



MOOG POLICY ON ANTI-BRIBERY

MOOG 关于商务礼品和酬金的政策

Companywide — 全公司

MOOG POLICY ON ANTI-BRIBERY	MOOG 关于商务礼品和酬金的政策
<p>Although Moog's Statement of Business Ethics 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 Moog Statement of Business Ethics, allows for more robust guidance and increases the profile and importance of compliance.</p>	<p>虽然 Moog 的商业道德声明 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 Moog 的商业道德声明 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>
OUR PRINCIPLES	我们的原则
<p>Integrity is a crucial component of our business. Moog, along with our subsidiaries and affiliates, is committed to ethical business practices and to obeying both the spirit and the letter of the law in every country in which we do business. This baseline commitment is integral to the tenets of our Culture & Values and our Statement of Business Ethics.</p>	<p>诚信是我们业务的重要组成部分。Moog，以及我们的子公司和附属公司，致力于道德商业行为，并遵守我们开展业务的每个国家/地区的法律精神和法律条文。这一基本承诺是我们的文化和价值观信条以及我们的商业道德声明不可或缺的组成部分。</p>
DEFINITIONS	定义
<p>The following words and phrases have the meanings expressed below in the context of this policy, in addition to their ordinary usage meanings:</p>	<p>下列词语和短语在本政策上下文中除具有通常用法的含义外，还具有下列含义：</p>
<p>Anything of Value - Includes, but is not limited to, cash, cash equivalents (such as gift cards, kickbacks, or discounts), benefits or favors, entertainment, gifts, hospitality, meals, travel, charitable contributions, political contributions, or employment opportunities. There is no minimum value for something to be considered "of value".</p>	<p>任何有价值的东西 - 包括但不限于现金、现金等价物（如礼品卡、回扣或折扣）、福利或优惠、娱乐、礼品、招待、餐食、旅行、慈善捐款、政治捐款或就业机会。被认为“具有价值”的东西没有最低价值。</p>
<p>Bribery (or Bribe) - Giving, offering, promising, requesting, or authorizing the giving of anything of value, directly or indirectly, to any person or entity to induce a person to act, or refrain from acting, in relation to the performance of their duties, in order</p>	<p>贿赂 - 直接或间接地给予、提供、承诺、要求或授权给予任何有价值的东西给任何人或实体，以诱使某人在履行职责时采取行动或不采取行动，以获取或保留任何商业</p>

<p>to obtain or retain any business advantage or benefit. However, customary business courtesies given or received consistent with our policy on Business Gifts and Gratuities and not provided for the purpose of improperly inducing action or inaction to obtain a business advantage are not bribes.</p>	<p>优势或利益。然而，按照我们关于商务礼品和酬金的政策给予或接受的习惯性商务礼仪，并且不是为了不正当地诱导采取行动或不采取行动以获取商业利益而提供的习惯性商务礼仪，不属于贿赂。</p>
<p>Facilitating Payments - Payments made to public officials to encourage them to expedite a routine or common governmental task that the official is otherwise required to undertake even if the payment were not made, such as issuing permits or licenses. This is distinct from payments expressly authorized to be made to a government agency (not an individual) to expedite processing.</p>	<p>疏通费 - 向公职人员支付的款项，以鼓励他们加快执行一项常规或常见的政府任务，即使没有支付该款项，这些任务也是要求官员执行的，例如发放许可证或执照。这与明确授权支付给政府机构（而非个人）以加快处理过程的付款不同。</p>
<p>Gift - Includes any tangible object of any kind, regardless of value. Acceptable reasonable and appropriate business gifts that will not be considered a violation of this policy are discussed in our separate policy on Business Gifts and Gratuities.</p>	<p>礼品 - 包括任何种类的任何有形物品，不论其价值如何。在我们关于商务礼品和酬金的单独政策中会讨论，可接受、合理和适当的商务礼品不会被视为违反本政策，</p>
<p>Hospitality - Meals, lodging, or any event or form of entertainment (including sporting events, parties, plays, and receptions).</p>	<p>招待 - 餐食、住宿或任何活动或任何形式的娱乐（包括体育赛事、聚会、戏剧和招待会）。</p>
<p>Public Official - A government official, whether elected or appointed; an officer or employee of a government agency or state-owned or state-controlled entity; a person performing a public service on behalf of a government or government agency; a political party or party official; a candidate for political office; any person acting in an official capacity; or an officer or employee of a public international organization.</p>	<p>公职人员 - 政府官员，无论是当选的还是任命的；政府机构或国有或国有控股实体的官员或雇员；代表政府或政府机构提供公共服务的人；政党或政党官员；政治职位候选人；任何以公职身份行事的人；或国际公共组织的官员或雇员。</p>
<p>Third Party - Any person or entity who acts on behalf of or represents Moog, including but not limited to sales agents or representatives, distributors, consultants, lobbyists, transportation or logistics providers, customs clearing agents, or any person or entity retained to represent Moog in a matter before a public official, government agency, or in tax or legal matters.</p>	<p>第三方 - 代表 Moog 行事的任何个人或实体，包括但不限于销售代理或代表、分销商、顾问、说客、运输或物流供应商、清关代理、或被聘请代表 Moog 处理公职人员、政府机构或税务或法律事务的任何人或实体。</p>
<p>Travel - All forms of transportation, including ground transit and air travel.</p>	<p>旅行 - 所有形式的交通工具，包括地面运输和空中旅行。</p>

