Abbott Global Anticorruption Translation Table 2023

**INSTRUCTIONS:**

1. Please edit the translation in the TARGET column directly.
2. It is best to edit this file in Normal or Draft view rather than page layout.
3. DO NOT alter the ID or SOURCE column text.
4. Blank rows should be ignored but not deleted.
5. **The following formatting must be maintained throughout:**
	* **Paragraph (the number of paragraphs per row must be maintained)**
	* **bold**
	* **italic**
	* **underline**
	* **links**
	* **lists (bullets and number of items in a list must be maintained)**
6. Ctrl+click on an ID in the left hand collumn to view the relevent screen in the online course. Toc ID’s will open the table of contents, ID’s containing \_string\_ have no relevent screen and are not linked.

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| --- | --- | --- |
| ID | SOURCE | TARGET |
| [Screen 0](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=1_C_1) [1\_C\_1](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=1_C_1)  | Global Anti-CorruptionClick the forward arrow to begin. | 全球反腐败请点击前进箭头以开始。 |
| [Screen 1](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=2_C_2) [2\_C\_2](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=2_C_2)  | At Abbott, we know that every one of us plays a vital role in bringing our life-changing solutions around the globe to people who need it.It is essential that we ensure our interactions remain free from any form of bribery, corruption, or inappropriate influence so that we can remain focused on what is important to us – helping people live life to the fullest through the power of health. | 在雅培，我们知道我们每一个人都扮演着至关重要的角色，将我们改变生活的解决方案带给全世界有需要的人。至关重要的是，我们必须确保我们的互动免于任何形式的贿赂、腐败或不正当影响，以便我们能够继续关注对我们重要的事情——通过健康的力量帮助人们过上更充实的生活。 |
| [Screen 3](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=4_C_4) [4\_C\_4](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=4_C_4)  | 1 | Recognizing RisksHere you will learn about the risks that acts of bribery and corruption pose to the company.10 MinutesSection 1 | Recognizing RisksOur Business TransactionsThe Risks in These TransactionsThe Consequences of Poor Decision MakingReview2 | Knowing What To DoHere you will learn how to ensure your interactions remain free from inappropriate influence.8 MinutesSection 2 | Knowing What To DoThe Law and Abbott’s StandardsYour ResponsibilitiesReview3 | Doing the Right ThingHere you will learn how to successfully navigate your way through business transactions, avoiding the risk of bribery and corruption.6 MinutesSection 3 | Doing the Right ThingSetting Clear ExpectationsKnowing How to Say “No”Making the Right ChoiceWhere to Go for SupportReview4 | Knowledge CheckAssess your understanding of the key concepts and principles of this course.5 MinutesSection 4 | Knowledge CheckAssessmentClick the panel to get started.Click the yellow play button to begin.This content is not yet available. You must complete Section{a} {b}. | 1 | 识别风险在这里，你将了解贿赂和腐败行为对公司构成的风险。10 分钟第 1 部分 | 识别风险我们的商业活动这些商业活动中的风险错误决策的后果查看2 | 了解要做什么在这里，你将学习如何确保你的互动不会受到不当影响。8 分钟第 2 部分 | 了解要做什么法律和雅培标准你的责任查看3 | 做正确的事在这里，你将学习如何成功地开展商业交易，避免贿赂和腐败的风险。6 分钟第 3 部分 | 做正确的事设定明确期望知道如何说“不”做出正确的选择到何处获取支持查看4 | 知识检查评估你对本课程的关键概念和原则的理解。5 分钟第 4 部分 | 知识检查评估点击面板以开始。点击黄色播放按钮以开始。此内容尚不可用。你必须完成第 {a} {b} 部分。 |
