

Assessment Standards

评估准则

ICIS China Assessment Standards ICIS 中国评估准则

1. Introduction 介绍

ICIS China's business is founded on its reputation for independence, accuracy, impartiality and objectivity. Our customers rely on ICIS China for accurate information and base commercial decisions on that accuracy. Customers must feel confident that information relayed by ICIS China, whether verbally, in print, on screen or in data form, has not been influenced by any commercial, personal or other interests. The international reputation of ICIS China has been established through dedication to getting the facts right and bringing transparency to opaque markets.

ICIS 中国的业务是建立在其独立、准确、公正和客观的声誉上。我们的客户依赖 ICIS 中国提供准确的信息从而进行基本的商业决策。客户必须确信 ICIS 中国传递的信息，无论是口头、印刷、屏幕或以数据的形式，都没有受到任何商业、个人或其他利益的影响。ICIS 中国的国际声誉是通过致力于获得正确的事实和使不透明的市场透明化而建立的。

This imposes a special duty of care on employees of ICIS China concerned with information-gathering, analysis and release. They must not engage in any activities, or be perceived to engage in any activities, that might be prejudicial to ICIS China's reputation for independence.

加强ICIS中国员工对信息收集、内容创作和发布的特殊责任。他们不能从事或者被视为从事可能损害ICIS中国的独立性声誉的任何活动。

This document is the culmination of inputs from information staff, market participants and regulators on best practice for market and price analysts.

这份文件是按信息工作人员、市场参与者和监管机构市场和价格分析师所要求的最佳工作标准而编制成的。

Our employees, as well as any sub-contractors or freelance contributors commissioned to work with us, all need to know and understand these guidelines. This is both a moral responsibility for our analysts and a requirement for everyone who creates content for ICIS China.

我们的员工，以及任何分包商或与我们合作委托的自由撰稿人，都需要知道和理解这些准则。这既是每个分析师的道德责任同时也是对 ICIS 中国内容制作部门的每个人的要求。

All employees must sign and acknowledge compliance with these Assessment Standards as part of the ICIS China Compliance Manual. Information Staff will also have their compliance with the ICIS China Assessment Standards regularly reviewed as part of the annual performance review process. Violations of the code should be reported to the Information Director as soon as employees become aware of them.

所有员工必须签署并确认符合遵守这些评估标准而视其为ICIS中国合规手册的一部分。信息员工也将定期进行ICIS中国评估标准合规审阅。对违反规定的行为应立即报告给信息总监。

This policy document is a part of the ICIS China Compliance Manual. The ICIS China Compliance Manual is supplementary to the RELX Code of Conduct and Business Ethics. Both documents should be read in conjunction.

这一政策文件是ICIS中国合规手册的一部分。ICIS中国合规手册是励讯集团道德与商业行为守则的补充。这两份文件应结合起来阅读。

1.1 Our Market Position 我们的市场定位

ICIS China is at all times completely independent of any market upon which we report. ICIS China does not hold any direct interest in the issues upon which it reports. ICIS China— the company or the individuals that comprise the information staff – does not maintain any commercial interest in the markets upon which it reports. ICIS China is a fully independent and unbiased source of market information.

ICIS 中国在任何时候都是完全独立于我们所报告任何市场。对于我们所报告的主题，ICIS 中国不持有任何直接的利益关系。ICIS 中国—公司或个人，包括信息人员—对其所报告的市场不会持有任何商业利益。ICIS 中国是完全独立和公正的市场信息源头。

2. Definitions 定义

ICIS China Sectors: Markets or industrial manufacturing sectors about which ICIS China gathers and publishes information, including but not limited to: markets and industries surrounding chemicals, oil, fertilizers, natural gas, electricity, coal, sulphur, paper/pulp and emissions.

ICIS中国的行业：ICIS中国收集和发布关于市场或工业制造领域的信息，包括但不限于：市场和相关化工、石油、化肥、天然气、电力、煤炭、硫磺、纸/纸浆和碳排放。

Information Staff: Employees whose management chain of command leads to the ICIS China information Director and who are involved in the reporting of industry updates, market developments and/or the price assessment process. This includes (but is not limited to): market analysts, price assessment analysts, industry analysts/researcher and all managers of the above.

“信息员工”指的是由 ICIS 中国信息总监督管理并参与报告行业信息最新动态、市场发展和/或价格评估过程的员工。这包括（但不限于）：市场分析师，估价分析师，行业分析师/研究员，及上述职位的管理人员。

3. Conflicts of Interest 利益冲突

ICIS China operates a strict Conflict of Interest Policy. This is highly important for Information Staff and will be actively enforced by Information management.

ICIS中国实行严格的利益冲突管理政策。这个对于信息员工非常重要并且将被信息管理层积极执行。

4. Work outside ICIS China ICIS 中国以外的工作

Information staff may wish to pursue opportunities to work freelance in areas outside their employment by ICIS China, and on their own time and their own equipment. The freelance work - whether it be creating, editing or otherwise handling content - should not constitute areas which overlap with the scope of the business in order to avoid a potential conflict of interest, or even the appearance of one.

信息人员可能希望寻求 ICIS 中国雇佣以外的领域，利用自己的时间和设备寻求自由工作的机会。自由撰稿人的工作不应该构成与 ICIS 中国业务范围重叠的领域，以避免潜在的利益冲突，或是被视为的利益冲突。

Information staff must at all times inform their manager of their intent to pursue such opportunities and obtain written permission to do so, and such permission will not be unreasonably refused.

