



# HONGKONG CHINESE LIMITED

## ANTI-CORRUPTION POLICY

(Revised on 31 March 2026)

### 1. POLICY, PURPOSE AND SCOPE

- 1.1 This Anti-corruption Policy (the “**Policy**”) of Hongkong Chinese Limited (the “**Company**”) applies to the Company and its subsidiaries (collectively the “**Group**”).
- 1.2 This Policy sets out the basic standard of conduct expected of all directors and staff (including full-time, part-time and contract staff) of the Group (collectively the “**Personnel**”), and the Group’s policy on acceptance of advantage and handling of conflict of interest when dealing with the Group’s business. This Policy also applies to all agents, representatives of and those acting for and on behalf of the Group, and all parties doing business with the Group including, but not limited to, business partners, contractors, tenants, vendors and suppliers (collectively, the “**External Parties**”).

### 2. ETHICAL COMMITMENT

The Group regards honesty, integrity, probity and fair play as our core values that must be upheld by the Personnel. The Group adopts a zero-tolerance approach to bribery and corruption.

### 3. ROLES AND RESPONSIBILITIES

- 3.1 The Board of Directors of the Company (the “**Board**”) is responsible for overseeing the implementation and effectiveness of this Policy and ensure that this Policy will be reviewed from time to time and updated, if necessary, in response to the changing legal standards and emerging risks. The Board should model ethical behavior and influencing the overall corporate culture.
- 3.2 The Chief Executive Officer of the Company (the “**CEO**”) and senior management are responsible for the day-to-day management of the Group’s business operations, by setting the right tone from the top and demonstrating strong, visible and active commitment to anti-bribery and anti-corruption business practices.
- 3.3 The members of the Risk Management Steering Group and the senior management of the business units periodically review fraud and corruption risks under the Group’s Enterprise Risk Management framework, ensure that controls are in place to mitigate risks, and report material breaches of this Policy to the Board and/or Audit Committee of the Company (the “**Audit Committee**”).

- 3.4 The managers of various departments and business units should also exercise effective supervision to ensure that the existing business processes and practices comply with this Policy or similar anti-corruption measures or policies of the relevant business units whichever is stricter. They should provide guidance and advice to the staff and External Parties where necessary, and exercise reasonable monitoring over their conduct. The Personnel should report any actual breaches or suspected breaches of this Policy to the senior management.

#### **4. PREVENTION OF BRIBERY**

The Group prohibits all forms of bribery and corruption. The Personnel are prohibited from soliciting, accepting or offering any bribe in conducting the Group's business, whether in Hong Kong, Singapore or elsewhere. They must not:

- (1) solicit or accept any advantage for themselves or others from other persons (individuals or organizations) as a reward for or inducement to doing or not doing any act or showing favour in relation to the Group's business, or offer any advantage to an agent of another as a reward for or inducement to doing or not doing any act or showing favour in relation to his/her principal's business;
- (2) offer any advantage to any public servant (including any government or public body employee) as a reward for or inducement to his/her performing any act in his/her official capacity or his/her showing any favour or providing any assistance in business dealing with such government or public body;
- (3) offer any advantage to any staff of any government or public body while they are having business dealing with the latter; or
- (4) offer, promise, give or accept facilitation payments and kickbacks of any form.

#### **5. ACCEPTANCE OF ADVANTAGE**

5.1 The Personnel may accept (but not solicit) the following when offered on a voluntary basis provided that the following will not violate the applicable laws and regulations of the relevant jurisdictions:

- (1) Advertising or promotional gifts or souvenirs of a nominal value; or
- (2) Gifts given on festive or special occasions, subject to a maximum limit of HK\$2,000 (or its equivalent currency) in value; or
- (3) Unusual discounts or other special offers given by any person to them as customers.

- 5.2 If any of the Personnel wishes to accept any advantage not covered in paragraph 5.1, he/she should seek permission from his/her employer using the report form attached hereto as Appendix 1.
- 5.3 However, any of the Personnel should decline an offer of advantage if acceptance could affect his/her objectivity in conducting the Group's business or induce him/her to act against the interest of the Group, or acceptance will likely lead to perception or allegation of impropriety.
- 5.4 If any of the Personnel has to act on behalf of a client in the course of carrying out the Group's business, he/she should also comply with any additional restrictions on acceptance of advantage that may be set by the client (e.g. Personnel performing any duties under a government or public body contract will normally be prohibited from accepting advantages in relation to that contract).

## **6. OFFER OF ADVANTAGE**

The Personnel are prohibited from offering advantages to any director, staff member or agent of another company or organization, for the purpose of influencing such person in any dealing, or any public official, whether directly or indirectly through a third party, when conducting the Group's business.

## **7. ENTERTAINMENT**

Although entertainment (such as food and drinks provided for immediate consumption on the occasion, and any other entertainment provided at the same time) is an acceptable form of business and social behaviour, any of the Personnel should avoid accepting lavish or frequent entertainment from persons (e.g. suppliers or contractors) with whom the Group has business dealing to avoid placing himself/herself in a position of obligation.

