Golden Phoenix
Global Limited

反賄賂、反貪污及禁止疏通費政策

政策承諾（COP 11）

GOLDEN PHOENIX GLOBAL LIMITED（「本公司」）對賄賂、貪污、回扣及疏通費採取零容忍態度，並遵守香港《防止賄賂條例》及其他適用法律。本政策適用於董事、管理層、員工及代表本公司行事的第三方。

禁止行為（COP 11.1）

- 不得直接或間接提供、承諾、索取或接受任何旨在不當影響決定的金錢、禮物、款待、回扣或其他利益；
- 不得支付疏通費。依法繳付、有正式收費依據並取得收據的政府費用不屬疏通費；
- 不得向政府官員提供禮物、款待、旅遊、酬金或其他利益；
- 不得透過代理、顧問、供應商、捐款、贊助或其他第三方規避本政策。

禮物、款待及記錄（COP 11.1）

一般商業禮物及款待須合法、合理、透明、具有正當商業目的，並按公司程序事前批准及登記。現金、現金等值物或可能造成利益衝突的安排一律禁止。

舉報及保護（COP 11.2、2.6）

任何人如懷疑有賄賂或貪污行為，應使用本公司公布的申訴及舉報渠道。公司會保密處理，並禁止對善意舉報人作出任何報復。

認可及生效

職銜：總經理｜生效日期：2026 年 9 月 24 日

本政策會定期覆核，並在適用法例、RJC 要求、業務範圍或主要風險出現重大變更時作出修訂。

Golden Phoenix
Global Limited

Anti-Bribery, Anti-Corruption and Prohibition of Facilitation Payments Policy

Policy Commitment (COP 11)

GOLDEN PHOENIX GLOBAL LIMITED (the "Company") has zero tolerance for bribery, corruption, kickbacks and facilitation payments, and complies with Hong Kong's Prevention of Bribery Ordinance and other applicable laws. This Policy applies to directors, management, employees and third parties acting on behalf of the Company.

Prohibited Conduct (COP 11.1)

- Do not directly or indirectly offer, promise, solicit or accept money, gifts, hospitality, kickbacks or any other advantage intended to improperly influence a decision;
- Do not make facilitation payments. Government charges paid lawfully under an official fee schedule and supported by a receipt are not facilitation payments;
- Do not provide gifts, hospitality, travel, fees or other advantages to public officials;
- Do not use agents, consultants, suppliers, donations, sponsorships or other third parties to circumvent this Policy.

Gifts, Hospitality and Records (COP 11.1)

Ordinary business gifts and hospitality must be lawful, reasonable, transparent and for a legitimate business purpose, and must be approved in advance and recorded in accordance with Company procedures. Cash, cash equivalents and arrangements that may create a conflict of interest are prohibited.

Reporting and Protection (COP 11.2, 2.6)

Anyone who suspects bribery or corruption should use the Company's published grievance and whistleblowing channels. Reports will be handled confidentially, and retaliation against anyone who reports in good faith is prohibited.

Endorsement and Effective Date

Designation: General Manager | Effective date: 24 September 2026

This Policy is reviewed periodically and revised when there are material changes to applicable laws, RJC requirements, the scope of the business or key risks.