



**AIM METALS & ALLOYS INC.\***

**ETHICS CODE**  
**AIM 金属与合金股份有限公司**  
**道德行为准则**

\* Which includes its affiliated entities and subsidiaries, collectively called AIM Solder

包括其附属实体和子公司，统称为 AIM 焊料

**AIM Metals & Alloys Inc./ AIM金属与合金股份有限公司**

**Contents / 目录**

<b>I. Introduction and statement of purpose/导言和目的陈述</b> .....	<b>4</b>
<b>II. Policies and practices/政策和实践</b> .....	<b>5</b>
<b>A. Conflicts of Interest/利益冲突</b> .....	<b>5</b>
1. Personal Financial Gain/个人财产收益.....	6
2. Employment of Relatives/亲属雇佣.....	6
3. Outside Activities/外部活动.....	6
4. Dealing with Suppliers, Customers, Agents and Other Third Parties/与供应商、客户、代理和其他第三方打交道 .....	7
5. Use of Company Property and Information/公司财产和信息的使用 .....	10
<b>B. Anticorruption Laws and Regulations/反腐败法律法规</b> .....	<b>15</b>
1. Corruption Involving Foreign Government Officials/涉及外国政府官员的腐败 .....	15
2. Commercial Bribery and Corruption Involving Non-Governmental Entities/非及政府实体的商业贿赂和腐败 .....	15
<b>C. Anti-Money Laundering and Anti-Terrorism Laws and Regulations/s 和反恐怖主义法规</b> .....	<b>17</b>
<b>D. Policy on Employment of Asylum Seekers</b> 关于接纳寻求庇护者就业的政策.....	<b>18</b>
<b>E. Books and Records/账簿和记录</b> .....	<b>18</b>
1. Financial Records/财务记录 .....	18
2. Expenses/费用 .....	19
<b>F. Competitive Practices/竞争实践</b> .....	<b>20</b>
1. Communications with Competitors/与竞争对手的沟通 .....	20
2. Information about Competitors/竞争对手信息 .....	21
<b>G. Political Activities and Contributions/政治活动和贡献</b> .....	<b>21</b>
<b>H. Safety, Health and Environment/安全、健康和环境</b> .....	<b>22</b>
(a) Environment, Health & Safety/环境、健康与安全 .....	22
(b) Safety and quality of our products and services/产品及服务的安全、质量 .....	23
(c) Environment/环境 .....	24
<b>I. Employment Policies/就业政策</b> .....	<b>25</b>

<b>J. Computer, Mobile Devices, E-mail and Internet Policies/计算机、移动设备、电子邮件和互联网政策.....</b>	<b>28</b>
1. The Computer System is Company Property/计算机系统是公司财产 .....	28
2. No Expectation of Privacy/不期望隐私.....	29
3. Professional Use of Computer System Required/需要专业使用计算机系统.....	29
4. Offensive and Inappropriate Material; Illegal Activities/冒犯性和不适当的材料，非法活动 .....	29
5. Solicitations/请求 .....	30
6. Copyrights and Trademarks/版权和商标 .....	30
<b>III. Compliance with the code of ethics/遵守道德规范.....</b>	<b>30</b>
<b>IV. Reporting suspected non-compliance/报告疑似不合规.....</b>	<b>31</b>
A. General Policy/一般政策.....	31
B. Compliance Procedures/合规程序.....	32
1. Notification of Complaint/投诉通知 .....	32
2. Investigation/调查 .....	33
3. Confidentiality/保密 .....	33
4. Protection against Retaliation/防止报复 .....	34
<b>Signature/签名页 .....</b>	<b>35</b>

## I. Introduction and statement of purpose/介绍和目的的陈述

The purpose of this Ethics Code is to set fundamental principles such as ethics and integrity on which AIM Metals & Alloys Inc. ("AIM Solder" or the "Company") conducts business and provide basic guidelines for situations in which the Company's employee/supplier, officers and directors are confronted with ethical issues arising in connection with the Company's corporate activities ("Code" or "Code of Ethics").

本道德规范的目的是制定基本原则，诸如AIM金属与合金股份有限公司（“AIM焊料”或合金“公司”）开展业务所依据的道德和诚信，并为公司员工/供应商、管理人员和董事面临与公司企业活动相关的道德问题时提供基本指导方针（“道德准则”或“道德准则”）。

We strive to do business with customers and suppliers of good reputation and healthy business practices. We do not knowingly support any public or private organization that engages in discriminatory policies or practices. We expect all our employee/supplier, officers and all third parties with whom we work to perform their work with honesty and integrity and in a manner that will reflect favorably on the Company and each of us.

我们努力与具有良好声誉和健康商业惯例的客户和供应商开展业务。我们不会故意支持任何从事歧视性政策或做法的公共或私人组织。我们希望我们的所有员工/供应商、管理人员和与我们合作的所有第三方以诚实和正直的方式开展工作，并以对公司和我们每个人都有利的方式进行工作。

It is the Company's policy to comply with all applicable governmental laws, rules, and regulations of the countries where we do business, including, without limitation, employment, discrimination, health, safety, antitrust, and environmental laws. Furthermore, if a country's regulations exceed ours, we will comply with it. No employee/supplier, officer or director of the Company and no third party with whom the Company works has authority to violate any law or to direct another employee/supplier or any other person to violate any law on behalf of the Company.

公司的政策是遵守我们开展业务所在国家的所有适用政府法律、规则和法规，包括但不限于就业、歧视、健康、安全、反垄断和环境法律。此外，如果一个国家的规定超过了我们的规定，我们将遵守。公司的任何员工/供应商、高管或董事以及与公司合作的任何第三方都无权违反任何法律，也无权代表公司指示其他员工/供应商或任何其他人违反任何法律。

All employee/supplier, officers and directors of the Company are responsible for observing this Code of Ethics. Further, each manager and supervisor are responsible for ensuring that all company compliance procedures and controls are followed. Ultimately, the Company's Human Resources department is responsible for monitoring and ensuring the Company's compliance with this Code.

公司的所有员工/供应商、高管和董事都有责任遵守本道德规范。此外，每位经理和主管负责确保遵守所有公司合规程序和控制措施。最终，公司人力资源部负责监督并确保公司遵守本准则。

No code can cover all circumstances or anticipate every situation. If you encounter situations not addressed specifically by this Ethics Code you should apply the overall philosophy and concepts of this Ethics Code to the situation. If you have questions about any section of this Code, direct them to your immediate supervisor or the Human Resources department.

没有准则可以涵盖所有情况或预测每种情况。如果您遇到本《道德准则》未具体说明的情况，您应将本《道德准则》的总体理念和概念应用于该情况。如果您对本准则的任何部分有疑问，请向您的直接主管或人力资源部提出。

Further, if you become aware of a violation of this Ethics Code, you are obligated to report it in accordance with procedures set forth in section IV.B below, and no one has the authority to retaliate, threaten or intimidate against an employee/supplier who reports a suspected violation. 此外，如果您发现违反本道德准则的行为，您有义务按照下文第IV.B节规定的程序进行报告，任何人都无权对报告可疑违规行为的员工/供应商进行报复、威胁或恐吓。

To the extent possible, the Company will maintain the confidentiality of communications about suspected violations that are made in good faith, except where law or policy may require disclosure. A violation of the provisions of this Code of Ethics may result in appropriate disciplinary measures up to and including termination.

在可能的情况下，公司将对善意进行的涉嫌违规的通信保持机密性，除非法律或政策要求披露。违反本道德准则的规定可能会导致适当的纪律措施，直至解雇。

## II. Policies and practices/政策及实践

### A. Conflicts of Interest/利益冲突

A conflict of interest may arise in any situation in which an employee/supplier's, officer's or director's loyalties are divided between business interests that, to some degree, are incompatible with the interests of the Company. A conflict of interest may arise when an employee/supplier, officer or director takes actions or has interests that may make it difficult to perform his or her duties and responsibilities to the Company objectively and effectively. All such conflicts should be avoided. The Company expects that no employee/supplier, officer or director will knowingly place himself or herself in a position that would have the appearance of being, or could be construed to be, in conflict with the interests of the Company. While it is not feasible to list every circumstance giving rise to a possible conflict of interest, some of the more sensitive areas of conflicts of interest and the Company's related guidelines are as follows:

如果员工/供应商、高管或董事的忠诚度在某种程度上与公司利益不符的商业利益之间存在分歧，则可能会产生利益冲突。当员工/供应商、高级职员或董事采取行动或拥有利益，使其难以客观有效地履行其对公司的职责时，可能会产生利益冲突。应避免所有此类冲突。公司预计，任何**员工/供应商**、高管或董事都不会故意将自己置于看似或可能被解释为与公司利益相冲突的位置。虽然不可能列出所有可能导致利益冲突的情况，但一些更敏感的利益冲突领域和公司的相关指南如下：

#### 1. Personal Financial Gain/个人财务收益

Each of us should avoid any situation that may involve, or appear to involve, a conflict between our personal interests and the interests of the Company. In dealing with current or potential agents, business partners, customers, suppliers, contractors, consultants and competitors, we should act in the best interests of the Company. We should not seek to gain personal advantage because of our position in the Company. You should make prompt and full disclosure to your supervisor of any situation that may involve a conflict of interest. Employee/supplier, officers and directors are prohibited from: making personal use of opportunities that are discovered through the use of Company property, information, or position; using Company property, information or position for personal gain; and competing with the Company.