在任何的情况下信息工作人员都必须随时通知他们的经理，他们意图追求这样的机会，并获得书面许可，这样的批准不会被无理拒绝。

Where such work is potentially in conflict with or prejudicial to the interests of ICIS China as a business; challenges the ability of the member of Information Staff to fulfil their ICIS China duties; conflicts with a legal or regulatory requirement and/or advice; conflicts with a compliance policy; or a conflict of interest exists as defined in the RELX Employee Code of Conduct, permission will not be given. The Information Director, and Compliance Team, are the arbiters of such permissions.

如此的工作情况可能存在潜在的冲突或有损于ICIS中国的利益作用，阻止员工在ICIS中国履行职责、与法律或监管要求和/或意见有冲突、与合规政策冲突或违反励讯集团员工行为准则所定义的利益冲突，都是不被许可的。信息总监和合规团队是此类许可的仲裁者。

5. Information Group Structure and Fire Walls 信息部门结构和防火墙

To ensure the integrity of the work of Information Staff, ICIS China operates other parts of its business interests, including the sale of its information products, training services and consulting work, behind a 'Fire Wall'.

为了确保信息员工的诚信，ICIS中国其他部份的商业利益，包括信息产品的销售，培训和咨询服务工作，是由“防火墙”进行隔离之后经营的。

ICIS China Information staff are increasingly in receipt of requests from customers for single-client and multi-client consulting work: regular advice, presentations, retainer basis, "panel of experts" groups, etc. While it is flattering that the industry is treating us as experts in our field, Information Staff will not normally undertake such work and will direct such requests to the ICIS China professional consulting group. In any event Information Staff must not undertake such work without approval from the Information Director and Compliance Team.

ICIS中国信息人员越来越常收到为单一客户和多方客户提供咨询工作的要求：定期咨询、演讲、预约、“专家小组”等。虽然很欣喜市场人士把我们视为相关领域的专家，信息人员通常不会承担这样的工作，而是把这样的客户要求交给ICIS中国的专业咨询部门。在任何情况下，未经信息总监和合规团队批准，信息工作人员不得从事此类工作。

Such approval will not be given where there is any possibility of a conflict of interest (see Conflict of Interest Policy) or the perception of a conflict of interest. Where there is any doubt about the existence of such a conflict the integrity of the work of Information Staff will be paramount.

在存在任何利益冲突可能性（见利益冲突政策）或被认为存在利益冲突，则不会给予这种批准。在无法明确利益冲突是否存在的任何情况下，保持信息员工工作的诚信是最为重要的。

5.1 Interaction with the Professional Consulting Group 与专业咨询部门之间的互动

ICIS China also has a **professional consulting group**, which operates behind a "Fire Wall", separately from the Information group. Requests for formal project-type consulting work should be referred in the first instance to this group, in particular requests for single-client studies. Information Staff could be called upon at times to participate in projects led by the Consulting Group should the relevant expertise lie within the Information groups. Where Staff participate in such studies and lend expertise they should do so in line with the prevailing **Information Group Consulting Cooperation Principles**. However, such work should never be allowed to compromise information group integrity and will be subject to the **Information Group Consulting Cooperation Principles**, which clearly outline the boundaries of Information contributions. Such contributions should not interfere with the day-to-day work of the Information groups and if needed, alternative work arrangements need to be agreed upon by Information management.

ICIS 中国还拥有专业的咨询团队，在“防火墙”后运营，独立于信息团队。对正式项目类型咨询工作的要求，应立即被转交给咨询团队，特别是对单一客户的研究要求。如果信息团队有相关的专业知识，其工作人员有时会被要求参与咨询团队领导的项目。如果工作人员参与此类研究并提供专业知识，他们应按照现行的信息、咨询团队合作原则行事。但是这类工作不能损害到信息团队的诚信，并将收到信息、咨询团队合作原则的约束，该原则明确规定了信息组贡献的界限。这种贡献不应干扰信息组的日常工作，如需要，应由信息管理部门同意作出其他工作安排。

Sensitive and commercially important data found in multi-client and single-client type studies and maps can only be used with the permission of management of the Consulting group in accordance with **Information**

Consulting Cooperation Principles and Confidentiality Policy. In the event of a breach of the 'Fire Wall', Information Staff should consider themselves to be bound by the confidentiality obligations of the Consulting Group and should immediately report the breach to the Compliance Team in line with the Confidentiality Policy.

根据信息、咨询团队合作原则和保密政策，多客户、单客户类型研究中发现的敏感和商业性的重要数据只有在获得咨询团队管理层批准下才可以使用。在违反“防火墙”的情况下，信息工作人员应知道自己承担的保密义务，并应根据保密政策立即向合规团队报告违反情况。

Likewise, **Information** staff meeting with sources – such as at industry conferences – should be careful not to compromise any source confidentiality by including non- **Information** staff in discussions specifically about markets. This does not preclude making introductions or asking the source whether they would like to meet other ICIS China staff, but in such cases it should not be disclosed whether or not the person is in fact a source.

同样，信息部工作人员在与消息来源会面时——例如在行业会议上——应注意不要让非信息部工作人员参与专门关于市场的讨论，从而损害任何消息来源的保密性。这并不排除进行介绍或询问消息来源是否愿意与 ICIS 中国的其他工作人员见面，但在这种情况下，不应透露该人是否是消息来源。

6. External Presentations 外部演讲

ICIS China maintains an open-door policy with regards to our price assessment methodology and this is reflected in our commitment to initiate dialogue with the markets. Presentations on ICIS China methodology are encouraged either through webinars, in-house presentations, industry events or face-to-face meetings. ICIS 中国对我们的价格评估方法保持开放政策，这反映在我们主动与市场对话的承诺。鼓励 ICIS 中国通过研讨会，内部演讲、行业活动或面对面的会议介绍其价格评估方法论。

Methodology presentations should be organised in consultation with the Information Manager, Information Director. In addition, ICIS China operates a formal methodology consultation process. Information staff should also encourage market participants to provide feedback through this process.

