

	<b>POLICY</b>		
	<b>Document Level:</b> Global	<b>Language:</b> Chinese	<b>Function:</b> Legal
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<b>Reference Number:</b> GBL-POL-LGL006-CHI	<b>Title:</b> Gifts and Entertainment - Chinese		

ENGLISH	中国人
<b>Title:</b> Gifts and Entertainment	<b>标题：</b> 礼品和招待
<b>Purpose</b>	<b>目的</b>
The purpose of this policy is to provide guidance to all team members of Oshkosh Corporation and each of its subsidiaries (collectively referred to herein as the "Company") regarding giving and receiving gifts and entertainment.	本政策旨在为 Oshkosh Corporation 及其所有子公司（以下统称为“公司”）的所有团队成员提供有关提供和接受礼品和招待的指导。
<b>Scope</b>	<b>范围</b>
This policy applies to all team members, officers, and directors of the Company.	本政策适用于公司的所有团队成员、管理人员和董事。
Departmental and regional policies may be more restrictive in which case team members are required to follow the most restrictive policy.	部门和地区政策可能要求更严格，在这种情况下，团队成员应遵守最严格的政策。
It is important to note that this Policy provides general guidelines around gifts and entertainment. Team members are encouraged to contact the Global Ethics and Compliance team with questions regarding receiving or giving gifts and entertainment.	重要的是要注意，本政策提供有关礼品和招待的一般准则。在解决有关接受或提供礼品和招待的问题时，我们鼓励团队成员联系全球道德与合规团队。
This Policy does not provide guidance related to political contributions in the U.S. Guidance on political contributions can be found in the policy on Lobbying Activities, GBL-POL-LGL007.	本政策未提供与美国政治捐款相关的指导。关于政治捐款的指导，请参见“游说活动”政策 GBL-POL-LGL007。

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➤ <a href="#">Accepting and Giving Gifts between Team Members</a>	➤ <a href="#">团队成员之间接受和提供礼品</a>
➤ <a href="#">Accepting Gifts from Business Partners</a>	➤ <a href="#">接受业务合作伙伴的礼品</a>
➤ <a href="#">Accepting Entertainment from Business Partners</a>	➤ <a href="#">接受业务合作伙伴的招待</a>
➤ <a href="#">Accepting Benefits Related to Business Events (Conferences, Advisory Board/Committee Meetings, Business Partner Visits)</a>	➤ <a href="#">接受与业务活动（会议、顾问委员会/委员会会议、业务合作伙伴拜访）相关的利益</a>
➤ <a href="#">Giving Gifts to Commercial Business Partners (Non-Government Officials)</a>	➤ <a href="#">向业务合作伙伴（非政府官员）提供礼品</a>
➤ <a href="#">Giving Gifts to U.S. Government Officials</a>	➤ <a href="#">向美国政府官员提供礼品</a>
➤ <a href="#">Giving Gifts to Non-U.S. Government (Foreign) Officials</a>	➤ <a href="#">向非美国政府（国外）官员提供礼品</a>
➤ <a href="#">Providing Entertainment to Commercial Business Partners (Non-Government Officials)</a>	➤ <a href="#">向业务合作伙伴（非政府官员）提供招待</a>
➤ <a href="#">Providing Entertainment to U.S. Government Officials</a>	➤ <a href="#">向美国政府官员提供招待</a>
➤ <a href="#">Providing Entertainment to Non-U.S. Government (Foreign) Officials</a>	➤ <a href="#">向非美国政府（国外）官员提供招待</a>
➤ <a href="#">Documenting Approved Expenditures and Reporting Improper Offers</a>	➤ <a href="#">记录批准的支出和报告不当提供的礼品和招待</a>
<b>Definitions</b>	<b>定义</b>
<u>Cash/Cash Equivalent</u> – Includes physical currency, checks/cheques, prepaid cards, gift cards/certificates. This does not include in-store credits for Company merchandise that comply with other gift guidelines and are not convertible to cash.	<u>现金/现金等价物</u> – 包括实物货币、支票、预付卡、礼品卡/礼券。这不包括符合其他礼品指南且不可兑换成现金的公司商品的店内抵用额度。