我们每个人都应避免任何可能涉及或似乎涉及我们个人利益与公司利益之间冲突的情况。在与当前或潜在的代理商、商业伙伴、客户、供应商、承包商、顾问和竞争对手打交道时，我们应以公司的最大利益为出发点。我们不应因为我们在公司的地位而寻求获得个人利益。对于可能涉及利益冲突的任何情况，您应及时向主管充分披露。禁止员工/供应商、高管和董事：个人利用通过使用公司财产、信息或职位发现的机会；利用公司财产、信息或职位谋取私利；并与公司竞争。

## 2. **Employment of Relatives/亲属雇佣**

An employee/supplier or officer may not supervise a family member or exercise direct or indirect influence over other employment decisions involving a family member without the prior approval of a member of the Company's executive branch. The Company's Human Resources department should be consulted for assistance and guidance in employment of family and others with whom an employee/supplier may have an intimate relationship.

未经公司行政部门成员事先批准，员工/供应商或高管不得监督家庭成员，或对涉及家庭成员的其他雇佣决策施加直接或间接影响。应咨询公司的人力资源部门，以寻求在雇佣家庭和员工可能有亲密关系的其他人方面的帮助和指导。

For example: you have a niece who just graduated with a degree in engineering. If we hired her, she would not report to you. Can you recommend her for a position? Some of our best hires come from employee/supplier referrals. To avoid the appearance of any impropriety, you must disclose this relationship to the hiring manager. You should not participate in the hiring process, so that your niece can be evaluated based solely on her merits.

例如：你有一个刚毕业的侄女，她获得了工程学学位。如果我们雇了她，她不会向你汇报。你能向她推荐一个职位吗？我们的一些优秀员工来自员工/供应商推荐。为了避免出现任何不当行为，您必须向招聘经理披露这一关系。你不应该参与招聘过程，这样你的侄女就可以完全根据她的优点来评估

## 3. **Outside Activities/外部活动**

Employee/supplier should not have outside employment or engage in activities that will have a negative impact on the performance of their duties with the Company, or in any way impact negatively the good name and reputation of the Company. We want all of our employee/supplier to be efficient and loyal in their work, and available as necessary to meet unusual or emergency work demands. Employee/supplier who have outside employment or activities may not use Company time, facilities, resources or supplies for such work.

员工/供应商不得从事外部工作或从事会对其在公司履行职责产生负面影响的活动，或以任何方式对公司的良好声誉和声誉产生负面影响。我们希望所有员工/供应商在工作中高效、忠诚，并在必要时随时待命，以满足异常或紧急工作需求。从事外部工作或活动的员工/供应商不得使用公司的时间、设施、资源或用品从事此类工作。

Employee/supplier must immediately disclose to the Company any outside employment, activities or involvement in a business or enterprise which may constitute a breach of the Employee/supplier's obligations hereunder, which may prevent or impede the Employee/supplier's ability to fulfill the requirements of their employment with the Company, or which may cause an actual or perceived conflict of interests between the Employee/supplier and the Company.

员工/供应商必须立即向公司披露任何可能构成违反员工/供应商在本协议项下义务的外部雇佣、活动或参与业务或企业，可能阻止或阻碍员工/供应商履行其在本公司的雇佣要求的能力，或可能导致员工/供应商与本公司之间实际或感知的利益冲突。

#### 4. **Dealing with Suppliers, Customers, Agents and Other Third Parties**

##### 与供应商、客户、代理和其他第三方打交道

The Company obtains and keeps business because of the quality and value of its products and services and the respect and confidence it instils both in its customers and suppliers. Conducting business with suppliers, customers, agents and other third parties related thereto can pose ethical or even legal problems. Employee/supplier, officers and directors should conduct their business affairs in such a manner that the Company's reputation will not be impugned if the details of their dealings should become a matter of public discussion. The Company prohibits employee/supplier from (1) soliciting for themselves or for a third party anything of value from anyone in return for any business, service or confidential information of the Company or (2) accepting anything of value other than *bona fide* salary, wages, fees or other compensation paid in the usual course of business from anyone in connection with the business of the Company. We also expect each of our employee/supplier and officers to conduct themselves appropriately at all times as representatives of the Company in order to not give any third party a reason to believe that the employee/supplier or our Company is anything other than ethical and above reproach.

公司获得并保持业务是因为其产品和服务的质量和价值，以及它对客户和供应商的尊重和信心。与供应商、客户、代理和其他与之相关的第三方开展业务可能会带来道德甚至法律问题。员工/供应商、高级管理人员和董事应

以这样一种方式处理他们的业务，即如果他们的交易细节成为公众讨论的问题，公司的声誉不会受到质疑。公司禁止员工/供应商(1)为自己或为第三方向任何人索取任何有价值的东西，以换取公司的任何业务、服务或机密信息；或(2)接受任何与公司业务有关的人在正常业务过程中支付的除真实工资、工资、费用或其他补偿以外的任何有价值的东西。我们还希望我们的每一位员工/供应商和管理人员在任何时候都能以公司代表的身份适当行事，不让任何第三方有理由认为该员工/供应商或我们公司不符合道德规范和无可指责。

(a) **Prohibition on Kickbacks and Rebates/禁止任何形式的回扣**

No employee/supplier, officer, director nor his or her spouse, domestic partner or any other member of the employee/supplier's immediate family (collectively, the "Family") may, directly or indirectly, offer or receive personal kickbacks or rebates in connection with the Company's purchases or sales of goods or services. Kickbacks or rebates can take many forms and are not limited to cash payments. For example, no employee/supplier, officer, director or family member shall offer or accept any funds or other assets for assisting in obtaining business or for securing special concessions from the Company, or for otherwise compromising independent judgment. Such practices are not only unethical but may at times be illegal.

员工/供应商、高管、董事及其配偶、家庭伴侣或员工/供应商直系亲属的任何其他成员（统称为“家庭”）不得直接或间接提供或接受与公司购买或销售商品或服务相关的个人回扣或回扣。回扣或回扣可以采取多种形式，不限于现金支付。例如，任何员工/供应商、高管、董事或家庭成员不得提供或接受任何资金或其他资产，以协助获得业务或获得公司的特别特许权，或以其他方式损害独立判断。这种做法不仅不道德，有时也可能是非法的。

If a family member might benefit from a transaction with the Company, the employee/supplier must advise his or her Supervisor so that the Company may determine the propriety of the transaction. Such a transaction may not be entered into without prior written approval of the Human Resources department.

如果家庭成员可能从与公司的交易中受益，员工/供应商必须通知其主管，以便公司确定交易的适当性。未经人力资源部事先书面批准，不得进行此类交易。

(b) **Prohibition on Accepting and Receiving Gifts, Gratuities or Entertainment. 禁止接受和接受礼物、馈赠或娱乐**

The Company seeks to discourage gift givers from soliciting special favors from employee/supplier, executives or directors of the Company. The acceptance of a gift or any entertainment beyond the normal social setting

may appear to be an incentive for the recipient to favor a customer, supplier, consultant or other similar party. Thus, accepting or receiving gifts as an employee/supplier of AIM Solder, either in cash, or soliciting non-monetary gifts, gratuities or other personal benefits or favors of any kind from customers, suppliers or other related parties is prohibited. If you receive a gift, please notify your immediate supervisor and the Corporate Human Resources department as soon as possible.

公司试图阻止送礼者向公司员工/供应商、高管或董事寻求特殊帮助。接受礼物或任何超出正常社交环境的娱乐可能会激励接受者青睐客户、供应商、顾问或其他类似方。因此，禁止作为AIM焊料的员工/供应商接受或接受现金礼物，或从客户、供应商或其他相关方索取非金钱礼物、小费或其他个人利益或任何形式的恩惠。如果您收到礼物，请尽快通知您的直属主管和公司人力资源部。

Promotional premiums and discounts: Employee/supplier, officers and directors may accept promotional premiums and discounts offered by transportation companies, hotels, auto rental agencies and restaurants, based on membership in bonus programs for individuals and offered to travellers generally.

促销溢价和折扣：员工/供应商、管理人员和董事可以接受交通公司、酒店、汽车租赁机构和餐馆提供的促销溢价和打折，这取决于个人奖励计划的会员资格以及一般向旅行者提供的优惠。

(c) **Agreements with Agents and Business Partners**

与代理商及业务伙伴的协议

Generally, agreements with agents or business partners must be in writing and must clearly and accurately set forth the services to be performed, the basis for earning the commission or fee involved, and the applicable rate or fee. Any commission or fee paid to a third party working on behalf of the Company must be reasonable in amount, not excessive in light of the practice in the trade, and commensurate with the value of the services rendered. In some countries, local laws may prohibit the use of agents or limit the rate of commissions or fees. In any event, any agent contracts must be reviewed by a Legal Counsel prior to signing. Please contact the Human Resources department.

通常，与代理商或业务合作伙伴的协议必须是书面的，并且必须清楚、准确地规定要提供的服务、赚取佣金或费用的依据以及适用的费率或费用。向代表公司工作的第三方支付的任何佣金或费用必须数额合理，根据行业惯例不得过高，并与所提供的服务的价值相称。在一些国家，当地法律可能禁止使用代理人或限制佣金或费用的比率。在任何情况下，任何代理合同必须在签署前由法律顾问审查。请联系人力资源部

(d) **International Trade Laws/国际贸易法**

We follow the trade laws of all countries wherein AIM Solder conducts business, including the import and export control of specific goods, services or technology. We also comply with laws prohibiting transactions with specific countries, entities or people, participating in international boycotts. Furthermore, we follow the laws of government approval, licenses or other requirements necessary to complete a transaction or sale product labelling.

