

# **DICKSON CONCEPTS (INTERNATIONAL) LIMITED**

**迪生創建(國際)有限公司\***

(Incorporated in Bermuda with limited liability)

## **ANTI-CORRUPTION POLICY**

### **A. POLICY STATEMENT**

Dickson Concepts (International) Limited (“DCIL”, together with its subsidiaries and controlled affiliates, “the Group”) is committed to upholding high standards of business integrity, honesty and transparency in all its business dealings.

This Policy applies to all Directors, Officers and employees (collectively “the Employee(s)”) of the Group and the Board is responsible for ensuring the effective implementation of the Policy.

The breach of this Policy may lead to disciplinary actions that might result in termination of employment and/or other legal consequences.

### **B. PROHIBITION OF IMPROPER PAYMENTS, KICKBACKS AND OTHER FORMS OF BRIBERY**

The Group prohibits and is committed to the prevention, deterrence, detection and investigation of all forms of bribery.

Bribery usually occurs where a person offers or solicits advantages to or from another as an inducement or reward for the recipient’s improper performance of duties, or where the recipient abuses his/her authority or position for personal gains.

The aforesaid advantages could consist of anything of value including :-

1. Inappropriate gift, entertainment and hospitality;
2. Sponsored travel and accommodation;
3. Cash payments, whether by or to Employees or business partners;
4. Loans, guarantees or other extensions of credit on preferential terms, or other intangible forms of preferential treatment;
5. Other favors provided by or to public officials, suppliers or customers.

All Employees must, taking into account normal business practice, exercise their common sense and judgement in assessing whether any arrangement could be perceived to be corrupt, illegal or otherwise inappropriate. In case of doubt, the Employees should consult their superiors and/or obtain the pre-approval of an Executive Director of DCIL.

### **C. GIFTS AND HOSPITALITY ('BUSINESS COURTESIES')**

Business gifts and hospitality are customary courtesies which could build goodwill among business partners and play an important role in business relationships. However, a problem may arise when such courtesies compromise, or appears to compromise, the ability to make objective and fair business decisions. Offering or receiving any inappropriate gift, gratuity or hospitality that might be perceived to unfairly influence a business relationship should be avoided.

All Employees must exercise their common sense and judgement in assessing whether such business gifts and hospitality are appropriate. In general, Business Courtesies must comply with the following guidelines :-

1. They must be reasonable;
2. They must be justifiable;
3. They must be appropriate and consistent with normal business practice;
4. They must be provided with the intend only to build or maintain a business relationship or offer normal courtesies rather than to influence the recipient's objectively in making a specific business decision;
5. They should never be offered in return for financial and personal gain or favor;
6. They must be permissible under all applicable laws, rules and regulations.

In case of doubt, the Employees should consult their superiors and/or obtain the pre-approval of an Executive Director of DCIL.

#### **D. COMMUNICATION AND TRAINING**

The Group shall ensure that all Employees are informed about and understand this Policy. The Group shall make this Policy available to all Employees (whether in hard copy or online) and to provide training to new Employees and updates (where applicable) to all existing Employees.

#### **E. REPORTING OF BRIBERY AND SUSPICIOUS ACTIVITIES**

If an Employee becomes aware of any actual or suspected breach of this Policy, such Employee must report such incident in accordance with the Group's Whistleblowing Policy which provides a mechanism for Employees and those who deal with the Group to raise their concerns through confidential reporting channels.

*\* For identification purposes only*