



CONCEPT4

Anti - Corruption Management Procedures - Internal

反腐败管理程序(内部文件)

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Anti - Corruption Management Procedures - Internal

Aim

- To prevent corrupt abuse of power among Concept 4 Ltd employees during contact with suppliers in the form of either offering, accepting bribes or fraud money laundering, to ensure suppliers operate properly, to protect fair competition, to regulate commercial activity and prevent acts of bribery occurring. Furthermore, to ensure that all Concept 4 Ltd employees are granted their lawful rights and reasonable safeguards.

Definition

- Commercial bribery is to commit an act of unfair competition in an aim to gain business opportunity, by offering kickbacks, reimbursement of promotional expenses, business expenses or other, providing domestic or international travel etc., directly or indirectly paying for various expenses, giving cash, material goods or other benefits.

- Fraud Money laundering is the act of concealing the transformation of profits from illegal activities and corruption into ostensibly legitimate assets

Scope of application

- All Concept 4 Ltd employees who have external contact in the course of their activities. This includes administration, design, human resources, IT, finance, factory inspection, logistic, merchandising, product development, product testing, quality assurance and sourcing department etc.

Obligation

- Management is responsible for dealing with and reporting on instances of Concept 4 Ltd staff coming into contact with bribery.

- Department manager is responsible to monitor the team on abnormal business connections / activities with specific supplier.

- Human Resources department is responsible to organize relevant training to all staffs regarding Code of Conduct / Anti-corruption

Work procedure

- All staff must gain familiarity with commercial bribery law, anti-money laundering and develop their understanding of corporate law and legal principles.

- Anti-corruption/anti-bribery management procedures and restrictions must be established, and supervisory measures implemented. Supervisory measures must be developed and policies of transparency implemented, instilling truly open and fair practices.

- All employees are forbidden from any of the following during contact with suppliers:

- Accepting cash or items from suppliers in violation of the rules; all staff must seek special approval for any individual gifts valued at over HK\$300.00 or number of gifts given or received in a 12 month period from the same individual or company etc that are valued in aggregate at over HK\$500.00
- Enjoying entertainment (Karaoke, birthday parties etc.), travel, or any such activities offered in violation of the rules;
- Accepting various membership cards, consumer tokens (vouchers), shopping tokens (vouchers) or any other kind of securities in violation of the rules;
- Accepting shares or dividends in violation of the rules;
- Gambling with supplier colleagues, accepting financial or other benefits in violation of the rules;
- Anti-money laundering, other violations of the law or statutory obligations.

We hope all employees will adhere to this policy and self monitor 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 the appointed independent personnel.

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

Anti - Corruption Policy Acknowledgement

Employee name: _____

Employee position: _____

I hereby acknowledge receipt of a copy of the Anti - corruption Policy, and I fully understand and accept the restrictions under Anti - corruption Policy. I promise to observe company regulations, and avoid acting in any conflict of interest with suppliers whatsoever.

Should the company discover that I have committed any act of corruption or bribery, suspect of bribery or mis-conduct, I shall willingly accept the company's disciplinary measures included immediate termination without compensation and assume liability under the country's laws.

Employee signature: _____

Date: _____



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反腐败管理程序(内部文件)

目的

- 为防止思方国际有限公司的员工在接触供应商的过程中，滥用职权，提供或接受任何形式的贿赂、贪污或欺诈洗钱，以确保供应商运作妥善，维护公平竞争，规范商业活动并防止发生贿赂的行为。此外，确保所有思方国际有限公司的员工授予合法的权益和合理的保障。

定义

- 商业贿赂是进行不公平的竞争行为，透过提供回扣、推广费用报销、营业费、提供国内或国际旅行等，直接或间接支付各种费用，给予现金、物质或者其他好处。目的是获取商业机会。
- 欺诈洗钱是指将利润从非法活动和腐败转化为表面上合法的资产的行爲

适用范围

- 所有需要与外部联系及进行商业活动的思方国际有限公司的员工。这包括行政管理，设计，人力资源，信息管理，财政，出厂检验，物流，业务，产品开发，产品测试，质量保证和采购部门等。

义务

- 管理层是负责处理和汇报思方国际有限公司的员工有关受贿的事宜。
- 部门经理负责监督团队与供应商在业务的异常事宜。
- 人力资源部负责安排员工相关行为/反腐败的培训。

工作程序

- 所有的员工必须熟悉商业贿赂法，反洗钱，并理解企业的法律和法律原则。
- 必须建立反腐败/反贿赂管理程序和限制，实施监管措施。必须落实制定监管措施和透明的政策，灌输确实开放和公平的做法。
- 在与供应商接触过程中，所有员工禁止任何以下行为：
 - 接受从供应商的现金或物品而违反规则。思方国际有限公司的员工如接受或给予任何礼品价值超过港币 300.00 给同一个人/公司或在过去 12 个月内接受或给予任何品总价值超过港币 500.00 给同一个人/公司，员工必须寻求特别批准
 - 娱乐享受（卡拉 OK，生日派对等），旅游，或者任何此类活动提供而违反规则；
 - 接受各种会籍卡，消费代币（券），购物代币（券）或任何其他类型的证券而违反规则；
 - 接受股份或分红而违反规则；
 - 与供应商的同事赌博，接受财务或其它利益而违反规则；
 - 反洗钱及其它违反法律或法定责任。

我們希望全體員工堅持這政策，執行自我監督，這樣大家便可以培育一個公平和公正的採購，審計和檢查環境。

如果您有任何疑問或異議，或者你想舉報異常的事件，請聯繫指定的獨立人員。

电子邮件（投诉）：c4-anti-corruption@concept4.net

反腐败政策确认

员工姓名： _____

员工职位： _____

我在此确认收到反腐败的政策副本，我完全明白并接受反腐败政策限制。我承诺遵守公司的规定，并避免与供应商有任何利益冲突。

如果公司怀疑或发现我触犯了贪污或贿赂的不当行为，我愿意接受公司的纪律处分包括即时终止而不须任何补偿，并承担在该国的法律责任。

员工签名： _____

日期： _____