我们遵守AIM焊料开展业务的所有国家的贸易法，包括特定商品、服务或技术的进出口管制。我们还遵守法律，禁止与特定国家、实体或个人进行交易，参与国际抵制。此外，我们遵循政府批准、许可证或完成交易或销售产品标签所需的其他要求的法律。

To apply these principles, AIM Solder must keep accurate records of its international trade. The Company must follow policies and processes when selling and shipping products to other countries or when importing anything. Additionally, the Company should make efforts to ensure customers, business partners, suppliers, service providers, agents, consultants and distributors follow AIM Solder's policies and procedures. Finally, AIM Solder should engage companies and business partners only once they agree to abide by acceptable international trade practices.

为了应用这些原则，AIM焊料必须保持其国际贸易的准确记录。在向其他国家销售和运输产品或进口任何产品时，公司必须遵守政策和流程。此外，公司应努力确保客户、业务合作伙伴、供应商、服务提供商、代理商、顾问和分销商遵守AIM焊料的政策和程序。最后，AIM焊料应仅在公司和商业伙伴同意遵守可接受的国际贸易惯例后才与他们接触。

## 5. Use of Company Property and Information/公司财产和信息的使用

The Company's employee/supplier, officers, and directors are each responsible for the proper use of the Company's resources and property, including its proprietary and other confidential information, for valid corporate purposes. Except as otherwise expressly provided, the Company's assets are to be used solely for the benefit of the Company. The Company's assets are much more than its facilities, equipment, inventory, corporate funds or office supplies. They include technologies, concepts, business strategies and plans, financial data and other information about the Company's business and operations. These assets may not be used improperly to provide personal gain. The Company's assets may not be transferred to other people or entities except in the ordinary course of business. Unless otherwise prohibited by an employee/supplier's supervisor, reasonable and appropriate incidental use of Company telephones, computers or other equipment is permitted. Employee/supplier should have no expectation of privacy

in connection with their use of Company telephones, computers and other communications equipment.

公司的员工/供应商、高管和董事各自负责为有效的公司目的正确使用公司的资源和财产，包括其专有信息和其他机密信息。除非另有明确规定，否则公司的资产仅用于公司的利益。公司的资产远远超过其设施、设备、库存、公司资金或办公用品。它们包括技术、概念、业务战略和计划、财务数据以及有关公司业务和运营的其他信息。这些资产不得不当用于提供个人利益。除非在正常业务过程中，否则不得将公司资产转让给其他人或实体。除非员工/供应商主管另有禁止，否则允许合理和适当地附带使用公司电话、计算机或其他设备。员工/供应商在使用公司电话、计算机和其他通信设备时，不应有隐私要求。

(a) **Company Property and Facilities/公司财产和设施**

Company property, facilities or physical resources may not be used for solicitation or distribution activities which are not related to an employee/supplier's services to the Company, except for charitable or not for profit activities that have been approved in writing in advance by the Company. Employee/supplier may not solicit any other employee/supplier during working time, nor may employee/supplier distribute literature in work areas at any time. Under no circumstances may an employee/supplier disturb the work of others to solicit or distribute literature to them during their working time. People not employed by the Company may not solicit Company employee/supplier for any purposes on Company premises.

员工/供应商不得将公司财产、设施或物质资源用于与对公司的服务无关的招揽或分配活动，但公司事先书面批准的慈善或非营利活动除外。员工/供应商在工作时间内不得招揽任何其他员工/供应商，也不得在任何时候在工作区域分发文学作品。在任何情况下，员工/供应商不得在工作时间打扰他人的工作，向其索取或分发文学作品。非公司员工/供应商不得在公司场所为任何目的招揽公司员工

Any employee/supplier, officer or director found to be engaging in, or attempting, theft of any property of the Company, including documents, equipment, intellectual property, personal property of other employee/supplier, cash or any other items of value, will be subject to immediate termination and possible criminal proceedings against them. **All employee/supplier, officers and directors have a responsibility to report any theft or attempted theft to the Company's management.**

任何员工/供应商、管理人员或董事被发被发现参与或企图盗窃公司任何财产（包括文件、设备、知识产权、其他员工/供应商的个人财产、现金或任何其他 有价值的物品）的任何员工/供应商、高管或董事将被立即解雇，并可能受到刑事诉讼。**所有员工/供应商、高管和董事都有责任向公司管理层报告任何盗窃或企图盗窃行为**

(b) **Company Proprietary and Other Confidential Information**

公司专有信息或其它保密信息

We operate in competitive markets and should each be aware that in any competitive environment, propriety information and trade secrets must be safeguarded in the same way that all other important Company assets are protected. The Company's financial data and information concerning pricing, products, and services that are being developed, and other such trade secrets, including information pertaining to any prospective Company acquisition or divestiture, must be held in the strictest confidence, and reasonable prudence and care should be exercised in dealing with such information in order to avoid inadvertent, inappropriate disclosure. Confidential information obtained from other parties doing business with or seeking to do business with the Company must be used in compliance with any signed agreement governing its use. None of the foregoing information may be used in any way other than as required in performing employment duties. All files, records and reports acquired or created in the course of employment are the property of the Company. Originals or copies of Company documents may be removed from the Company's offices for the sole purpose of performing the employee/supplier' duties for the Company and must be returned at any time upon request.

我们在竞争激烈的市场中运营，每个人都应该意识到，在任何竞争环境中，专有信息和商业秘密必须受到保护，就像所有其他重要的公司资产受到保护一样。公司有关定价、产品和正在开发的服务的财务数据和信息，以及其他此类商业秘密，包括与公司任何潜在收购或剥离有关的信息，必须严格保密，并且在处理此类信息时应采取合理的谨慎和谨慎，以避免无意中不适当的披露。从与本公司有业务往来或寻求与本公司有业务往来的其他各方获得的机密信息，必须按照任何已签署的管理其使用的协议使用。上述信息不得用于除履行雇佣职责所需以外的任何其他用途。在雇佣过程中获得或创建的所有文件、记录和报告都是公司的财产。公司文件的原件或副本可仅为履行员工/供应商对公司的职责而从公司办公室移走，并应要求随时归还

Unless and until the Company releases proprietary and confidential information to the public (including blogs or other social media, except as required by your regular employment duties) **an employee/supplier should not disclose that information to other employee/supplier who do not have a business need-to-know or to non-employee/supplier** (including retirees) for any reason except in accordance with established corporate procedures. If someone outside the Company asks questions about the Company or its business activities, either directly or through another, do not attempt to answer them unless you have authority to do so. It is also the Company's policy not to respond to outside inquiries about

rumors or business matters except to confirm facts already made public. If you have a question about whether or not information is confidential, you should assume that it is and seek clarification from your supervisor or the Human Resources department.

除非公司向公众发布专有和保密信息（包括博客或其他社交媒体，除非您的正常工作职责要求），否则员工/供应商不得以任何理由向无业务需要的其他员工/供应商或非员工/供应商（包括退休人员）披露该信息，根据既定公司规定除外程序。如果公司以外的人直接或通过他人询问有关公司或其业务活动的问题，除非您有权这样做，否则不要试图回答。公司的政策是，除了确认已经公开的事实外，不回应外界关于谣言或业务事宜的询问。如果您对信息是否保密有疑问，您应该假设信息是保密的，并寻求主管或人力资源部门的澄清。

For example: A good basic starting point would be to ask what could be considered confidential or proprietary information and not use that information outside of your functions. If you know the details of a process, design, or formula that is not supposed to be public, for example, you should never share that information.

例如：一个很好的基本出发点是询问哪些信息可以被视为机密或专有信息，而不要在您的职能之外使用这些信息。例如，如果你知道不应该公开的流程、设计或公式的细节，你就不应该分享这些信息。

(c) **Trademarks, Service Marks and Copyrights/商标、服务标志和版权**

Trademarks and service marks - words, slogans, symbols, logos or other devices used to identify a particular source of goods or services - are important business tools and valuable assets which require care in their use and treatment. The Company's trademark is indicated by the ® symbol and should be used properly. No employee/supplier may negotiate or enter into any agreement regarding the Company's trademarks, service marks or logos without first consulting the Legal Department. The Company also respects the trademark rights of others. Any proposed naming of a new product or service intended to be marketed to customers must be submitted to the Legal department for clearance prior to its adoption and use. Similarly, using the trademark or service mark of another company, even one with whom the Company has a business relationship, always requires clearance or approval by the Legal department to ensure that the use of the other company's mark is proper.

商标和服务标志-用于识别特定商品或服务来源的文字，口号，符号，徽标或其他设备-是重要的商业工具和宝贵的资产，需要谨慎使用和处理。本公司的商标由®符号表示，应正确使用。在未事先咨询法务

部之前，任何员工/供应商不得就公司的商标、服务标志或徽标进行谈判或签订任何协议。公司也尊重他人的商标权。任何旨在向客户推销的新产品或服务的拟议命名必须在其采用和使用之前提交给法务部批准。同样，使用其他公司的商标或服务标志，即使是与本公司有业务关系的公司，也总是需要法务部门的许可或批准，以确保使用其他公司的商标是适当的

Employee/supplier must avoid the unauthorized use of materials copyrighted by others and should confer with the Human Resources if they have any questions regarding the permissibility of photocopying, excerpting, electronically copying or otherwise using copyrighted materials. In addition, simply because material is available for copying, such as matter downloaded from the Internet, does not mean that it is automatically permissible to copy or re-circulate (by, for example, E-mail or posting to an intranet facility). All copies of work that is authorized to be made available for ultimate distribution to the public, including machine readable works such as computer software, must bear the prescribed form of copyright notice.

