



# CHOW SANG SANG HOLDINGS INTERNATIONAL LIMITED

(the “Company”)

*(Incorporated in Bermuda with limited liability)*

## ANTI-CORRUPTION POLICY

(Adopted by the Company pursuant to the Board Resolution passed on 25 August 2022)

### 1. Purpose

- 1.1 The Company and its subsidiaries (the “Group”) adopt a zero-tolerance stance towards all forms of bribery and corruption, and are committed to upholding high standards of integrity, honesty, fairness, and transparency in all business dealings.
- 1.2 The Group strictly prohibits any form of fraud or bribery, and is committed to the prevention, detection, reporting and investigation of such misconduct. Any solicitation or acceptance of advantages through abuse of position, without the Group’s permission, constitutes a breach of the Prevention of Bribery Ordinance. Employees must not solicit any advantages from clients, suppliers and other parties connected with the Group's business.
- 1.3 A strong ethical workplace contributes to the Company’s profitability, strengthens stakeholder trust, enhances operational efficiency, and fosters mutual respect among employees at all levels.

### 2. Scope of Application

- 2.1 This policy sets out the fundamental standards of conduct applicable to all directors, senior officers and employees (including temporary and contract-based staff) of the Group (collectively referred to as “Employees”). It also provides guidance to all Employees on the acceptance of advantages and the handling of conflicts of interest in the course of the Group’s business. The Group encourages and expects its business partners—including suppliers, contractors and clients—to adhere to the principles outlined in this policy.
- 2.2 In this policy, the following terms shall have the meanings set out below:

“advantage” means anything of value, including (1) gift (money or item), loan, fee, reward or commission; (2) office, employment or contract; (3) service or favour (other than courtesy entertainment in the ordinary course of business); and (4) the exercise or forbearance from the exercise of any right, power or duty etc.; and

“bribery” means the offering of anything of value with the intent to influence another person’s actions or decisions in order to obtain or retain unlawful business and/or personal advantage.

### 3. Acceptance of Advantage

- 3.1 All Employees must not solicit or accept any reward or gift from clients or suppliers. However, if refusing a gift from a client would be considered discourteous or cause dissatisfaction, the Employees may accept the gift at their discretion, and such gift should be regarded as a gift to the Group.
- 3.2 If an Employee believes that accepting an advantage may result in preferential treatment toward the offeror, the advantage must be declined. If the Employee is in doubt as to whether an advantage should be accepted, he/she should consult his/her supervisor.
- 3.3 Upon receiving a gift, the Employee must follow the handling methods outlined in Clause 3.4 and report the matter to the Corporate Affairs Department.

#### 3.4 Gift Handling Methods

Items	Handling Methods
Food	Report to supervisor immediately
Gifts, cash, cheques and cash vouchers etc.	Politely decline and consult supervisor immediately for guidance
Prizes won while representing the Group at a banquet	Return immediately or report to the Company
Red packets exceeding 50 in local currency	Consult supervisor immediately for appropriate action
Promotional gifts or souvenirs of symbolic value	Consult supervisor immediately for appropriate action

- 3.5 If an Employee receives a gift (excluding red packets valued at 100 or below in local currency during the first to the fifteenth day of the Lunar New Year), the department head must record the relevant information (including the date of receipt, the giver, the value, and the handling method), if applicable, for the Group to follow-up at any time.
- 3.6 Where an Employee is required to handle matters on behalf of the Group's client when performing the Group's affairs, the Employee must also comply with any additional restrictions imposed by the client regarding acceptance of advantages.

### 4. Offer of Advantage

- 4.1 (a) All Employees must not attempt to influence any person or the Group by offering bribes or rewards in order to secure business. Any payment of commission or amount, or the provision of preferential terms or other advantages in the course of the Group's business, must receive prior written approval from the Group.
- (b) While performing duties for the Group, all Employees must not, directly or indirectly through a third party, offer any advantage to any director, employee, or agent of another company or organisation to influence their decisions or offer any advantage to members or employees of government departments or public bodies when conducting business dealings with such entities. Even if the offer of advantage is not intended to exert improper influence, the Employee must ascertain that the intended recipient is permitted by his/her employer or principal to accept such an advantage under the relevant circumstances before offering it.

## **5. Entertainment**

- 5.1 While entertainment (such as provision of food and beverages) is a customary part of business and social interactions, all Employees should decline lavish or frequent entertainment from persons (such as suppliers or contractors) or their subordinates with whom the Group has business dealings, to avoid creating a sense of obligation or perceived favoritism toward the provider.

## **6. Conflict of Interest**

- 6.1 All Employees must avoid any situation where their personal interests conflict—or may appear to conflict—with the interests of the Group. If they are engaged in, or considering engaging in, any business, investment or activity that may present an actual or potential conflict of interest with the Company, they should report the matter truthfully to their supervisor.
- 6.2 The following are some common examples of conflicts of interest which are not exhaustive:
- (a) An Employee participating in a procurement process is closely related to, or has a financial interest in, a supplier under consideration by the Group.
  - (b) An Employee responsible for recruitment or promotion is a family member, relative, or close personal friend of a candidate or an Employee being considered for promotion.
  - (c) An Employee has a financial interest in a company whose tender is being evaluated.
  - (d) An Employee (full-time or part-time) engages in part-time work with a contractor whom he/she is responsible for monitoring.

## **7. Records, Accounts and Other Documents**

- 7.1 All Employees must ensure that all records, receipts, accounts or other documents submitted to the Group accurately reflect the actual events or business transactions described. The intentional use of documents containing false information to deceive or mislead the Group is strictly prohibited, regardless of whether any personal gain or advantage is obtained.

## **8. Compliance with Laws of Hong Kong and in Other Jurisdictions**

- 8.1 All Employees must comply with local laws and regulations, as well as other applicable laws and regulations, when conducting the Group's business locally or in other jurisdictions.

Employees who violate this policy and applicable laws and regulations related to anti-corruption will be subject to corresponding disciplinary actions by the Group, including possible immediate dismissal in accordance with the law, and may also face criminal prosecution.

## **9. Reporting and Investigation Procedures**

- 9.1 If Employees become aware of any suspected misconduct, violation, or malpractice, they should report the matter in accordance with the procedures specified in the Group's whistleblowing policy. Upon receiving each report, the Group will conduct a thorough investigation in accordance with the procedures stipulated in that policy. All reports will be handled with strict confidentiality and impartiality.

## **10. Training and Communication**

- 10.1 The Group will provide anti-corruption training to all Employees from time to time to ensure awareness of the Group's anti-corruption practices, and compliance with the laws, regulations and standards of conduct applicable to their business activities.
- 10.2 The Group's zero-tolerance stance on bribery and corruption will, where appropriate, be communicated to clients, suppliers, contractors and business partners.

## **11. Review of the Policy**

- 11.1 The Company will review this policy from time to time to enhance its effectiveness.

Note: In the event of any inconsistency between the English and Chinese versions, the Chinese version shall prevail.