



## Anti-corruption Policy 反貪污政策

(中文本為翻譯稿，僅供參考用)

### 1. Purpose

### 目的

1.1 Grand Ming Group Holdings Limited (the “Company”) and its subsidiaries (collectively referred to as the “Group”) take zero tolerance towards all form of bribery and corruption and is committed to observing and upholding high standard of business integrity, honesty, fairness and impartiality in all its business dealings at all times.

佳明集團控股有限公司（「本公司」）及其附屬公司（統稱「本集團」）對一切形式賄賂和貪污採取零容忍的態度，並致力在所有業務交易中任何時候堅持遵守和維護高標準的商業誠信、誠實、公平和公正。

1.2 The Group strictly prohibits any form of fraud or bribery, and is committed to prevention, deterrence, detection, reporting of all forms of fraud and bribery.

本公司嚴禁任何形式的欺詐或賄賂行為，並致力於預防、威懾、偵查、和舉報各種形式的欺詐和賄賂行為。

### 2. Scope

### 範圍

This policy set out the basic standard of conduct which applies to all directors and employees at all levels of the Group. All employees must conduct their activities in full compliance with this policy, the Prevention of Bribery Ordinance (Cap 201 of the Law of Hong Kong) (“POBO”), and all other applicable laws relating to bribery or corruption in each jurisdiction in which the employees do business. It also provides guidance to all employees on accepting and offering advantage when dealing with the Group’s business. The Group also encourages and expects its business partners including suppliers, contractors and clients to abide by the principles of this policy.

本政策規定適用於本集團各級的所有董事和僱員的基本行為標準。所有員工在進行業務時必須完全遵守本政策、香港法例第 201 章《防止賄賂條例》以及員工所在的每個司法管轄區與賄賂或腐敗有關的所有其他適用法律。本政策亦為所有員工在處理本集團業務時接受和提供利益提供指引。本公司鼓勵和期望業務合作夥伴，包括供應商、承包商和客戶遵守本政策的原則。

### 3. Policy

### 政策

#### 3.1 *Soliciting Advantage*

#### 索取利益

(a) The Group prohibits the solicitation of any advantage by an employee from clients, suppliers, contractors, government officials or any person, in connection with the Group’s business.

本集團嚴禁僱員向客戶、供應商、承包商、政府官員或其他與集團業務有關的任何人士索取任何形式的利益。

(b) Any facilitating payment is strictly prohibited.

嚴格禁止任何疏通費。

### 3.2 *Accepting advantage*

(a) Provided that the advantage is not given to influence any business decision or the performance of his/her duties, an employees is permitted to accept the following only:

- Employees may accept non-cash gifts not exceeding **HK\$500** in value when attending social occasions on behalf of the Group, with the exception of souvenirs inscribed with the organisation's logo and of limited commercial value;
- Employees may accept hampers during festive seasons;
- An employee may accept "Lai See" not exceeding **HK\$200**. If an employee receives "Lai See" exceeding HK\$200, he/she should it to the giver immediately. If the giver cannot be identified, the employee must surrender the "Lai See" to the Group's Human Resources Department for further action; and
- Commercial discounts which are equally available to other persons outside the Group.

(b) If the employee suspects the acceptance of an advantage could affect the proper discharge of his or her duties or put the employee under an obligation to act against the Group's interests, the employees should always decline to accept the advantage.

### 3.3 *Offering Advantages*

(a) The Group prohibits offering of any advantage by an employee to clients, suppliers, contractors, government officials or any person, in connection with the Group's business.

(b) Offering of gifts should be exercised with caution and in compliance with the guidelines given by the department heads.

(c) Offering free trips or reimbursing travelling expenses incurred that are directly for the purpose of promoting, demonstrating or certifying the Group's business and service may be proper, with the prior consent of the Group.

### *收受利益*

在不會對任何商業決定或執行職務構成不良影響的情況下，僱員僅可獲准接受下列利益：

- 僱員在代表集團出席社交場合時，只可接受價值不超過 **500 港元** 之非現金禮品。印有該致送機構標誌且具有限商業價值的紀念品則不在此限；
- 僱員可接受傳統節日的禮物籃；
- 僱員可接受不超過 **200 港元** 的「利是」；如「利是」超過 200 港元，僱員應立即全數退回饋贈者。如僱員未能確定饋贈者身份，必須透過部門主管將「利是」全數呈交集團人力資源部，以作進一步處理；及
- 非本集團人士同樣可獲得的商業折扣／優惠。

僱員如懷疑接受該利益會對其日常執行職務構成不良影響，或讓其覺得有義務做出有違集團利益的行為，僱員應拒絕任何利益。

### *提供利益*

本集團禁止僱員向客戶、供應商、承辦商、政府官員或任何與集團業務有關人士提供任何利益。

送贈禮物時必須審慎進行，並遵從部門主管訂立的指引。

在獲得本集團預先批核的情況下，提供直接與推廣、展示或認證集團業務或服務有關的免費旅程款待或償付旅費，或可被視作恰當。

### 3.4 *Charitable donations*

The Group participates in charitable activities and encourages employees to do the same, under circumstances that comply with applicable laws and regulations. Charitable donations should never be made to influence any business decision.

### 3.5 *Entertainment*

(a) Employees may accept invitations to business lunches or dinners from business associates provided they are not lavish, unreasonably generous or frequent that may give rise to any potential or real conflicts of interest.

(b) Where declining an invitation could be interpreted as being impolite, an employee may accept on the understanding that he or she will be allowed to reciprocate.

## 4. **Compliance with laws of Hong Kong and in other jurisdictions**

All employees must comply with all local laws and regulations when conducting the Group's business, and also those in other jurisdictions when conducting business there or where applicable.

Failure to comply with this Policy and applicable laws and regulations relating to anti-corruption may result in disciplinary action (which may include immediate termination) and where applicable, criminal prosecution against the parties concerned.

## 5. **Reporting Concern**

Every employee has a duty to report any potential violations of this Policy, when an employee becomes aware of a violation or potential violation of this Anti-corruption Policy, please report in accordance with the Whistleblowing Policy.

## 6. **Review and monitoring**

This policy will be reviewed periodically to ensure it remains relevant to the Company's needs and reflects both regulatory requirements and good corporate governance practices.

### **慈善捐款**

本集團參與並鼓勵僱員支持慈善活動，惟須遵守有關法律及法規，及確保慈善捐款不會影響任何商業決定。

### **款待**

僱員可接受有業務往來的商業機構邀請出席午膳或晚膳，惟不能過分奢華、過於適度或頻密，或構成潛在或實際利益衝突。

如拒絕出席會被視為不禮貌行為，在僱員可向對方作出酬答的前提下，僱員可接受邀請。

### **遵守香港及其他司法管轄區的法例**

所有僱員在本地或其他司法管轄區辦理本集團事務時，須遵守本地／當地的法例及規例，以及其他適用的法例及規例。

違反本政策和與反貪污有關的適用法律及法規可能遭紀律處分（可能包括即時解僱），並在適用的情況下遭受刑事檢控。

### **舉報問題**

每位僱員均有責任舉報任何可能違反本政策的行為，當僱員知悉有人違反或潛在違反本《反貪污政策》的行為，請按照《舉報政策》的規定檢舉。

### **檢討及監察**

本政策將定期檢討，以確保政策切合公司的需要，並能反映監管規定和良好企業管治常規。

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