APP 1b ANTI-BRIBERY POLICY

ANTI-BRIBERY MANAGEMENT SYSTEM POLICY

As a statutory body in Hong Kong, Federation of Hong Kong Industries (FHKI) always strive to prohibit bribery and commit to:

- satisfy applicable anti-bribery requirements, including the anti-bribery law Prevention of Bribery Ordinance (Cap. 201) and the Anti-Bribery Management System requirements; and

- improve the Anti-Bribery Management System (IMS) continually.

When conducting business and delivering services, all FHKI employees are required to follow the requirements of the IMS, including the Employees' Code of Conduct in Employee Handbook. The Code of Conduct is clearly communicated to employees at all levels during induction and refreshment trainings, and it's latest version is available at the intranet. Related IMS requirements are also communicated to all significant business associates including customers and suppliers.

Anti-bribery Management Representative (ABMR) is selected by the Director-General bi-annually, and would be acting as the anti-bribery function for not more than 2 years within a 6 years' period. Notice of appointment of latest ABMR would be available at the FHKI website. All persons are encouraged to report illegal or suspected bribery activities or to raise concerns to ABMR. FHKI ensures that no personnel will suffer retaliation, discrimination or disciplinary action for reports made in good faith, or on the basis of a reasonable belief of violation or suspected violation of FHKI's ABMS policy, or for refusing to engage in bribery, even if such refusal can result in FHKI losing business. Details of the reporting procedures could be found from the Appendix 1A of this policy.

FHKI would review the continuation of contract or relationship with any employees, business associates or members, who violate the above policy. For case in which the anti-bribery law was violated, the contract or relationship would be discontinued immediately. FHKI would fully support any legal actions required by the authority.

Bonnie Chan
Director-General
20 Nov 2024

Appendix 1A

Reporting and Investigation Procedures for Violation of Anti-bribery Requirements

1. Purpose

The purpose of this document is to establish clear and effective procedures for reporting suspected or actual violations of FHKI's anti-bribery policy. Ensuring transparency and accountability in all business dealings is paramount, and any violations must be reported and addressed promptly.

2. Scope

These procedures apply to all personnel who want to make report in good faith, or on the basis of a reasonable belief of violation or suspected violation of FHKI's ABMS policy.

3. Definitions

3.1 Bribery: offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties

4. Reporting Mechanisms

4.1 Internal Reporting Channels

All personnel could report any suspected violations through one of the following internal channels:

(For employees only) Immediate Supervisor: Report the concern to your direct supervisor unless the supervisor is involved in the suspected violation. The Supervisor shall pass on the report to the ABMR as soon as possible.

Anti-Bribery Management Representaive (ABMR) (anti-bribery function): Directly contact via email at ABMR@fhki.org.hk or by phone. Phone number of current ABMR could be found from the latest appointment letter at company website.

Hotline: Use the company's confidential hotline at +852 2732 3167, available from Monday to Friday 9:00a.m. to 5:30p.m. (except public holiday) for anonymous reporting.

4.2 External Reporting Channels

If internal reporting is not feasible or if the reporter feels uncomfortable using internal channels, the following external channels may be used:

ICAC Report Centre (24-hour service): G/F, 303 Java Road, North Point, Hong Kong.

ICAC Reporting Hotline (24-hour hotline): 25 266 366

ICAC Mailbox: G.P.O. Box 1000, Hong Kong

Legal Counsel: Consult with external legal counsel for advice on reporting the violation.

5. Reporting Procedure

5.1 Information to Include

When reporting a violation, provide as much detail as possible, including:

- Description of the alleged violation;
- Names and positions of the individuals involved;
- Date, time, and location of the incident;
- Any supporting evidence (documents, emails, etc.);
- Names of any witnesses.

5.2 Anonymity and Confidentiality

Reports can be made anonymously; however, providing contact information may facilitate the investigation.

All reports will be treated with strict confidentiality to the extent possible, consistent with the need to conduct a thorough investigation and comply with legal requirements.

6. Investigation Process

6.1 Initial Assessment

ABMR will conduct an initial assessment to determine if the report warrants a formal investigation.

The reporter will receive acknowledgment of the receipt of the report within 3 working days.

6.2 Formal Investigation

If a formal investigation is required, an investigation team will be appointed, which may include internal audit, legal, and HR representatives.

The investigation shall be carried out by, and reported to, personnel who are not part

of the role or function being investigated. FHKI can appoint a business associate to conduct the investgiation and report the results to personnel who are not part of the role or function being investigated.

ABMR shall empower and enable invesigators and require co-operation in the investigation by relevant personnel, and could seek for Director-General's help if necessary.

During and after conducting the investigation impartially and comprehensively, with all relevant evidence considered, the investigation team shall report the status and results of the investigation to ABMR.

ABMR shall take appropriate action in the event that the investigation reveals any bribery, or violation of the anti-bribery policy or IMS, including the issue of Corrective Action Report according to section 10.1 Nonconformity and corrective action in the IMS Manual.

All investigation shall be carried out confidentially and the outputs of the investigation shall be kept as confidential records.

6.3 Conclusion and Reporting

Upon completion of the investigation, a report will be prepared summarizing the findings, conclusions, and any recommended actions.

The final report will be submitted to the senior management and, if necessary, Director-General or General Committee.

Formal reply will be sent to the reporter within 3 working days after investigation completed.

7. Protection Against Retaliation

FHKI strictly prohibits retaliation against anyone who reports a suspected violation in good faith. Any employee who retaliates against a whistleblower will face disciplinary action, up to and including termination.

8. Record Keeping

All reports of suspected violations and the outcomes of investigations will be documented and retained for a minimum of five years.

Documentation will include the initial report, investigation notes, findings, and any corrective actions taken.