measures to clarify the facts. In addition to consequences under labour law, we also reserve the right to take criminal and civil action.

In the event of known or suspected breaches of legal or internal regulations, everyone is required to report these promptly. In addition to the reporting options listed above, it is also possible to report via the Fronius Whistleblower Reporting Channel, available on our website.

We treat all reports confidentially and investigate them carefully.

In order to promote open and trusting communication, we expressly state on this occasion that persons who submit reports in good faith should in no way fear negative consequences of any kind. This also applies to other persons who contribute important information in order to facilitate the investigation of such misconduct.

### Freely selectable reporting channels:

- Direct supervisor
- Legal Compliance
- Management
- Whistleblower reporting channel