 CONCEPT4	Anti - corruption Policy – External 反腐败政策（外部文件）						
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Anti - corruption Policy - External

Dear suppliers,

We would like to thank each supplier for your constant support and assistance to our company from the outset. It is with much credit to you all that both you and we have been able to achieve good, consistent development. We hope that all suppliers focusing on product development and quality, eliminating or limiting the negative impacts of price increases due to rising raw material and labor costs as far as possible, thereby ensuring we can all survive in the market and attain even greater development.

Concept 4 Ltd service aims have always been professional and strict levels of service, demonstrating honesty and integrity. Purchasing, audit, and inspection staffs are all subject to restrictions under our Anti-bribery and Corruption Policy. In order to protect both your company's and Concept 4 Ltd's corporate image, guarantee fairness in sourcing, purchase, audit, and inspection, as well as avoid conflicts of interest (especially commercial bribery) and the ensuing legal liabilities, we take this opportunity to solemnly make this declaration to all suppliers:

1. All Concept 4 Ltd employees do not form any ties of interest with suppliers which could jeopardize fair decisions, and we therefore kindly request that each supplier provide all the departments with a fair and independent environment.
2. We hope each supplier will fully comply with our company's quality inspection and factory audit and respect the neutrality of our audit/inspection staff, so a standard decision can be issued based on the results of our inspection, and the decision outcome not to be influenced in any way whatsoever by external factors or any third party.
3. Our company does not respond to any attempts by suppliers (i.e. commercial bribery) to interfere with our purchasing/audit/inspection staff's conduct through any improper method. If discovered, in compliance with company regulations, our company will immediately blacklist this supplier and pursue compensation.
4. Our company also requires that purchasing/audit/inspection staff follow principles of fairness, transparency and corporate responsibility, and carry out purchasing /inspection in strict compliance with company regulations. If any illegal conduct among purchasing/audit/inspection staff comes to light, including the acceptance of cash, monetary reward, material or any other

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benefit, our company will enact severe penalties to prevent incidents arising.

We hope all suppliers will adhere to this policy and supervise its implementation, so that together we may nurture a fair and equitable purchasing, audit and inspection environment.

Should you have any doubts or objections, or would you like to report an irregular incident, please contact our company immediately by one of the following methods:

E-mail address for Complaints: c4-anti-corruption@concept4.net

Telephone number for Complaints: (852) 2533 6513

Contact Person : Ms. Winnie Chow


Regards,

Concept 4 Ltd



Winnie Chow

Sr. Director of Operations, Supply Chain

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Anti - Corruption Policy Acknowledgement Slip

Supplier name: _____


Supplier address: _____

Our company acknowledges that we have received a copy of your company’s (Concept 4 Ltd’s) Anti - Corruption Policy and confirm:

- Our company will not allow any member of staff to commit acts of bribery and corruption. We will fully cooperate with Concept 4 Ltd Anti-bribery and Corruption Policy.

Our company acknowledges that Act 164 of the Criminal Law of the People’s Republic of China stipulates that bribing Concept 4 Ltd staff for improper benefit or any such purpose by way of gifts, kickbacks, etc. constitutes a criminal act of commercial bribery as provided for by law, and any person so doing will be liable to face legal charges.

Company (most senior manager) name:		Date:	
Company (most senior manager) signature:		Stamp:	

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反腐败政策（外部文件）

亲爱的供应商，

我们要感谢每一位供应商对我们公司的不断支持和帮助。这是全赖互相信任以至能够达到良好及持续发展的营商环境。我们希望所有的供应商专注于产品开发和质量，消除或限制由于原材料和劳动力成本上涨引致的价格负面影响，从而确保我们都能在市场上取得更大的发展。

思方国际有限公司的服务宗旨是一直保持敬业精神和严谨的服务水平，展现诚实和正直。采购，审计和检查的员工都须遵守我们的反贿赂和腐败政策的限制。为了保护贵公司 and 思方国际有限公司的企业形象，保证公平采购，购买，审计和检查，以及避免利益冲突（特别是商业贿赂），以及随之而来的法律责任，我们借此机会郑重对所有供应商作出声明：

1. 本公司所有员工不可与供应商构成任何利益关系而招致可能危及公正的决定，因此，我们恳请各供应商支持我们所有部门，为持独立与公正的营商环境。
2. 我们希望每一位供应商完全配合我们公司的质量检验和工厂审查，并尊重我们的审计/检验人员的中立性，因此我们可以根据的检查结果作出标准的决定，这结果并不被任何因素或第三方的影响。
3. 本公司并不受供应商的任何干扰（即商业贿赂）通过任何不正当方式对我们的采购/审计/检验人员作出干扰的行为。如发现，本公司根据公司章程规定，将供货商立即列入黑名单和追溯补偿。
4. 本公司还要求采购/审计/巡查人员遵循公平原则，透明和企业责任，严格遵守公司的规定。如果发现其中采购/审计/检查人员有任何违法的行为，其中包括现金，金钱奖励，材料或任何其他利益的验收，公司将制定严厉的惩罚，以防止产生事故。

我们希望所有供应商都会坚持这政策，并监管措施，使我们共同培育公平公正的采购，审计和检查环境。

如果您有任何疑问或异议，或者你想举报异常的事件，请通过以下其中一个方法，立即与本公司联系：

电子邮件（投诉）：c4-anti-corruption@concept4.net
 电话号码（投诉）：(852) 2533 6513
 联络人：Ms. Winnie Chow

思方国际有限公司



 高级运营总监

反腐败政策确认

供应商名称：_____

供应商地址：_____

本公司确认我们已收到贵公司（思方国际有限公司）的反腐败的政策副本和确认：

本公司将不会允许任何工作人员触犯贿赂和腐败行为。我们将与思方国际有限公司为反贿赂和腐败政策充分合作。

公司确认中华人民共和国刑法 164 条规定，贿赂思方国际有限公司员工工作不正当利益或以赠品的的方式达到任何目的，回扣等构成商业贿赂的犯罪行为,任何人这样做会面临法律指控。

公司（最高级经理）名称：:		日期：:	
公司（最高级经理）签字：		盖章：	