| [Screen 6](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=7_C_11) [7\_C\_11](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=7_C_11)  | These transactions, when done for the right reasons, and consistent with applicable law and Abbott policy, ultimately benefit the people who use our products.Some transactions may not be permitted in your country. Be sure to check your local Office of Ethics and Compliance (OEC) policies and procedures for guidance. | 这些商业活动的开展，如果是基于正当目的，并符合相应的法律和雅培政策，才能最终有利于我们产品的使用者。有些商业活动在你的国家/地区可能不允许开展。确保查阅你当地的商业道德合规部的政策和程序以获得指导。 |
| [Screen 7](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=8_C_12) [8\_C\_12](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=8_C_12)  | Let’s now look at the risks that common business transactions pose if they are done inappropriately. | 现在让我们看看如果不恰当地开展常见商业活动，它们会带来哪些风险。 |
| [Screen 8](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=9_C_13) [9\_C\_13](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=9_C_13)  | Bribery and corruption occur whenever we offer, promise, give, or receive anything of value for personal gain or to improperly influence business.In other words, when we act for personal gain or to improperly influence business, rather than in the legal and ethical best interest of Abbott, the nature of the transaction itself changes. What was a common business transaction becomes an act of bribery and corruption. | 每当我们为了个人利益或不正当业务优势而提供、承诺、给予或接受任何有价物时，就会发生贿赂和腐败。换言之，当我们的行为不符合雅培在法律和道德方面的最佳利益，而是为了个人利益或对业务产生不当影响时，商业活动的性质就会发生变化。原本普通的商业活动变成了贿赂和腐败行为。 |
| [Screen 9](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=10_C_20) [10\_C\_20](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=10_C_20)  | The perception that we may be engaged in acts of bribery and corruption pose similar risks as actual acts of bribery and corruption.Therefore, we must ensure that we never give or receive items of value for the purpose of gaining an inappropriate business advantage, and that we never appear to give or receive items of value for the purpose of improperly influencing business. | 一旦给外界造成我们可能存在商业贿赂和腐败行为的印象，将会带来与实际发生商业贿赂和腐败行为同等的风险。因此，我们必须确保我们不会为了获得不适当的业务优势而提供或接受有价物，并且也不能**看起来**为了不适当地影响业务而提供或接受有价物。 |
| [Screen 18](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=19_C_23) [19\_C\_23](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=19_C_23)  | At Abbott, our expectation is that the third parties we work with comply with all applicable local and international anti-bribery and anti-corruption laws and regulations.Regulators have held manufacturers liable for the actions of Third-Parties and expect Abbott to conduct background checks, or due diligences, on the Third-Parties who act on its behalf.Abbott operates in many countries globally and these countries have laws that prohibit bribery and corruption. Some bribery and corruption laws, such as the USA Foreign Corrupt Practices Act (FCPA), are international in scope, i.e., they apply everywhere and to everyone, i.e., not only to Abbott personnel, but to anyone doing business with, for, or on behalf of Abbott. | 在雅培，我们的期望是与我们合作的第三方遵守所有适用的地方和国际反贿赂和反腐败法律法规。监管机构要求制造商对第三方的行为负责，并希望雅培对代表其行事的第三方进行背景调查或尽职调查。雅培在全球许多国家和地区开展业务，这些国家和地区都有禁止贿赂和腐败的法律。一些反贿赂和腐败法律（例如美国《反海外腐败法》(FCPA)）是国际性的，即它们适用于任何地方和任何人，也就是说，它们不仅适用于雅培员工，而且适用于与雅培有业务往来、为雅培服务或代表雅培行事的任何人。 |
| [Screen 19](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=20_C_24) [20\_C\_24](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=20_C_24)  | Abbott has a strong risk-based Third-Party Compliance program that includes:* Clear Third-Party guidelines
* Third Party risk assessment and monitoring
* Third Party e-learning
* Third Party audits performed by Corporate Audit
* A robust due-diligence screening process (3PP), including red flag remediation

The Third Party Process (3PP) is a global integrated risk-based due diligence designed to proactively identify and help manage Third Party risks while ensuring that services performed on Abbott's behalf or with Abbott’s support are carried out in accordance with our expectations and follow applicable laws and regulations.Please refer to the Resources section of this course for links to additional resources on Third-Party Compliance, including the 3PP. | 雅培建立了一个强大的、基于风险的第三方合规计划，其中包括：* 明确的第三方指南
* 第三方风险评估和监督
* 第三方在线学习
* 由公司审计部门执行的第三方审计
* 健全的尽职调查筛查流程 (3PP)，包括危险信号补救

第三方流程 (3PP) 是一项基于风险的全球综合尽职调查，旨在主动识别和帮助管理第三方风险，同时确保代表雅培或在雅培支持下提供的服务符合我们的期望，并遵守适用的法律法规。请参阅本课程的“资源”部分，以获得关于第三方合规（包括 3PP）的其他资源的链接。 |
| [Screen 20](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=22_C_25) [22\_C\_25](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=22_C_25)  | Keep an eye out for red flags, including: | 注意危险信号，包括： |
| [Screen 20](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=23_C_25) [23\_C\_25](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=23_C_25)  | Ask follow-up questions, including: | 提问后续问题，包括： |
| [Screen 21](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=25_C_25b) [25\_C\_25b](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=25_C_25b)  | Finally, it may be tempting, particularly in the case of third parties, but also colleagues and other business partners, to rationalize behavior.We may, for example, rationalize that a partner is acting a certain way because he knows more about the local culture than we do, or we may accept a colleague’s rationalization that we don’t have time for due diligence.Just remember that Abbott’s prohibition of corruption extends to the third parties with whom we do business, and that enforcement authorities will seek to hold Abbott responsible for their conduct. | 最后，为行为辩解可能很诱人，尤其是对于第三方，但也包括同事和其他业务伙伴。例如，我们可能会为合伙伙伴的行为辩解，因为其比我们更了解当地文化，或者我们可能会接受同事的辩解，认为我们没有时间进行尽职调查。请记住，雅培对腐败的禁止延伸到与我们有业务往来的第三方，而且执法部门将寻求让雅培为这些第三方的行为负责。 |
| [Screen 24](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=28_C_29) [28\_C\_29](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=28_C_29)  | Fines and settlements for bribery and corruption – and the cost of investigating and remediating – can be severe.CLICK THE DOWN ARROW TO SEE SOME RECENT EXAMPLES OF HEALTHCARE COMPANIES INVESTIGATED AND PROSECUTED FOR CORRUPT PRACTICES.NOVARTISNOVARTIS AGIn 2020, The global pharmaceutical and healthcare company, Novartis AG, and its former Alcon subsidiary agreed to pay a combined total of more than $233 million in criminal monetary penalties to resolve the department’s investigation into violations of FCPA arising out of conduct in multiple jurisdictions. The resolution arose out of a scheme to bribe employees and to falsely record improper payments and similar conduct.Source [www.justice.gov](https://www.justice.gov)ALEXION PHARMACEUTICALSALEXION PHARMACEUTICALSIn 2020, Alexion Pharmaceuticals Inc. agreed to pay more than $21 million to resolve charges that it violated the books and records and internal accounting controls provisions of the FCPA. Two Alexion subsidiaries allegedly made payments to foreign government officials to secure favorable treatment.Source [www.justice.gov](https://www.justice.gov)FRESENIUS MEDICAL CARE (FMC)FRESENIUS MEDICAL CARE (FMC)In 2019, FMC, a provider of dialysis equipment and services, paid U.S. $231 million to settle investigations related to violations of the FCPA in at least 17 countries. FMC employees gave nearly $30 million in bribes to government officials and others to gain a competitive advantage in the medical services industry, resulting in profits of over $140 million. Improper payments were made through a variety of schemes, including using sham consulting contracts, falsifying documents, and funnelling bribes through a system of third-party intermediaries.Source [www.justice.gov](https://www.justice.gov) | 贿赂和腐败的罚款与和解——以及调查和补救成本——可能非常巨大。点击向下箭头可查看近期一些医疗保健公司因腐败行为而被调查和起诉的例子。诺华公司NOVARTIS AG2020 年，全球制药和保健公司 Novartis AG 及其前子公司爱尔康同意支付总计超过 **2.33 亿美元**的刑事罚款，以解决司法部对其在多个管辖区违反 FCPA 行为的调查。该决议源于一项贿赂员工、虚假记录不当付款和类似行为的计划。来源 [www.justice.gov](https://www.justice.gov)ALEXION PHARMACEUTICALSALEXION PHARMACEUTICALS2020 年，Alexion Pharmaceuticals Inc. 同意支付超过 **2,100 万美元**，以解决对其违反 FCPA 的账簿、记录和内部会计控制规定的指控。据称，两家 Alexion 子公司向外国政府官员行贿，以获得优惠待遇。来源 [www.justice.gov](https://www.justice.gov)费森尤斯医疗 (FMC)费森尤斯医疗 (FMC)2019 年，透析设备和服务提供商 FMC 支付了 **2.31 亿美元**的罚金，以解决针对其在至少 17 个国家违反 FCPA 的调查。为了在医疗服务行业获得竞争优势，FMC 员工向政府官员和其他人士行贿近 3,000 万美元，获取的利润超过 1.4 亿美元。不当付款通过各种方式支付，包括使用虚假的咨询合同、伪造文件，以及通过第三方中介系统进行贿赂。来源 [www.justice.gov](https://www.justice.gov) |
| [Screen 26](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=30_C_31) [30\_C\_31](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=30_C_31)  | Source [www.sec.gov](https://www.sec.gov) | 来源 [www.sec.gov](https://www.sec.gov) |
| [Screen 27](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=31_C_32) [31\_C\_32](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=31_C_32)  | Click the arrow to begin your review.ReviewTake a moment to review some of the key concepts in this section.BUSINESS TRANSACTIONSWhen done for the right reasons, and consistent with applicable law and Abbott policy, our business transactions benefit the people who use our products.BRIBERY AND CORRUPTIONBribery and corruption occur whenever we offer, promise, give, or receive anything of value for personal gain or to improperly influence business.APPEARANCEThe perception that we may be engaged in acts of bribery and corruption pose similar risks as actual acts of bribery and corruption.COMPLIANCE OF THIRD PARTIESOur expectation is that the third parties we work with comply with all applicable local and international anti-bribery and anti-corruption laws and regulations.ABBOTT’S THIRD PARTY PROCESSAbbott has established a Third-Party Process (3PP) to identify, address, and prevent potential risks associated with third parties.REMAINING VIGILANTWe all have a responsibility to remain vigilant to any potential red flags or warning signs that indicate our partners are engaged in corrupt practices.CONSEQUENCES OF BRIBERY AND CORRUPTIONThe consequences for companies and individuals involved in bribery and corruption can include government investigations, fines, civil and criminal prosecution and/or penalties, and exclusion from government contracting and programs.To check your progress, click the Menu button.You have completed section 1 of 4Click the forward arrow to continue learning | 点击箭头以开始查看。查看花点时间查看本部分中的一些关键概念。商业活动只有基于正当目的，并符合相应的法律和雅培政策，我们的商业活动才能有利于使用我们的产品的人。贿赂和腐败每当我们为了个人利益或不正当业务优势而提供、承诺、给予或接受任何有价物时，就会发生贿赂和腐败。表象一旦给外界造成我们可能存在商业贿赂和腐败行为的印象，将会带来与实际发生商业贿赂和腐败行为同等的风险。第三方合规我们的期望是与我们合作的第三方遵守所有适用的地方和国际反贿赂和。雅培第三方流程雅培制定了一个第三方流程 (3PP)，用于识别、处理和预防与第三方相关的潜在风险。保持警惕我们都有责任对表明我们的合作伙伴参与腐败行为的任何潜在危险信号或警示信号保持警惕。贿赂和腐败的后果涉及贿赂和腐败的公司和个人的后果可能包括政府调查、罚款、民事和刑事起诉和/或罚款，以及被排除在政府合同和项目之外。要查看你的进度，请点击“菜单”按钮。你已完成第 1 部分（共 4 部分）请点击前进箭头以继续学习 |