员工/供应商必须避免未经授权使用他人拥有版权的材料，如果他们对复印、摘录、电子复制或以其他方式使用受版权保护的材料的许可有任何疑问，应与人力资源部门协商。此外，仅仅因为材料可以复制，例如从因特网上下载的材料，并不意味着自动允许复制或再传播（例如，通过电子邮件或张贴到内部网设施）。所有被授权向公众最终分发的作品副本，包括计算机软件等机器可读作品，必须带有规定形式的版权声明

The Company is legally entitled (without payment of any additional compensation) to all ownership rights in ideas, inventions and works of authorship relating to its business that are made by employee/supplier during the scope of their employment with the Company or using the resources of the Company.

员工/供应商在公司工作期间或使用公司资源所产生的与公司业务有关的创意、发明和作品，公司依法享有（无需支付任何额外补偿）所有所有权

d) **Social Media /社交媒体**

Employee/supplier should never associate the AIM Solder brand with lies, misleading claims, conspiracy theories or malicious content on social media. Financial, operational, intellectual property and other critical details about the company and its customers should never be revealed on an employee/supplier's personal social media account. Employee/supplier should never express grievances about the company or their colleagues online. Employee/supplier should be aware of the cultural and political implications of social media posts and avoid comments that may be

considered offensive. For more details, please consult AIM Solder's complete social media policy for more information and guidelines.

员工/供应商不得将AIM Solder品牌与社交媒体上的谎言、误导性声明、阴谋论或恶意内容联系在一起。财务、运营、知识产权和其他关于公司及其客户的关键细节不应该在员工/供应商的个人社交媒体账户上透露。员工/供应商永远不要在网上表达对公司或同事的不满。员工/供应商应意识到社交媒体帖子的文化和政治含义，并避免可能被视为冒犯的评论。欲了解更多详情，请查阅AIM Solder完整的社交媒体政策，了解更多信息和指导方针

## **B. Anticorruption Laws and Regulations/反腐败法律法规**

### **1. Corruption Involving Foreign Government Officials/涉及外国政府官员的腐败**

It is AIM Solder's policy that all of its directors, officers, employee/supplier and shareholders acting on its behalf of AIM Solder ("AIM Solder personnel") shall not pay, offer to pay or promise to give anything of value, directly or indirectly, to any third party, including any government/political official(s) for the purpose of obtaining any improper advantage or business. Examples of situations that may constitute making improper payments to third parties, including government/political officials and giving gifts, paying tips or other monetary amounts not required by law, providing entertainment or sponsoring travel.

AIM焊料的政策是，其所有董事、高级职员、员工/供应商和代表AIM焊料行事的股东（“AIM焊料人员”）不得直接或间接向任何第三方（包括任何政府/政治官员）支付、提议支付或承诺给予任何有价值的东西，以获取任何不正当的利益或业务。可能构成向第三方支付不当款项的情况示例，包括政府/政治官员，赠送礼物，支付小费或法律未要求的其他金钱金额，提供娱乐或赞助旅行

### **2. Commercial Bribery and Corruption Involving Non-Governmental Entities**

涉及非政府实体的商业贿赂和腐败

(a) No one acting for or on behalf of AIM Solder shall, either directly or indirectly, offer, make, promise, approve or authorize the making of any improper payment.

任何代表或代表AIM Solder的人均不得直接或间接提供、作出、承诺、批准或授权进行任何不当付款。

(b) No one acting for or on behalf of AIM Solder shall, either directly or indirectly, offer, make, promise, approve or authorize the making of any payment to any other person or entity knowing that such person or entity

will, directly or indirectly, offer, make, promise, approve or authorize the making of any improper payment.

任何代表或代表AIM Solder的人均不得直接或间接地向任何其他人或实体提供、做出、承诺、批准或授权进行任何付款，而该等人或实体知道该等人或实体将直接或间接地提供、做出、承诺、批准或授权进行任何不当付款。

(c) No one acting for or on behalf of AIM Solder shall offer, pay, promise or give, directly or indirectly, anything of value in any form to an agent, intermediary or employee/supplier of another company with the intent to improperly influence the recipient's action in relation to that company's affairs or business.

任何代表或代表AIM Solder的人都不得直接或间接地向另一家公司的代理人、中间人或雇员/供应商提供、支付、承诺或给予任何形式的任何有价值的东西，意图不正当地影响接收方在该公司事务或业务方面的行为。

(d) No one acting for or on behalf of AIM Solder shall offer, pay, promise or give, directly or indirectly, any commissions, brokerages, kickbacks, rebates or other compensation to an agent, intermediary or employee/supplier of another company.

任何代表或代表AIM Solder的人不得直接或间接向另一家公司的代理、中介或员工/供应商提供、支付、承诺或给予任何佣金、经纪、回扣、回扣或其他补偿。

(e) In all circumstances, AIM Solder personnel must deal fairly, openly and honestly and not in a corrupt manner.

在任何情况下，AIM焊工人员必须公平、公开和诚实地行事，不得以腐败的方式行事

For example: A city clerk is refusing to release a payment owed to AIM Solder unless you make an extra cash payment, which the clerk says will “speed things up.” The amount he’s asking for is small enough that you might consider even paying it out of your own pocket, and then it doesn’t have to be on AIM Solder’s books. What should you do? Regardless of the clerk’s characterization of the payment, it is effectively a bribe. AIM Solder’s policies and core values prohibit payments that are or could be interpreted as bribes, even if they are customary in the country where we’re doing business. AIM Solder’s books and records must accurately reflect our business transactions—improperly recording our transactions constitutes a violation of law and policy. What is suggested above would be not only misguided, but also illegal under the laws that apply to AIM Solder. Contact the Legal Department immediately if you ever believe that you are being asked to pay a bribe.

例如：一名城市办事员拒绝支付欠AIM Solder的款项，除非你支付额外的现金，办事员说这样可以“加快速度”。他要求的金额很小，你甚至可能会考虑自掏腰包，而且这笔钱也不必记在AIM Solder的账上。你应该怎么做？不管店员如何描述这笔付款，这实际上是一种贿赂。AIM Solder的政策和核心价值观禁止被解释为或可能被解释为贿赂的付款，即使这在我们开展业务的国家是惯例。AIM Solder的账簿和记录必须准确地反映我们的业务交易-不恰当地记录我们的交易构成违反法律和政策。上面的建议不仅是错误的，而且根据适用于AIM Solder的法律也是非法的。如果你认为你被要求行贿，立即与法务部联系。

## C. Anti-Money Laundering and Anti-Terrorism Laws and Regulations

### 反洗钱和反恐怖主义法规

It is AIM Solder's policy to only associate with entities and individuals engaged in legitimate business and not with those who may be involved in criminal activities. Persons engaged in illegal business transactions or terrorism-related activities often seek to "launder" or use previously "laundered" proceeds of illegal or unlawful activities. Therefore, AIM Solder, its subsidiaries and affiliates, joint ventures, directors, officers, employee/supplier and shareholders acting for or on their behalf, shall not knowingly:

AIM Solder的政策是只与从事合法业务的实体和个人联系，而不与可能参与犯罪活动的实体和个人联系。从事非法商业交易或与恐怖主义有关活动的人往往寻求“洗钱”或使用以前“洗钱”的非法或非法活动的收益。因此，AIM Solder及其子公司和附属公司、合资企业、董事、高级管理人员、员工/供应商以及代表其行事的股东不得知情：

- (a) engage in any financial transaction involving property, funds or monetary instruments which, directly or indirectly, promotes or results from criminal activity punishable under the laws of any country;  
从事涉及财产、资金或货币工具的任何金融交易，直接或间接促进或促成根据任何国家法律应予惩处的犯罪活动
- (b) receive, transfer, transport, retain, use, structure, divert or hide the proceeds of any criminal activity, or aid or abet another in any such action;  
接收、转移、运输、保留、使用、组织、转移或隐藏任何犯罪活动的收益，或协助或教唆他人从事任何此类活动
- (c) engage or become involved in, finance or support financially, or otherwise sponsor, facilitate or assist any terrorist person, activity or organization;  
从事或参与、资助或资助任何恐怖主义人员、活动或组织，或以其他方式赞助、便利或协助任何恐怖主义人员、活动或组织
- (d) aid, abet or otherwise become involved in any arrangement that would result in a violation of this Code or the Anticorruption Policy by any person;  
协助、教唆或以其他方式参与任何可能导致任何人违反本准则或《反腐败政策》的安排

(e) engage in any transaction or otherwise conduct business with a designated party, which means any person, entity or country that is designated in published lists issued by the Canadian government or the United Nations as a terrorist, a foreign terrorist organization, an organization that assists or provides support to a foreign terrorist organization, a proliferator of weapons of mass destruction, a narcotics trafficker or any other similar designation that would prohibit AIM Solder from engaging in a business transaction with that individual or entity under law.

与指定方进行任何交易或以其他方式开展业务，指定方指在加拿大政府或联合国发布的公布名单中被指定为恐怖分子、外国恐怖组织、协助或支持外国恐怖组织的组织、大规模毁灭性武器扩散者的任何个人、实体或国家；毒品贩子或任何其他类似的名称，禁止AIM Solder与该个人或实体进行法律规定的商业交易。

#### **D. Policy on Employment of Asylum Seekers**

AIM Solder is committed to adhering to all applicable immigration and labor laws. As part of this commitment, the Company will not employ individuals who are currently seeking asylum and have not yet received work authorization. This policy ensures compliance with legal requirements and supports the integrity of our hiring practices. We recognize the importance of providing opportunities to authorized workers and maintaining a lawful and ethical workplace.

