

御佳控股有限公司
ROYAL DELUXE HOLDINGS LIMITED

Code of Conduct on Business Ethics

(CCBE)

(April 2016)

Code of Conduct on Business Ethics (CCBE)

Royal Deluxe Holdings Limited believes that fairness, honesty and integrity are important business assets of the Company; hence, all our employees must ensure the Company not to be impaired by fraud, disloyalty, corruption. The Code sets out guidelines to be complied by our employees during their carrying on the business activities, and performing their roles for possible situations. The Code is both applicable within and outside Hong Kong.

If employee breaches the Code, the Company will impose disciplinary action, including termination of employment. In some situations, it may also be guilty an offence under the Prevention of Bribery Ordinance.

1. Prevention of Bribery Ordinance

Any employee who, without the permission of employer, solicits or accepts any advantage in relation to his/her official capacity shall be guilty of an offence under the Chapter 9 of Prevention of Bribery Ordinance.

Under the Prevention of Bribery Ordinance, the term “advantage” is defined as cash, gift, loan, fee, reward, office, employment, contract, service and favour.

2. Soliciting an advantage

Employee and family member(s) of employee are prohibited from soliciting any advantage from any person or organization in connection with Company business, including customers, main contactors, subcontractors and suppliers or other employees.

3. Receiving an advantage or accepting a favour

Employee and family member(s) of employee are avoided to receive or accept any advantage from any person or organization in connection with Company business, including customers, main contactors, subcontractors and suppliers or other employees.

Where the advantage is voluntarily given, the employee may consider accepting only if:

- The acceptance will not influence your loyalty to the Company and your objectivity or induce you to act against the Company’s interest;

- You are able to openly discuss the acceptance without reservation, the acceptance could not lead to questions or complaints of bias or impropriety;
- The nature and the value of the advantage are such that refusal could be seen as unsociable or impolite, for example:
- Advertising promotional gift or traditional festival gift of value not exceeding HK\$200;
- Red Pocket Money (Chinese New Year) not exceeding HK\$100.

Additionally, the acceptance of free or discount services, such as decoration or relocation, etc., are also regarded as receiving an “advantage” under the Prevention of Bribery Ordinance. The employee should ensure there is no business relationship with the provider before accepting the advantage.

4. Conflicts of interest

Employees should not engage in business, investments or activities that might conflict or appear to conflict with the interests of the Company. Employee must declare any conflict of interest to the Company if conflict of interest will not avoid. Employee must declare to the executive director of the Company in written if employee or family member(s) of employee or close friend(s) of employee may have investment or carry on any competing business with the Company, or own an organization which has directly or indirectly dealing with the Company interest. All such declaration should be passed to Human Resource Department for handling.

5. Entertainment

Generally, employee should avoid to accept invitation from a person in connection with Company business. If it is impolite to decline such invitation, the employee might accept, and all entertainment should be reported to supervisor and obtained approval from the Company. The employee should turn down invitations to meals or entertainment that are luxurious in nature or frequent, so as to avoid embarrassment or loss of objectivity when conducting Company business.

6. Accepting a loan or relating assistant from customers, main contractors, subcontractors, suppliers or other employees

Employee or family member(s) of employee or close friend(s) of employee is prohibited from granting or guaranteeing loans to, or accepting a loan from customers, main contractors, subcontractors, supplies or other employees or

any individual or organization.

Additionally, employee or family member(s) of employee or close friend(s) of employee is also prohibited through the arrangement or assistance from customers, main contractors, subcontractors, supplies or other employee for having waiver, relief or settlement the obligation of loan or legal liability.

7. Gambling

The Company prohibits employees from gambling activities during on-duties or within the working area. Under any circumstance, employee does not engage in frequent and over high bet gambling with person(s) who dealing business with the Company. Or else in social occasions with customers, main contractors, subcontractors, suppliers or other employee which having gambling activities, employee exercise judgement the appropriateness, should drop out from high bet gambling, if having.

8. Outside Part-Time Work

Employees should devote themselves to the work for the Company. In particular circumstances, employee intend to work concurrently for other organization, no matter regular, irregular or on a consulting basis, the employee must seek the prior written approval from Executive Director, all the application should be submitted to Human Resource Department for handling.

9. Use of Company's name

Other than the Company, employee is not allowed to use the Company's name for other purpose. Misuse of Company's name is regarded as fraudulent conduct, connected employee will be indictment criminal.

10. Confidential information

In any circumstance, employee is not allowed to disclose any confidential information of the Company to any outsider. In addition, employees are not permitted to use the information obtained in their company's position to make their own or relatives' benefits, such as the use of inside information for the trading of shares of the Company.

Employees who are authorized to access or manage Company information must take adequate precautions to prevent such abuse or misuse.

11. Company property

The Company prohibits employees from taking or reselling Company property, including raw materials, finished goods, equipment and data information. If employee commits the offence, employment will be terminated immediately.

12. Company files and book of accounts

The Company is prohibited from making manipulation of accounts or providing fraudulent accounting records.

13. Respect of Intellectual property

The Company prohibits employees from unauthorized use of patents, such as technical know-how and ideas.

14. Compliance with the Code outside Hong Kong

Aforementioned Code is applicable both within and outside Hong Kong. Any employee who is dealing with the Company's business outside Hong Kong must comply with local laws, including anti-corruption and bribery laws and all other relevant laws and regulations.

15. Enquiry and complaint

If you have any queries about the Code, please contact your department head or Administrative and Human Resource Department. Complaints about violating the Code can be made to the Head of Administrative and Human Resources Department, all complaints will be dealt with as soon as possible and fairly.

16. Review of Code

The Code will be reviewed and revised at any time in response to the necessary.

16th March, 2017