

7 October 2022

WONG'S KONG KING INTERNATIONAL (HOLDINGS) LIMITED

ANTI-CORRUPTION POLICY

1. ABOUT THIS POLICY

- 1.1 We are committed to ethical and anti-corruption business practices to protect our reputation, revenues, assets and information from fraud, corruption, deceit or related improper conduct by employees or third parties.
- 1.2 This Anti-Corruption Policy outlines our expectations and requirements relating to the prevention, detection, reporting and investigation of suspected fraud, corruption and other similar irregularities.
- 1.3 This policy is an integral part of our corporate governance framework. It supplements other corporate policies including our Whistleblowing Policy, and is supported by our Anti-corruption Code of Conduct.

2. WHO DOES THIS POLICY APPLY TO?

- 2.1 This policy has been adopted by Wong's Kong King International (Holdings) Limited (the Company or WKK or we) and its subsidiaries (the Group).
- 2.2 This policy applies to all employees, officers and consultants of the Group and to External Parties.
- 2.3 For the purpose of this policy, an External Party is anyone who is not one of our employees and deals with any member of the Group, such as customers, suppliers and contractors.
- 2.4 This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.
- 2.5 Fraud and corrupt practices can cover a wide range of activity. Examples of fraudulent or corrupt activity that may compromise our interests include, but are not limited to:
 - 2.5.1 Misrepresentation of our publicly released financial statements or other public disclosures;
 - 2.5.2 Misappropriation, skimming or theft of the Group's assets such as cash, inventory, equipment, supplies, etc.;
 - 2.5.3 Unlawfully obtained revenue and assets, or unlawful avoidance of costs and expenses;
 - 2.5.4 Bribery of a commercial party or bribery of that party's agent.
 - 2.5.5 Bribery of a government or public official (including a facilitation payment);
 - 2.5.6 Employees of the Group seeking or accepting from (or paying or offering to) suppliers or business partners, payments, kickbacks or gifts intended to influence business judgment, or which may appear to influence business judgment; or
 - 2.5.7 Fraudulent disbursement or reimbursement such as payment for a fictitious or inflated invoice, expense claim, or overtime claim.

3. POLICY STATEMENTS

- 3.1 We have zero tolerance of fraud and corruption of any form.
- 3.2 This policy is communicated to all levels of employees, officers and consultants of the Group. Suitable anti-fraud and counter-corruption training will be provided to all employees.
- 3.3 All employees should fully comply with the principles in this policy, other relevant corporate policies and procedures, and internal controls requirements.
- 3.4 Controls are designed and adapted to mitigate fraud risks.
- 3.5 WKK will conduct fraud risk assessments from time to time.

4. REPORTING AND RAISING CONCERNS

- 4.1 All employees should familiarize themselves with and comply with the Anti-corruption Code of Conduct which supports this policy and sets out the general principles under the Prevention of Bribery Ordinance. They should also familiarize themselves with all other risk management and internal control policies and guidelines.
- 4.2 All employees are responsible for resisting fraud and helping us defend against corrupt practices.
- 4.3 All employees and External Parties should report immediately any suspected cases of fraud, corruption or related misconduct, whether it is known who may be responsible for the fraud or how it may have occurred. Cases should be reported to your line manager or, if it is not appropriate to report to your line manager, directly and in confidence to the Chairman of the WKK Audit Committee as set out in our Whistleblowing Policy.
- 4.4 Any reported fraud and corruption cases will be reported to the WKK Audit Committee.

5. CONFIDENTIALITY

- 5.1 We will make every effort to keep all disclosures and identities of the employees and External Parties who make disclosures confidential. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.
- 5.2 Where required by law or regulatory obligations, we may have to refer the disclosure to the relevant authorities without prior notice to or consultation with you (e.g. in cases involving possible criminal offences).

6. INVESTIGATION AND OUTCOME

- 6.1 All reported cases of suspected fraud or corruption will be taken very seriously. An investigation will be conducted in line with the Whistleblowing Policy.

- 6.2 The Chairman of the WKK Audit Committee will be responsible for investigations and may delegate investigatory responsibility to any party. The investigating party will not be the subject of the disclosure, nor have been involved in the subject matter of the disclosure.
- 6.3 If the investigation finds that fraud, corruption or other criminal offences may exist, a report may be made to the relevant authorities.
- 6.4 Any employee found committing fraud or corruption will be subject to disciplinary action which may include summary dismissal.
- 6.5 Employees must not suffer any detrimental treatment as a result of raising a genuine concern. The protections set out in the Whistleblowing Policy shall apply.

7. APPROVALS

- 7.1 This policy has been approved by the WKK Audit Committee and is deemed to take effect from 1 January 2022.
- 7.2 The WKK Audit Committee is responsible for:
 - 7.2.1 the implementation and oversight of this policy;
 - 7.2.2 reviewing investigation reports, establishing remedial action (if required) and follow up action to ensure accountability; and
 - 7.2.3 periodic review of this policy and its associated mechanisms to improve their effectiveness and the confidence of employees and External Parties in the investigation processes; and
- 7.3 This policy (or a summary) will be published on the Company's website.

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