

HONG KONG EXPRESS AIRWAYS LIMITED EXPECTATIONS OF BUSINESS PARTNERS POLICY

1. Context and Purpose

- 1.1 Hong Kong Express is committed to acting with integrity in how we conduct our business. Bribery and corruption hinder economic growth by confounding market principles, and the victims are individuals and businesses that rely on the sustainable growth for their physical and social well-being. For these reasons, Hong Kong Express does not countenance bribery or corruption in any form.
- 1.2 In addition, Hong Kong Express is subject to local laws that prohibit bribery and corruption and that requires us to take certain steps to prevent bribery within Hong Kong Express and by its business partners. The consequences of any violation of these laws can be severe, including unlimited fines for Hong Kong Express and imprisonment of the individuals involved and their managers. Moreover, failures to follow applicable laws can result in irreparable damage to Hong Kong Express’s brand and reputation.
- 1.3 Hong Kong Express endeavours to abide by both the spirit and letter of applicable laws wherever we operate. Hong Kong Express is committed to conducting its business with integrity and in compliance with the laws and regulations that govern its global business.
- 1.4 As part of that commitment, Hong Kong Express has introduced this Expectations of Business Partners Policy setting out the minimum standards which its business partners must follow (the Policy).

2. Policy

- 2.1 Hong Kong Express’ business partners have a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all their business dealings and relationships wherever they operate. Hong Kong Express’ business partners comply with all applicable anti-bribery laws in the jurisdictions which they do business.
- 2.2 Hong Kong Express’ business partners and their associated persons abide by all applicable anti-bribery laws in the jurisdictions which they operate when performing services for or on behalf of Hong Kong Express. An associated person of a business partner includes but not limited to agents, sub-contractors, intermediaries and other third parties acting for or on behalf of the business partner (**Associated Persons**).

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- 2.3 Hong Kong Express’ business partners and their Associated Persons have in place their own procedures aimed at ensuring compliance of the values contained in this Policy and all applicable anti-bribery laws in the jurisdictions which they operate.

3. Scope and Standard

- 3.1 Bribing is directly or indirectly, offering or paying, receiving or soliciting, anything of value in exchange for an improper advantage or the influence of the performance of a function or activity. Anything of value includes kickbacks, a financial advantage, or any other benefit, whether in cash or in kind, tangible or intangible (Anything of Value). Examples include: gifts, meals, entertainment, airline tickets or discounts, hospitality, travel vouchers, offers of employment or charitable contributions.
- 3.2 When performing services for or on behalf of Hong Kong Express, Hong Kong Express’ business partners and their Associated Persons will not:
- (a) offer or make any payments that are not for bona fide services or goods;
 - (b) attempt to induce any person (whether or not a government official) to perform a relevant function or activity improperly by offering or giving Anything of Value to her/him personally or to a family member, friend or business associate;
 - (c) attempt to influence the business decisions of any person (whether or not a government official) by offering or giving Anything of Value to her/him personally or to a family member, friend or business associate;
 - (d) accept or request Anything of Value for their personal benefit or the benefit of a family member, friend or business associate in exchange for giving preferential treatment to a business partner;
 - (e) make a “facilitation” or “grease” payment to a government official over and above any official fee or charge, to expedite a government action; or
 - (f) participate, encourage or otherwise facilitate any of the above actions by anyone other than him/herself.

4. Record Keeping and Monitoring

- 4.1 Hong Kong Express’ business partners and their Associated Persons must, in accordance with the relevant financial and internal controls, maintain all financial records in relation to their business with, for or on behalf of Hong Kong Express with strict accuracy and completeness, for a minimum of seven years (or a longer period if expressly required by Hong Kong Express).
- 4.2 Proper reporting should include clear written notation regarding the nature of Anything of Value accepted or offered; and identification of all recipients and/or participants of each expense made. No accounts shall be kept "off-book" to facilitate or conceal improper payments. No artificial, inaccurate, incomplete, false or misleading entries in the books, records, or accounts are permitted.