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<u>Business Entertainment</u> – Meals, tickets to events (such as the theatre or sporting events) or outings (such as golfing or hunting) where the business partner and team members are <b>both</b> in attendance to build goodwill and enhance business relationships.	<u>商务招待</u> – 为建立商誉和增进业务关系而提供的宴请、活动门票（如剧院或体育赛事）或业务伙伴和团队成员 <b>都</b> 参加的外出活动（如打高尔夫球或狩猎）。
<u>Business Partners</u> – Customers, prospective customers, suppliers, prospective suppliers, dealers, distributors, sales agents, consultants, and any person with whom the Company does or may do business.	<u>业务合作伙伴</u> – 客户、潜在客户、供应商、潜在供应商、经销商、分销商、销售代理、顾问，以及与公司有或可能有业务往来的任何人。
<u>Fair Market Value</u> – The retail cost you would have to pay to purchase the item. If the fair market value is not known, then its value may be estimated based on the retail cost of similar items of like quality. The fair market value of a ticket, fee, or invitation to any event, recreational activity, or other entertainment is the face value of the ticket. Note that the dollar value of any amenities offered (like parking or additional buffet, etc.) must be added to the face value to capture the total fair market value. Fair market value may not be the ticket price for special events (like the Olympics, World Cup or Super Bowl, etc.), but rather, is the value the general public would pay to attend the event.	<u>市场公允价值</u> – 购买物品必须支付的零售价格。如果公允市场价值未知，则可按照品质相当的类似物品的零售价格估算其价值。任何活动、娱乐活动或其他款待的门票、费用或邀请的市场公允价值是门票的面值。请注意，为了体现总体市场公允价值，必须将所提供的任何便利服务（如停车场或额外的自助餐等）的美元价值加到票面价值上。特殊活动（如奥运会、世界杯或超级碗等）的市场公允价值可能不等于门票价格，而是公众愿意为参加该活动支付的价值。
<u>Gifts</u> – Anything of tangible or intangible value. Meals, tickets, events, and other forms of entertainment where the business partner is not present is a gift rather than business entertainment since no business activity is taking place. Gifts do not include charitable donations (given to non profit or not for profit entities). Gifts do include items given to non-charitable entities (for profit or commercial entities).	<u>礼品</u> – 任何具有有形或无形价值的物品。宴请、门票、活动和业务合作伙伴不参加的其他招待方式属于礼品，而不是商务招待，因为不发生任何商业活动。礼品不包括慈善捐赠（捐赠给非营利实体）。礼品包括提供给非慈善实体（营利或商业实体）的物品。
<u>Monetary Thresholds</u> – Monetary thresholds are set for both accepting and giving gifts and entertainment. A gift must not exceed a fair market value of \$100. Business entertainment must not exceed a fair market value of \$250. Guidance for situations above these thresholds can be found in the applicable policy sections below.	<u>货币上限</u> – 我们为接受和提供礼品和招待设定了货币金额上限。礼品不得超过 100 美元的市场公允价值。商务招待不得超过 250 美元的市场公允价值。有关超出这些上限的情况的指南，请参阅本政策的以下相关部分。

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<p><u>Non-U.S. Government Officials</u> – The definition of non-U.S. government officials as used in this policy is meant to be very broad. It includes any officer or employee of any non-U.S. government or government-controlled entity (including any department, division or agency of government), or any state-owned or state-controlled entity, from the local to the national level. Non-U.S. Government Officials may include, for example:</p>	<p><u>非美国政府官员</u> – 本政策中对非美国政府官员的定义很宽泛。它包括任何从地方级到国家级、非美国政府或政府控制下的实体（包括任何部门、分部或政府机构）或任何国有或国家控制实体的任何官员或雇员。非美国政府官员的例子包括：</p>
<ul style="list-style-type: none"> <li>Officers and employees of public institutions, such as notary publics, lawyers, teachers and doctors</li> </ul>	<ul style="list-style-type: none"> <li>公共机构的官员和雇员，例如公证人、律师、教师和医生</li> </ul>
<ul style="list-style-type: none"> <li>Companies under government ownership or control, even if the companies are operated like privately owned corporations (e.g., government-controlled joint ventures)</li> </ul>	<ul style="list-style-type: none"> <li>由政府所有或控制的公司，即使这些公司像私营企业一样运作（例如，政府控制下的合资企业）</li> </ul>
<ul style="list-style-type: none"> <li>Members of royal families</li> </ul>	<ul style="list-style-type: none"> <li>王室成员</li> </ul>
<ul style="list-style-type: none"> <li>An officer or employee of a national or international public organization</li> </ul>	<ul style="list-style-type: none"> <li>国家或国际公共组织的官员或雇员</li> </ul>
<ul style="list-style-type: none"> <li>Part-time workers, unpaid workers, and any person acting in an official capacity (e.g., a celebrity ambassador for UNICEF) on behalf of a government or public international organization (e.g., the United Nations or World Bank)</li> </ul>	<ul style="list-style-type: none"> <li>兼职员工、无薪员工，以及以官方身份（例如，联合国儿童基金会 (UNICEF) 的名人大使）代表政府或国际公共组织（例如，联合国或世界银行）行事的任何人</li> </ul>
<ul style="list-style-type: none"> <li>An employee of any business that is owned or controlled by the state or government in any way (e.g., state-owned entities, state universities, public schools and hospitals, or state-controlled media)</li> </ul>	<ul style="list-style-type: none"> <li>由国家或政府以任何方式拥有或控制的任何企业的雇员（例如，国有实体、州立大学、公立学校和医院，或国家控制的媒体）</li> </ul>
<ul style="list-style-type: none"> <li>Any political party, official or candidate of a political party, or employee of a political party</li> </ul>	<ul style="list-style-type: none"> <li>任何政党、政党官员或候选人或政党雇员</li> </ul>

