

Sample Integrity Policy

_____ (“Company”) prohibits all forms of bribery and corruption and is committed to integrity, honesty and anti-corruption practices in doing business. We will enhance the collaboration with government departments, regulatory authorities and other enterprises to jointly prevent and combat corruption, as well as strengthen the “integrity business” principle to co-build a clean business environment. All sole proprietor / partners / directors # and staff (hereafter referred as “personnel”), whether in Hong Kong or elsewhere, must abide by this integrity policy and the associated company rules / guidelines / code of conduct #.

1. 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 and regulations in Hong Kong Special Administrative Region. In addition, our Company and all personnel have to observe relevant laws and regulations in other jurisdictions.
2. Our Company is committed to implementing an effective integrity and compliance management system, fulfilling corresponding legal obligations, and upholding the highest standards of integrity.
3. Our Company does not allow our personnel to solicit or accept any advantages¹ 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’s personnel are required to avoid accepting lavish or frequent entertainment from others having business dealings with our Company.
4. 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.
5. 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.
6. Our Company prohibits all personnel from disclosing any classified information without authorisation, and misusing any information of our Company or clients.
7. 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, and conducts reviews of anti-corruption work in a timely manner.
8. Our Company establishes a whistle-blower protection mechanism, including 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.
9. 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.
10. Our Company is committed to partner with ethical business counterparts / entities / organisations who share the same value and commit to the same integrity standard. We also actively share anti-corruption experience and effective practices with other enterprises/institutions (including those in the Belt and Road countries), promote the spirit of integrity and the goal of sustainable development, and take collective actions to build a clean social environment.

¹ Advantage is defined under the Prevention of Bribery Ordinance (Cap. 201, Laws of Hong Kong) 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.

Signature(s) of Management Representative(s) : _____

Name(s) of Management Representative(s) : _____

Post Title(s) of Management Representative(s) : _____

Date : _____

delete as appropriate