| [Screen 29](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=33_C_35) [33\_C\_35](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=33_C_35)  | In our industry, governments are often both regulators and major customers.It’s important to be aware that for laws like the FCPA, the definition of a government official is often broadly interpreted – especially for the healthcare industry – and covers well beyond those in political office.For example, in many circumstances, doctors and other healthcare professionals who are employed by, teach, or have privileges at a government hospital or public clinic or university and/or act on behalf of a government authority or their respective national health service may be considered government officials – even if their government work is only part time. | 在我们这个行业中，政府往往同时是监管机构和主要客户。需要注意的是，像美国 FCPA 这样的法律，对政府官员的定义往往有广泛的解释——尤其是对医疗行业，远远超出政界人士的范围。例如，在许多情况下，受雇于政府医院、公共诊所或大学并/或代表政府当局或其各自的国家卫生服务机构行事的医生和其他医疗保健专业人员可能被视为政府官员，即使他们的政府工作只是兼职。 |
| [Screen 31](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=35_C_37) [35\_C\_37](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=35_C_37)  | Laws from Around the WorldIf you work at Abbott, it is your responsibility to know and comply with the laws and regulations that apply to your role in the countries in which you do business.This is particularly important in the area of bribery and corruption, where a number of countries have implemented laws that are international in scope. Contact Legal for further guidance.CLICK A REGION FOR AN EXAMPLE OF THE GLOBAL BRIBERY AND CORRUPTION LAWS IN THAT REGION.BrazilThe Brazil Clean Companies Act prohibits companies (acting through directors, officers, employees or third parties) from bribing both foreign and domestic public officials. It applies to all companies in Brazil, even if they are headquartered elsewhere, and/or violations take place outside Brazil. The Anticorruption Law is a strict liability statue. In other words, even if a company had no knowledge of the wrongdoing or the wrongdoing was not intentional, liability is established merely by showing that a director, officer, employee or other agent committed a prohibited act to benefit the corporation.ChinaThe PRC Criminal Code prohibits commercial bribery as well as bribery of both Chinese and foreign public officials. China’s Anti-Unfair Competition Law also prohibits businesses from giving bribes in order to purchase or sell products in a manner that restricts free competition. Bribes that do not violate the PRC Criminal Code may still violate the PRC Anti-Unfair Competition Law. China's top anti-corruption authority has also pledged to maintain a tough stance on corruption. | 世界各地的法律如果你在雅培工作，你就有责任了解并遵守适用于你的职位和业务所在国的法律法规。这在贿赂和腐败领域特别重要，其中一些国家/地区在这方面执行了具有国际范围的法律。联系法务部寻求更多指导。单击某个地区，查看该地区的全球反贿赂和腐败法律示例。巴西巴西《清洁公司法》禁止公司（通过董事、管理人员、员工或第三方）贿赂外国和国内公职人员。它适用于巴西的所有公司，即使它们的总部在其他地方，并且/或者违法行为发生在巴西以外。《反腐败法》是一部严格的责任法规。换言之，即使公司对不法行为毫不知情或不法行为并非故意，只要证明董事、高级管理人员、员工或其他代理人为了公司利益而从事了被禁止的行为，责任就成立。中国《中华人民共和国刑法典》禁止商业贿赂以及贿赂国内外公职人员。中国的《反不正当竞争法》还禁止企业以限制自由竞争的方式为购买或销售商品而行贿。虽然某些贿赂行为不违法《中华人民共和国刑法典》，但仍有可能违反中国的《反不正当竞争法》。中国最高反腐机构也已承诺对腐败保持强硬立场。 |
| [Screen 32](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=36_C_38) [36\_C\_38](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=36_C_38)  | We are committed to reporting any suspected violation of Abbott’s policies related to anti-bribery and anti-corruption laws. We can do so through OEC, Legal, or the Ethics and Compliance Helpline. | 我们致力于报告任何涉嫌违反雅培反贿赂和反腐败法律政策的行为。我们可以通过商业道德合规部、法务部或商业道德合规热线报告可疑违法行为。 |