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<u>Sponsorship-Non-Charitable</u> – A sponsorship is the act of supporting an event or activity and can be charitable (given to a charity, non-commercial, not for profit or non-profit organization) or non-charitable (given to a for profit or commercial entity). Providing items for give aways or raffles/lucky draws at holiday parties or other special events to for-profit entities such as our customers is considered to be a gift and must follow the guidelines of this policy.	<u>非慈善赞助</u> – 赞助是支持某事件或活动的行为，可能为慈善（捐赠给慈善机构、非商业性、或非营利组织）或非慈善性质（捐赠给营利性或商业实体）。在假日聚会或其他特殊活动中，向我们的客户等营利实体提供的赠品或抽奖/幸运抽奖的物品被视为礼品，必须遵守本政策的指导方针。
<b>Policy</b>	<b>政策</b>
The exchange of gifts and entertainment may be an appropriate business courtesy under limited circumstances. However, it can also create divided loyalties, inappropriate influences (actual or perceived), violations of our business partner’s company policies, and violations of laws and/or regulations.	在有限的情况下，互相提供礼品和招待可能是一种适当的商务礼节。但是，这也会导致忠诚出现裂痕、不适当的影响（实际或印象），违反我们业务合作伙伴的公司政策，以及违反法律和/或法规的情况。
<ul style="list-style-type: none"> <li>Our Company competes fairly and ethically on the merits of our products and services. Likewise, our business decisions should always be made in the best interests of the Company.</li> </ul>	<ul style="list-style-type: none"> <li>我们公司凭借产品和服务的优势公平、道德地参与竞争。同样，我们的业务决策也应始终出于公司的最佳利益而做出。</li> </ul>
<ul style="list-style-type: none"> <li>Our Company prohibits offering, giving, or receiving gifts and entertainment that are intended to gain a competitive advantage or to influence business decisions.</li> </ul>	<ul style="list-style-type: none"> <li>本公司禁止提供、给予或接受旨在获得竞争优势或影响业务决策的礼品和招待。</li> </ul>
<ul style="list-style-type: none"> <li>Offering, receiving or providing gifts or entertainment that are excessive, frequent or inappropriate can be damaging to our Company, harm our Company’s reputation and create actual or perceived conflicts of interest.</li> </ul>	<ul style="list-style-type: none"> <li>许诺、接受或提供过度、频繁或不适当的礼品或招待可能会损害我们的公司，损害公司的声誉，并造成实际或印象中的利益冲突。</li> </ul>
<ul style="list-style-type: none"> <li>Gifts and entertainment shall only be given if permitted under local laws and by the recipient’s employer/government entity.</li> </ul>	<ul style="list-style-type: none"> <li>礼品和招待只能在当地法律，以及接受者的雇主/政府实体允许的情况下提供。</li> </ul>
<ul style="list-style-type: none"> <li>It is never appropriate for a team member to solicit gifts, entertainment, or anything of value for themselves or anyone else.</li> </ul>	<ul style="list-style-type: none"> <li>团队成员为自己或任何其他人索取礼品、款待或任何有价物在任何情况下都是不合适的。</li> </ul>

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<ul style="list-style-type: none"> <li>Where the policy requires pre-approval but circumstances do not provide time to obtain the prior approval, then a request for approval must be obtained as soon as practical after the gift or event.</li> </ul>	<ul style="list-style-type: none"> <li>如果政策要求预先批准，但在当时情况下无法及时获得预先批准，则必须在礼品或活动结束后尽快获得批准。</li> </ul>
<u>Accepting and Giving Gifts Between Team Members</u>	<u>团队成员之间接受和提供礼品</u>
Team members may provide and receive unsolicited gifts (including cash and cash equivalents such as gift cards and gift certificates) between fellow team members (including from leaders to team members) as long as the gifts are in good taste, reasonable and appropriate, paid for by the team member and not expensed to the Company. Under certain circumstances, it may be appropriate to provide a gift and expense it to the Company. In these circumstances, refer to JNT-POL-FIN012, Taxation of Employee Gifts, Prizes, and Awards for guidance, as well as GBL-POL-TVL001 – Business Travel & Expense Policy and business unit specific policies/procedures, as applicable.	团队成员之间（包括领导和团队成员）可以在未索取的情况下提供和接受礼品（包括现金和现金等价物，如礼品卡和礼券），前提是这些礼品具有良好的品味、合理且适当，且费用由团队成员，而不是公司承担。在某些情况下，也可以在公司承担费用的情况下提供礼品。在这种情况下，请参照 JNT-POL-FIN012 - 员工礼品、奖品和奖励的征税的指导，以及 GBL-POL-TVL001 – 商务旅行和费用政策及业务部门特定的政策/程序（如适用）。
<u>Accepting Gifts from Business Partners</u>	<u>接受业务合作伙伴的礼品</u>
While it is customary for some business partners to occasionally give small gifts to those with whom they do business, it is important that these gifts do not affect a team member's business judgment, or give the appearance that judgment may be affected. Accordingly, it is important for team members to be careful when accepting gifts. It must be clear that the person providing the gift or entertainment is not trying to influence or offer an inappropriate token of gratitude for a business decision or transaction.	尽管某些业务合作伙伴习惯于偶尔向与他们有业务往来的人赠送小礼品，但一定不能让这些礼品影响团队成员的商业判断，或让人觉得其判断可能受影响。因此，团队成员在接受礼品时一定要小心。必须明确，提供礼品或款待的人并非试图影响，或以不适当的致谢来左右商业决策或交易。
Acceptance of gifts must be in accordance with this policy and with applicable regional or departmental policies or local laws that may be more restrictive.	接受礼品必须符合本政策，以及可能更加严格的适用区域或部门政策或地方法律。
Gifts include:	礼品包括：

