

Ethical Business Practices 營商操守

We regard honesty, integrity and fair play as core values that must be upheld by all directors and staff at all times. Any malpractice related to bribery, extortion, fraud or anti-money laundering are strictly prohibited within the Group.

We have the following measures to safeguard against unethical practices:

Regular Reviews and Updates

The executive office and the legal department monitor new regulations applicable to our Group, while staying alert to relevant notices from relevant authorities and industry news, to evaluate the implications of such new regulations to the Group and our business.

Policies and Procedures

We have policies and procedures to ensure all directors and staff are well informed of expected ethical conduct, including:

- **Code of Conduct**

Sets out the basic standard of conduct expected of all directors and staff, and the Group's policy on the acceptance of advantage and the handling of conflict of interest when dealing with the Group's business.

- **Anti-Money Laundering Policy**

Stipulates that any form of participation in or assistance in money laundering or other financial offenses is strictly prohibited.

- **Anti-Fraud Policy**

Sets out the Group's expectations for honesty, integrity and fair play in all interactions of and between staff and other business partners, including contractors and suppliers, and details what constitutes fraudulent behaviour and how we address and mitigate fraud risk.

- **Purchasing Policy**

Sets out clear procedures and requirements for our procurement, tendering, assessment and selection processes for suppliers to prevent misconduct and corruption.

我們認為誠實、廉潔和公平是所有董事和員工必須時刻謹守的核心價值，本集團內嚴禁一切賄賂、勒索、舞弊和反洗黑錢等不當行為。

我們有下列措施以防範有違道德操守的行為：

定期檢討及更新

行政部和法務部監察適用於本集團的新法規，同時密切留意有關當局的通知，以及來自業界的訊息，以評估這些新法規對集團和我們業務的影響。

政策及程序

我們設有相關的政策與程序，確保所有董事和員工都清楚知道他們應遵循的道德操守，包括：

- **紀律守則**

列明所有董事與員工應遵守的基本行為準則，以及在處理本集團事務時應遵守有關收受利益和申報利益衝突的政策。

- **反洗黑錢政策**

訂明嚴禁以任何形式參與或協助洗黑錢或其他金融罪行。

- **反舞弊政策**

訂明在所有員工之間，以及與承辦商和供應商等業務合作夥伴之往來間，集團對誠實、廉潔和公平行為的期望，並詳細列舉足以構成舞弊的行為，以及我們如何應對和緩減舞弊風險。

- **採購政策**

對我們的採購、招標、評估及挑選供應商的過程訂立清晰的程序與要求，以防範不當行為和貪污。

Our policies and procedures outline training requirements, processes for continuous monitoring to ensure compliance, as well as mechanisms for reporting and responding to any potential issues or incidents, and for the regular review and update of the policies and procedures.

Training

We conduct training sessions for our staff to strengthen their knowledge of compliance and corporate governance. Training covers risk management, intellectual property rights, personal data privacy and the promotion of a culture of integrity, which includes preventive measures against corruption and money laundering.

Whistleblowing System

We provide a confidential channel to encourage employees to raise concerns on suspected frauds and other misconduct within the Group without retaliation.

Adherence to Industry Standards

We adhere to international industry codes of practice, including the Kimberley Process Certification Scheme, the "Best Practice Principles" of De Beers, the "Code of Practices" of Responsible Jewellery Council and other local industry codes, such as the "Code of Practice for the Jewellery Retail Sector" of the Hong Kong Consumer Council.

我們的政策與程序列明培訓要求、持續監察合規的程序、通報和回應任何潛在問題或事故的機制，以及定期檢討和更新政策與程序的機制。

培訓

我們為員工舉行培訓班，以加強他們對遵守規章和企業管治的了解。培訓內容包括風險管理、知識產權、個人資料私隱，以及提倡誠信文化，包括防預貪污和洗黑錢的措施。

舉報機制

我們提供保密渠道，鼓勵員工對集團內懷疑舞弊事項及其他不當行為提出關注，並不會遭受報復。

遵循行業標準

我們遵循國際認可的行業行為守則，包括金伯利流程認證計劃、De Beers的《最佳執業守則》、責任珠寶業委員會的《從業準則》，以及其他本地行業守則，例如香港消費者委員會的《珠寶零售業營商實務守則》。



Code of Practices ("COP") of the Responsible Jewellery Council ("RJC") 責任珠寶業委員會(「RJC」)的《從業準則》

The RJC is a not-for-profit, standard setting and certification organisation. RJC launched its COP, to address human and labour rights, environmental impact, mining practices and product disclosure, among other important issues in the jewellery supply chain. RJC members commit to and are independently audited against the COP.

We have been admitted as a member of the RJC since 2010, in recognition of our compliance with the COP.

責任珠寶業委員會是一個制訂標準和發出認證的非牟利組織，該會推出其從業準則，以處理在珠寶供應鏈上的人權、勞工權益、環境影響、採礦行為、產品披露及其他重要議題。責任珠寶業委員會會員承諾遵守《從業準則》，並就《從業準則》接受獨立審核。

我們自2010年起已成為責任珠寶業委員會之會員，確認我們遵循其行為守則。



"Code of Practice for the Jewellery Retail Sector" of the Hong Kong Consumer Council 香港消費者委員會的《珠寶零售業營商實務守則》

In 2017, the Hong Kong Consumer Council together with a number of industry associations, launched the new code of practice for the Jewellery Retail Sector. It sets out best practice for jewellery retailers in areas including product quality assurance, advertising and promotion, customer service, fair competition and intellectual property rights.

Some of our senior management are committee members of major industry associations to help promote the practice to the industry.

在2017年，香港消費者委員會與多個行業組織為珠寶零售業推出新的營商實務守則，訂出珠寶零售商在多個範疇的最佳實踐，包括產品質量保證、廣告與推廣、顧客服務、公平競爭和知識產權等。

我們的部分高層管理人員在多個主要業界聯會擔任委員，協助在業內推動這些最佳實踐。

During the financial year, there were no legal cases regarding corrupt practices that were brought against the Group, nor our employees.

在本財政年度內，本集團及我們的員工並無涉及任何有關貪污行為的法律案件。