价格评估方法论介绍应与信息经理和信息总监协商组织。此外，ICIS 中国实行正式化方法论咨询流程。员工还应鼓励市场参与者在通过这个流程提供反馈。

All presentations should be reviewed before delivery by local Information management according to standard procedures to ensure quality control.

所有报告在交付前应由当地信息部门根据标准程序进行审查，以确保质量控制。

From time to time, ICIS China is invited to present on markets by conference organisers who are willing to meet some or all of the travel costs. In return for providing the conference with ICIS China resources and information, senior management may approve conference travel with reasonable travel expenses being paid by the organiser. In such cases there should be no direct or indirect payment or benefit accrued by the presenter, and the presenter must not be the one giving the approval.

ICIS 中国不时被会议组织者邀请到市场上演讲，这些组织者愿意承担部分或全部的差旅费用。作为向会议提供 ICIS 中国资源和信息的回报，高级管理层可以批准会议差旅，并由组织者支付合理的差旅费用。在这种情况下，演讲者不应直接或间接付款或获得利益，而且演讲者不得是给予批准的人。

ICIS China may also be invited to present at company meetings. These invitations may be business opportunities and consideration should be given as to whether the event should fall under the auspices of ICIS China Training, so that provision of the ICIS China services shall be under commercial terms.

ICIS 中国也可能被邀请在公司会议上发言。这些邀请可能是商业机会，应考虑该活动是否应属于 ICIS 中国培训的范畴，因此，ICIS 中国提供的服务应符合商业条款。

When ICIS China Sales staff request Analyst participation in a meeting with existing or potential customers, the request must go in the first instance to the relevant Information Director and follow the documented process that Sales has implemented.

当 ICIS 中国的销售人员要求分析师参加与现有或潜在客户的会议时，必须首先向相关的信息总监提出请求，并遵循销售部实施的文件流程。

ICIS China Information Staff are normally barred from appearing as “expert witnesses” in legal proceedings and they should not agree to do so without permission from the RELX Legal department and information management. ICIS China information staff are, however, able to provide chargeable data/information to be used in court at the discretion of the Information Director.

ICIS 中国的信息工作人员通常被禁止在法律诉讼中作为 “专家证人” 出庭，未经法律部门和信息管理部门允许，他们不应同意这样做。然而，ICIS 中国的信息工作人员能够提供收费的数据/信息，并由信息总监决定在法庭上使用。

Under no circumstances may Information staff accept payment privately for consultancy-type activities. 在任何情况下，信息工作人员都不得私下接受咨询类活动的报酬。

7. General Communication 一般沟通

7.1. Professional Standards 专业标准

ICIS China Information Staff are expected to behave at all times with professional courtesy and respect towards industry and market participants, whether customers of ICIS China or not. Conversely, ICIS China expects industry participants to show similar standards of respect in their communications with ICIS China Information Staff. Employees should report any abusive or other inappropriate behaviour by industry contacts to their managers. ICIS China staff should also be mindful of their role in representing ICIS China by dressing appropriately for business meetings.

ICIS 中国的信息工作人员在任何时候都应该对行业和市场参与者表现出专业的礼貌和尊重，无论他们是否是 ICIS 中国的客户。同样的，ICIS 中国要求行业参与者以类似的尊重标准与 ICIS 中国信息员工沟通。若碰到有市场参与者不合理的或不适当的对待，员工应向他们的经理报告。ICIS 中国的员工也应注意自己代表了 ICIS 中国，在商务会议上着装得体。

7.2 Written communication 书面沟通

ICIS China pledges to respond to all communications it receives in an appropriate manner. This includes timely responses to telephone calls and, where appropriate the delivery of a written response. Email correspondence with clients and contacts should be from a company account. When soliciting information from sources by email, the Bcc function should never be used to email multiple people. This is both to avoid accidental disclosure of source identities, and to prevent the use of email software that can thwart Bcc secrecy. If the communication is intended as a one-way message to point out to market participants some information that has already been released, such as a market alert, then Bcc is an acceptable means of achieving a fair and efficient dissemination.

ICIS中国承诺以适当的方式回复所有沟通。这包括及时通过电话回应，并在适当的情况下交付书面答复。与客户和联系人的电子邮件应由公司的邮件帐号发出。当通过电子邮件向消息来源索取信息时，绝不应使用秘密抄送功能向多人发送电子邮件。这既是为了避免意外泄露消息来源的身份，也是为了防范可以破解密件的电子邮件软件。如果通信的目的是作为一个单向信息，向市场参与者指出一些已经发布的信息，比如市场资讯提醒，那么秘密抄送是一个可以接受的实现公平和有效传播的手段。

7.3 Advance or delayed disclosure of information 提前或延迟披露信息

Information scheduled for release in any form may not be disclosed to any industry or market participants, **or to non-Information ICIS China staff (for example sales or marketing personnel)**, in advance of release. This includes in particular price assessments, market analysis, and any other items of information likely to result in market movements.

计划以任何形式发布的价格和市场信息，不得在发布之前透露给任何行业或市场参与者，**或ICIS中国非信息员工（例如销售或营销人员）**。这包括特定的价格评估、市场分析以及任何可能影响市场走势的其他项目的信息。

Information Staff are forbidden from delaying the release of information with the intent of enhancing its market impact. Real-time information items should be released as soon as they are ready for release and not, for example, held back until “market opening”. Exceptions to this must be authorised by the Information following advice from the Compliance Team and/or the ICIS General Counsel.