<p style="text-align: center;">BASIC POLICY</p>	<p style="text-align: center;">基本政策</p>
<p>Moog prohibits bribery or any other improper payments in business dealings. Moog takes its legal responsibilities to prevent bribery very seriously and expects you to do the same. Where bribery might be a customary business practice in a given country, it is not a justification for violation of this policy. We expect full compliance with its terms from every single employee, whether permanent or temporary. The same expectation applies to employees of our agents and third parties acting on Moog's behalf.</p>	<p>Moog 禁止在商业交易中进行贿赂或任何其他不正当的付款。Moog 非常认真地履行其防止贿赂的法律责任，并希望您也能这样做。尽管贿赂在某一个国家/地区可能是一种习惯性商业行为，但它不是违反本政策的理由。我们希望每一位员工（无论是永久员工还是临时员工）都能完全遵守公司的条款。对我们的代理和代表 Moog 行事的第三方的员工也有同样的期望。</p>
<p style="text-align: center;">REQUIRED CONDUCT AND ACTIONS</p>	<p style="text-align: center;">所需行为和行动</p>
<p style="text-align: center;">BRIBERY AND FACILITATING PAYMENTS</p>	<p style="text-align: center;">贿赂和疏通费</p>
<p>Moog, our employees, and our third parties are prohibited from offering or giving a bribe, whether directly or indirectly, to any person or entity. Moog, our employees, and our third parties are prohibited from requesting or receiving a bribe, directly or indirectly, from any person or entity. All demands for bribes or kickbacks must be expressly rejected. Moog, our employees, and our third parties are prohibited from offering or making facilitating payments to public officials. If a Moog employee or third party believes there is a serious threat to a person's health or safety if a payment demand is not met, such payment would not be considered a prohibited bribe. In that situation, the employee or third party should immediately report the incident to the Corporate law department and the payment must be properly recorded as a bribe given under duress in Moog's books and records. Employees and third parties who refuse to pay a bribe will not suffer any penalty, demotion, or other adverse consequence as a result, even if Moog loses business. Employees and third parties are required to promptly report any suspected violations of this anti-bribery policy to Moog's Corporate law department, senior management, or the Moog hotline. No employee or third party will suffer any penalty, demotion or other adverse consequence for reports made in good faith. Reports will be treated confidentially to the extent possible, consistent with the need to conduct a thorough investigation.</p>	<p>Moog、我们的员工和我们的第三方不得直接或间接地提供或给予任何人或实体贿赂。Moog、我们的员工和我们的第三方不得直接或间接地要求或接受任何人或实体的贿赂。有关所有贿赂或回扣的要求必须明确拒绝。</p> <p>Moog、我们的员工和我们的第三方不得向公职人员提供或支付疏通费。如果 Moog 员工或第三方认为，如果付款要求没有得到满足，将对某人的健康或安全构成严重威胁，则这种付款将不会被禁止的贿赂。在这种情况下，员工或第三方应立即向公司法律部门报告该事件，并且必须在 Moog 的账簿和记录单中正确地将该付款记录为在胁迫下进行的贿赂。拒绝行贿的员工和第三方不会因此而遭受任何处罚、降职或其他不利后果，即使 Moog 失去业务。要求员工和第三方及时向 Moog 公司法律部门、高级管理层或 Moog 热线举报任何涉嫌违反本反贿赂政策的行为。任何员工或第三方均不会因善意举报而遭受任何处罚、降职或其他不良后果。为了进行彻底调查，将尽可能保密地处理举报。</p>