AIM Solder 公司致力于遵守所有相关的移民和劳工法律。作为这一承诺的一部分，公司不会雇用那些正在寻求庇护且尚未获得工作许可的人员。这一政策确保了符合法律要求，并支持了我们招聘实践的公正性。我们认识到为获得授权的员工提供机会以及维持合法且道德的工作环境的重要性。

#### **E. Books and Records/账簿和记录**

The Company must maintain accurate and complete records. It is the Company's policy that each of its employee/supplier, officers, directors and agents make and keep books, records and accounts which, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the Company and any of its subsidiaries.

公司必须保持准确和完整的记录。本公司的政策是，其每位员工/供应商、高级管理人员、董事和代理均应制作并保存账簿、记录和账目，这些账簿、记录和账目应以合理的细节准确、公平地反映本公司及其任何子公司的交易和资产处置情况

##### **1. Financial Records/财务记录**

AIM Solder's accounting and financial records must reflect in an accurate, complete and timely manner, in reasonable details, every business transaction undertaken by the Company and must conform to all applicable legal

requirements and AIM's system of internal controls. All personnel who have control over AIM's assets and transactions is responsible for establishing and / or maintaining a system of internal controls in its area of responsibility designed to (a) prevent unauthorized, unrecorded or inaccurately recorded transactions and (b) permit the preparation of financial statements according to generally accepted accounting principles.

AIM Solder的会计和财务记录必须以准确、完整和及时的方式，以合理的细节反映公司进行的每项业务交易，并必须符合所有适用的法律要求和AIM的内部控制系统。所有控制AIM资产和交易的人员都有责任在其职责范围内建立和/或维护内部控制系统，旨在(a)防止未经授权、未记录或记录不准确的交易，以及(b)允许根据公认会计原则编制财务报表

For example: you work in the Finance department and are hard-pressed to make a payment to a customer late on a Friday afternoon. You know there is no conceivable way to issue the payment on time other than to override some of the internal controls put in place by your department, especially if you care to leave by the end of the day. Do you make the customer happy and leave a note to fill it all in on Monday?

例如：你在财务部门工作，在周五下午晚些时候给客户付款。你知道，要想按时付款，除了克服部门的一些内部控制之外，没有别的办法，尤其是如果你想在下班前离开的话。你是否让客户满意，并在周一留下一张纸条让他填写？

No, you must demand receipt of all required information and input it into the system prior to the issuance of any payment(s). Though you may simply want to "get the job done," it is of utmost importance that you insure it is done according to internal rules and policies.

不可以。在发出任何付款前，你必须要求收到所有所需资料，并将资料输入系统。虽然你可能只是想“完成工作”，但确保按照内部规则和政策完成工作是至关重要的

## 2. Expenses/费用

Authorized expenses incurred by employee/supplier in performing Company business will be reimbursed through the filing of expense reports, which must be documented accurately and completely in accordance with Company policies related to reimbursement of expenses.

For example: you are an account manager who processes expenses. Recently you received a department manager's application for expense reimbursement that is somewhat questionable. The manager, however, has clearly indicated that it is a travel-related expense. Given your relationship and the relatively minor amount what should you do?

员工/供应商在执行公司业务时发生的授权费用将通过费用报告的归档进行报销，费用报告必须准确完整地按照公司有关费用报销的政策进行记录。

例如：你是一个处理费用的客户经理。最近你收到了一个部门经理的报销申请，有一些问题。但是，经理明确表示这是一笔与旅行有关的费用。考虑到你们的关系和相对较小的金额，你应该怎么做？

In this case it's advisable to figure whether it is allowable before processing the expense. One error, though minor, could easily lead to several repeated errors of the same type. This could hurt our bottom line and risk inadvertently violating laws with serious consequences for the Company and all of us.

在这种情况下，最好在处理费用之前弄清楚是否允许。一个错误，虽然很小，但很容易导致几个相同类型的重复错误。这可能会损害我们的底线，并有可能在无意中违反法律，给公司和我们所有人带来严重后果。

## F. Competitive Practices/竞争实践

### 1. Communications with Competitors/与竞争对手的沟通

AIM Solder ethics its business in jurisdictions which have enacted antitrust or "competition" laws. These laws prohibit restraints of trade," which is certain conduct involving competitors, customers or supplies in the marketplace. Their purpose is to ensure that markets for goods and services operate competitively and efficiently, so that customers enjoy the benefit of open competition among their suppliers and sellers similarly benefit from competition among their purchasers. In Canada and some other jurisdictions, violations of the antitrust laws can lead to substantial civil liability - triple the actual economic damages to a plaintiff. Moreover, violations of the antitrust laws are often treated as criminal acts that can result in criminal convictions of both corporations and individuals. Nevertheless, it is not illegal or inappropriate for Company representatives and its competitors to meet and talk from time to time. However, such conversations must be conducted in accordance with applicable laws, and except as permitted by law, employee/supplier must scrupulously avoid commenting on such topics as pricing, production levels, marketing methods, inventories, product development, sales territories and goals, non-public market studies and any proprietary or confidential information. Except as permitted by law, discussions regarding customers must be limited to the exchange of credit information. The Human Resources Department should be consulted whenever questions arise that may involve antitrust implications.

AIM在制定了反托拉斯法或“竞争”法的司法管辖区规范其业务。这些法律禁止“贸易限制”，“贸易限制”指的是市场上涉及竞争对手、客户或供应的某些行为。它们的目的是确保商品和服务市场以竞争性和高效率的方式运作，使顾客从其供应商之间的公开竞争中获益，使销售者同样从其购买者之间的竞争中获益。在加拿大和其他一些司法管辖区，违反反垄断法可能导致重大民事责任-原告实际经济损失的三倍。此外，违反反垄断法的行为通常被视为犯罪行为，可能导致公司和个人的刑事定罪。然而，公司代表与其竞争对手不时会面交谈并不违法或不合适。但是，此类对话必须按照适用法律进行，并且除非法律允许，员工/供应商必须严格避免评论诸如定价、生产

水平、营销方法、库存、产品开发、销售区域和目标、非公开市场研究以及任何专有或机密信息等主题。除非法律允许，有关客户的讨论必须限于交换信用信息。

For example: you recently attended an industry-related networking event. During the reception some of the guests were talking and a competitor brought up a new marketing campaign, her company is promoting on YouTube. Some of the videos have already been posted which means they're public, yet you still felt uncomfortable about the topic and decided to leave the conversation. Was that the right thing to do? Yes, you did the right thing by moving on. Conferences and trade shows are important resources for staying current in our industry, but they can also create situations that can lead to competition law violations—often inadvertently. While discussing public ads is not necessarily a violation, the conversation could have easily turned to the long-term marketing strategy that prompted the campaign, or to future plans.

例如：你最近参加了一个行业相关的社交活动。在招待会上，一些客人在交谈，一位竞争对手提出了一个新的营销活动，她的公司正在YouTube上推广。有些视频已经发布了，这意味着它们是公开的，但你仍然对这个话题感到不舒服，决定离开这个话题。这样做对吗？是的，你向前看是对的。会议和贸易展览是保持我们行业最新发展的重要资源，但它们也可能造成违反竞争法的情况——通常是在不经意间。虽然讨论公共广告不一定是违法行为，但谈话可以很容易地转向推动该活动的长期营销策略，或者未来的计划

## 2. Information about Competitors/竞争对手信息

As a vigorous competitor, the Company naturally seeks to obtain economic knowledge about its competitors. However, the Company and its employee/supplier must not engage in illegal or improper acts to acquire a competitor's trade secrets or customer lists, or information about facilities, technical developments or operations. In addition, the Company will not seek to hire a competitor's employee/supplier for the purpose of obtaining confidential information or pressure a competitor's personnel, customers or suppliers to disclose confidential information.

作为一个强有力的竞争者，公司自然会寻求获得有关其竞争对手的经济知识。但是，公司及其员工/供应商不得从事非法或不正当行为，以获取竞争对手的商业秘密或客户名单，或有关设施、技术发展或运营的信息。此外，公司不会为了获取机密信息或迫使竞争对手的人员、客户或供应商披露机密信息而雇用竞争对手的员工/供应商。

## G. Political Activities and Contributions /政治活动和贡献

The Company encourages each of its employee/supplier to participate fully in the political process, but employee/supplier who participate in partisan political activities as individuals must avoid creating the impression that they are speaking or acting for the Company. In most jurisdictions, the Company cannot contribute to political candidates, political parties or party officials except through the means of approved vehicles.

公司鼓励每位员工/供应商充分参与政治过程，但以个人身份参与党派政治活动的员工/供应商必须避免给人留下他们代表公司发言或行事的印象。在大多数司法管辖区，本公司不能向政治候选人、政党或政党官员捐款，除非通过经批准的工具

For example: You are going to volunteer at a charity fundraiser this weekend. Is it okay if you represent yourself as an AIM Solder employee/supplier because you know the Company has been a long-time supporter of this charity? Although the Company also supports your charity, you should not attend any such event as an official AIM Solder representative without prior authorization to do so. Contact your management beforehand for authorization, and perhaps you can even get the Company to officially support the event.

这个周末你要去做慈善筹款活动的志愿者。如果您代表自己是AIM Solder的员工/供应商，是否可以，因为您知道该公司一直是该慈善机构的长期支持者？虽然公司也支持您的慈善事业，但未经事先授权，您不应作为AIM Solder的官方代表参加任何此类活动。事先与你的管理层联系以获得授权，也许你甚至可以让公司正式支持该活动

## H. Safety, Health and Environment/安全、健康和环境

### (a) Environment, Health & Safety /环境、健康、安全

The Company is committed to providing a safe and healthy workplace for its employee/supplier and visitors. In addition, several laws and regulations impose responsibility on the Company to safeguard against safety and health hazards. For that reason, and to protect the safety of themselves and others, employee/supplier and other persons who are present at Company facilities are required to carefully follow all safety instructions and procedures that the Company adopts. Questions about possible health and safety hazards at any Company facility should be directed immediately to your supervisor.

