



Anti-Corruption Policy

1. Purpose

CITIC Telecom International Holdings Limited and its subsidiaries (collectively, the “Group”) are committed to the prevention, deterrent and detection of corruption, and conducting business in good faith, ethically and with integrity. In line with such commitment, this anti-corruption policy (the “Policy”) sets out the responsibilities of all business units and employees of the Group to comply with the applicable anti-corruption laws, rules and regulations. The Group adopts a zero-tolerance principle against corrupt practices.

2. Scope

This Policy applies to all directors, management and employees of the Group, the Group’s subsidiary companies and overseas offices. The Group’s related third parties (such as contractors and suppliers) are encouraged to abide by the principles of this Policy. The Group’s subsidiary companies and overseas offices are encouraged to either maintain their own set of policy or share this Policy with their directors, senior management and employees and related third parties.

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 as 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(s)**” includes anything that is of value such as money, gift, loan, fee, reward, commission, employment or contract, service, favor (other than entertainment) and discharge of liability in whole or in part;

“**bribe(s)**” means anything of value given in an attempt to affect a person’s actions or decisions to gain or retain an illicit business and/or personal advantage; and

“**kickback**” means the return of a sum already paid or due.

3. Anti-Corruption and Anti-Bribery

No employees shall (no matter acting in their own capacity or on behalf of the Group) :

(1) offer, promise, give or authorize, directly or indirectly, any bribe or kickback to or for the benefit of any person (in private or public office) to obtain any improper business or other improper advantages for the Group and/or for their own;

(2) solicit, accept or receive (for the benefit of the Group, their benefit or that of their family, friends, associates or acquaintances) any bribe or kickback from any person (in private or public office) in return for providing any improper business or other improper advantages in relation to the business of the Group;

(3) use illegal or improper means (including bribes, favors, blackmails, financial payments, inducements, secret commissions or other rewards) to influence the actions of others; or

(4) act as an intermediary for a third party in the solicitation, acceptance, payment or offer of a bribe or kickback.

In addition, all employees must exercise their reasonable judgment in assessing whether any arrangement could be perceived to be corrupt, illegal or otherwise inappropriate. Even when an offer of advantage carries no intention of improper influence, it should be ascertained that the intended recipient is permitted by his/her employer/responsible person to accept it under the relevant circumstances before the advantage is offered, and vice versa.

4. Responsibilities

In carrying out the Group's business, all employees shall adhere to the Group's high standards of professional and ethical conduct and shall comply with all applicable laws, rules and regulations in Hong Kong and other applicable jurisdictions, such as the Prevention of Bribery Ordinance (Cap. 201) of the Laws of Hong Kong.

Employees shall familiarize themselves with and comply with the requirements of this Policy and other policies and procedures supplementing this Policy issued by the Group from time to time.

Employees shall avoid any conflict of interest (i.e. situation where their private interest conflicts with the Group's interest) or the perception of such conflicts.

5. Whistle-blowing mechanism

All employees are responsible for reporting any actual or suspected breach of this Policy in a timely manner in accordance with the Group's procedures. For further details on the reporting channels and procedures, please refer to the "Whistle-blowing Policy" of the Group.

All employees shall fully and honestly cooperate with any investigation into any alleged breach of this Policy or any suspected corrupt or fraudulent activity. Any employee who failed to cooperate with the investigation or failed to provide truthful information may be subject to disciplinary action and where applicable, criminal prosecution against the parties concerned.

6. Others

The Board is responsible for monitoring and regularly reviewing this Policy to ensure its relevance and effectiveness. Any subsequent amendment(s) of this Policy shall be reviewed and approved by the Board.

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