

Chia Tai Enterprises International Limited

(Incorporated in Bermuda with limited liability)

(Stock Code: 3839)

(the “Company”, together with its subsidiaries, the “Group”)

Anti-corruption Policy

(adopted by the board (the “Board”) of directors (the “Directors”) of the Company on 10 August 2022)

1. Purpose

The Group is committed to doing business with integrity. The Company adopts a zero-tolerance policy on fraud, bribery and corruption across the operations of the Group.

This Policy aims to guide all directors, officers and employees (collectively, the “Employees”) of the Group to recognize the circumstances which may lead to or give the appearance of corruption or unethical business conduct, avoid prohibited conduct, and comply with the applicable anti-corruption laws, rules and regulations.

2. Scope

This Policy applies to all Employees. External parties doing businesses with the Group and those acting in an agency or fiduciary capacity on behalf of the Group are encouraged to abide by the principles of this Policy.

All Employees are required to comply with this Policy, as well as any additional requirements set by their employing company or by all applicable anti-corruption laws, rules and regulations in the jurisdiction in which the employing company operates.

Any Employee who breaches this Policy will result in disciplinary actions which may include termination of employment and also may result in criminal and civil penalties for the violations of any anti-corruption laws, rules and regulations.

3. Role and Responsibility

The Board is responsible for monitoring the implementation of this Policy.

Management of the Company is responsible for the implementation and promotion of this Policy.

Internal Audit Department of the Company is responsible for identification and assessment of corruption risks, recommendation of controls to mitigate the risks, monitoring and investigation of suspected fraudulent or bribery activities, and reporting to the Audit Committee of the Company.

4. Prohibition on Improper Payments, Kickbacks and Other Forms of Bribery

All Employees are prohibited from:

- a. offering, promising, giving or authorizing, directly or indirectly, any bribe, kickback, facilitation payment or advantage to or for the benefit of any person, for the purpose of obtaining business or other benefit for the Group, for themselves, or for anyone else;

- b. soliciting, accepting or receiving, directly or indirectly, any bribe, kickback, facilitation payment or advantage from any person in return for providing any business or benefit;
- c. using illegal or improper means (including bribes, favors, blackmail, financial payments, inducements, secret commissions, loans and other advantages) to influence the actions of others; and
- d. acting as an intermediary for a third party in the solicitation, acceptance, payment or offer of a bribe or kickback.

In addition, all Employees should exercise reasonable judgement in assessing whether any arrangement could be perceived to be corrupt, illegal or otherwise inappropriate.

All Employees should avoid having any conflicts of interest (i.e., a situation in which an Employee is in a position to derive personal benefit from the actions or decisions that they are making in their professional capacity) in carrying out the Group's businesses and if any conflicts of interest arise, declarations of interest are required.

5. Gifts and Hospitality (“Business Courtesies”)

Business Courtesies must be conducted in compliance with the following principles:

- a. they must be reasonable and not excessive;
- b. they must be in line with common business practice;
- c. they must not be used for influencing someone's decision-making;
- d. they must not be used for soliciting any benefits in return; and
- e. they must not violate any internal policies and procedures of the Group, and any applicable laws, rules and regulations in jurisdictions in which the Group operates.

6. Charitable Donations and Contributions

Charitable donations and contributions must be legal and ethical under applicable laws and practices and approved by senior management of the Group. It should be made directly to an official entity and be able to be disclosed publicly when required to.

7. Customers

The Company is committed to protecting itself from being used as an intermediary in money laundering process and funding illegal business.

Group companies should establish and perform customer risk management, under which Group companies are required to verify customers' identities by know-your-customer and customer due diligence processes before establishing business relations with customers. Group companies are required to retain customer information and make updates periodically. Based on the customer information, Group companies should assess and prioritize customer risk and place appropriate controls to mitigate any potential risks.

Every Employee has a duty to report any suspected money laundering or illegal funding activities according to the whistleblowing policy of the Company.

8. Suppliers and Business Partners

Suppliers and business partners are encouraged to operate with the same ethical standards and quality requirements to which the Group upholds. The Group conducts its procurement in a fair and transparent manner and our Employees should act with due care and diligence when evaluating contractors and suppliers. Proper measures will be taken should these suppliers or business partners be found to be in breach of laws and regulations.

9. Third Party Representatives

Third party representatives refer to the external parties acting in an agency or fiduciary capacity on behalf of any Group companies. To minimize the risk of them engaging in inappropriate conduct, Group companies should:

- a. act in due care and diligence in selecting third party representatives;
- b. ensure that third party representatives are aware of and are encouraged to abide by the principles of this Policy;
- c. follow the recruitment policies and procedures of the Group to make appointments or engagements with third party representatives; and
- d. keep all payment records related to third party representatives.

10. Training

The Company will make this Policy available for every Employee and trainings are available to help every Employee, in particular to those Employees who are likely to be exposed to risks of any forms of corruption, to understand how to recognize and deal with the circumstances which may lead to or give the appearance of any forms of corruption.

11. Reporting

Every Employee has a duty to report any potential violations of this Policy. The Company has established a whistleblowing policy, in which confidential reporting channels and procedures are provided for whistleblowers, both internal and external persons, to report any actual or suspected improprieties associated with the Group.

12. Review

The Board will review this Policy from time to time, as appropriate, and approve any revisions that may be desired.

13. Disclosure of Policy

This Policy may be disclosed in such manner as the Board considers appropriate and in compliance with any applicable regulatory requirements or guidelines.