

MOOG

MOOG POLICY ON BUSINESS GIFTS AND GRATUITIES

MOOG 关于商务礼品和酬金的政策

Companywide — 全公司

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<p align="center">MOOG POLICY ON BUSINESS GIFTS AND GRATUITIES</p>	<p align="center">MOOG 关于商务礼品和酬金的政策</p>
<p>Although <i>Moog's Statement of Business Ethics</i> broadly addresses this topic, the Company has considered and vetted the benefits of having stand-alone policy statements for important topics related to business ethics and principled conduct by Moog employees. Having stand-alone policy statements, which are consistent with the general commitment set forth in the <i>Moog Statement of Business Ethics</i>, provides for more robust guidance and increases the profile and importance of compliance.</p>	<p>虽然 <i>Moog 的商业道德声明</i> 广泛涉及此主题，但对于与 Moog 员工的商业道德和原则行为相关的重要主题，该公司已经考虑并审查了对其制定独立政策声明的好处。由于独立政策声明与 <i>Moog 的商业道德声明</i> 中提出的一般承诺相一致，因此可以提供更有效的指导，并提高合规性的地位和重要性。</p>
<p align="center">PURPOSE</p>	<p align="center">目的</p>
<p>Inappropriate or excessive gifts, gratuities, or entertainment can be viewed as a means to improperly influence business relationships and can also give rise to conflicts of interest. To maintain independent judgment and action, we must avoid any potential conflict or appearance of conflict with the interests of the Company. Gifts or gratuities are not to be accepted or extended if they could, or if they give the appearance that they could, be reasonably considered to: improperly influence the Company's business relationship with or create an obligation to a customer, vendor or contractor; violate laws, regulations, or our Statement of Business Ethics; constitute an unfair business inducement; or cause embarrassment or negative impact to the Company.</p>	<p>不适当或过多的礼品、酬金或款待可被视为不当影响商业关系的一种手段，也可引起利益冲突。若要保持独立的判断和行动，我们必须避免任何潜在的冲突或与公司利益冲突的表象。如果礼品或酬金可能被合理地认为或其表面看来，它们可能被合理地认为：不当地影响公司与客户、销售商或承包商的业务关系或产生对客户、销售商或承包商的义务；违反法律、法规或我们的商业道德声明；构成不公平的商业诱因；或给公司造成尴尬或负面影响，则不得接受或发放礼品或酬金。</p>

SCOPE/APPLICABILITY	范围/适用性
<p>Accepting or offering a gift, favor, service, or privilege, including travel or entertainment, to or from an existing or potential customer, supplier, or government official or regulator that is of more than nominal value creates a conflict of interest and is prohibited. It will be considered a violation of this policy, and subject you to disciplinary measure, including potential termination of employment.</p>	<p>禁止接受现有的或潜在的客户、供应商、政府官员或监管机构提供的其价值超过名义价值、会造成利益冲突的礼物、优待、服务或特权，包括旅行或娱乐，或向其提供其价值超过名义价值、会造成利益冲突的礼物、优待、服务或特权，包括旅行或娱乐。这将被视为违反本政策，并会对您采取纪律措施，包括可能终止雇用关系。</p>
POLICY	政策
<p>If you have any doubt as to whether accepting or offering a gift would violate this policy, then you should consult with your supervisor. If your supervisor has any questions regarding the matter, he/she should consult with the Corporate law department for guidance.</p>	<p>如果您对接受或提供礼品是否会违反本政策有任何疑问，您应该咨询您的主管。如果您的主管对此事有任何疑问，他/她应咨询公司法律部门以寻求指导。</p>
<p>If a prohibited gift is received, it must be returned promptly, accompanied by an explanation of this policy.</p>	<p>如果您收到被禁止的礼品，则必须立即归还，并附上本政策的解释。</p>
<p>Occasionally, a supplier may offer a discount on services or products purchased by Company employees. Such discounts can only be accepted when they are available to all employees and notice of such fact is given to all employees.</p>	<p>有时，供应商可能会对公司员工购买的服务或产品打折。只有当所有员工均可获得此等折扣，并已向所有员工发出此等事实的通知时，才可接受此等折扣。</p>
<p>From Vendors/Suppliers: Do not accept from any vendor or supplier to the Company bribes or kickbacks in any form. If a gift or gratuity might influence your judgment or be perceived by others to have influenced your judgment, do not accept it.</p>	<p>来自销售商/供应商：请勿接受任何销售商或供应商向本公司提供的任何形式的贿赂或回扣。如果礼品或酬金可能会影响您的判断，或者被别人认为影响了您的判断，则请不要接受它。</p>
<p>You may accept from vendors or suppliers traditional holiday or promotional gifts, which could not reasonably be viewed as a quid pro quo for taking actions favorable to the vendor or supplier. Occasional gifts (amounts of \$50 or less per gift) and/or business-</p>	<p>您可能会接受销售商或供应商的传统节日礼品或促销礼品，这些礼品不能合理地视为对销售商或供应商采取有利行动的交换条件。可以接受在业务关系中被认为是习惯性的临时礼品（每份礼品金额不得超过 50 美元）和/或与业务相关的餐食（每次发生的金额不得超过 100</p>

