



China Fortune Holdings Limited

中國長遠控股有限公司*

(Incorporated in Bermuda with limited liability, carrying on business in H.K. as CFH Limited)

(Stock Code: 110)

(the “Company”)

Anti-corruption Policy

1. Purpose

1.1 The Company and its subsidiaries (collectively the “Group”) are committed to abiding by all laws and regulations or if necessary to exceeding them, to prevent corruption and bribery in all business dealings. This Policy provides information and guidance to our personnel on how to recognize and deal with bribery and corruption, and applies to all employees and contract workers of the Group.

2. Scope

2.1 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 set out below:

“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;

“hospitality” shall mean meals, receptions, tickets to entertainment, social or sports events; and

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

* *For identification purpose only*

3. Anti-Corruption and Bribery

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

- a) no acceptance of improper payments, kickbacks and other forms of bribery;
- b) no payment, offer, solicitation, proposal of terms for, or acceptance of, bribes directly or with the assistance of any organization or individual;
- c) 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;
- d) no offer or acceptance of any gift, gratuity or hospitality that might be perceived to unfairly influence a business relationship; and
- e) 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.

3.2 Charitable Contributions

The Group participates in charitable activities and encourages employees to do the same, under circumstances that comply with applicable laws and regulations. Charitable contributions should never be made to influence any business decision.

4. Training

4.1 The Company Secretary should arrange regular training to Directors and Relevant Staff on anti-corruption.

5. Reporting

5.1 Every employee has a duty to report any potential violations of this Policy and employee who receives an offer of bribery must immediately report to his/her supervisor.

6. Approval and Review of this Policy

6.1 This Policy has been approved by the Board. The Company shall review this Policy from time to time as appropriate. Any subsequent amendment of this Policy shall be reviewed and approved by the Board.

January 2022