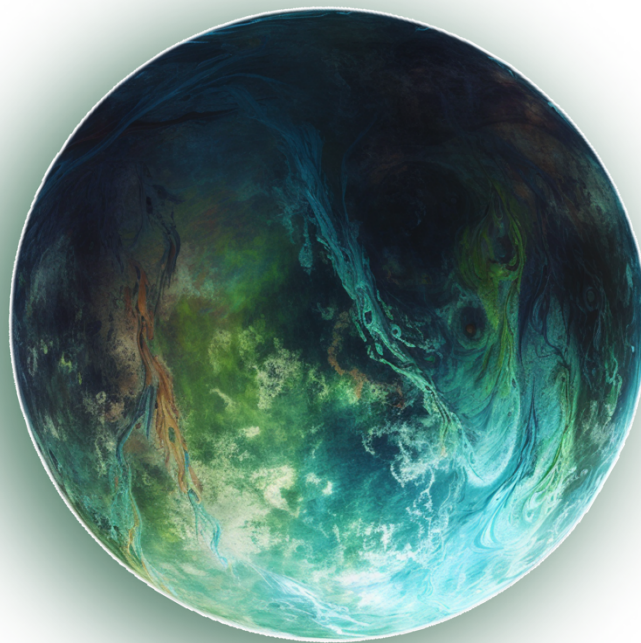


RMG FZC

Anti Bribery & Corruption Policy



RMG FZC LIMITED
Hong Kong SAR, China

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1. Introduction

Bribery, whether committed in Hong Kong SAR or in another jurisdiction, is a criminal offence under the Prevention of Bribery Ordinance (Cap. 201) of Hong Kong SAR. RMG FZC takes a zero-tolerance approach to bribery and corruption. RMG FZC and all its personnel are committed to acting professionally, fairly, and with integrity when conducting business dealings and establishing business relationships both within Hong Kong SAR and other jurisdictions we operate in. Principle 1 of the FCA's Principles of Business (POBs) sets out a requirement for firms to conduct their business with integrity, and RMG FZC has therefore established effective systems and controls as outlined within this policy to counter bribery and corruption.

2. Document purpose

The purpose of this policy is to set out RMG FZC's position in relation to bribery and corruption. Compliance with this policy is mandatory for all employees and contractors. The policy provides information and guidance on how to recognize and deal with bribery and corruption in line with legislative and regulatory requirements, responsibilities for compliance with this policy, and applicable penalties for non-compliance.

3. Objectives

The objectives of RMG FZC's Anti-Bribery and Corruption policy are to:

- Ensure compliance with the Prevention of Bribery Ordinance (Cap. 201) of Hong Kong SAR and set out our zero-tolerance of any form of bribery and corruption.
- Inform all personnel of their individual responsibilities and penalties which can be applied if they are found guilty of committing any act of bribery and corruption.

4. Scope

This policy is applicable to all RMG FZC activities including those outsourced to third parties. RMG FZC may share this policy with selected clients and partners, and in some instances, they may also be contractually obliged to adhere to it. This policy is not intended to prohibit appropriate provision of hospitality, gifts, or entertainment which complies with our gifts, hospitality, and expenses limits & procedures as set out herein.

5. Non-compliance with this policy

If you discover a breach of this policy, you must report it immediately to the Head of Risk & Compliance.

6. Governance and review of this policy

The owner of this policy is the Head of Risk & Compliance. It will be subject to periodic

reviews taking into account various factors including regulatory changes, adjustments to RMG FZC's business model, market intelligence, and industry standards.

7. What is bribery

Bribery is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions or to reward them for acting improperly, or where the recipient would act improperly by accepting the bribery offer.

8. What is corruption

Corruption is the abuse of entrusted power or position for private gain.

