

**Integrity Management Policy**

**SHUN HING ENGINEERING CONTRACTING CO., LTD. (SHECON)** prohibits all forms of bribery and corruption and is committed to integrity, honesty and anti-corruption practices in doing business. All directors and staff (hereafter referred as "personnel") must abide by this integrity policy and the associated company rules / guidelines / code of conduct.

- Our Company and all personnel have to observe the Prevention of Bribery Ordinance (Cap. 201), the Competition Ordinance (Cap. 619) and other integrity-related laws in Hong Kong Special Administrative Region.
- Our Company does not allow our personnel to solicit or accept any advantages<sup>1</sup> from any individuals or organisations having business dealings with our Company unless permission is granted for the acceptance, and such permission shall be in line with anti-corruption and integrity principles.
- Our Company prohibits all personnel from offering advantages to any staff or member of a government department or public body while having dealings of any kind with them. We also prohibit all personnel from offering advantages to any individual of organisations, whether directly or indirectly, for influencing them in any dealing, when conducting business with our Company.
- Our Company's personnel are required to avoid accepting lavish or frequent entertainment from others having business dealings with our Company.
- Our Company requires all personnel to avoid any conflict of interest situation, or the perception of such. If unavoidable, the personnel concerned should make a declaration to the approving authority who should decide on actions for mitigating the conflict.
- Our Company prohibits all personnel from disclosing any classified information without authorisation, and misusing any information of our Company or clients.
- Our Company has an internal reporting mechanism for our personnel to enquire matters relating to integrity and report possible breaches of integrity requirements. Our Company handles these reports promptly, prudently and in strict confidence.
- Our Company strictly forbids retaliation against any personnel who, in good faith, reports possible breaches of integrity requirements or who participates in the inquiry / investigation of the allegation.
- Any personnel in breach of integrity requirements will be subject to internal disciplinary action, including termination of appointment and / or referral to relevant law enforcement agencies. Our Company will render full assistance to law enforcement agencies in the investigation of criminal offences.
- Our Company is committed to partner with ethical business counterparts / entities / organisations who share the same value and commit to the same integrity standard.

Managing Director (K.C. Ma):

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Date: 1st June, 2023

<sup>1</sup> Advantage is defined under the Prevention of Bribery Ordinance (Cap. 201) covering any gift, loan, fee, reward, commission, office, employment contract, discharge from obligation/liability/loan, service and favour, exercise or forbearance from exercise of right/power/duty, etc.