信息工作人员禁止延迟信息发布从而意图加强对市场的影响，即时的消息应该在准备好以后尽快被公布，而不是，例如：在“开市”之前扣留。例外情况必须由信息总监在听取合规团队和/或ICIS法律顾问的建议后授权。

Articles that are deemed to be not market sensitive may be held back to enhance their visibility; for example, a feature story completed too late in the day for its intended audience may be released early the next morning to better serve our subscribers who might otherwise have missed it.

被认为对市场不敏感的文章可能会被搁置，以提高其可见性；例如，对其目标受众来说，当天完成的专题太晚了，可能会在第二天清晨发布，以便更好地为我们的订户服务，否则他们可能会错过它。

7.4 Use of social media 使用公共媒体

As part of their job, and in accordance with prevailing policies on the use of Social Media to market and publicise ICIS China, ICIS Information Staff are encouraged to make use of social media (Twitter, LinkedIn, etc) that is consistent both with the company's objectives to draw visitors to icis.com and to build networks of industry contacts, and with the policies on appropriate content and frequency of updates. Outside of work and under their own accounts, staff are asked to observe the company's social media policy and to continue using prudence and discretion when using social media, including personal blogs, given that our sources, customers, competitors, regulators and anyone else will associate us with our employer - regardless of whether or not we as individuals believe ourselves to be speaking in a private capacity.

作为工作的一部分，并根据关于使用社交媒体营销和宣传 ICIS 中国的现行政策，ICIS 中国信息员工被鼓励使用社交媒体（Twitter, LinkedIn 等），但必须以吸引访问者浏览 icis.com 及建立行业联系网络为目标。

和其相应的内容和更新频率政策一致。在工作之外及使用自己的帐户时，员工被要求遵守公司的社交媒体政策，并在使用社交媒体，包括个人博客时继续谨慎小心，因为我们的消息来源、客户、竞争对手、监管机构和其他任何人都会将我们与我们的雇主联系起来，无论我们作为个人是否认为自己是私人身份在发表意见。

Accordingly, all staff are required not to express any comment or opinion on the sectors or markets we cover, or the participants in them, that could embarrass, harm, or otherwise lower the standing of ICIS China. This would include making any forecast or expressing any opinion on market trends or strategies - especially related to pricing - that could harm our reputation for objectivity.

因此，所有员工将被要求不要对我们覆盖的行业或市场，或其中的参与者表达任何可能使 ICIS 中国陷入尴尬、损害或降低其地位的评论或意见。这包括对市场趋势或策略做出任何预测或发表任何意见，尤其是与价格有关的意见，这可能会有损我们客观性的声誉。

ICIS China policy requires Information Staff using social media to promote content to create an account that will only be used for work-related information. Work-related information should never be distributed via personal accounts as this could create confusion between personal and work-related accounts.

ICIS 中国的政策要求使用社交媒体推广内容的信息工作人员创建一个只用于工作相关信息的账户。与工作有关的信息不应该通过个人账户发布，因为这可能会导致个人和工作相关的账号的混淆。

Please note that personal instant messenger accounts (such as Skype) should not be used on ICIS China equipment or over the ICIS China data network.

请注意，个人即时通讯帐户(如Skype)，不能用于ICIS中国设备或ICIS中国数据网络。

Please note that market information that is not related to a market covered by a analyst should not be distributed through their social media account, other than content specifically intended for wide dissemination (a podcast or video by a colleague, for example).

请注意，除了专门用于广泛传播的内容（例如，同事的播客或视频），与分析师所发布的市场无关的市场信息不应通过其社交媒体账户发布。

If during the course of their employment a staff member creates or is given access to the social media account or electronic messaging system that is identifiable as being associated with ICIS China, whether or not the account name actually includes the company name, the staff member acknowledges that in the event of their departure from ICIS China, control of the account - including passwords - shall be passed over to their manager.

如果工作人员在工作期间创建或被允许访问可识别为与ICIS中国有关的社交媒体账户或电子信息系统，无论账户名称是否实际包含公司名称，该工作人员确认在其离开ICIS中国时，该账户的控制权（包括密码）应移交给其经理。

Employees should be aware that all forms of communication whether written or spoken are the subject of increasing levels of scrutiny. Employees are encouraged to consider that all communication may become public or the subject of regulatory or legal action and that retaining a professional and courteous tone to communication is therefore expected.

员工应该意识到，无论是书面的还是口头的，所有的交流方式都承受越来越多的审查。我们鼓励员工考虑，所有的沟通都可能成为公开的，或者成为监管或法律行动的对象，因此，我们希望在沟通中保持专业和礼貌的语气。

8. Collections of receiving information from sources 从市场相关人士收集信息

8.1 Information from Sources 来自市场相关人士的信息

As part of their job ICIS China Information Staff will collect or receive information, including data, from market sources which will be used to assess market prices. The requirements for such market submissions and their timeliness will be defined in the Data Standards Policy and the relevant methodology. ICIS China Information Staff must ensure that they are aware of the relevant standards and ensure that these are followed.

作为工作的一部分，信息员工将从市场相关人士那收集或接收信息和数据，用来评估市场价格。数据标准政策和相关方法论将规定对此类市场提交的要求及其及时性。ICIS 中国信息人员必须确保他们了解相关标准，并确保这些标准得到遵守。

8.2 Integrity of the Reporting Process 报告整合过程

The Data Standards Policy and the methodologies will define who may submit market data to ICIS China and the criteria that applies to such submissions. ICIS China Information Staff must ensure they are aware of such criteria and line managers must check to ensure such criteria are being followed. These criteria will include the evaluation of the identity of a source and the organisation that they represent.

