GLORIOUS SUN ENTERPRISES LIMITED

旭日企業有限公司

(Incorporated in Bermuda with limited liability)

(Stock Code: 393)

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

1. Purposes

1.1. This Policy has been formulated for Glorious Sun Enterprises Limited (the "Company") and its subsidiaries (collectively, the "Group") with reference to the Prevention of Bribery Ordinance (Chapter 201 of the Laws of Hong Kong), to provide guidance to all employees of the Group (including Directors) and all parties having business relationships with the Group (collectively, the "Stakeholders") on the identification of, and response to, bribery and corruption.

1.2. The Company believes that honesty, integrity and fairness are core values that all Stakeholders of the Group must uphold at all times. This Policy sets out the basic standards of conduct with which employees must comply, together with the guidelines regarding the acceptance of advantages and the declaration of conflicts of interest when conducting the Group's affairs. