



POLICY GUIDE

政策指引

Global Code of Conduct

《全球行为准则》

NUMBER 编号: COMP-01GPT | EFFECTIVE DATE 生效日期: 01/01/2026

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1. PURPOSE AND SCOPE

宗旨与适用范围



1.1 Purpose of the Code of Conduct

1.1 行为准则的宗旨

Grain & Protein Technologies (“GPT”) is a leading global designer, manufacturer, and marketer of reliable, durable, and innovative equipment solutions for grain, seed, poultry, egg, and swine production. The Company goes to market with its strong portfolio of industry-leading brands: GSI, Cumberland, AP, Tecno, Cimbria, Aerotech, Reventa, and Euroemme. With its Company Purpose of “Feeding the World Better”, GPT emphasizes advancing smart technologies and offering innovative technical solutions to make farmers and agribusiness managers more productive and profitable in a sustainable way. We are committed to delivering high-performance solutions that maximize machine utilization while minimizing energy consumption and environmental impact.

Grain & Protein Technologies（以下简称“GPT”）是一家全球领先的具设计、制造和营销能力的企业，致力于为谷物、种子、家禽、蛋类及生猪生产领域提供可靠、耐用且具有创新性的设备解决方案。公司依托其行业领先的品牌组合开展市场运营，当中包括 GSI、Cumberland、AP、Tecno、Cimbria、Aerotech、Reventa 及 Euroemme。围绕“Feeding the World Better（更好地滋养世界）”这一公司使命，GPT 致力于推进智能技术发展，提供创新性技术解决方案，帮助农场主及农业企业管理者以可持续方式提升生产效率与盈利能力。我们承诺提供高性能解决方案，在最大化设备利用率的同时，尽可能降低能源消耗与环境影响。

In view of this, this Code of Conduct (hereinafter, the “**Code**”) provides shared ethical standards that ensure all who act on behalf of GPT act with integrity, transparency, and accountability in all circumstances. By following these principles, GPT aims to prevent behaviors that could harm its business partners, reputation, stakeholders, or the communities in which it operates.

基于上述使命与责任，本《全球行为准则》（以下简称“本准则”）确立了共同遵循的道德标准，确保所有代表 GPT 行事的人员在任何情况下均秉持诚信、透明与责任原则。通过遵循这些原则，GPT 旨在防止任何可能损害其业务合作伙伴、企业声誉、利益相关方或其运营所在社区的行为。

In addition to this Code, GPT has implemented a set of corporate guidelines, internal procedures, and operational processes that complement and integrate the principles of the Code. The Code should be interpreted and applied in conjunction with GPT’s policies, ensuring consistency and alignment across all levels of the organization. These policies form an essential part of GPT’s governance framework and are accessible to employees on the GPT HUB or upon request.

除本准则外，GPT 还制定了一系列公司指引、内部程序及运营流程，与本准则原则相辅相成、相互融合。本准则应结合 GPT 各项政策一并理解与适用，以确保在组织各层级之间保持一致性与协调性。这些政策构成 GPT 公司治理与合规框架的重要组成部分，并可通过 GPT HUB 获取或依申请提供。

1.2 Applicability to Employees, Contractors, and Partners

对员工、承包商及合作伙伴的适用性

The Code applies to all officers, directors and employees of GPT companies. Compliance with the Code is integral to the manner in which GPT conducts business and to the relationship between GPT and its employees.

本准则适用于 GPT 各公司全体高级管理人员、董事及员工。遵守本准则是 GPT 开展业务方式的重要组成部分，也是 GPT 与员工之间关系的核心基础。

Failure to comply with any of the provisions set forth in this Code of Conduct may result in disciplinary action, including, but not limited to termination, in accordance with applicable law.

任何未遵守本《全球行为准则》所载规定的行为，均可能依据适用法律受到纪律处分，包括但不限于解除劳动关系。

GPT may provide consultants, agents, sales representatives, distributors, vendors, contractors, or subcontractors with a copy of this Code and require or encourage them to comply with relevant aspects of it. If any such third party fails to comply with the principles set forth in this Code, GPT may take any appropriate action, including, but not limited to, termination of the relationship.

GPT 可向顾问、代理人、销售代表、分销商、供应商、承包商或分包商提供本准则副本，并要求或鼓励其遵守其中相关条款。如任何该等第三方未遵守本准则所确立的原则，GPT 可采取适当措施，包括但不限于终止合作关系。

This Code alone is not intended to create, nor does it create, any contractual rights or obligations, express or implied, and does not alter the at-will or other applicable employment relationship, to the extent permitted by law.

本准则本身并不旨在、亦不会创设任何明示或默示的合同权利或义务；在法律允许范围内，本准则亦不改变依法适用的雇佣关系性质（包括“随意雇佣关系”或其他适用的雇佣关系形式）。



1.3 Integrity and Ethical Commitments

1.3 诚信与道德承诺

We succeed as individuals and as a company when we take the time to learn from one another, listen to different points of view, and treat each other with mutual respect. Everyone is responsible for helping to prevent the occurrence of discrimination, harassment, intimidation, and other abusive conduct in the workplace. This includes promptly reporting observed instances of inappropriate behavior to a supervisor, Human Resources, or Legal & Compliance, without fear of retaliation. Individuals are expected to act with integrity and be mindful of the impact of their behaviors and words on others.

无论作为个人还是作为公司整体，我们的成功源于彼此学习、倾听不同观点以及以相互尊重的态度相处。每一位员工均有责任协助防止工作场所中出现歧视、骚扰、威胁及其他不当或滥用行为。这包括在发现不当行为时，及时向直属主管、人力资源部或法务与合规部报告，而无需担心遭受报复。每一位员工均应以诚信行事，并充分意识到自身言行对他人的影响。

1.4 Alignment with Our Winning Values

1.4 与公司核心价值观的一致性

GPT's foundational values of integrity, transparency, constant learning, and passion for customer success requires all activities to be conducted with the highest standard of ethical conduct. Every individual is required to demonstrate ethical and professional behavior in fulfilling their responsibilities and in all interactions with colleagues, customers, and partners.

GPT 以诚信、透明、持续学习及对客户成功的热情为核心价值观。上述价值观要求公司所有活动均以最高标准的道德规范开展。每一位员工在履行职责及与同事、客户和合作伙伴互动过程中，均必须展现符合道德规范与职业标准的行为。

2. RELATIONSHIP OF THE CODE TO LAWS, REGULATIONS AND GPT POLICIES

本准则与法律、法规及 GPT 政策的关系

2.1 Role of Leadership and Management

2.1 领导层与管理层的职责

Leadership plays a crucial role in shaping and upholding a Code by setting the ethical tone for the entire organization. Leaders are responsible for modeling the values and behaviors outlined in the Code, ensuring that expectations are clearly communicated and consistently enforced. They foster a culture of integrity by promoting transparency, accountability, and open dialogue, encouraging employees to speak up without fear of retaliation. Through regular training, monitoring, and policy updates, leadership ensures that the Code remains relevant and effective. Ultimately, their commitment to ethical standards strengthens trust, drives responsible decision-making, and reinforces the organization's reputation.

领导层在塑造并维护本准则方面发挥关键作用，其职责在于为整个组织树立道德基调。各级领导应以身作则，实践本准则所载价值观与行为标准，确保相关要求得到清晰传达并持续有效执行。领导层应通过提升透明度、强化问责机制并促进开放对话，营造诚信文化，鼓励员工在无需担心遭受报复的情况下勇于发声。通过定期培训、监督机制及政策更新，确保本准则持续保持相关性与有效性。领导层对道德标准的坚定承诺，有助于增强信任、推动负责任决策，并巩固组织声誉。

2.2 Compliance with Laws and Regulations

2.2 遵守法律法规

GPT recognizes, complies with, and respects the laws, rules and regulations in all the countries where it operates as a fundamental principle. All directors, officers, employees, and third parties with whom GPT conducts business are required to diligently acquire knowledge of the laws and regulations applicable to their work, comply with all applicable legal frameworks, and refrain from any actions that could violate the law.

GPT 将遵守并尊重其运营所在国家和地区的法律、规则及法规视为基本原则。所有董事、高级管理人员、员工以及与 GPT 开展业务往来的第三方，均有责任主动了解与其工作相关的法律法规，严格遵守相关法律框架，并避免从事任何可能违反法律的行为。

This Code defines the principles that govern GPT's business conduct across all locations. In cases where local customs, laws, or regulations differ from the provisions of this Code, the standard representing the highest level of ethical behavior shall be applied. There may be instances where the laws of two or more countries are in conflict. In such cases, please consult GPT's Legal & Compliance Department to determine the appropriate course of action.

本准则确立了 GPT 在全球各运营地点开展业务的行为原则。如当地习俗、法律或法规与本准则条款存在差异，应适用能够体现最高道德标准的规范。在某些情况下，不同国家法律之间可能存在冲突。遇此情形，应及时咨询法务与合规部，以确定适当的处理方式。

2.3 Reporting Violations and Non-Retaliation

2.3 违规举报与反报复

Although this Code and GPT's policies serve as a guide, they are not a substitute for sound decision-making. If the Code does not address a particular issue or question, individuals are expected to exercise good judgment and common sense in determining an appropriate course of action. It is essential to pause and reflect in these moments before proceeding.

本准则及 GPT 各项政策为行为提供指引，但并不能替代审慎判断。如本准则未涵盖某一具体问题或情形，相关人员应运用良好判断与常识，审慎决定适当的行动方案。在此类情况下，应暂停并认真思考后再作决定。

Situations that appear inappropriate, raise regulatory or ethical concerns, violate company policy, or pose any other risk to GPT, its employees, or business partners should be reported immediately. Remaining silent may allow problems to escalate. Honest, accurate, and timely reporting helps safeguard GPT, the workplace, colleagues, and the broader community. Adherence to this Code is a collective responsibility, and its values are reinforced through the actions of all organizational members.

任何看似不当、引发监管或道德疑虑、违反公司政策，或可能对 GPT、员工或业务合作伙伴构成风险的情况，均应立即报告。保持沉默可能导致问题升级。诚实、准确、及时的报告，有助于保护 GPT、工作环境、同事及更广泛的社会群体。遵守本准则是全体成员的共同责任，其价值应通过每位员工的实际行动得以体现。

GPT is committed to supporting individuals who raise or assist in resolving concerns. Additionally, employees are expected to promptly report known or suspected violations of this Code, applicable law, or GPT policies, and failure or omission to do so may itself be considered a violation of this Code. All employees are expected to cooperate fully, honestly, and in good faith with internal investigations, audits, or inquiries conducted by or on behalf of GPT. Failure to cooperate may itself also constitute a violation of this Code. To protect the integrity of investigations, GPT may request that information relating to an investigation be treated confidentially, consistent with applicable law and employees' legal rights.

GPT 承诺支持提出或协助解决问题的人员。此外，员工有义务及时报告已知或疑似违反本准则、相关法律或 GPT 政策的行为。未履行报告义务或故意隐瞒相关情况，亦可能构成对本准则的违反。所有员工应在 GPT 或代表 GPT 开展的内部调查、审计或问询中，充分、诚实并善意配合。拒绝配合亦可能构成对本准则的违反。为维护调查的完整性，GPT 可根据适用法律及员工法定权利要求对相关信息予以保密处理。

GPT strictly prohibits retaliation against anyone who, in good faith, reports or provides information regarding a suspected violation of any law, this Code, or GPT policies. Any act of retaliation will be subject to disciplinary action, up to and including, but not limited to, termination of employment. Additional resources can be found in Section 8.2.

GPT 严格禁止对任何基于善意报告或提供涉嫌违反法律、本准则或 GPT 政策信息的人员实施报复。任何报复行为将受到纪律处分，包括但不限于解除劳动关系。更多资源请参见第 8.2 条。

2.4 Governance and Compliance Framework

2.4 公司治理与合规框架

GPT conducts its activities with the professionalism demanded by its responsibilities, striving to achieve corporate objectives while acting diligently and in good faith, in strict accordance with applicable laws and regulations across all locations where it and its affiliates operate.

GPT 在履行其职责时始终秉持高度专业精神，在实现公司目标的同时，勤勉尽责、诚信行事，并严格遵守其及其关联公司运营所在地的适用法律法规。

3. WORKSPACE CONDUCT

职场行为

- **3.1 Health, Safety, and Security Standards**
- **3.1 健康、安全与安保标准**

The health and safety of every employee, and visitors to a GPT facility, is the highest priority of the company. Employees must perform their duties fully capable, and as such, the use, possession,

distribution, or being under the influence of illegal drugs or alcohol in the workplace is prohibited. Employees are required to disclose the use of any prescribed or over-the-counter medication that could impair judgment, alertness, or the ability to perform work safely. Employees must not perform safety-sensitive duties while impaired. Failure to comply may result in disciplinary action, up to and including termination of employment, to the extent permitted by applicable law. Disclosures of medication use will be handled confidentially and in accordance with applicable privacy and disability-related laws.

GPT 将每一位员工及来访人员的健康与安全置于最高优先级别。员工在履行职责时必须具备完全胜任的状态。因此，严禁在工作场所使用、持有、分发非法药物或酒精，或在受其影响状态下工作。员工应披露任何可能影响判断力、警觉性或安全履职能力的处方药或非处方药使用情况。涉及安全敏感岗位的员工在受到影响时不得履行相关职责。违反上述规定的，可能依据适用法律受到纪律处分，包括但不限于解除劳动关系。关于药物使用的披露信息，将根据适用隐私法律及与残疾相关法律规定予以保密处理。

Workplace violence, including threats or acts of violence, of any kind is strictly prohibited. Possession of firearms or any other items intended for harm are likewise prohibited to the maximum extent under applicable law. Any observed or suspected threats, violent behavior, or unauthorized items must be immediately reported to a supervisor, HR, EHS, the hotline, or local law enforcement.

任何形式的职场暴力行为，包括威胁或暴力行为，均被严格禁止。在适用法律允许的最大范围内，严禁持有枪支或任何旨在造成伤害的物品。任何观察到或怀疑存在的威胁、暴力行为或未经授权的危险物品，必须立即向直属主管、人力资源部、环境健康安全部门（EHS）、举报热线或当地执法机关报告。

3.2 Discrimination, Harassment, or Disrespect

3.2 歧视、骚扰或不尊重行为

GPT does not tolerate disrespectful behavior, discrimination or unlawful harassment, including verbal abuse, unwanted advances, or other exclusionary practices. GPT adheres to all applicable laws and regulations requiring equal opportunities in employment, and prohibits discrimination against any individual or group on the basis of race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, national origin, ethnicity, age, disability, veteran or military status, pregnancy, childbirth or related medical conditions, genetic information, marital status, or any other characteristic protected by applicable law.

GPT 不容忍任何不尊重行为、歧视或违法骚扰行为，包括言语辱骂、不受欢迎的性或其他不当接触、或其他排斥性行为。GPT 严格遵守所有适用的平等就业法律法规，禁止基于以下任何受法律保护的特征对个人或群体实施歧视，当中包括：种族、肤色、宗教、性别、性别认同、性别表达、性取向、国籍、民族、年龄、残疾、退伍军人或军人身份、怀孕、生育或相关医疗状况、遗传信息、婚姻状况或其他受适用法律保护的特征。

4. BUSINESS INTEGRITY

商业诚信

4.1 Conflicts of Interest

4.1 利益冲突

All individuals are expected to perform their duties with integrity. Situations where personal interest, whether direct or indirect, conflict with the interests of GPT must be avoided. Even the appearance of a conflict can undermine trust and compromise decision-making. Each individual has an obligation to perform their work for GPT effectively and objectively. Accordingly, individuals should avoid any situations or actions that could give rise to a conflict of interest or the appearance of such a conflict.

所有人员均应以诚信履行职责。凡个人利益（无论直接或间接）与 GPT 利益发生冲突的情形，均应避免。即便仅存在利益冲突的表象，也可能削弱信任并影响决策客观性。每位员工均有义务高效、客观地履行其在 GPT 的职责。因此，应避免任何可能导致实际或表面利益冲突的情形或行为。

An actual or apparent conflict of interest may arise in many ways, including the following:

利益冲突可能以多种形式出现，包括但不限于：

- **Financial Interests:** Holding ownership or other interest in a competitor or in a business with which GPT has, or is contemplating, a business relationship;
- **财务利益：** 在竞争对手或与 GPT 存在或拟建立业务关系的企业中持有所有权或其他利益；
- **Outside Employment:** Maintaining any business, financial or other relationship with third parties if it impairs one's ability to fulfill their responsibilities to GPT;

- 兼职或外部业务关系: 与第三方维持任何可能影响其履行GPT职责能力的业务、财务或其他关系;
- Family Relationships: Nepotism or favoritism in employment decisions (e.g., hiring, promotions, or assignments) or commercial dealings (e.g., supplier selections or contracts) involving immediate family members (e.g., spouses, domestic partners, parents, siblings, children, or in-laws), without prompt written disclosure to a supervisor, HR, or Legal & Compliance prior to taking any such actions. All potential conflicts must be disclosed to avoid actual or perceived bias;
- 家庭关系: 在涉及直系亲属（如配偶、伴侣、父母、兄弟姐妹、子女或姻亲）的人事决策（如招聘、晋升、岗位分配）或商业决策（如供应商选择或合同签订）中存在裙带关系或偏袒行为，且未在采取相关行动前及时以书面形式向直属主管、人力资源部或法务与合规部披露。所有潜在冲突必须披露，以避免产生实际偏见或被合理认为存在偏见的情形;
- Confidential Information: Utilizing confidential, commercial, or proprietary information of GPT obtained through the performance of work with or for GPT or otherwise acquired through conversations or observations involving GPT personnel or third parties engaged in commercial relationships with GPT;
- 保密信息: 利用在GPT任职期间或通过GPT人员或与GPT存在商业关系的第三方接触过程中获取的GPT机密、商业或专有信息;
- Employment Relationship: Serving as an employee, director, officer, partner, agent or consultant for a current or prospective competitor, supplier or customer, where such participation could interfere with responsibilities to GPT. This includes “moonlighting” or providing services to another business as an officer, director, employee, agent, representative, or consultant where one's participation could detract from duties at GPT;
- 雇佣关系: 在现有或潜在竞争对手、供应商或客户处担任员工、董事、高级管理人员、合伙人、代理人或顾问，且该等参与可能影响对GPT的职责履行，当中包括“兼职”或为其他企业提供作为员工、董事、高级管理人员、代表、代理人或顾问等可能影响GPT工作职责的服务;
- Use of GPT Resources: Devoting work hours or GPT resources to activities unrelated to one's role at GPT;
- 使用GPT资源: 将工作时间或GPT资源用于与本职工作无关的活动;
- Influence on Decisions: Influencing or attempting to influence any business transaction between GPT and another entity in which one has a direct or indirect financial interest;
- 影响决策: 在自身具有直接或间接财务利益的情况下，影响或试图影响GPT与其他实体之间的业务交易;
- Gifts and Hospitality: Accepting or providing unapproved gifts, favors, hospitality, or anything else of value that could influence, or appear to influence, business decisions;

- 礼品与招待: 接受或提供未经批准的礼品、好处、招待或其他有价物品, 从而影响或可能被认为影响业务决策;
- Personal Gain: Taking opportunities discovered through one's role at GPT for personal gain.
- 个人获利: 利用因在 GPT 任职而发现的商业机会为个人谋取利益。

Transparency is crucial in managing potential conflicts of interest. No action may be taken with respect to a potential conflict of interest unless and until it has been fully disclosed and reviewed by the individual's supervisor, HR, or Legal & Compliance, and appropriate guidance or approval has been provided. By raising any potential conflicts of interest as they arise, individuals help advance GPT's reputation for honesty, integrity and fair dealing.

在管理潜在利益冲突时, 透明度至关重要。在相关潜在冲突已向直属主管、人力资源部或法务与合规部充分披露并获得适当指导或批准前, 不得采取任何相关行动。及时披露潜在利益冲突, 有助于维护 GPT 诚实、正直及公平交易的良好声誉。

In many cases, the interest, relationship, or transaction may not be considered harmful to GPT, and individuals may be allowed to pursue it; however, transparency prior to any actions allows for all involved to make the best decision for GPT's interests.

在许多情况下, 相关利益、关系或交易可能并不损害 GPT 利益, 个人亦可能被允许继续参与; 但在采取任何行动前保持透明, 有助于各方作出最有利于 GPT 的决定。

4.2 Accurate Financial and Operational Records

4.2 准确的财务与运营记录

GPT requires that all financial and accounting records are maintained with accuracy, completeness and transparency in accordance with generally accepted accounting principles. No entries may intentionally conceal or disguise the true nature of any GPT transaction. Employees must adhere to the following guidelines to ensure integrity in financial reporting and operations:

GPT 要求所有财务及会计记录必须依据公认会计原则保持准确、完整与透明。任何记录不得故意掩盖或歪曲 GPT 交易的真实性质。员工应遵循以下原则, 确保财务报告及运营活动的完整性:

- No undisclosed, unrecorded, or "off-the-books" funds or assets may be created for any purpose.
- 不得为任何目的设立未披露、未记录或账外资金或资产;

- No false or fictitious entries should be made or misleading reports issued; all entries must accurately and fairly describe the transactions they cover.
- 不得编制虚假或误导性记录或报告；所有记录必须真实、公允地反映相关交易；
- Payments may be made only for actual services rendered or products delivered; false or fictitious invoices may not be paid.
- 仅可为实际提供的服务或交付的产品支付款项；不得支付虚假或虚构发票；
- No document will be dated as of any date other than the actual date of execution unless that document clearly states on its face that the date is to be regarded “as of” a different date. Such “as of” dating must be reviewed by Legal & Compliance to ensure compliance with Legal & financial reporting standards.
- 任何文件不得标注与实际签署日期不同的日期，除非文件明确注明该日期为“自某日期起生效 (as of)”，且此类“追溯生效日期”须经法务与合规部审查，以确保符合相关法律及财务报告标准；
- Business expenses properly incurred in performing GPT business must be documented promptly, accurately, and completely in expense reports, clearly distinguishing the type of expense being reported.
- 为履行 GPT 业务而发生的合理费用，必须在费用报销单中及时、准确、完整地记录，并清晰区分费用类型。

Any suspected violation of accounting or financial records requirements must be reported to a supervisor, HR, the hotline, or Legal & Compliance via email at GPTCompliance@grainproteintech.com.

如怀疑存在违反会计或财务记录要求的行为，应向直属主管、人力资源部、举报热线或通过电子邮件 GPTCompliance@grainproteintech.com 向法务与合规部报告。

Sound management of GPT’s cash and accounts is also essential to prevent bribes, kickbacks and other illegal payments. Employees must adhere to the applicable anti-bribery and anti-corruption policies, in addition to the following requirements:

为了GPT 现金及账户的健全管理，对于防止贿赂、回扣及其他非法支付亦至关重要。除遵守适用的反贿赂与反腐败政策外，员工还必须遵守以下要求：

- All bank accounts containing GPT funds, except accounts in the names of custodians of petty cash funds, should be established and maintained in the name of the appropriate GPT affiliate’s legal business name.

- 除由小额现金保管人名义开立的账户外，所有存放 GPT 资金的银行账户均应以相应 GPT 关联公司的法人机构名称设立和保留持有。
- All transactions containing GPT funds should be clearly identified in GPT books and records.
- 所有涉及 GPT 资金的交易必须在 GPT 账簿和记录中清晰标识。

No funds should be maintained by GPT in the form of cash beyond what is reasonably required for normal business operations. GPT creates a wide range of records and documents in the course of its business, which must comply with all records management policies. Such records may be critical in government audits, legal requirements, investigations, or lawsuits. Employees are prohibited from inappropriately altering or destroying GPT records and must comply with all applicable records retention policies and procedures. GPT may issue a “*legal hold*” or “*litigation hold*” requiring the suspension of records management policies and procedures. Any such suspension will be done at the direction of Legal & Compliance.

除正常业务运营合理所需外，不得以现金形式保留 GPT 资金。在业务过程中，GPT 会生成大量记录和文件，必须遵守所有记录管理政策。相关记录可能在政府审计、法律程序、调查或诉讼中具有关键意义。员工不得篡改或销毁 GPT 记录，并必须遵守所有适用的记录保留政策与程序。在特定情况下，GPT 可发布“法律保全令（*legal hold*）”或“诉讼保全令（*litigation hold*）”，要求暂停适用记录管理政策与程序。任何此类暂停均须由法务与合规部指示。

4.3 Use and Protection of Company Assets

4.3 公司资产的使用与保护

GPT employees share a collective responsibility to protect and properly use the property and funds entrusted to them by GPT. GPT encourages employees to be cost conscious in their work and to continuously seek ways to enhance performance while reducing expenses.

GPT 员工对公司委托管理的财产与资金负有共同保护责任。GPT 鼓励员工在工作中注重成本意识，持续寻求提升绩效并降低费用的工作方式。

While occasional personal use of GPT property may be necessary, such as personal use of communication systems, employees should generally avoid personal use of GPT property, including office supplies, equipment, computers and vehicles. GPT property must not be used for personal benefit or sold, loaned or given away, regardless of its condition or value, except when an explicit authorization has been granted.

尽管在个别情况下可能存在合理的个人使用（例如偶尔使用通信系统处理个人事务），员工原则上应避免将 GPT 资产用于个人用途，包括办公用品、设备、计算机及车辆等。未经明确授权，不得将 GPT 资产用于个人利益，也不得出售、出借或赠与，无论其状况或价值如何。

4.4 Protection of GPT’s Intellectual Property

4.4 GPT 知识产权保护

GPT’s intellectual property represents some of GPT’s most valuable assets and serves as the foundation for new product innovations for its customers. Each employee must therefore comply with any intellectual property laws and regulations, as well as any agreements required by GPT, and ensure the protection and proper use of GPT’s intellectual property. Similarly, all employees are expected to respect the intellectual property rights of third parties, including GPT competitors.

GPT 的知识产权是其最具价值的资产之一，也是为客户持续推出创新产品的基础。因此，每位员工必须遵守相关知识产权法律法规及 GPT 要求签署的相关协议，确保对 GPT 知识产权的保护与合理使用。同样，所有员工亦应尊重第三方（包括 GPT 竞争对手）的知识产权。

4.5 Responsible Use of Artificial Intelligence

4.5 人工智能的负责任使用

The responsible use of Artificial Intelligence (AI) is an integral part of how we conduct business, as an emerging tool that reflects our commitment to ethical innovation and data integrity. Employees must use approved AI tools transparently, ensuring outputs are accurate, unbiased, and aligned with organizational values. This includes protecting sensitive data, avoiding deceptive or manipulative uses, and maintaining human oversight in decision-making. All AI usage must comply with applicable laws, internal guidelines, and policies. Any use of AI for legal, financial, safety-critical, or employment decisions and use must be preapproved by Legal & Compliance. By following these practices and regularly reviewing AI applications for ethical, legal, security, and other risks, we build trust, accountability, and responsible innovation across our organization.

负责任地使用人工智能（Artificial Intelligence, AI）是 GPT 开展业务的重要组成部分，也是我们对道德创新与数据完整性承诺的体现。员工必须以透明方式使用经批准的 AI 工具，确保输出内容准确、公正，并与组织价值观保持一致。这包括保护敏感数据，避免欺骗性



或操纵性的使用方式，并在决策过程中保持人工监督。所有 AI 的使用必须遵守适用法律、内部指引及相关政策。任何涉及法律、财务、安全关键或人事决策的 AI 使用，均须事先获得法务与合规部批准。通过遵循上述做法，并定期评估 AI 应用可能带来的道德、法律、安全及其他风险，我们旨在组织内部建立信任、强化问责，并推动负责任的创新。

4.6 Data Privacy and Cybersecurity

4.6 数据隐私与网络安全

GPT is committed to respecting and protecting the privacy and confidentiality of all employees, customers, vendors and other business partners, ensuring information is used only for legitimate business purposes and in compliance with all applicable laws and regulations. Employees are encouraged to consult [GPT privacy policy](#) for more detailed information on privacy practices and obligations.

GPT 致力于尊重并保护所有员工、客户、供应商及其他业务合作伙伴的隐私与信息机密性，确保相关信息仅用于合法的业务目的，并严格遵守所有适用法律法规。员工应查阅 [GPT 隐私政策](#)，以获取有关隐私实践与合规义务的更详细信息。

Cybersecurity is a critical component of our Code reflecting our commitment to protecting sensitive data, systems, and digital assets. All employees are expected to uphold best practices in information security, including safeguarding passwords, avoiding unauthorized access, reporting suspicious activity promptly, and following incident response protocols in the event of a potential breach. Strict adherence to data protection laws and internal protocols to prevent breaches and ensure confidentiality, integrity, and availability of information is essential. By maintaining vigilance and accountability in our digital behavior, we help preserve trust and resilience across the organization.

网络安全是本准则的重要组成部分，体现了我们对保护敏感数据、系统及数字资产的承诺。所有员工均应遵循信息安全最佳实践，包括妥善保管密码、防止未经授权的访问、及时报告可疑活动，并在发生潜在信息安全事件时遵循应急响应流程。严格遵守数据保护法律及内部规程，对于防止数据泄露、确保信息的机密性、完整性与可用性至关重要。通过在数字行为中保持警觉与责任意识，我们共同维护组织的信任基础与运营韧性。



4.7 Communication and Social Media Guidelines

4.7 沟通与社交媒体指引

Employees are expected to use social media responsibly, reflecting GPT’s values of respect, integrity, and transparency. Prohibited actions include disclosing confidential information, misrepresenting GPT, or engaging in discriminatory, harassing, defamatory, hostile, or offensive behavior that could damage GPT’s reputation or workplace culture.

员工在使用社交媒体时，应秉持 GPT 所倡导的尊重、诚信与透明价值观，审慎发布内容。以下行为将被严格禁止：披露机密信息；歪曲或错误代表 GPT；从事歧视性、骚扰性、诽谤性、敌对性或其他可能损害 GPT 声誉或职场文化的行为。

When discussing work-related topics, clearly identify your affiliation and avoid implying official GPT endorsement, unless authorized. Only authorized spokespersons may communicate with the media, investors, or analysts on behalf of GPT. Any media or external inquiries regarding GPT should be referred to the appropriate communications or Legal & Compliance function. Nothing in this section is intended to restrict or interfere with employees’ rights to engage in lawfully protected concerted activity or other rights protected under applicable labor and employment laws.

在讨论与工作相关的话题时，应明确说明个人身份，并避免暗示相关言论代表 GPT 官方立场（除非已获得正式授权）。仅经授权的发言人可代表 GPT 与媒体、投资人或分析师沟通。任何来自媒体或外部机构关于 GPT 的问询，均应转交相应的沟通部门或法务与合规部处理。本条款无意限制或干涉员工依法享有的受法律保护的集体行动权利或其他劳动法律所保障的权利。

4.8 Anti-Money Laundering

4.8 反洗钱

GPT conducts business only with reputable customers involved in legitimate business activities and with funds derived from lawful sources. GPT is fully committed to complying with all anti-money laundering and anti-terrorism laws worldwide, including compliance with OFAC and similar laws and regulations. Any involvement in money laundering, whether knowingly or not, undermines GPT’s reputation for integrity and exposes both the individuals and GPT to significant civil and criminal penalties.



GPT 仅与从事合法商业活动且资金来源合法的信誉良好客户开展业务。GPT 全面承诺遵守全球适用的反洗钱及反恐怖主义法律，包括遵守美国海外资产控制办公室（OFAC）及类似法律法规。无论是否明知，任何涉及洗钱的行为都会损害 GPT 的诚信声誉，并使个人及公司面临严重的民事与刑事处罚风险。

GPT does not conduct business with individuals or entities subject to applicable sanctions or restricted-party lists. Employees must comply with all screening, due diligence, and escalation requirements relating to sanctions and restricted parties.

GPT 不与受到适用制裁或被列入限制名单的个人或实体开展业务。员工必须遵守所有与制裁及受限方相关的筛查、尽职调查及升级报告要求。

4.9 Anti-Bribery and Anti-Corruption

4.9 反贿赂与反腐败

GPT upholds a strict policy prohibiting bribery and corruption in any form, any time, to any person, whether involved in the private or public sector. This includes a ban on facilitation payments and requirements for accurate accounting of all payments to prevent improper transactions. Violations of these anti-bribery or anti-corruption laws may result in severe legal penalties and reputational harm, even in countries where such practices might appear customary.

不论时间、形式或对象为何，不论涉及私营部门或公共部门人员，GPT 严格禁止任何形式的贿赂或腐败行为。该政策包括：严禁便利费（facilitation payments）；要求对所有付款进行准确记录与会计处理，以防止不当交易。即便在某些国家或地区相关做法可能被视为惯例，违反反贿赂或反腐败法律仍可能导致严重法律处罚及声誉损害。

This prohibition also applies to all third parties acting on behalf of GPT, such as contractors, subcontractors, agents, dealers, distributors, and vendors. Employees are required to perform proper due diligence when selecting these partners to ensure, among other things, compliance with anti-bribery and anti-corruption laws.

上述禁止规定同样适用于代表 GPT 行事的所有第三方，包括承包商、分包商、代理人、经销商、分销商及供应商。员工在选择上述合作伙伴时，必须履行适当的尽职调查程序，确保其遵守反贿赂与反腐败法。



5. CUSTOMER AND MARKET RELATIONS

客户与市场关系

5.1 Product Quality

5.1 产品质量

We are dedicated to designing, manufacturing, and delivering reliable, durable, and innovative solutions our customers can count on to make their jobs easier, faster, and more productive. GPT competes by demonstrating integrity in all of its actions, and by bringing together industry-leading brands, deep agricultural experience, and forward-thinking technology to help farmers and agribusiness managers increase productivity, protect what they've produced, and care for their animals.

我们致力于设计、制造并交付可靠、耐用且富有创新性的解决方案，帮助客户更轻松、更高效、更具生产力地完成工作。在竞争过程中，GPT的所有行动均展现诚信，并整合行业领先品牌、深厚农业经验与前瞻性技术，帮助农场主及农业企业管理者提升生产效率、保护其生产成果并妥善照料动物。

Every team member is responsible for ensuring our products are safe, dependable, and meet or exceed the standards of our industry. We actively listen to market feedback, respond transparently to concerns, uphold rigorous quality controls, and are committed to continuous improvement. By doing so, we strengthen trust, foster long-term relationships, and reinforce our reputation for excellence in the marketplace.

每一位团队成员均有责任确保我们的产品安全、可靠，并达到或超越行业标准。我们积极倾听市场反馈，透明回应各类关切，执行严格的质量控制，并持续推动改进。通过上述实践，我们增强信任，建立长期合作关系，并巩固在市场中的卓越声誉。

5.2 Fair Competition and Antitrust Compliance

5.2 公平竞争与反垄断合规

GPT is fully committed to upholding the principles of fair competition and strict compliance with antitrust laws. All employees must conduct business ethically and independently, avoiding any agreements or practices that could restrict competition, such as price fixing, market allocation, bid



rigging, or sharing sensitive information with competitors. These actions not only violate legal standards but also undermine trust and innovation in the marketplace. We expect everyone to engage with competitors, suppliers, and partners in a manner that promotes transparency and integrity. Any suspected violations must be reported immediately to Legal & Compliance.

GPT 坚决维护公平竞争原则，并严格遵守反垄断法律。所有员工必须以独立、合乎道德的方式开展业务，避免任何可能限制竞争的协议或行为，包括：价格操纵；市场分割；围标；与竞争对手共享敏感信息。上述行为不仅违反法律标准，也会损害市场信任与创新环境。我们期望所有员工在与竞争对手、供应商及合作伙伴互动时，秉持透明与诚信原则。如发现任何疑似违反反垄断法律的行为，应立即向法务与合规部报告。

5.3 Government Contracting Standards

5.3 政府合同标准

When engaging with government entities, GPT is committed to full compliance with all applicable laws, regulations, rules, and contractual obligations. All representatives of GPT, when engaged in any communication or other activities with government entities or government officials are expected to:

在与政府机构开展业务往来时，GPT 承诺全面遵守所有相关法律、法规、规章及合同义务。代表 GPT 与政府机构或政府官员沟通或开展活动的人员，应：

- Promptly notify Legal & Compliance and follow all guidance;
及时通知法务与合规部，并遵循其指导；
- Cooperate fully and provide truthful, accurate and complete information;
充分配合，并提供真实、准确、完整的信息；
- Safeguard GPT's legitimate interests.

维护 GPT 的合法权益。

Employees must inform Legal & Compliance at GPTCompliance@grainproteintech.com upon receipt and before responding to any request for information from a government or regulatory agency, unless otherwise prohibited by law.

员工在收到政府或监管机构的信息请求时，除非法律另有禁止，应在回复前及时通知法务与合规部 (GPTCompliance@grainproteintech.com) 。

5.4 International Trade and Export Controls

5.4 国际贸易与出口管制

GPT operates internationally and must comply with the relevant international and domestic trade laws and regulations including export and import controls, sanctions, anti-boycott requirements, trade embargoes and similar requirements.

GPT 在全球范围内开展业务，必须遵守相关国际及国内贸易法律法规，包括出口与进口管制、制裁、反抵制要求、贸易禁运及类似规定。

Regardless of their roles within GPT, all employees are responsible for adhering to the laws regulating the classification, licensing, end use, recipients and duties related to GPT's exports, maintaining accurate records of such activities.

无论在 GPT 担任何种岗位，所有员工均有责任遵守有关产品分类、许可、最终用途、最终用户及关税义务等方面的法律要求，并妥善保存相关活动的准确记录。

In the event any employee becomes aware of any request of GPT, from a customer, vendor or any other 3rd party to participate in or condone any economic boycotts of countries, groups or individuals, immediately contact Legal & Compliance at GPTCompliance@grainproteintech.com.

如员工知悉任何客户、供应商或其他第三方要求 GPT 参与或支持针对某一国家、群体或个人的经济抵制行为，应立即联系法务与合规部 (GPTCompliance@grainproteintech.com) 。

6. SUPPLIER AND THIRD-PARTY ENGAGEMENT

供应商与第三方合作

6.1 Ethical Supplier Relationships

6.1 合乎道德的供应商关系



GPT's relationships with vendors, suppliers, and subcontractors are essential to its operations and must be conducted with fairness, transparency, and integrity. All commercial dealings shall comply with applicable laws, regulations, and GPT's ethical standards. Relationships involving counterfeit goods, illicit origins or destinations, or any other practices violating legal or ethical norms are strictly prohibited.