数据标准政策和价格评估方法论将定义谁可以向ICIS中国提交市场数据及适用于此类提交的标准。ICIS中国的信息员工必须确保他们了解这些标准，部门经理必须检查以确保这些标准得到遵守。这些标准将包括评估消息来源的身份和他们所代表的组织。

All employees should make reasonable efforts to ensure that they verify the identity, position and relevant authority (authorisation) of contacts and sources. They should also actively seek to understand any relationships a contact or source has within the market. This includes relationships between affiliates and subsidiaries. This is especially important for Information Staff.

所有员工应做出合理努力，确保核实联系人和消息来源的身份、职位和相关权限（授权）。他们还应该积极寻求了解联系人或消息来源在市场中的任何关系。这包括关联公司和子公司之间的关系。这一点对信息工作人员尤其重要。

Information staff should always have a clear understanding of the nature of the analyst-source relationship, which traditionally in ICIS China market reporting has included a promise of confidentiality that the source will naturally assume exists unless we tell them otherwise. ICIS China staff should never disclose the identity of the individuals or companies that talk to us about markets without their permission. Even in situations where the identity is obvious due to circumstances, the utmost effort should be made to avoid saying or writing anything to diminish our reputation for discretion.

信息工作人员应始终清楚地了解分析师与消息来源关系的性质，在 ICIS 中国的市场报告中，传统上包括对消息来源的保密承诺，除非我们告诉他们，否则他们自然会认为存在这种关系。ICIS 中国的员工在未经允许的情况下，不应透露与我们谈论市场的个人或公司的身份。即使在由于环境原因导致身份明显的情况下，也应尽最大努力避免说或写任何有损于我们谨慎声誉的内容。

Information Staff should always seek corroborating data from multiple sources as well as cross-checking market indicators to validate submitted information. Information or transaction data received directly from traders should always be verified.

信息工作人员应该通过多个信息来源来核实所得到的信息及数据，以及交叉检查市场指标来验证所得到的信息。直接从交易商那里得到的信息或交易数据应进行核实。

Where relevant and possible, Information Staff should encourage sources to provide information and data from back-office functions.

在相关和可能的情况下，信息工作人员应鼓励信息源提供后台职能部门的信息和数据。

All staff should be cognisant of any attempt to influence an assessment including any pattern of sources submitting anomalous or suspicious transaction data. **Any such attempt to influence an assessment should be reported immediately in line with the Escalation Policy process to their line manager and/or to a member of the Compliance team.**

所有工作人员应认识到任何影响评估的企图，包括任何提交异常或可疑交易数据的来源模式。任何试图影响评估的行为都应依据升级政策流程立即报告给直线经理和/或合规团队成员。

NB: Reed Elsevier also operates a whistleblower line. Details can be found at:

注：Reed Elsevier 实行举报热线。详见：www.ReedElsevierConfidentialLine.com

Information Group management may also perform spot checks of communications between sources and Information Staff to ensure no source, its employees or any third party, is attempting to cause an assessor to violate the ICIS China rules or guidelines.

信息团队管理层也可以对信息来源和信息工作人员之间的沟通进行抽查，以确保没有信息来源、其雇员或任何第三方，试图使评估员违反ICIS中国的规则或准则。

Where sources attempt to influence an assessment, including any pattern of sources submitting anomalous or suspicious transaction data, ICIS China management will consider the appropriate measure(s) needed to protect the integrity of its analyses and data. Measures may include:

当信息源试图影响 ICIS 中国的评估，包括提交任何形式的异常或可疑的交易数据，ICIS 中国管理层会考虑适当的措施以保护分析和数据的诚信。措施可能包括：

- Additional validation checks on information provided by the source
增加对于信息源提供的信息验证检查
- Escalation by ICIS China management of the issue to the source's company
ICIS 中国管理层把问题上报给信息源的公司
- Restricting the use of data by ICIS China from the source or the source's company
ICIS中国限制使用此信息源及其公司提供的数据
- Publicly reporting (including to any relevant regulator) the above concerns and the actions taken by ICIS China
公开报告（包括对任何相关监管机构）上述问题和 ICIS 中国采取的行动

8.3 Excluding Data and the use of Judgement 排除数据和使用判断

ICIS China wishes its analyses to reflect a complete and accurate reflection of the various markets it covers. **Information Staff will therefore not exclude data which meet the criteria defined in the relevant methodology and the Data Standards Policy without the written permission of a line manager.¹**

ICIS 中国希望对于所报告的各种市场都能反映一个完整、准确的画面。所以若没有直线经理的书面许可，信息员工不能排除符合相关评估方法论定义和数据标准政策的数据。

Where data is excluded Information Staff will ensure that records are kept, in line with the Data Retention Policy, of the excluded data and the reason(s) for the exclusion.

在数据排除的情况下，信息员工将确保依数据保留政策，保留被排除的数据和排除的原因的记录。

Where Information Staff are authorised to exercise judgement to exclude data which meets the criteria defined in the relevant methodology and the Data Standards Policy then this must be disclosed in the relevant report and notes must be kept of the decision. This explanation should be as complete as possible without risking the integrity of the report, violating any internal policy or breaking (or risk breaking) any law or regulation.

当信息工作人员被授权排除符合相关方法标准定义和数据标准政策的数据时，则必须在相关报告和说明中披露，也必须记录排除数据的原因。对数据排除的原因的解释必须是完整的，以避免违反任何内部政策、法律或法规的风险。

In the case of data that does not meet the methodology criteria but is sufficiently relevant and significant to be worth mentioning in a commentary, the analysis should explicitly explain why the data was excluded, including direct reference to the methodology. While it may be advisable to discuss the circumstances with the line manager, it is not compulsory to get written permission to exclude such data.