## **8. RECORDS, ACCOUNTS AND OTHER DOCUMENTS**

The Personnel should ensure that all records, receipts, accounts or other documents they submit to the Group give a true representation of the facts, events or business transactions as shown in the documents. Intentional use of documents containing false information to deceive or mislead the Group, regardless of whether there is any gain or advantage involved, may constitute an offence under the relevant laws and regulations.

## **9. COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS**

The Personnel should comply with the applicable anti-corruption laws and regulations of the jurisdictions in which the Group conducts its business including, without limitation, the Prevention of Bribery Ordinance of Hong Kong and the Prevention of Corruption Act of Singapore.

## **10. CONFLICT OF INTEREST**

- 10.1 The Personnel should avoid any conflict of interest situation (i.e. situation where their private interest conflicts with the interest of the Group) or the perception of such conflicts unless such conflict is dealt with or exempted in the manner prescribed by the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the “**Listing Rules**”), the applicable laws and regulations and/or the articles of association or constitutional documents of the relevant company within the Group.
- 10.2 Some common examples of conflict of interest are described below but they are by no means exhaustive:
- (1) Any of the Personnel involved in a procurement exercise is closely related to or has financial interest in the business of a supplier who is being considered for selection by the Group.
  - (2) Any of the Personnel or his/her family member has financial interest in a company whose quotation or tender is under consideration by the Group.
  - (3) Any of the Personnel undertaking part-time work with a contractor whom he/she is responsible for monitoring.

## **11. MISUSE OF OFFICIAL POSITION, GROUP ASSETS AND INFORMATION**

- 11.1 The Personnel must not misuse their official position in the Group to pursue their own private interests, which include both financial and personal interests and those of their family members, relatives or close persons.
- 11.2 The Personnel in charge of or having access to any of the Group’s assets, including funds, property, information and intellectual property should use them solely for the purpose of conducting the Group’s business. Unauthorized use, such as misuse for personal interest, is prohibited.
- 11.3 The Personnel should not disclose any confidential information of the Group without authorization or misuse any information of the Group (e.g. unauthorized sale or release of information). Those who have access to or are in control of such information, including information in the Group’s computer systems or CCTV cameras, should protect the information from unauthorized disclosure or misuse. Special care should also be taken in the use of any CCTV footage and personal data, including personal data of the directors, staff and customers, to ensure compliance with the relevant laws and regulations.

## **12. OUTSIDE EMPLOYMENT**

If any staff member of the Group wishes to take up paid or unpaid employment outside the Group, he/she may need to seek the prior written approval of his/her employer within the Group in accordance with his/her employment terms. Such employer should consider whether the outside employment would give rise to a conflict of interest with the staff member's duties in the Group or the interest of the Group.

## **13. RELATIONSHIP WITH SUPPLIERS, CONTRACTORS AND CUSTOMERS**

13.1 The Personnel are advised not to engage in frequent gaming activities with persons having business dealings with the Group.

13.2 The Personnel should not accept any loan from, or through the assistance of, any individual or organization having business dealings with the Group without the prior written approval of his/her employer. There is however no restriction on borrowing from licensed banks or financial institutions.

13.3 The Personnel should not deal with contractors, suppliers or other potential business partners known to be paying bribes and/or engaging in corrupt activity. Appropriate levels of due diligence are to be conducted in the selection of contractors and suppliers and other business partners.

## **14. TRAINING AND COMMUNICATION**

Staff training on this Policy forms part of the induction process for all new employees. This Policy and zero-tolerance attitude towards corruption shall be clearly communicated to all External Parties.

## **15. COMPLIANCE WITH POLICY**

15.1 It is the responsibility of the Personnel to understand and comply with this Policy, whether performing his/her duties of the Group.

15.2 Any of the Personnel in breach of this Policy will be subject to disciplinary actions, including, but not limited to, termination of appointment. Any enquiry about this Policy or report of possible breach of this Policy should be made to the Company's email address at [anti-corruption@lippohk.com](mailto:anti-corruption@lippohk.com) for the attention of the CEO and/or the Audit Committee. In cases of suspected corruption or other criminal offences, a report should be made to the appropriate government authority.

15.3 In the event of any conflict between this Policy and the Listing Rules, the applicable laws and regulations and the articles of association or constitutional documents or similar anti-corruption measures or policies of business units within the Group, the strictest one shall prevail.

**APPENDIX 1**

**REPORT ON GIFT/ADVANTAGE RECEIVED WITH VALUE OVER HK\$2,000  
(OR ITS EQUIVALENT CURRENCY)**

<b>Part A – To be completed by Receiving Staff</b>	
Name & Title:	
Department & Employer's Name:	
Description of Offeror:	
Relationship with Receiving Staff (Business / Personal):	
Occasion on which the Gift /Advantage was/is to be received:	
Description and (assessed) value of the Gift /Advantage:	
Suggested Method of Disposal:	<input type="checkbox"/> Retain by Receiving Staff
	<input type="checkbox"/> Retain for Display / as a Souvenir in the Office
	<input type="checkbox"/> Share among the Office
	<input type="checkbox"/> Reserve as Lucky Draw Price at Staff Function
	<input type="checkbox"/> Donate to a Charitable Organization
	<input type="checkbox"/> Return to Offeror
	<input type="checkbox"/> Others (please specify):
	Remark:
Signature:	
Date:	

