

**HUNG HING PRINTING GROUP LIMITED**  
**(THE "COMPANY")**  
**ANTI-CORRUPTION AND BRIBERY POLICY**

**Preamble**

The Company and its subsidiaries (collectively the "Group") are committed to the highest standards of business conduct and has zero tolerance for bribery and corruption. All Group Members at all levels are required to follow all applicable laws, rules, and regulations related to anti-bribery and corruption, namely Sections 4, 8 and 9 of the Prevention of Bribery Ordinance ("POBO") (Cap. 201), guidance(s) issued by the Independent Commission Against Corruption ("ICAC") and other similar laws.

**Policy statement**

**1. Scope**

The Group has a strong stance against all forms of bribery and corruption. It has stipulated clearly in the company policies, applicable to all Group Members at all levels, its restrictions in soliciting or accepting any advantage from others as well as offering any advantage by its employees to an agent of the others including public servant.

Corruption and bribery include any illicit advantage offered or accepted as an inducement to or a reward for performing or abstaining from performing any duties. Items considered bribes include cash, cash equivalents, loans, commissions, benefits in kind or other advantages, but excluding traditional gifts of nominal value given during festival. In this Policy, definitions of wording used shall carry the same meanings set out in the "POBO".

**2. Anti-Corruption and Bribery - General Principle**

Employee shall strictly observe laws, rules and regulations on anti-corruption and bribery and may not solicit or accept advantage. Without proper consent in terms of prior company approval, employees must not accept payment, kickback or any other form of advantage and bribery including but not limited to gifts, gratuity and hospitality directly or indirectly regardless of occasions.

**3. Gifts and hospitality**

Each company of the Group has put in place guidelines and procedures which employees should follow when gifts and hospitality are accepted under specified circumstances. Prior approval must be sought from the General Manager (or higher authority of the Group as appropriate), employees must declare to the responsible General Manager (or higher authority of the Group) under relevant jurisdiction for further action. The company shall keep proper registers recording the application and the final decision.

**4. Donation and sponsorship**

The Group shall only make donation to charity and sponsor business events, all donations and sponsorship must be legal and ethical under applicable laws and practices and approved by the senior management. It is the Group's general policy not to make any form of political donation. Employees shall avoid making any political donation or sponsorship on behalf of the Group.

## **5. Whistleblowing**

If any complainant including our employee becomes aware of any actual or suspected bribery, he/she is free to report such incidents to ICAC without notifying the company. On the other hand, the Group has put in place the Whistleblowing Policy, to ensure that there is an appropriate channel for reporting illegal, unethical practices or irregularities related to the Group (including any suspected bribery or corruption activities) in good faith, without the fear of personal repercussions or the risk of reprisals. For more details of the Whistleblowing Policy, please refer to the Whistleblowing Policy available on the Company's website.

## **6. Making a Report**

To facilitate the investigation, complainants are requested to provide their contact information which will be treated in strict confidential. In case the complainants are employees of the Group, please also provide the company and department they are affiliated. They are expected to provide as much details as they have regarding the improprieties that they want to report.

Reports can be made in writing and sent via the following methods:

- (i) Mail to  
Chairman of the Audit Committee  
Hung Hing Printing Group Limited  
Hung Hing Printing Centre,  
17-19 Dai Hei Street,  
Tai Po Industrial Estate,  
New Territories, Hong Kong

Envelope should be sealed and clearly marked "Private & Confidential".

- (ii) E-mail to  
ined.hunghing@gmail.com

## **7. Review of this Policy**

The Company will review this Policy from time to time as appropriate.

25 November 2022