

# EVERGREEN COMPUTER TECHNOLOGY COMPANY

## Anti-Bribery & Corruption (ABC) Policy

**Revision Date:** November 2023 | **Effective Date:** June 18, 2019

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### 1. Introduction:

At Evergreen Computer Technology Company, we are committed to conducting business with the highest standards of integrity and ethics. As a leading provider of computer components and accessories, we recognize the importance of maintaining transparency and trust in all our business dealings. This Anti-Bribery and Corruption Policy outlines our firm stance against bribery and corruption and sets forth the principles and guidelines that all employees, contractors, and partners must adhere to.

### 2. Policy Statement:

Evergreen Computer Technology Company prohibits bribery and corruption in any form. We are dedicated to conducting business ethically, complying with all applicable laws and regulations, and upholding the trust of our customers, suppliers, and stakeholders. Bribery and corruption undermine fair competition and erode trust in our industry, and we will not tolerate such practices in any aspect of our operations.

### 3. Scope:

This policy applies to all employees, contractors, consultants, agents, and representatives acting on behalf of Evergreen Computer Technology Company in any capacity.

#### **4. Responsibilities:**

Every employee and representative of Evergreen Computer Technology Company is responsible for upholding the principles of this policy. Management at all levels is accountable for promoting a culture of integrity and compliance with anti-bribery and corruption laws.

#### **5. Prohibited Conduct:**

Examples of prohibited conduct include but are not limited to:

- Offering, giving, receiving, or soliciting bribes, kickbacks, or other improper payments or inducements.
- Providing gifts, hospitality, or entertainment with the intention of improperly influencing business decisions.
- Making facilitation payments to expedite routine government actions.

#### **6. Gifts and Entertainment:**

All gifts, hospitality, or entertainment given or received in the course of business must be reasonable, proportionate, and transparent. Employees must obtain prior approval for gifts or entertainment exceeding \$150 in value.

#### **7. Conflicts of Interest:**

Employees must disclose any actual or potential conflicts of interest promptly. Failure to disclose conflicts of interest may result in disciplinary action.

#### **8. Training:**

Evergreen Computer Technology Company is committed to providing regular training on anti-bribery and corruption policies and procedures to ensure awareness and compliance among all employees and representatives.

#### **9. Consequences of Non-Compliance:**

Violations of this policy may result in disciplinary action, up to and including termination of employment, legal action, and damage to the company's reputation.

#### **10. Reporting Mechanisms:**

Employees are encouraged to report any suspected violations of this policy through the designated reporting channels, including a confidential hotline or email address. Whistleblowers will be protected from retaliation.

### **11. Policy Review:**

This policy will be reviewed periodically to ensure its effectiveness and compliance with relevant laws and regulations.

### **12. Approval and Implementation:**

This policy is approved by Sam Yip and is effective as of June 18, 2019.

### **13. Contact Information:**

For inquiries or to report suspected violations of this policy, please contact:

- Compliance Officer: Sam Yip
- Email: [sam.yip@evergreencomputer.com.hk](mailto:sam.yip@evergreencomputer.com.hk)