



# CCT FORTIS HOLDINGS LIMITED ( 中 建 富 通 集 團 有 限 公 司 )

*(Incorporated in the Cayman Islands and continued in Bermuda with limited liability)*

(Stock Code: 00138)  
(the “**Company**”)

## **ANTI-CORRUPTION AND BRIBERY POLICY (the “**Policy**”)**

### **INTRODUCTION**

CCT Fortis Holdings Limited (the “**Company**”) and its subsidiaries (collectively, the “**Group**”) is committed to upholding high standards of business integrity, honesty and transparency in all its business dealings. The Company strictly prohibits any form of corruption or bribery, and is committed to the prevention, deterrence, detection and investigation of all forms of corruption and bribery.

### **SCOPE**

This Policy applies to all directors, officers and employees (includes temporary and contract staffs, the “**Employees**”) of the Group, and joint ventures or companies in which the Group holds a controlling interest. We encourage all our business partners, including joint venture partners, associated companies, contractors and suppliers to abide by the principles of this Policy.

Corruption and bribery include any illicit advantage offered or accepted as an inducement to or a reward for performing or abstaining from performing any duties. Items considered bribes include cash, cash equivalents, loans, commissions, benefits in kind or other advantages, but excluding traditional gifts of nominal value given during festive seasons. In this Policy, the following words shall have the meanings as set out in “*Appendix I*” to this Policy.

- (i) advantage
- (ii) bribery
- (iii) corruption
- (iv) hospitality
- (v) kickback

## **Bribery and corruption**

Employees are expected to comply with all applicable laws, rules and regulations in relation to anti-corruption and bribery, and adhere to the following:

- no acceptance of improper payments, kickbacks and other forms of bribery;
- no payment, offer, solicitation, proposal of terms for, or acceptance of, bribes directly or with the assistance of any organisation or individual;
- no attempt to circumvent any anti-corruption and bribery provisions through the use of agents, partners, contractors, family members or any others acting on someone's behalf;
- no offer or acceptance of any gift, gratuity or hospitality that might be perceived to unfairly influence a business relationship; and
- no acceptance of lavish or frequent entertainment from persons with whom the Group has business dealings if, by doing so, it might be perceived that the employees are placing themselves in a position of obligation to the offeror.

As well as complying strictly with the provisions in this Policy, Employees must exercise common sense and judgment in assessing whether any arrangement could be perceived to be corrupt or otherwise inappropriate.

## **Donation and sponsorship**

- The Group shall only make contributions to programmes, which have a positive impact on community development, are commensurate with the Group's values and sustainability strategy.
- All donations or sponsorships must be legal and ethical under applicable laws and practices and approved by the senior management of the Company. The Company shall keep proper records of such donations or sponsorships for inspection by regulatory authorities.
- Employees shall avoid making contributions or sponsorships, whether charitable in nature or otherwise, on behalf of the Group to organisations or entities that may be considered as disguised vehicles or arrangements for obtaining bribes or corrupt payments. Care must be taken to ensure that such activities do not create, or appear to create, an improper advantage to any party.
- Any forms of political donations are expected not to make.

## **Reporting**

Every employee has a duty to report any potential violations of this Policy and any employee who receives an offer of bribery must immediately report to his/her immediate supervisor and/or the Internal Auditors of the Company (pursuant to the Whistleblowing Policy of the Group).

This Policy should be read in conjunction with the Group's Whistleblowing Policy of which provides a guidance for Employees and those who deal with the Group to raise concerns on any suspected impropriety, misconduct or malpractice through confidential reporting channels. This Policy shall continue to be posted to the Company's website for adherence.

## **Review of this Policy**

The audit committee of the Company will review this Policy from time to time as appropriate, and in any event, once every three years for completeness and accuracy.

*Adopted on 29 March 2023*

*Encl.: Appendix 1*

**“advantage”** shall mean paying or giving anything of value directly or indirectly, or any other action, such as any office, employment or contract; any payment or discharge of any loan or other liability; any other service or favour; the exercise or forbearance from the exercise of any right or any power or duty; and any offer, undertaking or promise.

**“bribes”** shall mean anything of value given in an attempt to affect a person’s actions or decisions in order to gain or retain a business advantage; and

shall involves giving or offering to give any advantage, directly or indirectly, to a public servant (i.e. officers, members and employees of public bodies) or any employee of a company or other person connected with a business, as an inducement or reward for or otherwise on account of such person’s conduct in relation to the affairs of their employer or principal. It also involves soliciting or accepting bribes. Bribery usually occurs where a person offers advantages to another as an inducement or reward for the recipient’s improper performance of duties (usually to win or retain business or advantages), or where the recipient abuses his authority or position for personal gain. Bribery can also take place where the offer or payment is made by or through a third party.

**“Corruption”** shall mean dishonest or fraudulent conduct, typically involving bribery.

**“hospitality”** shall mean meals, receptions, tickets to entertainment, social or sports events.

**“kickback”** shall mean the return of a sum already paid or due as a reward for awarding further business.

*Note:*

Bribes and kickbacks can consist of anything of value (i.e. an “advantage”), including:

- gifts, excessive entertainment and hospitality, sponsored travel and accommodation;
- cash payments, whether by or to employees or business partners such as agents, finders, introducers or consultants;
- other favours provided by or to public officials, suppliers or customers, such as engaging a company owned by a member of a public official or customer’s family;
- free use of a company's services, facilities or property; and
- loans, loan guarantees or other extensions of credit on preferential terms, or other intangible forms of preferential treatment.