

Playmates Holdings Limited

(“Company”)

ANTI-CORRUPTION POLICY

1. Purpose

The Company is committed to abiding by all laws and regulations to prevent corruption and bribery in all business dealings. This Policy outlines the Company’s requirements relating to the prevention and reporting to any suspected corruption and related malpractice.

This Policy is an integral part of the Company’s corporate governance framework. It should be read in conjunction with the Code of Business Conduct, Whistleblowing Policy, Staff Handbook and other relevant corporate policies.

2. Scope of Operation

This Policy applies to all personnel of the Company and its subsidiaries (collectively “**Group**”) including directors, employees at all levels and others who may provide services to or act on behalf of the Group. All of our business partners are encouraged to abide by the requirements of this Policy and to report corruption or corruption attempts by any of the Company’s personnel.

3. General Policy

The Company has zero tolerance towards corruption and related malpractice. The Company prohibits all forms of bribery and corruption. All directors and employees are prohibited from soliciting, accepting or offering any bribe in conducting the Company’s business or affair, whether in Hong Kong or elsewhere. In conducting all business or affair of the Company, they must comply with the relevant anti-corruption laws including but not limited to the Prevention of Bribery Ordinance (Cap. 201 of the laws of Hong Kong) and must not:

- (a) solicit or accept any advantage from others as a reward for or inducement to doing any act or showing favour in relation to the Company’s business or affair, or offer any advantage to an agent of another as a reward for or inducement to doing any act or showing favour in relation to their principal’s business or affairs;
- (b) offer any advantage to any public servant (including government and any public body employee) as a reward for or inducement to their performing any act in their official capacity or their showing any favour or providing any assistance in business dealing with the government or a public body; or
- (c) offer any advantage to any staff of a government department or public body while they are having business dealing with the latter.

4. Reporting and Responsibility

All employees should adhere to the Company's high standard of business and ethical conduct. They should also familiarize themselves with and comply with this Policy and the requirements of the Code of Business Conduct, Staff Handbook and all other relevant corporate policies in respect of anti-corruption and related malpractice. Failure to comply with anti-corruption laws or internal requirements may result in disciplinary action (which may include immediate termination) and where applicable, criminal prosecution against the parties concerned.

The Company shall conduct periodic risk assessment to identify and mitigate corruption and related risks. It also provides regular anti-corruption training to Company directors and employees. The Company shall maintain effective reporting channels for employees to report any suspected corruption. Suspected cases should be reported promptly to the Chairman of the Audit Committee via the whistleblowing channel confidentially if appropriate (please refer to the Whistleblowing Policy for more details).

5. Review of this Policy

The Board will review this Policy from time to time as appropriate.