公司致力于为员工/供应商和访客提供安全健康的工作场所。此外，一些法律法规规定公司有责任防范安全和健康危害。因此，为了保护自己和他人的安全，员工/供应商和公司设施内的其他人员必须认真遵守公司采用的所有安全指示和程序。关于任何公司设施可能存在的健康和安全隐患，应立即向你的主管询问

The Company is committed to providing a safe work environment, including one that is free from the effects of drug and/or alcohol use and abuse. Please contact the Human Resources department to obtain information about these topics.

本公司致力于提供安全的工作环境，包括不受吸毒和/或酗酒影响的工作环境。请与人力资源部联系以获取有关这些主题的信息

For example: During work in the yard one day, a game begins and an employee/supplier throws a piece of metal at a colleague in jest. This action ends up injuring the recipient of the piece of metal. Neither the

perpetrator nor victim have informed anyone of this incident. You are the only witness – what should you do?

例如：一天在院子里工作时，一场游戏开始了，一名员工/供应商开玩笑地向一名同事扔了一块金属。这一行为最终会伤害到金属碎片的接受者。肇事者和受害者都没有将这一事件告知任何人。你是唯一的证人，你该怎么办？

It is of utmost importance that you bring this information to a supervisor for the sake of everyone's safety. You are encouraged to report to your supervisor or to the appropriate Company health and safety personnel conditions that you perceive to be unsafe, unhealthy or hazardous to the environment.

为了大家的安全着想，把这个信息告诉主管是非常重要的。我们鼓励您向您的主管或适当的公司健康和安全人员报告您认为不安全、不健康或对环境有害的情况。

**(b) Safety and quality of our products and services**

**我们的产品及服务的安全和质量**

AIM Solder is committed to providing safe, quality products and services. We assess risk and do not hide our mistakes. Employee/supplier are required to immediately contact quality management personnel if they are aware of any deficiency in product design, installation, or maintenance that could threaten anyone's health or safety. Also, if they become aware of anything that may harm the quality of our products or services, reputation or hurt AIM Solder's financial interests, a Supervisor must be contacted without delay.

AIM焊料致力于提供安全、优质的产品和服务。我们评估风险，不隐瞒我们的错误。如果员工/供应商发现产品设计、安装或维护中的任何缺陷可能威胁到任何人的健康或安全，应立即与质量管理人员联系。此外，如果他们发现任何可能损害我们的产品或服务质量、声誉或损害AIM Solder的财务利益的事情，必须立即联系主管

AIM Solder offers complete training to every employee/supplier upon hiring and throughout their employment to keep current about products, new technologies, new procedures and processes, health & safety, quality insurance and behaviour. This ensures our values to are applied throughout the employee/supplier's journey in any of our factories. The Company is certified ISO: 9001.

AIM焊料为每一位员工/供应商提供完整的培训，以确保他们在雇佣时和整个雇佣过程中了解最新的产品、新技术、新程序和工艺、健康与安全、质量保险和行为。这确保了我们的价值观在我们任何工厂的员工/供应商的旅程中得到应用。公司已通过ISO: 9001认证。

For example: Your job requires that you inspect 100 percent of the products going through the production line. Rarely do parts get rejected.

Production would be faster, and delivery to customers would be timelier, if you inspected 10 percent of the parts. Can you use your judgment and reduce the number of parts you inspect? No, quality requirements must be strictly adhered to at all times. Our customers expect all of our employee/supplier to perform their jobs accurately and thoroughly, especially when it comes to quality. You must continue to follow the job requirements, but you may have an innovative solution to improve production times and inspections. Discuss your ideas with your supervisor or process improvement representative. Until the requirements change, however, you are expected to perform all required inspections.

例如：你的工作要求你对生产线上的产品进行100%的检查。零件很少被拒绝。如果你检验了10%的零件，生产就会更快，交货给客户也会更及时。你能运用你的判断力，减少你检查零件的数量吗？不，任何时候都必须严格遵守质量要求。我们的客户希望我们所有的员工/供应商都能准确、彻底地完成他们的工作，尤其是在质量方面。你必须继续遵循工作要求，但你可能有一个创新的解决方案来改善生产时间和检查。与你的主管或过程改进代表讨论你的想法。然而，在需求改变之前，您需要执行所有必需的检查

### **(c) Environment /环境**

AIM Solder's products, services and manufacturing methods reflect our long tradition of prioritizing environmental concerns. It is important for each employee/supplier to follow environmental laws and regulations, as well as the Company's policies vis-à-vis environmental protection. Additionally, the company employs environmentally responsible practices, works to minimize toxic emissions, and uses and produces environmentally friendly products all the while addressing community concerns about the environment.

AIM焊料的产品，服务和制造方法反映了我们优先考虑环境问题的悠久传统。每位员工/供应商都必须遵守环境法律法规，以及公司关于-à-vis环境保护的政策。此外，该公司采用对环境负责的做法，努力减少有毒物质的排放，并使用和生产环保产品，同时解决社区对环境的关注。

The company is certified ISO 14001 (certain divisions only).

公司已通过ISO 14001认证（仅限某些部门）

## **I. Employment Policies/就业政策**

The Company is committed to fostering a work environment in which all individuals are treated with respect and dignity. Each individual should be permitted to work in a business-like atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment and any other harmful behaviour (language, derogatory conduct, intimidation, retaliation). Therefore, the Company expects all relationships among personnel in the workplace to be business-like and free

of unlawful bias, prejudice and harassment. It is the Company's policy to ensure equal employment opportunity without regard to race, colour, religion, age, national origin or ancestry, sex, pregnancy, citizenship status, marital status, physical or mental disability (related to work, personal or veteran's injuries), medical conditions, sexual orientation, or any other consideration made unlawful by applicable law.

公司致力于营造一个人都能得到尊重和尊严的工作环境。应允许每个人在商业氛围中工作，促进平等就业机会，禁止歧视做法，包括和任何其他有害行为（语言、贬损行为、恐吓、报复）。因此，公司希望工作场所人员之间的所有关系都具有商业性质，不存在非法偏见、偏见和骚扰。公司的政策是确保平等的就业机会，而不考虑种族、肤色、宗教、年龄、国籍或血统、性别、怀孕、公民身份、婚姻状况、身体或精神残疾（与工作、个人或退伍军人受伤有关）、医疗状况、性取向或任何其他适用法律规定为非法的考虑。

**Employment is freely chosen. There is no forced, bonded or involuntary prison labour. Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.**

就业是自由选择的。没有强迫、束缚或非自愿的监狱劳动。工人不需要向雇主缴纳“押金”或身份证件，并且在合理通知后可以自由离开雇主。

**Living wages are paid. Wages and benefits paid for a standard working month meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income. All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.**

支付生活工资。一个标准工作月的工资和福利至少符合国家法定标准或行业基准标准，以较高者为准。在任何情况下，工资都应该足以满足基本需要，并提供一些可自由支配的收入。应向所有工人提供书面和可理解的信息，说明他们在就业前的就业条件和每次支付工资时的工资细节。未经有关工人的明确许可，不得作为一种纪律措施扣减工资，也不得未经国家法律规定的任何扣减工资。所有纪律处分都应记录在案。

**Working hours are not excessive. Working hours must comply with national laws, collective agreements, and the provisions below, whichever affords the greater protection for workers. Working hours, excluding overtime, shall be defined by contract. All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment.**

工作时间不超长。工作时间必须符合国家法律、集体协议和下述规定，以对工人提供更大保护的规定为准。工作时间（不包括加班）由合同规定。所有加班都是自愿的。负责任地加班，考虑到以下所有因素：个别工人和整个劳动力的工作范围、频率和时间。不得代替正常就业。

Regular employment is provided. To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

提供固定就业机会。在任何可能的范围内，所从事的工作必须以通过国家法律和惯例确立的公认的雇佣关系为基础。不得通过采用纯劳动承包、转包或在家工作安排，或采用并非真正意图传授技能或提供正式就业的学徒计划，来逃避因正常雇佣关系而对雇员产生的劳动或社会保障法律法规规定的义务，也不得通过过度使用固定期限雇佣合同来逃避这种义务。

The Company's policy is to respect the legal rights of workers to freedom of association. Employee/supplier shall be able to communicate openly with management regarding subjects such as: health & safety, working conditions, career development without the threat of discrimination, reprisals, harassment, or intimidation.

公司的政策是尊重工人自由结社的合法权利。员工/供应商应能够就健康与安全、工作条件、职业发展等问题与管理层进行公开沟通，而不会受到歧视、报复、骚扰或恐吓的威胁

It is the Company's policy to comply with all applicable employment laws and other statutes regulating the employer-employee/supplier relationship and the workplace environment.

公司的政策是遵守所有适用的就业法律和其他规范雇主-雇员/供应商关系和工作场所环境的法规。

The Company also strictly adheres to laws regarding the non-employment of children. No child below the age of 16 can be employed in AIM Solder factories. Should statutory age limits indicate a higher age, then that number will be abided. All our suppliers must also have sufficient management systems in place to ensure no children are employed in any of their divisions absent of which AIM Solder will not conduct business with same. Young workers or students below the age of 18 can only undertake duties with low risks in the factory, and all laws concerning the treatment of young workers must be followed. Please read the company's policy in regard to this matter.