¹ Please note that line managers may 'self approve' their own decisions to exercise judgement but must keep written notes of the reasons for such approval.

请注意，直线经理可能会“自我批准”他们自己的决定，但必须保持书面说明这种批准的原因。

如果数据不符合方法论标准，但又足够相关和重要，值得在分析评论中提及，分析内容应明确解释为什么排除该数据，包括直接提及方法论。虽然与部门经理讨论这种情况可能是有好处的，但不一定要获得排除这种数据的书面许可。

Information staff must follow the methodology to determine price assessments, once they have gathered as much relevant data as is practical. Staff should refrain from using their own judgment to make price assessments, and should refrain from making any suggestion in the market commentary - or in discussion with sources - that their personal judgment has been used to determine the assessments.

信息工作人员在收集了尽可能多的相关数据后，必须按照方法论来确定价格评估。工作人员应避免使用自己的判断来进行价格评估，并应避免在市场评论中或在与消息来源的讨论中暗示其个人判断已被用于确定评估。

Every price assessment must be given due care and attention; in no circumstances should any assessment be treated as minor and therefore not needing the same level of attention or timeliness as any other price or be deemed to be outside the scope of normal Analysis policy and practice. If an assessment has lost relevance or has become problematic, it should be referred to senior management.

每一项价格评估都必须得到应有的关注和重视；在任何情况下，任何评估都不应被视为次要的，因此不需要像其他价格一样得到同等程度的关注或及时性，或被视为超出了正常分析政策和做法的范围。如果一项评估已失去相关性或变得有问题，应将其提交给高级管理层。

9. Corrections 更正

Where a correction to an analysis, or other content is required this must be completed, after appropriate consultation with management, in accordance with the Corrections Policy as soon as reasonably practicable. In accordance with the goal of continuous improvement, all parties to a correction, and their managers, shall also examine what went wrong and implement remedial steps.

对一篇分析或其他内容的更正，必须在与管理层进行适当的协商后，按照更正政策尽快合理的执行。根据持续改进目标，改正的所有各方以及他们的管理人员应检查出错的地方，并实施补救措施。

The continuous improvement approach also means that every member of staff bears responsibility for questioning workflows that are inefficient or risky, and pro-actively taking steps to create a better system, whether or not a correction has occurred.

持续改进的方法也意味着每位员工都有责任质疑那些效率低下或有风险的工作流程，并积极主动地采取措施建立一个更好的系统，无论是否已经发生了更正。

All content creators should follow prevailing policies to reduce the chances of introducing errors. In particular, typing over old copy to create new content is strictly forbidden, because of the inevitability of errors making it through to the subscriber.

所有内容创作者都应遵循现行政策，以减少发生错误的机会。特别是严格禁止在旧的版本上打字来创建新的内容，因为错误不可避免地会传到用户那里。

No individual should make any decision about correcting – or not correcting - their own content. Per the Corrections Policy, such decisions need to be made at the most senior levels to enable consistent application of policy and precedent.

任何个人都不应该对更正或不更正自己的内容做出任何决定。根据更正政策，这种决定需要在最高层做出，以确保政策和先例的适用保持一致。

10. Paying for information 支付的信息

ICIS China does pay for some market information, for example for foreign exchange rates or other markets where ICIS has no reporting expertise. ICIS China Information Staff should not individually subscribe to competitors' publications, nor to publications produced by brokerage houses, banks etc, except where these are free of charge without management permission.

ICIS中国确实为一些市场信息付费，例如外汇汇率或其他ICIS中国没有报告专长的市场。没有管理层的批准，ICIS中国信息员工不应单独订阅竞争者的出版物，或是券商银行等出版物，除非这些都是免费的。

It is permissible, with written management permission, to arrange a swap of released content with a competitor or other source (such as a broker or industry organisation), where the information exchanged is deemed to be of similar value. The counter-party to the swap must have obtained similar written permission from their management and a contra-agreement form must be completed and authorised by the ICIS China Head of Sales.

经管理层书面许可，允许安排与竞争对手交换发布内容，其中所交换的信息被认为是带有相似的价值。对方也必须获得其管理层书面许可，必须填写对销协议表格并由ICIS中国销售负责人授权。

11. Competitors' publications 竞争者的发布

ICIS China enforces the strictest controls on violation of its copyright. Information Staff need to live up to the same standards, ensuring that any copyright information we hold has been legitimately obtained. This means:

ICIS 中国对侵犯其版权的行为实行最严格的控制。信息工作人员要达到同样的标准，确保我们持有的任何版权信息是已经合法获得的。这意味着：

Information Staff may not share subscriptions to released content or log-ins to information services beyond the use limit permitted by the subscription.

信息工作人员不允许将发布内容或信息服务台的订阅账号与他人分享。

Information Staff should be on their guard against industry participants who are in the habit of forwarding competitors' publications. Such forwarding, except for the occasional purpose of pointing out conflicting information, constitutes **illegal redistribution**. Information Staff who are offered copies of competitors' publications on a systematic basis should politely decline and inform their manager. Information Staff who are sent email copies of competitors' publications should delete them and inform their manager. This includes obtaining competitors' publications via personal email addresses.

信息工作人员应该防范有转发竞争对手的出版物习惯的行业参与者。这种转发，除了偶尔目的是指出相互矛盾的信息，构成**非法的再传播**。信息员工若是系统化的收到竞争对手的出版物，应该有礼貌地拒绝接收，并通知他们的经理。信息员工若收到竞争对手的刊物电子邮件副本，应立即删除并通知他们的经理。这也包括通过个人电子邮件地址获得竞争对手的出版物。

Please note that it is acceptable to acquire and keep a few copies of competitors' reports that have been distributed as samples by those competitors for comparative market intelligence purposes. This includes reports and marketing materials that a competitor may leave out for conference attendees, for example.

