

**NANYANG HOLDINGS LIMITED**  
**(Incorporated in Bermuda with limited liability)**  
**(Stock Code: 212)**

**ANTI-CORRUPTION POLICY**

*(Adopted by the Board on 22 March 2023)*

The Group has in place an anti-corruption policy, which supports anti-corruption laws and regulations and promotes an anti-corruption culture. It is a requirement that all employees are to conduct themselves with integrity, honesty, fairness, impartiality and in an ethical proper manner. The Group has zero tolerance to corruption. This policy covers employees at all levels.

The Group ensures that all the employees comply with this Anti-corruption Policy:

1. Improper payment including kickbacks on any other form of payments or advantage including commission, gift, benefit in kind are strictly prohibited. The Group strictly prohibits any form of bribery, corruption or money laundering.
2. Employees are required to conduct themselves with integrity, in an ethical and proper manner, and in compliance with all applicable laws and regulations of the jurisdictions in which the Group operates, including anti-bribery laws.

**The Group prohibits accepting advantages**

By reference to the Prevention of Bribery Ordinance (POBO):

Advantage means:

1. any gift, loan, fee, reward or commission consisting of money or of any valuable security or of other property or interest in property of any description;
2. any office, employment or contract;
3. any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
4. any other service, of favour (other than entertainment). Including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted;

5. the exercise or forbearance from the exercise of any right or any power or duty; and
6. any offer, undertaking or promise, whether conditional or unconditional, of any advantage within the meaning of any of the preceding paragraphs.

### **Soliciting or Accepting Advantage**

The Group prohibits the solicitation or acceptance of any advantage, (including entertainment, sponsorships, travel and accommodation or recruitment) by an employee from clients, contractors, suppliers, government officials or any person, in connection with the Group's business.

### **Training and Monitoring**

The Group aims at providing proper training, internal monitoring, bribery and corruption risk assessments of all employees so as to ensure bribery and corrupt activities are prevented.

Disciplinary action, including dismissal, is in place and for any serious breaches, the case will be referred to law enforcement agencies.

### **Conflict of Interests**

Conflict of interest refers to a situation where an employee is confronted with choosing between the requirements of his or her function and his or her own private interests. The Group is committed to avoid conducting businesses that may lead to a conflict of interest.

### **Implementation and Review of this Policy**

The Policy is reviewed and updated annually by the Board.

### **Disclosure and Publication**

This Policy is available on the Company's website for public information.

A summary of this policy will be disclosed in the Corporate Governance Report of the Company annually.