| [Screen 34](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=38_C_40) [38\_C\_40](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=38_C_40)  | Imagine...You set up an Advisory Board with a small group of doctors to get feedback on a new product that has been recently launched. There is a clear and legitimate purpose for the meeting and the participants are selected solely on the basis of their qualifications and expertise. After the program, you conduct a return on investment analysis to determine if participants in the Advisory Board purchased more Abbott products. | 试想一下……你与一小群医生成立了一个咨询委员会，以获得对最近推出的新产品的反馈。会议有明确和合法的目的，与会者完全是根据他们的资格和专门知识进行挑选。项目结束后，你将进行投资回报分析，以确定咨询委员会的参与者是否购买了更多雅培产品。 |
| [Screen 36](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=40_C_42) [40\_C\_42](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=40_C_42)  | Imagine...You’ve been asked to review an arrangement where your employee wants to hire an HCP, who works in a government hospital in China, to conduct product training on one of the company’s devices for a group of HCPs from other government hospitals. Your employee has been careful to select the HCP solely based on her qualifications as a trainer and used the fair market value tool to determine the appropriate compensation for her services. Because the HCP who will conduct the training, and the HCPs who will receive the training, are from all over the region, the event will be held in an appropriate hotel in Shanghai. On final review of the documentation for the proposed event, you notice that there is nothing supporting the business need to train this group of HCPs on this device. | 试想一下……你被要求审查一项工作安排，即你的员工想要雇佣一名在中国一家政府医院工作的 HCP，为一组来自其他政府医院的 HCP 提供关于一款公司设备的产品培训。你的员工选择 HCP 时非常谨慎，完全基于她作为培训师的资格，并遵循市场公允价值的标准来确定她的服务的适当报酬。由于将进行培训的 HCP 和将接受培训的 HCP 来自该地区的不同城市，因此该活动选择在位于上海的一家合适的酒店举行。在对提议的活动的文件进行最终审查时，你注意到没有任何业务需求来支持对这组 HCP 进行这款设备的培训。 |
| [Screen 38](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=42_C_43b) [42\_C\_43b](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=42_C_43b)  | Sponsorships (Continued)Here are some simple things that you can do to ensure that sponsorships remain appropriate – free of inappropriate influence and inducement.* Never offer a sponsorship as a reward or inducement.
* Always seek and obtain appropriate prior authorization before agreeing to sponsor business expenses for a government employee.
* Ensure the meeting is appropriate and check to make sure there is a pre-approved agenda with scientific merit.
* Ensure expenses are modest, appropriate, and in compliance with local policy.
* Never pay for any expense incurred by a spouse, family member or guest.
* Never pay for side trips or entertainment.
* Wherever possible, make all payments directly to service providers and do not pay in cash.

Keep in mind sponsorships are prohibited by law and/or industry code in many jurisdictions. Always consult your local affiliate standards before providing a sponsorship. | 赞助（续）这里有一些你可以遵循的简单的原则，以确保赞助是基于正当目的而进行，没有任何不当影响和利诱。* 永远不要将赞助作为奖励或利诱。
* 在同意赞助政府雇员的业务开支前，必须取得适当的事先授权。
* 确保会议是适当的，并检查确保会议议程经过预先批准、会议议程体现内容具有科学价值。
* 确保费用适中、适当，并符合当地政策。
* 不得为配偶、家庭成员或客人支付任何费用。
* 切勿为附带进行的旅游或招待付款。
* 尽可能直接向服务提供商付款，不要以现金形式付款。

请记住，许多司法管辖区的法律和/或行业规范禁止赞助。在提供赞助之前，要始终参阅当地的附属公司的标准。 |
| [Screen 42](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=46_C_47) [46\_C\_47](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=46_C_47)  | Items of ValueCheck with your local OEC policies and procedures to determine what items of value are permitted. Then use the following guidelines to ensure that meals and other items are never provided, or appear to be provided, as a reward or inducement.* Only pay for meals and snacks that are reasonable in amount, infrequent, business-related, and in accordance with local policy.