<p style="text-align: center;">CHARITABLE CONTRIBUTIONS</p>	<p style="text-align: center;">慈善捐款</p>
<p>No charitable donations may be given, offered, promised, or authorized without proper authorization. If a donation is authorized, it must fully comply with all applicable laws and be properly and accurately reflected in Moog's books and records.</p>	<p>未经适当授权，不得进行、提供、承诺或授权任何慈善捐赠。如果授权捐赠，则捐赠必须完全遵守所有适用法律，并在 Moog 的账簿和记录单中正确且准确地反映出来。</p>
<p style="text-align: center;">GIFTS, HOPITALITY AND TRAVEL</p>	<p style="text-align: center;">礼品、招待和旅行</p>
<p>Moog, our employees, and our third parties shall not offer or receive gifts, hospitality, or travel whenever these could affect the outcome of business transactions or other matters Moog is involved in, or where doing so would be in violation of the laws of the recipient's country. All gifts, hospitality, and travel must be made consistent with Moog's policies regarding gifts, hospitality, and travel, and be properly and accurately recorded in Moog's books, records, and accounts. Moog, our employees, and our third parties shall not offer or receive gifts, hospitality, or travel that are not reasonable and legitimate business expenditures. Any hospitality or travel offered or provided to public officials must be directly related to the promotion or demonstration of our products or services, or directly related to the performance of a contract with a government, government agency, or state-owned or -controlled entity. Any expenses that do not meet these criteria will not be reimbursed or otherwise paid for by Moog. In order to qualify for reimbursement, proposed gift, hospitality, and travel expenses must be explicitly detailed in the request (i.e., broken down by names and positions of government officials, dates and places of travel, and the amount and type of specific expenses). Moog reserves the right to deny, in whole or in part, any expenses related to the travel of a government or political party official (including officers and employees of government-owned or government-controlled enterprises) for any reason. Employees who authorize the reimbursement or payment of expenses covered by this section without following the above procedures will be subject to disciplinary action, including termination of employment.</p>	<p>Moog、我们的员工和我们的第三方不得在任何可能影响到业务交易或 Moog 涉及的其他事项的结果或违反接受方国家/地区法律的情况下提供或接受礼品、招待或旅行。所有的礼品、招待和旅行都必须符合 Moog 关于礼品、招待和旅行的政策，并正确且准确地记录在 Moog 的账簿、记录单和帐目中。Moog、我们的员工和第三方不得提供或接受不是合理合法的业务费用的礼品、招待或旅行。提供给公职人员的任何招待或旅行必须与我们的产品或服务的促销或演示直接相关，或者与与政府、政府机构或国有或国有控股实体的合同的履行直接相关。任何不符合这些标准的费用将无法报销，或由 Moog 以其他方式支付。为符合报销条件，提议的礼品、招待费和差旅费必须在申请中明确详细说明（即按政府官员姓名和职务、旅行日期和地点以及具体费用的数额和类型进行细分）。Moog 保留以任何理由全部或部分拒绝支付与政府或政党官员(包括政府所有或政府控制企业的官员和雇员)旅行相关的任何费用的权利。未按上述程序授权报销或支付本节所涵盖的费用的员工将受到纪律处分，包括解雇。</p>

<p style="text-align: center;">CONFLICTS OF INTEREST</p>	<p style="text-align: center;">利益冲突</p>
<p>Moog, our employees, and our third parties shall avoid any relationship or activity that might impair, or reasonably appear to impair, their ability to render objective and appropriate business decisions in the performance of their jobs.</p>	<p>Moog、我们的员工和我们的第三方应避免任何可能损害或合理看来损害他们在履行其工作时作出客观和适当商业决策的能力的关系或活动。</p>
<p style="text-align: center;">BOOKS AND RECORDS</p>	<p style="text-align: center;">账簿和记录单</p>
<p>Moog is committed to maintaining complete and accurate books, records, and accounts. All transactions, including payments, reimbursement requests, expenditures, expense reports, invoices, vouchers, gifts, and business entertainment must be properly and accurately entered into Moog's books, records, and accounts in a timely manner, in detail, and with supporting documentation. Failure to properly record an expense is a per se violation of the U.S. Foreign Corrupt Practices Act, for which there is strict liability. Therefore, a payment, while not intended to be a bribe, if not properly recorded, may still be treated as a violation of the law.</p>	<p>Moog 致力于维护完整和准确的账簿、记录单和帐目。所有交易，包括付款、报销申请、支出、费用报告、发票、收据、礼品和商务招待，必须及时、详细、正确且准确地录入到 Moog 的账簿、记录单和帐目中，并附上证明文件。未正确记录费用本身就违反了美国反海外腐败法，对此应负有严格责任。因此，尽管一笔付款不是为了贿赂，但如果沒有正确记录，仍可被视为一种违法行为。</p>
<p style="text-align: center;">TRAINING</p>	<p style="text-align: center;">培训</p>
<p>Officers, directors, and employees are expected to participate in anti-bribery training on a periodic basis. Managers and supervisors subject to completing periodic financial reporting questionnaires must certify that they have read this policy and that they are acting and will continue to act in compliance with this policy.</p>	<p>官员、董事和员工应定期参加反贿赂培训。需填写定期财务报告调查表的管理人员和主管必须证明他们已经阅读了本政策，并且他们正在并将继续按照本政策行事。</p>
<p style="text-align: center;">CONSEQUENCES OF NON-COMPLIANCE</p>	<p style="text-align: center;">不遵守本政策的后果</p>
<p>Under a variety of anti-bribery laws applicable to our world-wide operations, bribery is not only a civil violation, it is a criminal offense punishable by the imposition of substantial fines on Moog and the loss of licensing and contracting privileges. Any person involved in the bribery faces the real possibility of termination of employment, substantial fines, and imprisonment.</p>	<p>根据适用于我们全球业务的各种反贿赂法律，贿赂不仅是一种民事违法行为，而且是一种刑事犯罪，可以对 Moog 处以巨额罚款，并剥夺许可和签约特权。任何参与贿赂的人都很有可能面临解雇、处以巨额罚款和监禁。</p>
<p>Moog123284.1 August 2020 ##</p>	