请注意，以比较市场情报为目的，获得和保留一些竞争对手分发的报告为样本是可以被接受的。例如，这包括竞争对手可能为会议与会者留下的报告和营销材料。

12. Plagiarism and Copyright 抄袭和版权

ICIS China takes a far stricter view of any activity resembling plagiarism than is perhaps current in the general media.

对于任何类似抄袭的活动，ICIS 中国会以比一般机构所持的态度更为严格。

ICIS China will treat as gross misconduct any evidence that a member of its Information Staff has reproduced in whole or in part market analysis, commentary, pricing, data or market information that originates outside the company, including especially market commentary written by industry participants, **even if that commentary has been sent to ICIS for its exclusive information.** With regard to the last point, we have a duty of care to not blindly reproduce the views of market participants, which are likely to be inherently biased. This rule is not intended to prevent the use of email content in market event especially, where a source's comments might be quoted verbatim.

ICIS 中国任何信息员工复制全部或部分的市场分析、评论、定价、数据或源于其他地方的市场信息，特别是市场的业内人士写的评论将视为严重违纪行为的证据，即使该评论是发给 ICIS 中国做为独家信息。关于最后一点，我们的责任是，不盲目地再现市场参与者的意见，因为那些意见可能是带有偏见。这个规则不是为了防止在市场活动中使用电子邮件内容，特别是在可能逐字引用消息来源的评论时。

While Information Staff are encouraged to appropriately re-use content produced by other ICIS China staff, this should be done in accordance with standing policy, such as the controls on repeating price assessments or large amounts of text from another analysis, in particular a counterpart analysis from another region. Any significant use of another person's content should also be accompanied by consideration of whether formal by-line acknowledgement of the other author is appropriate.

虽然我们鼓励信息工作人员适当地重新使用 ICIS 中国其他工作人员制作的内容，但这应该按照常设政策进行，例如对重复价格评估或另一篇分析的大量文本的控制，特别是另一领域的对应分析。在大量使用他人的内容时，还应该考虑是否应该在正式的署名中对其他作者进行确认。

Information Staff should also exercise professional care about copyright issues, and before reproducing content shall confirm permission to do so in writing, unless no permission is needed (such as with government data). This is particularly important when dealing with data sets. For example, while the "fair use" allowance for analysts might allow them to cite some numbers from a released data set, it does not mean that data set can be replicated in its entirety, even if its source is properly identified.

信息工作人员也应该对版权问题保持专业的谨慎，在复制内容之前，应以书面形式确认许可，除非不需要许可（如政府数据）。在处理数据组时，这一点尤其重要。例如，虽然对分析员的“合理使用”许可可能允许他们引用已公布的数据组中的一些数字，即使其来源已被适当确认，但这并不意味着该数据组可以被全部复制。

13. ICIS China Approach to Competitors and ICIS China Market Development and Events

ICIS 中国对于竞争者的方法和 ICIS 中国行业发展及事件

ICIS China recognises it is not the only organisation offering marketing information, pricing assessments and market intelligence on the sectors it covers. ICIS China aims to base itself on the principles of honesty and straight-dealing, and strives to offer the most reliable, accurate and comprehensive service available. ICIS China employees must not unduly criticise competing services.

ICIS中国承认它不是唯一提供市场消息、定价评估和对它所涵盖的行业的市场情报的组织。ICIS中国旨在立足诚信和公正处理的原则，力求提供最可靠、准确和全面的服务。ICIS中国的员工不得不适当地批评竞争者的服务。

ICIS China is committed to providing its sources within a competitive market and therefore requires that its employees do not enter into exclusive arrangements with market sources or any other similar arrangement which restricts the ability of a competitor to create a competing product.

ICIS中国是致力于在竞争激烈的市场中提供其来源，因此要求其员工不与市场人士签署独家协议或任何其他类似限制竞争对手创建一个竞争产品能力的协议。

When a staff member from a competitor is speaking at a conference or other public forum, and reasonable judgment suggests the remarks or information presented are worthy, it is perfectly acceptable for ICIS China to report on the event in an article as it would with anyone else.

当竞争对手的工作人员在会议或其他公共论坛上发言时，如果合理的判断认为所发表的言论或信息具有价值，ICIS 中国完全可以像对待其他任何人一样在文章中对该事件进行报告。

In contrast, ICIS China market intelligence should never include direct or indirect mention of a competitor or the competitor's analysis of the market. Nor should the competitor's view of pricing in the market be included among the data points being used for an ICIS China price assessment. This approach should generally also be taken with opinions published by other entities, such as brokers or industry association. 相反，ICIS 中国市场资讯绝不应直接或间接提及竞争对手或竞争对手的市场分析。竞争者对市场定价的看法也不应被纳入 ICIS 中国价格评估所使用的数据要点中。对于其他实体，如经纪人或行业协会发表的意见，一般也应采取这种方法。

13.1 Reporting 报告

Where the business activities of ICIS China or its competitors are of legitimate interest to ICIS China customers, ICIS China's Information Staff have a responsibility to report such activities impartially, and should follow normal standards for independent and impartial information or other reporting, including where appropriate interviewing ICIS China or LNRS management.

若 ICIS 中国或是其竞争对手的商业活动对 ICIS 中国的客户是有合理意义的，ICIS 中国信息员工有责任公正报告这些活动，并遵循正常标准制作独立、公正的信息或其他报告，包括在适当情况下采访 ICIS 中国或 LNRS 管理层。

There may be occasions where our competitors become the subject of a market event. In such circumstances ICIS China will approach the story as if the competitor were any other party involved in a topical issue.