公司还严格遵守有关不雇用儿童的法律。16岁以下的儿童不得在AIM焊料工厂工作。如果法定年龄限制表明年龄更高，则将遵守该数字。我们所有的供应商也必须有足够的管理系统，以确保他们的任何部门都没有雇用儿童，否则AIM焊料将不会与儿童开展业务。18岁以下的青年工人或学生只能在工厂从事低风险的工作，并且必须遵守有关青年工人待遇的所有法律。请阅读公司关于此事的政策。

**In performing its obligations under this Code, the Company shall ensure on a best efforts basis, that each of its divisions on a global level as well as its Suppliers shall comply with all applicable laws, statutes, regulations in force from time to time and take reasonable steps to ensure that there is no modern slavery or human trafficking in the Suppliers' or subcontractors' supply chains or in any part of their business.**

在履行本准则项下的义务时，公司应尽最大努力确保其全球各部门及其供应商遵守不时生效的所有适用法律、法规和法规，并采取合理措施确保供应商或分包商的供应链或其业务的任何部分不存在现代奴役或人口贩运。

We are committed to ensure that modern slavery or human trafficking are not part of our business or in our supply chain. Human trafficking and modern slavery can take the form of using forced labor or involuntary in the performance of work, using misleading or fraudulent practices during the recruitment of employee/supplier, destroying, concealing or confiscating the employee/supplier's identity or immigration documents just to name a few. If someone believes to have suffered such treatment, employee/supplier must communicate immediately with their Human Resources department or by contacting the Alert Line of AIM Solder.

我们致力于确保现代奴役或人口贩运不在我们的业务或供应链中。人口贩运和现代奴役的形式包括在工作中使用强迫劳动或非自愿劳动，在招聘雇员/供应商期间使用误导或欺诈手段，销毁、隐瞒或没收雇员/供应商的身份或移民文件，仅举几例。如果有人认为遭受了这种待遇，员工/供应商必须立即与人力资源部门沟通，或联系AIM焊料的举报热线。

It is the Company's policy to respect the privacy of its employee/supplier, and therefore the Company maintains only those employee/supplier personnel and medical records necessary for business, legal or contractual purposes. Access to those records and the information contained therein is **limited to those with a need to know, for a legitimate business purpose**. The Company will comply with all applicable laws regulating the disclosure of personal information about employee/supplier and the protection of records containing medical or disability-related information.

本公司的政策是尊重员工/供应商的隐私，因此本公司只保留业务、法律或合同目的所必需的员工/供应商人员和医疗记录。查阅这些记录及其所载信息的权限仅限于出于合法商业目的而有必要了解的人士。公司将遵守所有有关雇员/供应商个人信息披露的适用法律，并保护包含医疗或残疾相关信息的记录。

For example: Your supervisor asked you to work with a service provider to create a team directory listing the employee/supplier working on your project. She wants you to provide each employee/supplier's name, work telephone number, work E-mail address, home

telephone number, and photograph to facilitate communication, teamwork, and sharing of contact information in the event of an emergency. Should you create and provide that list to the service provider? Not before consulting with the Human Resources Department. All of the information noted above constitutes Personal Information. Personal Information is defined as data that relates to an identified or identifiable person. Before collecting or sharing HR Personal Information, be sure to follow AIM Solder's standard work policy to confirm that collection and sharing are appropriate.

例如：您的主管要求您与服务提供商合作创建一个团队目录，列出为您的项目工作的员工/供应商。她希望您提供每个员工/供应商的姓名、工作电话号码、工作电子邮件地址、家庭电话号码和照片，以便在紧急情况下方便沟通、团队合作和共享联系信息。您是否应该创建并向服务提供者提供该列表？在咨询了人力资源部之后。上述所有信息均构成个人信息。个人信息被定义为与已识别或可识别的人相关的数据。在收集或共享人力资源个人信息之前，请确保遵守公司的标准工作政策，以确认收集和共享是适当的。

#### **J. Computer, Mobile Devices, E-mail and Internet Policies**

##### **计算机、移动设备、电子邮件和互联网正策**

Every employee/supplier is responsible for using the Company's computer system, including, without limitation, its computers, servers, electronic mail ("E-mail") system, mobile devices and the Internet (collectively, the "Computer System") properly and in accordance with Company policies. Any questions about these policies should be addressed to your immediate supervisor or the Human Resources Department. Employee/supplier should be aware of among other matters, the following:

每位员工/供应商有责任按照公司政策正确使用公司的计算机系统，包括但不限于公司的计算机、服务器、电子邮件（“电子邮件”）系统、移动设备和互联网（统称为“计算机系统”）。关于这些政策的任何问题都应该向你的直接主管或人力资源部提出。除其他事项外，员工/供应商应注意以下事项：

###### **1. The Computer System is Company Property/计算机系统是公司财产**

The computers and mobile devices that employee/supplier are provided or have access to for work and the E-mail system are the property of the Company and have been provided for use in conducting Company business. All communications and information transmitted by, received from, created on, or stored in its Computer System (whether through word-processing programs, E-mail, the Internet, social networks or otherwise) are Company records and property of the Company.

员工/供应商为工作提供或可以使用的计算机和移动设备以及电子邮件系统是公司的财产，并且是为开展公司业务而提供的。通过其计算机系统（无论是通过文字处理程序、电子邮件、互联网、社交网络或其他方式）传输、接收、创建或存储的所有通信和信息均为公司记录和公司财产。

###### **2. No Expectation of Privacy/不希望隐私**

The Company has the right, but not the duty, for any reason and without the permission of any employee/supplier, to monitor any and all aspects of its Computer System, including without limitation reviewing documents created and stored on its Computer System, deleting any matter stored in its Computer System, limiting or eliminating an employee/supplier's access to the Internet, monitoring sites visited by employee/supplier on the Internet, monitoring chat and news groups, reviewing material downloaded or uploaded by users from the Internet and reviewing E-Mail sent and received by users. Employee/supplier should not have an expectation of privacy in anything they create, store, send or receive on the Computer System.

公司有权（但没有义务）在未经任何员工/供应商许可的情况下，以任何理由监控其计算机系统的任何和所有方面，包括但不限于审查在其计算机系统中创建和存储的文件、删除存储在其计算机系统中的任何事项、限制或消除员工/供应商对互联网的访问、监控员工/供应商在互联网上访问的网站、监控聊天和新闻组。审核用户从互联网下载或上传的资料，审核用户发送和接收的电子邮件。员工/供应商不应期望他们在计算机系统上创建、存储、发送或接收的任何内容的隐私。

### **3. Professional Use of Computer System Required/ 应专业使用计算机系统**

You are reminded to be courteous to other users of the Computer System and always to conduct yourself in a professional manner. The Company's policies against discrimination and harassment (sexual or otherwise) apply fully to the Company's Computer System, and any violation of those policies is grounds for discipline up to and including termination.

本署提醒你对电脑系统的其他使用者要有礼貌，并始终以专业的态度行事。公司反对歧视和骚扰（性或其他）的政策完全适用于公司的计算机系统，任何违反这些政策的行为都将受到纪律处分，直至并包括解雇。

### **4. Offensive and Inappropriate Material; Illegal Activities**

**冒犯性和不适当的材料；非法活动**

Company policies prohibit using the Company's Computer System to send or receive messages or files that are illegal, sexually explicit, abusive, offensive, or profane.

公司政策禁止使用公司的计算机系统发送或接收非法、色情、辱骂、冒犯或亵渎的信息或文件。

### **5. Solicitations/请求**

The Company's Computer System may not be used to solicit for religious or political causes, commercial enterprises, outside organizations, or other activities not related to an employee/supplier's services to the Company, except as may be permitted pursuant to paragraph II A. 5 above.

公司的计算机系统不得用于为宗教或政治原因、商业企业、外部组织或其他与员工/供应商为公司提供的服务无关的活动进行募捐，但上文第II A. 5段允许的情况除外。

## 6. Copyrights and Trademarks/版权和商标

The Company's Computer System may not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary financial information or similar materials.

公司的计算机系统不得用于发送（上传）或接收（下载）版权材料、商业秘密、专有财务信息或类似材料。

## III. Compliance with the Code of Ethics/遵守道德规范

Compliance is the individual responsibility of each of us. We have the personal responsibility to understand and follow this Code and the other policies of the Company applicable to us. A violation of this Code, or the law, may result in appropriate disciplinary action, up to and including termination, without additional warning. However, it is not the threat of discipline or termination that should govern your actions. We expect you to share our belief that a dedicated commitment to ethical behavior is the right thing to do and is good business.

遵守是我们每个人的责任。我们个人有责任理解和遵守本守则以及公司适用于我们的其他政策。违反本守则或法律，可能导致适当的纪律处分，直至并包括解雇，而不另行警告。然而，你的行为不应该受到纪律处分或解雇的威胁。我们希望您能认同我们的信念，即致力于道德行为是一件正确的事情，也是良好的行为。

Ethical decision-making requires that you ask yourself and answer “yes” to two fundamental questions, before you act:

道德决策要求你在行动之前问自己并对两个基本问题回答“是”：

1. Can I? Is the contemplated course of action compliant with the letter and spirit of the law and Company policy?

我可以吗？所考虑的行动是否符合法律和公司政策的条文和精神？

2. Should I? Is the contemplated course of action consistent with AIM SOLDER's core values and reputation?

我应该吗？设想的行动方案是否与AIM焊料的核心价值和声誉相一致？

When answering these questions, be sure to understand all the pertinent facts, consider duties to affected stakeholders, and think about potential alternatives. You also must involve the right people to help you, including your Human Resources Department and subject-matter experts (e.g., technical, engineering, quality, operational, and legal professionals).

