

## **GUANGDONG INVESTMENT LIMITED**

### **ANTI-CORRUPTION POLICY**

*Guangdong Investment Limited Anti-Corruption Policy* (the “Policy”) has been adopted by Guangdong Investment Limited and its subsidiaries (the “Group”). The Policy is applicable to all staff of the Group with no exception, including all staff employed by the Group and members of the Board of Directors. The Group complies with all applicable anti-corruption laws, regulations and policies, adheres to business ethics, established a sound integrity system and various anti-corruption mechanisms, to ensure effective control of major integrity risks and to facilitate corporate development along with the culture of integrity.

We will:

- comply with applicable laws and regulations relating to integrity, and strive to cultivate a corporate culture of integrity, anti-malpractice and anti-fraud;
- strictly prohibit staff from giving or receiving relevant gifts, rebates, commissions, rewards, allowances, favours or benefits, directly or indirectly, from or to individuals or companies with business dealings, in order to achieve prohibited commercial purposes;
- encourage the implementation of anti-corruption regulations in tendering procurement management, establish internal control mechanisms to prevent any conflict of interest, and prohibit our personnel from giving or accepting illegal benefits;
- strictly regulate all aspects of construction works and company operation management, prohibit irregularities including abuse of power, power for private gain, acceptance of benefits, etc.;
- establish and implement an audit and supervision mechanism, develop annual audit plans and conduct independent supervision of various business activities by internal auditors;
- establish a policy for employees to raise concerns over possible misconduct, and strive to achieve and maintain a high level of transparency, integrity and accountability;
- set up penal provisions for those units and personnel suspected of corruption and deal with them strictly in accordance with relevant laws and regulations and our internal policies upon discovery;
- strictly prohibit any acceptance or payment of facilitation fee under any circumstances by our directors, senior management or staff of the Company; and
- provide staff with anti-corruption-related training and education in accordance with local circumstances