9. Examples of bribery

- Giving, promising to give, or offering a payment, gift, or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- Giving or accepting a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome.
- Accepting a payment, gift, or hospitality from a third party that you know or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return.
- Accepting hospitality from a third party that is unduly lavish or extravagant under the circumstances.
- Offering or accepting a gift to or from government officials or representatives, politicians, or political parties without prior approval.
- Threatening or retaliating against another individual who has refused to commit a bribery offence or who has raised concerns.
- Engaging in any other activity that might lead to a breach of this policy.

10. Receiving a bribe

A supplier gives your nephew a job but makes it clear that in return they expect you to use your influence in RMG FZC to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer and would certainly be one if you were to accept it, as you would be doing so to gain a personal advantage.

11. Bribing a foreign official

You arrange for the business to pay an additional "facilitation" payment to a foreign official to speed up an administrative process, such as clearing RMG FZC's goods through customs.

The offence of bribing a foreign public official is committed as soon as the offer is made, as you were seeking to gain a business advantage. Both you, the individual, and our company may be found to have committed an offence. Facilitation payments and kickbacks

RMG FZC and its employees, including contractors, will not make or accept facilitation payments or "kick-backs" of any kind. These are also known as "back-handers" or "grease payments" and are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example, by a government official). They are not common in Hong Kong SAR but are in some other jurisdictions.

12. Gifts, hospitality and expenses

This policy allows reasonable and appropriate hospitality or entertainment to be given to or received from third parties, for the purposes of:

- Establishing or maintaining good business relationships.
- Improving or maintaining our image or reputation.
- Marketing or presenting our products and/or services.

The giving and accepting of gifts is allowed if the following requirements are met:

- They are not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage.
- The gift is given in our name, not an employee's personal name.
- It does not include cash or a cash equivalent (such as gift certificates or vouchers).
- It is appropriate in the circumstances, taking account of the reason for the gift, its timing, and value—for example, in Hong Kong SAR, it is customary for small gifts to be given at Chinese New Year.
- The gift is given openly, not secretly, and it complies with any applicable local law.

13. Approval of gifts hospitality and expenses

All RMG FZC employees, including contractors, are required to notify the compliance team if the value of the gift meets the recording requirements outlined in the table found below.

- This is achieved by emailing compliance@rmgfzc.co detailing the gift or entertainment being offered, with accompanying management approval where applicable. This should be completed before accepting the gift or hospitality.
- All approved gift and hospitality offers will be registered in RMG FZC's Gift and Entertainment log.

14. Gifts & hospitality approval limits

Monetary Value	Action
Less than HKD 500	No requirement to log or seek approval

HKD 500 - HKD 1,000	No approval required – notification must be sent to compliance in a timely manner.
HKD 1,000 - HKD 2,500	Approval required – notification must be sent to compliance in a timely manner with line manager approval BEFORE gift or hospitality offered or accepted.
More than HKD 2,500	Seek approval directly from the Head of Compliance, which must be received before acceptance.

Promotional gifts of low value such as branded stationery to or from existing customers, suppliers, and business partners will usually be acceptable.

Reimbursing a third party's expenses or accepting an offer to reimburse our expenses (for example, the costs of attending a business meeting) would not usually amount to bribery - however a payment in excess of genuine and reasonable costs (such as that of an extended hotel stay) is not acceptable.

We appreciate that practice varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift, hospitality, or payment is reasonable and justifiable, with it always being necessary to consider the underlying intention behind it.

15. Donations

We do not make contributions to political parties and may only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Head of Risk & Compliance.

16. Your responsibilities

You must ensure that you read, understand, and comply with this policy. The prevention, detection, and reporting of bribery and other forms of corruption is the responsibility of all those working for RMG FZC or under our control, and you are required to avoid any activity that might lead to or suggest a breach of this policy.

You must notify the Head of Risk & Compliance as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

17. How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage. If you are offered a bribe or are asked to make one, or if you believe or suspect that any bribery, corruption, or other breach of this policy has occurred or may occur, you must notify the Head of Risk & Compliance as soon as possible.