在某些情况下，我们的竞争对手可能会成为一个市场活动的主题。在这种情况下，ICIS 中国在应该像对待其他涉及热点问题的竞争者一样对待该活动。

ICIS China Information Staff should not undertake reporting on ICIS or its competitors without permission from their line managers, and reports of this kind should be reviewed by the Information Director prior to release.

没有直线经理的许可，ICIS 中国信息员工不应对于 ICIS 中国或其竞争对手进行报告，而这类报告发布之前应由信息总监审查。

ICIS China Information Staff have a duty of care to ensure any such reporting cannot be interpreted by customers as attempts to further the business agenda of ICIS China.

ICIS 中国信息员工有责任确保任何此类报告不被客户视为 ICIS 中国作为推进其商业利益的报告。

ICIS China Information Staff should not comment to the industries we serve on competitors' activities or methodologies.

ICIS 中国信息员工不应该针对竞争对手的活动或方法论进行评论。

ICIS China Information Staff should not discuss ICIS China methodology or other internal issues with employees of competitors.

ICIS 中国信息员工不应该与竞争对手的员工讨论 ICIS 中国的价格评估方法论或其他内部问题。

14. The Values of ICIS China ICIS 中国的价值

ICIS China is built on objective fairness, and this standard percolates through everything ICIS China produces. In its markets, ICIS China recognises that views reported from market participants will necessarily be subjective. ICIS China pledges to make reasonable efforts to cross-check information to ensure market, price assessments, market commentary and other content remain accurate and impartial. It will be necessary from time to time to give prominence to certain views prevalent within the market if those views are having significant trading impact.

ICIS中国是建立在客观公正的基础上，这个标准渗透到ICIS中国的所有产品中。在市场中，ICIS中国承认市场参与者的观点必然是主观的。ICIS中国承诺尽力进行交叉检查以确保市场事件、价格评估、市场评论和其他内容的准确和公正。如果市场上流行的某些观点对交易有重大影响，则有必要不时地突出这些观点。

If external pressure (of whatever form) or any form of censorship is imposed, ICIS China pledges to state such and define under which restrictions content has been prepared.

如果受到外部压力（任何形式）或以任何形式被强加的审查制度，ICIS 中国对此进行陈述并说明内容是在何种限制下编写的。

The ICIS China corrections policy states that: ICIS China issues corrections to prices when it discovers a mathematical, typographical, procedural or computer error has occurred in the assessment or production process. Price assessments will not be corrected with information that comes to light after the releasing deadline. Facts established after the releasing deadline will be included in the next pricing analysis. In the event that an ICIS China customer raises questions about a price quotation, ICIS China undertakes to review the relevant released quotation and to respond in detail. If a correction is deemed necessary per the Corrections Policy, it will be made as quickly as possible and the price assessment and all relevant analyses reissued. ICIS China stands by its released material unless a correction is issued.

ICIS 中国的更正政策指出：当 ICIS 中国发现在评估或发布过程中出现数学、排版、程序或计算机的错误时，会对价格进行更正。价格评估是不会基于发布期限之后所得到的信息而被更正。在发布期限后所建立的事实将列入下一份价格分析。当 ICIS 中国的客户对价格评估提出问题，ICIS 中国承诺检查有关发布的价格并作出详细回应。如果根据更正政策需要发布修正，将尽快补发价格评估及相关分析。在没有发布修正的前提下，ICIS 中国将维持其原有的发布的内容。

15. Third-Party Information 第三方信息

ICIS China can refer to third-party information when appropriate, although this must always be clearly sourced as such. The only information that can be used as fact is information previously released by ICIS China, unless that information originated from a third party, in which case the source must be stated.

ICIS 中国可以在适当的时候参考第三方信息，但这些信息必须始终明确其来源。唯一可以作为事实的信息是 ICIS 中国之前发布的信息，除非该信息来自于第三方，在这种情况下必须说明来源。

16. Training 培训

ICIS China information staff are offered comprehensive training opportunities covering assessment or analysis skills, market knowledge, information technology and other management and development skills. Courses may be offered through our in-house training department or outsourced to third parties.

ICIS中国的信息工作人员会有覆盖评估和分析技能、市场知识、信息技术和其他管理和发展技能的全面的培训机会。课程可以通过我们的内部培训部门提供或外包第三方。

All training that is undertaken shall be properly documented. Records of training relating to market reporting, methodology and Compliance in particular are subject to audit. All staff and their managers shall share the responsibility for completing training schedules and the appropriate documentation.

所有进行的培训都应该有适当的记录。特别是与市场报告、方法论和合规有关的培训记录要接受审计。所有员工和他们的经理应共同完成培训计划和正确归档的责任。

17. Legal Issues 法律问题

Pricing and price information, as well as industry updates and other market development content, can be highly sensitive and potentially fraught with legal risks. ICIS has a legal team on hand to advise on potential legal risks, and the lawyers are consulted as and when appropriate.

价格评估和价格信息，以及行业更新和其他市场发展内容，可能是高度敏感并充满了法律风险的。ICIS中国拥有法律团队，提供对潜在法律风险的建议，在适当的时候可以向律师进行咨询。

Information Staff should never respond to legal letters or to telephone calls from lawyers, other than to acknowledge the receipt of the letter or the call. All such communications should be passed to the management and to the legal team.

信息员工除了确认收到信件和电话之外，不应应对法律信函或律师电话作出回应，应将所有这类通信转交给管理层和法律团队。

Internal queries on the Information Group's Assessment Standards can be directed via normal management or via the Compliance Team. External queries can be directed to cc-support@icis.com.

信息部门的评估标准内部查询可以直接通过管理层或合规团队。外部查询可直接发送至：cc-support@icis.com。