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<ul style="list-style-type: none"> <li>Tickets to sports, music, or cultural events where Company team members and representatives of the business partner providing the tickets do not attend the event together</li> </ul>	<ul style="list-style-type: none"> <li>体育、音乐或文化活动的门票，提供门票的公司团队成员和业务合作伙伴代表不一起参加活动</li> </ul>
<ul style="list-style-type: none"> <li>Merchandise such as gift baskets, wine, clothing, mugs, pens, and other collectibles</li> </ul>	<ul style="list-style-type: none"> <li>商品，如礼篮、葡萄酒、服装、马克杯、钢笔和其他收藏品</li> </ul>
<ul style="list-style-type: none"> <li>Travel or lodging not associated with a business conference, meeting or event</li> </ul>	<ul style="list-style-type: none"> <li>与商务会议、会议或活动无关的旅行或住宿</li> </ul>
<ul style="list-style-type: none"> <li>Favorable terms or discounts on a product or service or free goods or services for the team member's benefit that are not otherwise available to all Company team members</li> </ul>	<ul style="list-style-type: none"> <li>某个团队成员（而非公司所有团队成员都能）享受的某个产品或某项服务的优惠条款或折扣，或免费商品或服务</li> </ul>
<ul style="list-style-type: none"> <li>Any item of value including, but not limited to, any expense paid on your behalf (e.g., personal travel, child's tuition, mortgage payment) or use of equipment, vacation home, etc.</li> </ul>	<ul style="list-style-type: none"> <li>任何有价物，包括但不限于以您的名义支付的任何费用（例如，个人旅行、孩子的学费、偿还抵押贷款）或对设备、度假屋等的使用。</li> </ul>
<p>Team members may accept gifts from business partners outside of the Company provided the gift meets <u>all</u> the following criteria:</p>	<p>团队成员可以接受公司外部业务合作伙伴提供的礼品，前提是礼品满足下列<u>所有</u>条件：</p>
<ul style="list-style-type: none"> <li>Is of nominal value (<b>total fair market value cannot exceed \$100</b>). Gifts exceeding this amount should be returned with an explanation of Company policy, if practical. Should circumstances arise where gifts are received and cannot be returned or returning gifts would cause offense within the context of local custom, contact Global Ethics and Compliance for disposition</li> </ul>	<ul style="list-style-type: none"> <li>价值很低（<b>总市场公允价值不得超过 100 美元</b>）。如果可行，超过此金额的礼品应退还并说明公司政策。如果出现收受的礼品无法退回的情况，或者按照当地习俗，退回礼品会引起冒犯，请联系全球道德与合规部进行处置</li> </ul>
<ul style="list-style-type: none"> <li>Is not given to influence judgment or create the appearance that the gift giver is entitled to preferential treatment, an award of business, better prices, or improved business terms</li> </ul>	<ul style="list-style-type: none"> <li>给予礼品的目的不是为了影响判断，或让人觉得送礼者有权享受优惠待遇、获得业务、享受更优惠的价格或更有利的商业条件</li> </ul>
<ul style="list-style-type: none"> <li>Would not embarrass the Company or the gift giver if disclosed publicly</li> </ul>	<ul style="list-style-type: none"> <li>如果公开披露，不会让公司或送礼者尴尬</li> </ul>

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<ul style="list-style-type: none"> <li>Is unsolicited and infrequent in nature</li> </ul>	<ul style="list-style-type: none"> <li>非主动索取且不经常发生</li> </ul>
<ul style="list-style-type: none"> <li>Complies with any specific limits established by local law, local management, or departmental policy</li> </ul>	<ul style="list-style-type: none"> <li>符合当地法律、当地管理层或部门政策规定的任何特定限制</li> </ul>
<ul style="list-style-type: none"> <li>Is not cash or cash equivalent, and</li> </ul>	<ul style="list-style-type: none"> <li>并非现金或现金等价物，并且</li> </ul>
<ul style="list-style-type: none"> <li>Would not prevent the recipient from awarding business to one of the gift giver's competitors.</li> </ul>	<ul style="list-style-type: none"> <li>不会阻止礼品的接受者将业务授予赠送者的竞争对手。</li> </ul>
<p>If a gift is received that complies with the policy guidelines, but the receiving team member is not able to use the gift, the team member should return the gift, if practical, or contact Global Ethics &amp; Compliance for proper disposition. It is not appropriate or permissible for team members to sell gifts received for their personal financial benefit.</p>	<p>如果收到的礼品符合政策准则，但接受礼品的团队成员无法使用该礼品，则该团队成员应退还礼品（如可行），或与全球道德与合规部联系，以进行适当处理。团队成员为了个人的经济利益而将收到的礼品出售是不合适和不允许的。</p>
<u>Accepting Entertainment from Business Partners</u>	<u>接受业务合作伙伴的招待</u>
<p>Business entertainment is any event where the business partner is accompanied by the team member. This includes, but is not limited to:</p>	<p>商务招待是指团队成员陪伴业务合作伙伴进行的任何活动。这包括但不限于：</p>
<ul style="list-style-type: none"> <li>Meals</li> </ul>	<ul style="list-style-type: none"> <li>宴请</li> </ul>
<ul style="list-style-type: none"> <li>Sporting, music, or cultural events where Company team members <b>and</b> representatives of the business partner attend the event together (if the business partner is unable to attend, refer to guidelines above for receiving gifts)</li> </ul>	<ul style="list-style-type: none"> <li>公司团队成员<b>和</b>业务合作伙伴代表一起参加的体育、音乐或文化活动（如果业务合作伙伴无法参加，请参照上面有关收受礼品的指南）</li> </ul>
<p>Team members may accept business entertainment offered for legitimate business purposes, such as building goodwill and enhancing relationships with business partners. Team members are encouraged to use good judgment regarding consumption of alcohol as part of entertaining.</p>	<p>团队成员可以接受出于合法商业目的而提供的商务招待，例如建立商誉和增进与商业伙伴的关系。对于招待过程中的饮酒，我们鼓励团队成员运用良好的判断。</p>
<p>Acceptable business entertainment must meet <u>all</u> the following criteria:</p>	<p>可接受的商务招待必须满足下列<u>所有</u>条件：</p>



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**Title: Gifts and Entertainment - Chinese**

<ul style="list-style-type: none"> <li>Is unsolicited and infrequent in nature</li> </ul>	<ul style="list-style-type: none"> <li>非主动索取且不经常发生</li> </ul>
<ul style="list-style-type: none"> <li>Is reasonably related to a legitimate business purpose (e.g., accompanying a business partner to a theater/sporting event or attending a business meal)</li> </ul>	<ul style="list-style-type: none"> <li>与合法的商业目的合理相关（例如，陪同商业伙伴参加剧院/体育活动或出席商务宴请）</li> </ul>
<ul style="list-style-type: none"> <li>Is not given with the intent to influence business or to secure an improper advantage (e.g., bribe, payoff, or kickback)</li> </ul>	<ul style="list-style-type: none"> <li>提供的目的不是影响业务或获取不正当利益（例如，贿赂、回报或回扣）</li> </ul>
<ul style="list-style-type: none"> <li>Does not create the appearance (or implied obligation) that the giver is entitled to preferential treatment, an award of business, better prices, or improved business terms</li> </ul>	<ul style="list-style-type: none"> <li>不会让人觉得（或暗示有义务使）款待者有权享受优惠待遇、获得业务、享受更优惠的价格或更有利的商业条件</li> </ul>
<ul style="list-style-type: none"> <li>Is in good taste and occurs at a business appropriate venue</li> </ul>	<ul style="list-style-type: none"> <li>有良好的品味，且在适合商务活动的场所进行</li> </ul>
<ul style="list-style-type: none"> <li>Is reasonable (fair market value less than \$250) and appropriate in the context of the business occasion (business entertainment that is greater than \$250 must be approved in advance in writing by your team leader/supervisor and Segment General Counsel)</li> </ul>	<ul style="list-style-type: none"> <li>合理（市场公允价值不到 250 美元）并且在商务场合中是适当的（超过 250 美元的商务招待必须事先得到您的团队负责人/主管和事业部总法律顾问的书面批准）</li> </ul>
<ul style="list-style-type: none"> <li>Is not during or near negotiations with the business partner</li> </ul>	<ul style="list-style-type: none"> <li>不在即将和业务伙伴进行谈判时，或在谈判过程中进行</li> </ul>
<ul style="list-style-type: none"> <li>Would not influence, or appear to influence, our team member's ability to act in the best interest of the Company; and</li> </ul>	<ul style="list-style-type: none"> <li>不会影响或让人觉得会影响我们的团队成员出于公司利益最大化的目的而行事的能力；并且</li> </ul>
<ul style="list-style-type: none"> <li>Complies with any specific limits established by local law, local management, or departmental policy.</li> </ul>	<ul style="list-style-type: none"> <li>符合当地法律、当地管理层或部门政策规定的任何特定限制。</li> </ul>
<p><u>Accepting Benefits Related to Business Events (Conferences, Advisory Board/Committee Meetings, Business Partner Visits)</u></p>	<p><u>接受与业务活动（会议、顾问委员会/委员会会议、业务合作伙伴拜访）相关的利益</u></p>

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<p>You may accept an invitation for free or reduced cost admittance to a business-related conference, briefing, seminar, or training session; Company authorized advisory board or committee meeting; or other business event hosted by a business partner or industry group provided fair market value is less than \$250 (greater than \$250 requires approval in advance and in writing by your leader/supervisor and Segment General Counsel) and meets <u>all</u> the following criteria:</p>	<p>您可以接受免费或以降低的费用参加与业务相关的会议、简报、研讨会或培训课程的邀请；公司授权的咨询委员会或委员会会议；或由业务合作伙伴或行业集团主办的其他商业活动，但前提是公允市场公允价值少于 250 美元（超过 250 美元则需要事先获得领导/主管和事业部总法律顾问的书面批准），并且必须满足下列<u>所有</u>条件：</p>
<ul style="list-style-type: none"> <li>• Is offered to other participants or businesses on the same basis</li> </ul>	<ul style="list-style-type: none"> <li>• 以相同的标准提供给其他参与者或企业</li> </ul>
<ul style="list-style-type: none"> <li>• Is unsolicited and infrequent in nature</li> </ul>	<ul style="list-style-type: none"> <li>• 非主动索取且不经常发生</li> </ul>
<ul style="list-style-type: none"> <li>• Is related to a legitimate business purpose (e.g., not solely a meal and/or refreshment with networking) and</li> </ul>	<ul style="list-style-type: none"> <li>• 与合法的商业目的有关（例如，不仅仅是吃饭和/或增进联系），并且</li> </ul>
<ul style="list-style-type: none"> <li>• Is neither a real nor perceived conflict of interest arising from acceptance of the offer.</li> </ul>	<ul style="list-style-type: none"> <li>• 接受这种优惠既不会产生实际的利益冲突，也不会让人觉得有利益冲突。</li> </ul>
<p>You may accept local transportation from a business partner when it is connected to your official Company duties and the expenses are reasonable under the circumstances. For example, local ride sharing for business purposes is permissible. You may not accept costs for a hotel that is within reasonable commuting distance of your business location that are paid by the business partner. Accepting expense-paid travel (transportation and lodging) for travel to/from out-of-town events is not allowed without prior written approval of your leader/supervisor and Segment General Counsel.</p>	<p>如果和您在公司的正式职责相关，并且在这种情况下费用合理时，您可以接受业务合作伙伴提供的本地交通。例如，出于商业目的共乘一辆车是允许的。如果距离您的业务地点在合理的通勤距离内，您不得接受由业务合作伙伴支付的酒店费用。未经您的领导/主管和事业部总法律顾问的事先书面批准，不允许接受出城参加活动及其返程的预付费用旅行（交通和住宿）。</p>
<p>If you are asked to be a speaker or presenter at an event, you may accept free or reduced cost admittance as long as your leader/supervisor approves in advance. You may accept lodging, subsistence meals and transportation associated with the activity with prior approval by your leader/supervisor and provided that:</p>	<p>如果您被邀请在活动中演讲或演示，只要您的领导/主管事先批准，可以接受免费或减价的入场券。只要领导/主管事先批准，您可以接受与该活动相关的住宿、便餐和交通安排，但前提是：</p>

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<ul style="list-style-type: none"> <li>The offer is made to other participants and/or businesses on the same basis</li> </ul>	<ul style="list-style-type: none"> <li>这种优惠以相同的标准提供给其他参与者和/或企业</li> </ul>
<ul style="list-style-type: none"> <li>The activity has a legitimate business purpose</li> </ul>	<ul style="list-style-type: none"> <li>该活动具有合法的商业目的</li> </ul>
<ul style="list-style-type: none"> <li>There is no real nor perceived conflict of interest arising from acceptance of the offer; and</li> </ul>	<ul style="list-style-type: none"> <li>接受这种优惠既不会产生实际的利益冲突，也不会让人觉得有利益冲突；并且</li> </ul>
<ul style="list-style-type: none"> <li>The offer is not excessive or unreasonable for the totality of the circumstances.</li> </ul>	<ul style="list-style-type: none"> <li>这种优惠对于各种情况都不算过度或不合理。</li> </ul>
You may not accept honoraria or other cash compensation.	您不可以接受谢礼或其他现金报酬。
<u>Giving Gifts to Commercial Business Partners (Non-Government Officials)</u>	<u>向业务合作伙伴（非政府官员）提供礼品</u>
Occasionally, offering gifts to business partners may be appropriate to strengthen relationships or comply with local customs. Company team members may offer gifts to business partners outside of the Company for legitimate business purposes, such as building goodwill and strengthening working relationships (e.g., holiday or ceremonial presentations, service anniversaries, retirements, etc.), provided the gift meets <u>all</u> the following criteria:	有时，为了增进关系或遵守当地习俗，可以向业务合作伙伴提供礼品。公司团队成员可以出于合法商业目的向公司外部的业务合作伙伴提供礼品，例如为了建立商誉和加强工作关系（例如，节日或礼仪性演讲、服务周年纪念日、退休等），前提是礼品可以满足下列 <u>所有</u> 条件：
<ul style="list-style-type: none"> <li>Has fair market value under \$100 (preference should be given to promotional items with the Company logo)</li> </ul>	<ul style="list-style-type: none"> <li>市场公允价值低于 100 美元（应优先考虑带有公司徽标的促销品）</li> </ul>
<ul style="list-style-type: none"> <li>If valued \$100 or above, is pre-approved by the gift giver's leader/supervisor and Segment General Counsel. Die-cast models of Company products and Company logoed merchandise exceeding \$100 do not require pre-approval due to the promotional nature and limited market resale value.</li> </ul>	<ul style="list-style-type: none"> <li>如果价值 100 美元或以上，则需经过礼品赠送者的领导/主管和部门总法律顾问事先批准。由于具有推广性质且市场转售价值有限，超过 100 美元的公司产品和带有公司标志的商品的压铸模型无需事先批准。</li> </ul>
<ul style="list-style-type: none"> <li>Is unsolicited and infrequent in nature</li> </ul>	<ul style="list-style-type: none"> <li>非主动索取且不经常发生</li> </ul>
<ul style="list-style-type: none"> <li>Does not violate the policies of the recipient's organization</li> </ul>	<ul style="list-style-type: none"> <li>不违反接受者的组织政策</li> </ul>

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<ul style="list-style-type: none"> <li>Does not create the appearance of impropriety</li> </ul>	<ul style="list-style-type: none"> <li>不会让人觉得不适当</li> </ul>
<ul style="list-style-type: none"> <li>Is not given as a bribe, payoff, or kickback</li> </ul>	<ul style="list-style-type: none"> <li>并非作为贿赂、回报或回扣而给予</li> </ul>
<ul style="list-style-type: none"> <li>Is not cash or cash equivalent</li> </ul>	<ul style="list-style-type: none"> <li>并非现金或现金等价物</li> </ul>
<ul style="list-style-type: none"> <li>Is in good taste and would not embarrass the Company or the recipient if disclosed publicly</li> </ul>	<ul style="list-style-type: none"> <li>有良好的品味，并且如果公开披露，不会使公司或接受者感到尴尬</li> </ul>
<ul style="list-style-type: none"> <li>Complies with any specific limits established by local laws, local management, or department policy</li> </ul>	<ul style="list-style-type: none"> <li>符合当地法律、当地管理层或部门政策规定的任何特定限制</li> </ul>
<u>Giving Gifts to U.S. Government Officials</u>	<u>向美国政府官员提供礼品</u>
FAR Part 3 and U.S. Anti-kickback Act prohibit the offering, giving, soliciting or accepting of “any money, fee, commission, credit, gift, gratuity, thing of value, or compensation of any kind” for the purpose of improperly obtaining or rewarding favorable treatment in connection with a prime contract, or in connection with a subcontract relating to a prime contract.”	FAR 第3部分和美国《反回扣法》禁止以在主合同或与主合同相关的分包合同中不当获得优惠待遇或以此为回报为目的，提供、给予、索要或接受“任何金钱、费用、佣金、信贷、礼品、馈赠、有价物或任何形式的报酬”。
Federal, state, and local government departments and agencies are governed by laws and regulations concerning acceptance by their employees of gifts, gratuities, or entertainment with whom those departments and agencies do business or over whom they have regulatory authority. Team members are expected to comply with the laws and regulations governing the departments and agencies with whom they work.	联邦、州和地方政府部门和机构受有关其员工接受与这些部门和机构开展业务或受其监管的单位的礼品、馈赠或招待的法律法规的约束。团队成员应遵守管理其工作所在部门和机构的法律法规。
Company policy generally prohibits giving or offering to give any of these items to any actual or potential government customer or representative. Certain narrow exceptions may exist, including the provision of promotional materials, modest refreshments, or items of little intrinsic value. If you feel these narrow exceptions apply, please seek guidance from Segment General Counsel or Global Ethics and Compliance before offering.	公司政策总体上禁止向任何实际或潜在的政府客户或代表给予或承诺给予任何此类物品。在极少情况下也可能存在例外，包括提供促销材料、适度提供的茶点或内在价值很低的物品。如果您认为自己适用这些极少的例外情况，请在提供之前先向事业部总法律顾问或全球道德与合规部寻求指导。

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Additional guidance is included in GBL-POL-LGL007 – Lobbying Activities.	其他指导请参见 GBL-POL-LGL007 - 游说活动。
<u>Giving Gifts to Non-U.S. Government (Foreign) Officials</u>	<u>向非美国政府（国外）官员提供礼品</u>
Please refer to the global procedure for Hosting Non-U.S. Government Officials (GBL-PROC-LGL004) and Lobbying Activities (GBL-POL-LGL007).	请参考接待非美国政府官员的全球程序 (GBL-PROC-LGL004) 和游说活动 (GBL-POL-LGL007)。
<u>Providing Entertainment to Commercial Business Partners (Non-Government Officials)</u>	<u>向业务合作伙伴（非政府官员）提供招待</u>
Business entertainment can play an important role in strengthening working relationships among business associates. The Company permits business entertainment when done for legitimate business purposes such as building goodwill and enhancing relationships with business partners, provided that it complies with these guidelines. Team members are expected to use good judgment regarding consumption of alcohol.	商务招待活动可以在加强业务伙伴之间的工作关系方面发挥重要作用。在遵守这些准则的前提下，公司可以出于合法的商业目的（例如建立商誉和增进与业务合作伙伴的关系）而允许提供商务招待。在饮酒方面，团队成员应运用良好的判断。
Entertaining business partners outside the Company is permitted only if such entertainment meets <u>all</u> the following criteria:	只有在满足下列 <u>所有</u> 条件的情况下，才允许招待公司以外的业务合作伙伴：
<ul style="list-style-type: none"> <li>Has fair market value under \$250 per attendee per event (greater than \$250 requires approval in advance and in writing by your leader/supervisor and Segment General Counsel). The total cost per attendee includes the cost of all items including meals, alcohol, event tickets, transportation, etc. The cost per attendee would not include costs associated with renting a traditional business meeting venue.</li> </ul>	<ul style="list-style-type: none"> <li>每名参与者每次活动的市场公允价值低于 250 美元（超过 250 美元则需要事先获得您的领导/主管和事业部总法律顾问的书面批准）。每位参与者的总费用包括所有项目的费用，包括餐费、酒精性饮料、活动门票、交通费等每位参与者的费用不包括与租用传统商务会议场地相关的费用。</li> </ul>
<ul style="list-style-type: none"> <li>Is not provided with the intent to influences business improperly or secure an improper advantage (i.e., is not a bribe, payoff, or kickback)</li> </ul>	<ul style="list-style-type: none"> <li>提供招待的目的不是不当影响业务或获取不正当利益（即，并非贿赂、回报或回扣）</li> </ul>
<ul style="list-style-type: none"> <li>Does not create the appearance that the Company is entitled to preferential treatment</li> </ul>	<ul style="list-style-type: none"> <li>不会让人觉得公司有权享受优惠待遇</li> </ul>

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<ul style="list-style-type: none"> <li>Is in good taste and occurs at a business appropriate venue</li> </ul>	<ul style="list-style-type: none"> <li>有良好的品味，且在适合商务活动的场所进行</li> </ul>
<ul style="list-style-type: none"> <li>Is reasonable and appropriate in the context of the business occasion and would not be viewed as excessive by an objective third party</li> </ul>	<ul style="list-style-type: none"> <li>在业务场合下是合理和适当的，不会被客观的第三方视为过度</li> </ul>
<ul style="list-style-type: none"> <li>Is unsolicited and infrequent in nature</li> </ul>	<ul style="list-style-type: none"> <li>非主动索取且不经常发生</li> </ul>
<ul style="list-style-type: none"> <li>Is allowable by the recipient's employer</li> </ul>	<ul style="list-style-type: none"> <li>接受者的雇主允许</li> </ul>
<ul style="list-style-type: none"> <li>Complies with any specific limits established by local law, local management, or departmental policies.</li> </ul>	<ul style="list-style-type: none"> <li>符合当地法律、当地管理层或部门政策规定的任何特定限制。</li> </ul>
<u>Providing Entertainment to U.S. Government Officials</u>	<u>向美国政府官员提供招待</u>
Federal, state, and local government departments and agencies are governed by laws and regulations concerning acceptance by their employees of gifts, gratuities, or entertainment with whom those departments and agencies do business or over whom they have regulatory authority. Team members are expected to comply with the laws and regulations governing the departments and agencies with whom they work.	联邦、州和地方政府部门和机构受有关其员工接受与这些部门和机构开展业务或受其监管的单位的礼品、馈赠或招待的法律法规的约束。团队成员应遵守管理其工作所在部门和机构的法律法规。
Company policy generally prohibits giving or offering to give any of these items to any actual or potential government customer or representative. Certain narrow exceptions may exist, including the provision of promotional materials, modest refreshments, or items of little intrinsic value. If you feel these narrow exceptions apply, please seek guidance from Segment General Counsel or Global Ethics and Compliance before offering.	公司政策总体上禁止向任何实际或潜在的政府客户或代表给予或承诺给予任何此类物品。在极少情况下也可能存在例外，包括提供促销材料、适度提供的茶点或内在价值很低的物品。如果您认为自己适用这些极少的例外情况，请在提供之前先向事业部总法律顾问或全球道德与合规部寻求指导。
<u>Providing Entertainment to Non-U.S. Government (Foreign) Officials</u>	<u>向非美国政府（国外）官员提供招待</u>
Please refer to the global procedure for Hosting Non-U.S. Government Officials (GBL-PROC-LGL004).	请参考接待非美国政府官员的全球程序 (GBL-PROC-LGL004)。

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<u>Documenting Approved Expenditures and Reporting Improper Offers</u>	<u>记录批准的支出和报告不当提供的礼品和招待</u>
All expenditures for gifts and entertainment must be in accordance with Company policies and procedures, accurately recorded in the Company's books and records and supported by appropriate documentation. Appropriate documentation includes detailed receipts and documentation of whom the gift or entertainment was given to and the purpose/reason. Pre-approval as noted within the policy should be obtained using the Gifts and Entertainment Pre-Approval Form for your Segment. Email approval will be accepted in lieu of the Pre-Approval Form so long as it includes all approvers and details required in the Pre-Approval form.	礼品和招待的所有支出必须符合公司的政策和程序，并准确记录在公司的账簿和记录中，并附有适当的文档。适当的文档包括详细收据和记录提供礼品或招待的对象，以及目的/原因的文件。应使用您所在事业部的礼品和招待预先批准表，获得政策所述的预先批准。如果电子邮件批准包含预先批准表要求的所有审批者和详细信息，则允许使用电子邮件批准来代替预先批准表。
Team members should report to Global Ethics and Compliance any instance in which they are offered money, gifts, or anything else of value, by a business partner with the intent to receive preferential treatment or are solicited for a bribe by a business partner.	团队成员应向全球道德与合规部报告业务合作伙伴以获得优惠待遇为目的，向其提供金钱、礼品或任何有价值物，或被业务伙伴索贿的情况。
<b>References</b>	<b>参考资料</b>
<a href="#">The Oshkosh Way—Our Code of Ethics and Conduct</a>	<a href="#">The Oshkosh Way - 我们的《道德与行为准则》</a>
<a href="#">GBL-POL-LGL005 - Anti-Bribery/Anti-Corruption Compliance</a>	<a href="#">GBL-POL-LGL005 - 反贿赂/反腐败合规</a>
<a href="#">GBL-PROC-LGL004 - Hosting Non-U.S. Government Officials</a>	<a href="#">GBL-PROC-LGL004 - 接待非美国政府官员</a>
<a href="#">GBL-POL-LGL007 – Lobbying Activities</a>	<a href="#">GBL-POL-LGL007 - 游说活动</a>
<a href="#">GBL-POL-TVL001 – Business Travel &amp; Expense Policy</a> and business unit specific travel policies/procedures, if applicable	<a href="#">GBL-POL-TVL001 - 商务旅行和费用政策</a> 及业务部门特定的差旅政策/程序（如适用）
<a href="#">JNT-POL-FIN012 - Taxation of Employee Gifts, Prizes, and Awards</a>	<a href="#">JNT-POL-FIN012 - 员工礼品、奖品和奖励的征税</a>
<a href="#">GBL-MAN-LGL006 – Gifts and Entertainment Frequently Asked Questions (FAQs)</a>	<a href="#">GBL-MAN-LGL006 - 礼品和招待常见问题 (FAQ)</a>

**POLICY**

<b>Reference Number:</b> GBL-POL-LGL006- CHI	<b>Title:</b> Gifts and Entertainment - Chinese
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<a href="#">GBL-FORM-LGL006 - Gifts and Entertainment Pre-Approval Form</a>	<a href="#">GBL-FORM-LGL006 - 礼品和招待预先批准表</a>
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