在回答这些问题时，一定要了解所有相关的事，考虑对受影响的利益相关者的责任，并考虑潜在的替代方案。您还必须让合适的人来帮助您，包括您的人力资源部和主题专家（例如，技术、工程、质量、运营和法律专业人员）。

This Code reflects general principles to guide employee/supplier, officers and directors in making ethical decisions and cannot and is not intended to address every specific situation. No code or set of values can address every ethical choice we face in business. Each of us must use good common sense and good judgment in our personal conduct and perform our work with honesty and integrity. It is our goal to foster an environment in which integrity issues and concerns may be raised and discussed with supervisors or with others without the fear of retribution.

本准则反映了指导员工/供应商、高级管理人员和董事做出道德决策的一般原则，不能也不是针对每一种具体情况。没有任何准则或一套价值观可以解决我们在商业中面临的每一个道德选择。我们每个人都必须在个人行为中运用良好的常识和良好的判断力，诚实正直地开展工作。我们的目标是营造一种环境，在这种环境中，诚信问题和担忧可以与主管或其他人提出和讨论，而不必担心受到报复。

Nothing in this Code prohibits or restricts the Company from taking any disciplinary action on any matters pertaining to employee/supplier conduct, whether or not they are expressly discussed in this document. This Code is not intended to create any express or implied contract with any employee/supplier or third party. In particular, nothing in this document creates any employment/business contract between the Company and any of its employee/supplier.

本准则不禁止或限制公司对与员工/供应商行为有关的任何事项采取任何纪律处分，无论这些事项是否在本文件中明确讨论。本准则无意与任何员工/供应商或第三方订立任何明示或默示合同。特别是，本文件中没有任何内容构成公司与其任何员工/供应商之间的任何雇佣/商业合同。

Richard Black, President of the Company, shall have the exclusive responsibility and authority for the final interpretation of the Code.

本守则的最终解释权由本公司总裁Richard Black全权负责

#### IV. Reporting suspected non-compliance/报告疑似不合规

##### A. General Policy/一般正策

As part of its commitment to ethical and legal conduct, the Company expects its employee/supplier to bring to the attention of their supervisor, Human Resources personnel, information about suspected violations of this Code, Company policies and procedures or the law by any employee/supplier or agent. Employee/supplier are required to come forward with any such information, without regard to the identity or position of the suspected offender. The Company will treat the information in a confidential manner to the extent possible (consistent with law and corporate policy and the requirements necessary to conduct an effective investigation) and will seek to ensure that no acts of retribution or retaliation will be taken against anyone for making a report in good faith.

作为其道德和法律行为承诺的一部分，公司希望其员工/供应商将任何员工/供应商或代理涉嫌违反本准则、公司政策和程序或法律的信息告知其主管、人力资源人员。员工/供应商必须提供任何此类信息，无论涉嫌违规者的身份或职位如何。公司将

在可能的范围内（符合法律和公司政策以及进行有效调查所需的要求）以保密的方式处理信息，并将努力确保不会因善意举报而对任何人采取报复或报复行为。

## B. **Compliance Procedures/合规程序**

### 1. **Notification of Complaint/投诉通知书**

Information about known or suspected violations by any employee/supplier or agent should be reported promptly. Whenever practical, an employee/supplier should do so in writing. We encourage employee/supplier to talk to their supervisor or a member of the Executive management about observed or suspected inappropriate behavior; however, if an employee/supplier chooses to file a formal complaint, he or she can do so in contacting the Head of Human Resources department by phone, e-mail or in accordance with the Whistleblower Policy.

任何员工/供应商或代理商的已知或怀疑违规信息应及时报告。在可行的情况下，雇员/供应商应以书面形式提出上述要求。我们鼓励员工/供应商就发现或怀疑的不当行为与主管或行政管理人员进行沟通；但是，如果员工/供应商选择提交正式投诉，他或她可以通过电话、电子邮件或按照举报人政策与人力资源部主管联系。

For example: Should you suspect a co-worker to be the victim of harassment and he/she does not speak up about it, you can, if you are comfortable doing so, begin by speaking with the co-worker about the situation. If that co-worker refuses to make a report, but you still suspect harassment is taking place, contact your supervisor or Human Resources. An investigation can be conducted discreetly. If harassment is discovered, you'd not only be protecting your co-worker, but other possible victims as well.

例如：如果你怀疑某位同事是性骚扰的受害者，而他/她却没有说出来，如果你觉得这样做舒服的话，你可以先和这位同事谈谈情况。如果那位同事拒绝报告，但你仍然怀疑正在发生骚扰，请联系你的主管或人力资源部。调查可以谨慎地进行。如果骚扰被发现，你不仅保护了你的同事，也保护了其他可能的受害者。

### 2. **Investigation/调查**

If you report a violation in any manner, the Company will begin an investigation under the direction of AIM Solder's Human Resources department. All reports are investigated to their full conclusion. You will be told how to follow up on your report and you will also be told when to expect follow-up information. Any employee/supplier involved in an investigation, either as the reporter or the subject of the investigation, will be obligated to cooperate in the investigation of reported violations, provide detailed information and produce any evidence or documentation that is requested by investigators. This duty includes maintaining

the confidentiality of investigative information unless specifically authorized or required by law to disclose such information. When an actual or potential violation of law, the Code, or Company policy is reported or detected, AIM Solder's Human Resources department will conduct a timely and thorough investigation in compliance with the law. Every effort will be made to get all sides of the story, while also maintaining confidentiality to the greatest extent possible, as well as attorney-client privilege when the investigation is being done at the direction of legal counsel.

在公司人力资源部的指导下工作。所有报告都经过全面调查。你会被告知如何跟进你的报告，你也会被告知何时需要跟进信息。参与调查的任何员工/供应商，无论是作为报告方还是作为调查对象，都有义务配合调查所报告的违规行为，提供详细信息，并提供调查人员要求的任何证据或文件。这项职责包括对调查资料保密，除非法律特别授权或要求披露此类资料。当实际或潜在的违反法律、准则或公司政策的行为被报告或发现时，AIM Solder的人力资源部门将依法进行及时和彻底的调查。

### 3. Confidentiality/保密

To the extent possible, no one investigating the complaint will discuss the identity of anyone who reports a suspected violation or who participates in the investigation. Confidentiality cannot be guaranteed in some cases due to a legal obligation to reveal certain aspects of a report. Also, the investigator may need to involve others in the Company to resolve an issue. Every effort will be made to ensure that any information revealed is released on a "need to know" only basis. Employee/supplier should be aware that Human Resources personnel, the General Counsel and those assisting them in any investigation are obligated to act in the best interests of the Company; **they do not act as personal representatives of or lawyers for employee/supplier.**

在可能的范围内，任何调查投诉的人都不会讨论任何举报可疑违规行为或参与调查的人的身份。在某些情况下，由于披露报告某些方面的法律义务，保密性不能得到保证。此外，调查人员可能需要让公司的其他人参与解决问题。我们会尽一切努力确保所披露的任何资料只在“需要知道”的基础上发布。员工/供应商应意识到，人力资源人员、总法律顾问和协助他们进行任何调查的人员有义务为公司的最佳利益行事；**他们不作为雇员/供应商的个人代表或律师。**

### 4. Protection against Retaliation/防止报复

Retaliation in any form against an individual, who in good faith reports an alleged violation of this Code or of law, is itself a serious violation of this Code and will not be tolerated. Acts of retaliation should be reported immediately and will be disciplined appropriately, up to and including termination from employment with the Company.

N.B. All examples noted above are hypothetical and do not constitute the full range or possibilities that can surface at any point during the course of work duties

and functions. It is important that each employee/supplier use their best judgment and consult with their superiors in the event of doubt or confusion.

对善意举报涉嫌违反本守则或法律的个人进行任何形式的报复，本身就是严重违反本守则的行为，是不能容忍的。报复行为应立即报告，并将受到适当的处分，直至并包括终止与公司的雇佣关系。

注：上述所有例子都是假设的，并不构成在工作职责和职能过程中任何时候可能出现的全部范围或可能性。重要的是，每个员工/供应商使用他们最好的判断，并咨询他们的上级在怀疑或困惑的情况下。

**The Company, at its sole discretion, reserves the right to change, modify or terminate this Ethics Code at any time.**

公司保留随时更改、修改或终止本道德规范的权利。

**Signature page/签名页**

**AIM METALS & ALLOYS INC. (“AIM SOLDER”)/ AIM金属和合金公司 (“AIM焊料”)**

**ETHICS CODE /道德规范**

**COMPLIANCE CERTIFICATION/合规性认证**

**The undersigned hereby certifies that/签字人特此申明::**

- I have reviewed and understand my obligations under AIM Solder’s Ethics Code and I am in compliance with it;  
我已经审查并理解了AIM焊料道德规范规定的义务，并遵守了该规范；

**Furthermore, the undersigned agrees/此外，签字人同意:**

- To abide by the Code of Ethics and applicable laws and regulations as a condition to my continued employment by or association with AIM Solder; and  
遵守道德准则和适用的法律法规，作为我继续受雇于AIM Solder或与之有联系的条件;而且
- To ask questions of, seek guidance from, report suspected violations to, and express concerns to AIM Solder’s Human Resources team regarding the Code of Ethics.  
向AIM焊锡的人力资源团队提出有关道德准则的问题，寻求指导，报告可疑的违规行为，并表达对道德准则的关注。

**Finally, the undersigned/以下签署人:**

- Understands that violations of the Code of Ethics or Applicable Laws and Regulations may result in disciplinary action, up to and including termination from employment with the Company.

理解违反道德准则或适用法律法规的行为可能导致纪律处分，直至并包括终止在公司的劳动合同。

Signature/签名: \_\_\_\_\_

Full Name/全名: \_\_\_\_\_

Date/日期: \_\_\_\_\_