GPT 与供应商、分包商及其他合作方之间的关系对于公司运营至关重要，必须以公平、透明及诚信为原则开展。所有商业往来均须遵守适用法律法规及 GPT 的道德标准。任何涉及假冒产品、非法来源或去向，或其他违反法律或道德规范的行为，均被严格禁止。

GPT promotes competitive procurement to the fullest extent practicable, exercising due diligence and upholding the highest ethical practices in sourcing selection, negotiation, and administration. Vendor, supplier, contractor, and subcontractor selections shall be based on objective criteria, balancing quality, value, and performance. GPT reserves the right to verify supplier compliance through requests for information, audits, or site visits. Non-compliance may result in corrective action plans or termination of relationships.

GPT 在可行范围内充分推行竞争性采购，在供应商选择、谈判及管理过程中履行尽职调查义务，并坚持最高道德标准。供应商、承包商及分包商的选择应基于客观标准，在质量、价值与绩效之间实现合理平衡。GPT 保留通过信息请求、审计或现场访问等方式核实供应商合规情况的权利。若发现不合规情形，可能要求制定整改计划，或终止合作关系。

Appropriate gathering and use of competitive intelligence supports GPT's success, but employees must never solicit or accept competitors' trade secrets or proprietary information. Any such offers or questions regarding the legitimacy of competitive data must be reported immediately to a supervisor, HR, or Legal & Compliance.

适当收集并合理使用竞争情报有助于 GPT 的业务成功，但员工不得主动索取或接受竞争对手的商业秘密或专有信息。若收到此类信息或对相关数据合法性存疑，应立即向直属主管、人力资源部或法务与合规部报告。

6.2 Gifts, Entertainment, and Hospitality

6.2 礼品、招待与商务款待

GPT business decisions should be based on objective factors such as quality, service, and price. Employees should ensure that gifts, entertainment, or hospitality do not influence, or appear to influence, their judgement. Modest and customary business courtesy may be acceptable to give or

receive when they are both reasonable and appropriate. Employees must refer to the applicable GPT Anti-Corruption Policy or regional guidelines for thresholds, approval processes, and any regional variations prior to providing gifts to non-GPT parties. For questions, please contact Legal & Compliance.

GPT 的业务决策应基于客观因素，例如质量、服务与价格。员工必须确保所提供或接受的礼品、娱乐或款待不会影响或被认为影响其判断。适度且符合商业惯例的商务礼仪，在合理且适当的情况下，可能被允许。在向非 GPT 人员提供礼品前，员工必须查阅适用的GPT 反腐败政策或区域性指引，了解相关金额标准、审批流程及地区差异。如有疑问，应咨询法务与合规部。

6.3 Human Rights and Labor Practices

6.3 人权与劳动实践

GPT has the highest commitment to respecting human rights and combating all forms of slavery and human trafficking. This commitment begins with GPT’s own operations and extends across its global supply chain and in the communities where GPT products and services are sold and used.

GPT对尊重人权及打击一切形式的奴役和人口贩运负有最高承诺。这一承诺始于 GPT 自身运营，并延伸至全球供应链以及 GPT 产品和服务销售与使用所在的社区。

GPT’s approach is guided by the following principles:

GPT 的人权与劳动实践基于以下原则：

- Conducting business in a way that respects the dignity and the rights of all people.
- 以尊重所有人尊严与权利的方式开展业务。
- Conducting due diligence on suppliers to assess and mitigate human rights risks in the supply chain.
- 对供应商开展尽职调查，以识别并降低供应链中的人权风险。
- Promoting diversity, equal opportunity, non-discrimination in all forms, and fostering a workplace free from unlawful harassment and retaliation.
- 推动多元化、平等机会与非歧视，营造无非法骚扰及报复行为的工作环境。
- Complying with all applicable local health and safety laws and regulations.
- 遵守所有适用的本地健康与安全法律法规。
- Providing a safe and secure environment for all employees.

- 为所有员工提供安全可靠的工作环境。
- Ensuring fair wages and working hours that comply with local laws and do not exceed reasonable limits; respecting freedom of association and collective bargaining rights.
- 提供符合当地法律且合理的薪酬与工作时间安排；尊重结社自由及集体谈判权。
- Prohibiting child labor, human trafficking, slavery and all other forms of forced or involuntary labor.
- 严禁童工、人口贩运、奴役以及一切形式的强迫或非自愿劳动。

GPT suppliers must comply with all applicable laws and regulations and respect the human rights of their employees and the communities in which they operate. GPT will not knowingly conduct business with any individual or entity that participates in human rights abuses. Employees must immediately report any concerns regarding safety, security, or human rights within GPT or GPT's supply chain to a supervisor, HR, Legal & Compliance, or through the GPT hotline.

GPT 要求供应商遵守所有适用法律法规，并尊重其员工及其运营所在社区的人权。GPT 不会明知与任何参与人权侵犯行为的个人或实体开展业务。员工如发现 GPT 或其供应链中存在任何与安全、安保或人权相关的疑虑，应立即向直属主管、人力资源部、法务与合规部或通过举报热线报告。

6.4 Philanthropy

6.4 慈善事业

GPT is committed to making a positive impact in the world and engaging responsibly in charitable activities that benefit the communities in which it operates. GPT may contribute funds, time, talent, or materials to support philanthropic causes. Employees are encouraged, but not required, to become familiar with, and if they wish, participate in the many philanthropic initiatives GPT supports. Philanthropic contributions of direct funds require Legal & Compliance approval.

GPT 致力于对社会产生积极影响，并以负责任的方式参与有益于其运营所在社区的慈善活动。GPT 可通过资金、时间、专业能力或物资形式支持慈善事业。鼓励员工了解并在自愿基础上参与 GPT 所支持的慈善项目，但不作强制要求。涉及直接资金捐赠的慈善活动，须事先获得法务与合规部批准。

6.5 Environmental Sustainability

6.5 环境可持续发展



GPT is committed to environmental sustainability and broader ESG principles as foundational elements of responsible business operations. We are dedicated to minimizing our environmental impact through resource-efficient practices, compliance with applicable environmental laws and regulations, and ongoing efforts to promote and increase sustainable agriculture. This includes a focus on reducing carbon emissions and conserving water and energy in the communities where we operate. This approach also includes minimizing the use of hazardous substances, obtaining necessary environmental permits, and identifying reportable materials in compliance with applicable regulations. As our ESG framework evolves, we will continue to assess and enhance our strategies to align with global standards, ensuring long-term value for our stakeholders while contributing positively to the planet.

