



## Integrity Policy (Anti-Bribery and Anti-Corruption Policy)

**Dah Chong Hong Holdings Limited** (“the Group”) believes honesty, integrity and fair competition are important assets. The Group and employees, including management staff and directors must act with honesty, integrity and incorruptibility. The Group and employees also firmly reject the bribery, corruption and improper conduct in any forms. The Group committed to enhancing the collaboration with government departments, regulatory bodies and other companies to maintain the probity society and business environment, collectively prevent corruption and improper conducts, continuously strengthen the anti-corruption efforts, in order to facilitate the principle of “integrity operation”.

The Group formulated the Integrity Policy (also known as the Anti-Bribery and Anti-Corruption Policy). All business units and staff should comply with this policy, Code of Conduct and other relevant regulations or guidelines issued by the Group for avoiding the inappropriate conduct which would undermines integrity.

Suppliers, contractors, and business partners of the Group are also expected to comply with this policy to ensure compliance with applicable laws and regulations, and to align with the Group’s business principles.

### **Scope of the Policy :**

- The Scope of this policy includes all business units within the Group. All business units and staff are required to comply with the policy, as well as Code of Conduct and other relevant regulations or guidelines issued by the Group.
- Business units should amend the Integrity Policy, when necessary, to ensuring compliance with the local laws and regulations, and the amended policy should comply with the laws and regulations of local jurisdictions and Hong Kong, Group Integrity Policy, Group Code of Conduct and other relevant regulations or guidelines.
- The Group also mandates its suppliers, contractors, and business partners to comply with this policy, as well as the relevant laws and regulations of Hong Kong and the jurisdictions in which they operate.

### **Group Integrity Policy (Anti-Bribery and Anti-Corruption Policy) :**

1. The Group, including all staff and business units should strictly comply with Prevention of Bribery Ordinance. If business unit is located outside of Hong Kong region, the business unit and the staff should comply with both Hong Kong and local equivalent laws.
2. The Group committed to fulfilling the legal obligations and responsibilities, striving to operate with the highest standards of integrity. The Group actively develops and implements an integrity and compliance management system to ensure the Group could fully comply with the legal obligations and operates with the highest standards of integrity.



3. All staff should not solicit or accept any advantage\* related to their duties without the Group's permission in advance. All advantages permitted by the Group must comply with legal requirements, and meet the principles of honesty, integrity and fair competition. Meanwhile, the Group also requires all staff to reject the lavish or frequent entertainment offer from supplier, customer, company, organization and any individual related to the Group's business.
4. All staff should not offer any form of advantage or similar value to any individuals, companies, government department, public institution and any other organization to influence their decisions related to the Group's business, including the decision on granting the business to the Group, retain current business or business referrals.
5. The Group strictly prohibits donations to political parties, candidates, or campaigns intended to secure business advantages. Any political contribution must comply with applicable laws and receive prior approval from the Group.
6. All staff must not use charitable donations and sponsorships as a vehicle for bribery.
7. All staff should avoid, as much as possible to the situations which possibly involving conflicts of interest. If such situations are unavoidable, staff should report, disclose to the relevant units and personnel, discuss the matter and submit relevant documents within a reasonable time according to the Group's Code of Conduct, in order to handle the situation properly.
8. All staff should not disclose or provide any confidential information without a written approval by the Group. Meanwhile, any inappropriate usage of Group information, including the information of customers, suppliers and individuals, are strictly prohibited.
9. The Group ensures that all Group staff complete anti-corruption and compliance training regularly, including as part of the staff onboarding process to ensure that their behaviour aligns with the Group's values of honesty, integrity, and fair competition.
10. There are both external and internal whistleblowing mechanism for in the Group for staff and public to report any cases or suspected cases of violations of integrity. The Group will investigate every case in fairly and timely manner. Case will keep confidential if it is suitable. The Group will review anti-corruption and anti-improper conduct when appropriate. The Group welcomes inquiries from every person within or outside the Group, the Group will respond with an open-minded, prompt and serious manner.



11. The whistleblowing mechanism of the Group ensures that all staff will not facing any retaliation or unfair treatment due to reporting.
12. Staff who violates the integrity regulations or Group's Code of Conduct will face disciplinary action, including but not limited to termination of employment contract and possible (if applicable) criminal prosecution. The Group will fully support and assist the enforcement department's investigation if there is criminal investigation involved.
13. The Group will collaborate with the companies, organizations and individuals that value integrity standards, anti-corruption and anti-improper conduct, adhering to the Group's values and principles of honesty, integrity and fair competition. The Group refuse to collaborate with companies, organizations or individuals that violate the Group's integrity principles. Meanwhile, the Group welcomes sharing and exchanges an anti-corruption practices and related measures with different companies or organizations locally and internationally (including the Belt and Road countries and regions), in order to develop integrity, honesty and fair competition's probity society collectively, also introduce sustainable development targets.

\*According to the Laws of Hong Kong, Cap. 201 Prevention of Bribery Ordinance, "advantage" refers to any gift, loan, fee, reward, commission, position, employment, contract, service, exercise or forbearance from the exercise of any right or any power or duty, discharge any loan, obligation or other liability and favour etc.

**Publication and Distribution of the Policy:**

Integrity Policy is a public document, which formulated by the Group's ESG Working Group in collaboration with relevant departments, and is published with the authorisation of the management. The policy is accessible to every staff, stakeholders or anyone interested in this policy. All interested parties are welcome to request the policy.

**Review and Improvement:**

The policy will be reviewed by the Group's ESG Working Group and relevant departments annually or at any time deemed appropriate. The Group will collect the comments of staff regularly, communicating with the stakeholders actively and amend the policy timely to ensure that the Integrity policy of the Group is effective, feasible and sustainable.

**Last Update Date:** 30 October 2025

**Last Review Date:** 28 November 2025