<p>related meals (amounts of \$100 or less per occurrence) that are considered customary in the context of the business relationship are acceptable. Any gifts and /or meal received in excess of the above amounts must be reported to your supervisor within 10 days.</p>	<p>美元)。如果接受的礼品和/或餐食的价值超过上述金额，必须在 10 天内向您的主管报告。</p>
<p>You may accept from vendors or suppliers tickets or passes allowing attendance at athletic, cultural, or similar events. However, participation in these events is to be valued at no more than \$200 per event and may not exceed a total of two (2) events per year per employee.</p>	<p>您可以接受销售商或供应商提供的参加体育、文化或类似活动的门票或通行证。但是，如果参加这些活动，每项活动的价值不得超过 200 美元，每位员工每年参加的活动次数不得超过两 (2) 次。</p>
<p>Notwithstanding the above guidelines, you should consider declining an otherwise permissible gift if you believe that a reasonable person would question your impartiality or integrity as a result of accepting the gift.</p>	<p>尽管有上述准则，但如果您认为一个通情达理的人会因您接受礼品而质疑您的公正性或正直性，则应考虑拒绝本来可以接受的礼品。</p>
<p>You may not accept from any vendor or supplier gifts or gratuities that are of a substantial value (as defined above) or attend athletic, cultural, or similar events of a substantial value (as defined above) in excess of two times per year without the written approval of one of the following officers: Chief Executive Officer, Chief Financial Officer, Chief Human Resources Officer, or an Operating Group President.</p>	<p>未得到下列官员之一的书面批准，您不得接受任何销售商或供应商提供的价值不菲（如上所定义）的礼品或酬金，或每年参加价值不菲（如上所定义）的体育、文化或类似活动超过两次：首席执行官、财务总监、人力资源总监或集团运营总裁。</p>
<p>Cash gifts are strictly prohibited. Gift certificates are acceptable so long as they meet the requirements defined above.</p>	<p>严禁接收礼金。如果礼品券符合上述要求，则您可以接受。</p>
<p>Gifts to Customers and Government Officials. All gratuities and gifts provided to customers, government officials, and other third parties must be reasonable and customary and not intended as a bribe or kickback. All gratuities and gifts in excess of \$50 must be approved by your supervisor. All gifts and gratuities,</p>	<p>给客户和政府官员的礼品。给客户、政府官员和其他第三方的所有酬金和礼品必须合理且符合习惯，不得将其作为贿赂或回扣。如果所有酬金和礼品的价值超过 50 美元，则其必须得到您的主管的批准。所有的礼品和酬金，无论其价值多少，都必须正确地记录在公司的账簿和</p>

<p>regardless of value, must be properly recorded on the books and records of the Company. In all instances they must not violate the rules and regulations of the organization for whom the recipient works.</p>	<p>记录单上。在任何情况下，接收者都不得违反其为之工作的组织的规则和条例。</p>
<p>Check Before Acting. Any employee receiving a gift that seems excessive or inappropriate or is considering providing a gift that may be questionable, should promptly contact his or her supervisor and, as appropriate, the Corporate law department. Not adhering to this policy may lead to disciplinary action against an employee.</p>	<p>行动之前先检查。如果员工收到的礼品似乎过多或不合适，或正在考虑提供的礼物可能有问题，应及时联系其主管，如果合适的话，还应联系公司法律部门。如果员工未遵守此政策，可能会受到纪律处分。</p>
<p>Notes:</p>	
<p>¹ The above stated amounts are in reference to U.S. operations and are subject to adjustment within non-U.S. operations. Multiple gifts or a pattern of repeated gifts exceeding the above thresholds in the aggregate are prohibited.</p>	<p>¹ 上述金额是针对美国业务，非美国业务范围内可能会进行调整。 如果多个礼品或重复礼品的总额超过上述限额，则应被禁止。</p>
<p>² Government employees and officials are often subject to more stringent limitations on the acceptance of gifts and meals than is the case in private industry.</p>	<p>² 与私营企业相比，政府雇员和官员在接受礼品和餐食方面往往受到更严格的限制。</p>
<p>Moog123285.2 August 2020 Rev 1.0</p>	