GPT 将环境可持续发展及更广泛的 ESG（环境、社会与公司治理）原则视为负责任商业运营的基础要素。我们致力于通过资源高效利用、遵守适用环境法律法规，以及持续推动可持续农业发展，尽可能降低环境影响。这包括：减少碳排放；节约水资源与能源；在运营所在地推动环保实践；尽量减少有害物质使用；获取必要的环境许可；按照适用法规识别并报告相关物质。随着 ESG 框架的不断完善，我们将持续评估并优化战略，以符合全球标准，在为利益相关方创造长期价值的同时，为地球环境作出积极贡献。

6.6 Conflict Minerals

6.6 冲突矿产

GPT supports efforts to end violence associated with conflict minerals and complies with applicable regulations regarding responsible sourcing. Suppliers must assess and mitigate risks related to sourcing minerals from conflict-affected areas, ensuring transparency in their supply chains where such minerals are used in products provided to GPT.

GPT 支持终止与冲突矿产相关的暴力行为，并遵守适用的负责任采购法规。供应商必须评估并降低从受冲突影响地区采购矿产所带来的风险，并在其向 GPT 提供的产品中使用相关矿产时，确保供应链透明。

7. POLITICAL AND CIVIC ENGAGEMENT

政治与公民参与

7.1 Guidelines for Political Activities

7.1 政治活动指引

Political contributions and lobbying are heavily regulated and may be subject to special legal requirements. Any business unit considering a political donation, hiring a lobbyist, or engaging in any lobbying activity must first consult with SVP, Global Finance (or designee), and Legal & Compliance. 政治捐款及游说活动受到严格监管，可能涉及特别法律要求。任何业务单元在考虑进行政治捐赠、聘请游说人员或开展游说活动前，必须首先咨询全球财务高级副总裁（或其指定人员）及法务与合规部。

GPT encourages employees - acting solely in their personal capacities, on their own time, and utilizing their own resources - to become engaged in their communities and in the electoral process at the local, state, regional and national level. When engaging in personal political or community activities, the following principles apply:

GPT 鼓励员工仅以个人身份、利用个人时间及个人资源参与社区事务及各级选举活动。在参与个人政治或社区活动时，应遵循以下原则：

- Do not use GPT time, property, funds, or equipment to carry out or support personal activities, whether political or otherwise.
- 不得使用 GPT 的时间、财产、资金或设备支持个人活动（无论是否政治性质）。
- Always make it clear your views and actions are your own, and not those of GPT.
- 始终明确相关观点与行为仅代表个人立场，而非 GPT。
- Anyone intending to seek or accept public office must notify their supervisor in advance to discuss whether any potential material conflicts from official duties might affect their work, and to work with their supervisor to ensure that job responsibilities at GPT are not negatively impacted.
- 任何拟竞选或接受公职的员工，须事先通知直属主管，以评估是否存在可能影响其 GPT 工作职责的重大利益冲突，并确保其公司职责不受影响。
- Employees are prohibited from pressuring or coercing colleagues to support a political candidate, a political party, or charitable cause.
- 禁止对同事施加压力或强迫其支持某一政治候选人、政党或慈善事业。

In the event these requirements conflict with applicable law, the applicable law shall control.

如上述要求与适用法律存在冲突，应以适用法律为准。

8. POLICY ADMINISTRATION

政策管理

8.1 Reference to Supporting Policies and Procedures

8.1 相关支持政策与程序

GPT maintains an intranet site with additional information about this Code, other policies and guidelines together with other ethics and compliance matters which can be located on GPT Hub. If you do not have access to the intranet site, ask GPT's Human Resource Department.

GPT 通过内部网站 GPT Hub 提供与本准则相关的补充信息、其他政策及指引，以及有关道德与合规事项的资料。如无法访问内部网站，请联系 GPT 人力资源部。

8.2 Resources for Guidance and Support

8.2 指导与支持资源

There are many resources available to answer questions and address concerns about potential violations of the law, this Code or other GPT policies, including:

如对潜在违反法律、本准则或 GPT 其他政策的行为存在疑问或关切，可通过以下渠道寻求帮助：

- Your supervisor or HR representative.
- 直属主管或人力资源代表。
- GPT's Legal & Compliance Department - GPTCompliance@grainproteintech.com.
- 法务与合规部 (GPTCompliance@grainproteintech.com) 。
- Hotline (report online or by phone): <https://gpt.ethicspoint.com>.
- 举报热线 (在线或电话) : <https://gpt.ethicspoint.com>。

8.3 Policy Review and Updates

8.3 政策审查与更新



The Legal & Compliance Department is responsible for the revision and periodic updating of the Code of Conduct. This Code shall be reviewed at least biennially, or more frequently as required by changes in law, business operations, or regulatory requirements.

法务与合规部负责本《全球行为准则》的修订与定期更新。本准则至少每两年审查一次，或根据法律变化、业务运营调整或监管要求变化而更频繁地进行更新。

8.4 Continuation and Modification

8.4 持续适用与修订

GPT reserves the unrestricted right, consistent with the law, to review, reconsider, interpret, amend, modify, suspend or discontinue all or any portion of such policy, plan or program at any time, with or without notice. If any provision of this policy conflicts with or violates any applicable law, regulation, or other legal requirements, the provisions of those requirements will control.

在法律允许范围内，GPT 保留随时审查、重新解释、修改、暂停或终止全部或部分政策、计划或项目的权利，无论是否事先通知。如本政策的任何条款与适用法律、法规或其他法律要求发生冲突，应以相关法律规定为准。

In the rare circumstances where a waiver or an exception of the Code may be appropriate, contact Legal & Compliance immediately at GPTCompliance@grainproteintech.com.

在极少数情况下，如需对本准则给予豁免或例外，应立即联系法务与合规部（GPTCompliance@grainproteintech.com）。

This Code is not intended to provide legal advice. Employees should consult with Legal & Compliance for specific guidance on any matter.

本准则不构成法律意见。如需就具体事项获得指导，员工应咨询法务与合规部。

**QUESTIONS REGARDING THIS POLICY GUIDE SHOULD BE REFERRED
TO THE LEGAL & COMPLIANCE DEPARTMENT
关于本政策指引的任何问题，请咨询法务与合规部**

Description 政策说明	Effective Date 生效日期	Change Made By Name and Title 制定人及职务
Policy Creation 政策制定	01/01/2026	Patrick Rykhus, GC



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