* Only offer items of minimal value that are patient-health or office/work-related, and in accordance with local policy. Gifts are never permitted.
* Never pay for something out of your own pocket.
* Never provide meals or hospitality for a spouse, guest, or family member of an HCP or other customer.
 | 有价物请查阅你当地的商业道德合规部政策和程序，确定哪些有价物是允许的。然后使用以下指南，确保从未作为或看似作为一种奖励或利诱而提供餐饮和其他物品。* 只支付金额合理、不频繁、与业务相关、符合当地政策的餐费和零食费。
* 仅提供有益患者健康或办公/工作相关的，且符合当地政策要求的最低价值物品。决不允许提供礼物。
* 切勿为你自己提供的东西付款。
* 决不能为 HCP 或其他客户的配偶、客人或家庭成员提供餐食或款待。
 |
| [Screen 43](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=47_C_48) [47\_C\_48](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=47_C_48)  | Click the arrow to begin your review.ReviewTake a moment to review some of the key concepts in this section.ALL FORMS OF BRIBERY ARE STRICTLY PROHIBITEDAt Abbott, bribery of government officials and commercial bribery are both strictly prohibited.GLOBAL BRIBERY AND CORRUPTION LAWSIt is your responsibility to know and comply with the laws and regulations that apply to your role in the countries in which you do business.ABBOTT’S STANDARDSAbbott’s own standards on bribery and corruption are consistent with our commitment to conduct business with honesty, fairness, and integrity.HIRING FOR PROFESSIONAL SERVICESNever enter into an arrangement in order to inappropriately influence or induce a business decision, even if it’s only a partial reason.SPONSORSHIPSAlways ensure that sponsorships remain appropriate – free of inappropriate influence and inducement – and are in line with your local affiliate standards.BOOKS AND RECORDSRecord every transaction accurately to reflect the actual purpose, actual details, and correct description.ITEMS OF VALUEAlways check with your local OEC policies and procedures to determine what items of value are permitted.To check your progress, click the Menu button.You have completed section 2 of 4Click the forward arrow to continue learning | 点击箭头以开始查看。查看花点时间查看本部分中的一些关键概念。严禁一切形式的贿赂行为在雅培，贿赂政府官员和商业贿赂都被严格禁止。全球反贿赂和反腐败法律你有责任了解并遵守适用于你的职位和业务所在国的法律法规。雅培标准雅培在对待商业贿赂和腐败方面的标准与我们在诚信、公平、正直的基础上开展业务的承诺一致。专业服务招聘永远不要为了不恰当地影响或诱导商业决策而签订协议，即使这只是部分原因。赞助始终确保赞助适当、没有任何不当影响和利诱，并符合你当地的附属公司的标准。账簿和记录准确记录每笔交易，以反映实际目的、实际详情和正确的描述。有价物始终查阅你当地的商业道德合规部政策和程序，确定哪些有价物是允许的。要查看你的进度，请点击“菜单”按钮。你已完成第 2 部分（共 4 部分）请点击前进箭头以继续学习 |
| [Screen 44](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=48_C_50) [48\_C\_50](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=48_C_50)  | Abbott provides sponsorships only on the basis of HCP educational needs and expertise, only where permitted by all applicable law and industry code, and never as a reward or inducement for winning business. You set clear expectations by telling the head of the department what Abbott’s rules are, while reinforcing the company’s commitment to legal and ethical conduct. | 雅培仅根据医疗专业人士 (HCP) 的教育需求和专长，并且仅在所有适用法律和行业规范允许的情况下才给予赞助，而且绝不将赞助作为赢得业务的奖励或利诱。你可以告知部门主管雅培的规定是什么，同时加强公司对法律与道德行为的承诺，以此来设立双方沟通的期望。 |