If you are unsure about whether a particular act or interaction constitutes bribery or corruption, make sure to raise it immediately with the Head of Risk & Compliance.

18. Record keeping

We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties

You must declare and keep a written record of all gifts or hospitality given or received, which will be subject to managerial review and submit any expenses claims relating to gifts, hospitality or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

19. Protection

Individuals who refuse to accept or offer a bribe or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to participate in an act of bribery or corruption, or because they reported in good faith their suspicion that an actual or potential act of bribery or corruption offence may have taken place or might in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Head of Risk & Compliance immediately and if the matter is not remedied, raise it formally with the CEO.

20. Training and communication

Training covering Anti-Bribery and Corruption forms part of the induction process for all individuals who work for us, and this is updated on a regular basis no less than annually or as necessary.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

21. Potential risk scenarios: "red flags"

The following is a list of possible red flags that may arise during the course of your work for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only. If you encounter any of these red flags while working for us, you must report them promptly to the Head of Risk & Compliance:

- You become aware that a third party engages in, or has been accused of engaging in, improper business practices.
- You learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials.
- A third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for RMG FZC.
- A third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
- A third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business.
- A third party requests an unexpected additional fee or commission to "facilitate" a service.
- A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services.
- A third party requests that a payment is made to "overlook" potential legal violations.
- A third party requests that you provide employment or some other advantage to a friend or relative.
- You receive an invoice from a third party that appears to be non-standard or customised.
- A third party insists on the use of side letters or refuses to put terms agreed in writing.
- You notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided.
- A third party requests or requires the use of an agent, intermediary, consultant, distributor, or supplier that is not typically used by or known to us.
- You are offered an unusually generous gift or offered lavish hospitality by a third party.

22. Penalties

Any individual found guilty of an offence under section 2.3 may be liable to the following penalties: Conviction to imprisonment for a term not exceeding 12 months, or to a fine not exceeding the statutory maximum (or both) On conviction on indictment, to imprisonment for a term not exceeding 10 years, a fine, or both.

Commitment to Compliance and Integrity

RMG FZC LIMITED remains steadfast in its commitment to upholding the highest standards of integrity, ethical conduct, and compliance with all applicable laws, including the Prevention of Bribery Ordinance (Cap. 201) of Hong Kong SAR. This Anti-Bribery & Corruption Policy is an integral part of our overarching compliance framework, designed to prevent, detect, and address any forms of bribery and corruption within our operations and supply chain.

Responsibility and Accountability

All employees, contractors, and business partners of RMG FZC are required to understand and comply with this policy. It is everyone's responsibility to prevent and report any form of bribery or corruption. The effective implementation of this policy relies on the vigilance, integrity, and proactive participation of every individual associated with RMG FZC.

Continuous Improvement and Adaptation

RMG FZC is committed to continuously improving its anti-bribery and corruption measures. We will regularly review and update this policy to ensure it remains effective and aligned with current laws, industry standards, and best practices. We will also provide ongoing training and support to our employees and partners to foster a culture of compliance and ethical business practices.

Enforcement and Support

Violations of this policy will not be tolerated and will be addressed with appropriate disciplinary actions, including possible termination of employment or contracts, and legal action where necessary. RMG FZC pledges to support and protect individuals who report genuine concerns in good faith.

Contact Information

For any questions, concerns, or reports related to this policy, please contact:

Head of Risk & Compliance

RMG FZC LIMITED
9/F Amtel Building,
148 Des Voeux Rd Central, Central,
Hong Kong

Email: compliance@rmgfzc.co

Phone: +852-96710994

By adhering to this policy, we collectively contribute to a transparent, fair, and ethical business environment, thereby ensuring the continued success and integrity of RMG FZC LIMITED.

For any enquiries or further information regarding this policy, please contact us at:

Email: welcome@rmgfzc.co

Website: www.RMGFZC.co