| [Screen 55](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=59_C_61) [59\_C\_61](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=59_C_61)  | Click the arrow to begin your review.ReviewTake a moment to review some of the key concepts in this section.SETTING CLEAR EXPECTATIONSSetting clear boundaries and expectations with customers and partners is a simple way to avoid the risk of bribery and corruption.KNOWING HOW TO SAY “NO”The key to responding to customers and partners who directly and openly request a bribe is to immediately and firmly reject their request.MAKING THE RIGHT CHOICEEven in the most difficult situations, you always have options. Take the time to think things through.WHERE TO GO FOR SUPPORTIf you face a difficult choice, or you have a question on a potential bribery or corruption issue, talk to someone in the OEC or Legal.To check your progress, click the Menu button.You have completed section 3 of 4Click the forward arrow to continue learning | 点击箭头以开始查看。查看花点时间查看本部分中的一些关键概念。设定明确期望为客户和合作伙伴设定清晰的界限和期望，是避免贿赂和腐败的一种简单方法。知道如何说“不”对于那些直接公开要求贿赂的客户和合作伙伴来说，回应他们的关键是立即坚决拒绝他们的要求。做出正确的选择即使是在最棘手的情形下，你也总是有选择权。务必三思而后行。到何处获取支持如果你面临艰难选择，或者你对潜在贿赂或腐败问题有疑问，请联系商业道德合规部或法务部工作人员。要查看你的进度，请点击“菜单”按钮。你已完成第 3 部分（共 4 部分）请点击前进箭头以继续学习 |
| [Screen 56](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=60_C_62) [60\_C\_62](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=60_C_62)  | Where to Get Help* Visit the [Third Party Compliance](https://abbott.sharepoint.com/sites/abbottworld/EthicsCompliance/3pp/Pages/default.aspx) section of the OEC website on Abbott World.
* For [3PP Guidelines](https://www.abbott.com/policies/anti-corruption.html).
* For [Due-Diligence screening process](https://319abbott.com/).
* For 3PP related questions, contact your Local OEC or 3PP team.

Course ResourcesTranscriptClick [here](http://dummy.com/reference/Transcript.pdf) for a full transcript of the course. | 获取帮助的途径* 访问雅培全球商业道德合规部网站上的[第三方合规](https://abbott.sharepoint.com/sites/abbottworld/EthicsCompliance/3pp/Pages/default.aspx)部分。
* 对于 [3PP 指南](https://www.abbott.com/policies/anti-corruption.html)。
* 对于[尽职调查筛查流程](https://319abbott.com/)。
* 对于 3PP 相关问题，请联系你当地的商业道德合规部或 3PP 团队。

课程资源录音文稿点击[此处](http://dummy.com/reference/Transcript.pdf)可查看本课程的脚本全文。 |
| Screen 58Question 1: Scenario62\_C\_65 | NextPlease retake the questions indicated. | 下一页请重新回答所提出的问题。 |
| [Screen 59](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=63_C_66) [63\_C\_66](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=63_C_66)  | When you are done, click the Retake button. | 完成后，请点击**重新测验**按钮。 |
| 67\_toc\_4 | Menu | 菜单 |
| 72\_toc\_9 | Review | 查看 |
| 108\_string\_12 | Retake | 重新测验 |
| 109\_string\_13 | This course defines bribery, describes the anti-bribery laws that exist globally for the protection of the common good, and shows Abbott’s standards designed to prevent bribery and corruption. This course also shows the consequences of violating the anti-bribery laws and Abbott’s standards, and describes what each of us can do to ensure we continue to conduct business the right way. | 本课程对贿赂进行了定义，描述了全球各地为保护共同利益而存在的反贿赂法律，并介绍了雅培旨在防止贿赂和腐败的标准。本课程还介绍了违反反贿赂法律和雅培标准的后果，并描述了我们每个人可以做些什么来确保我们继续以正确的方式开展业务。 |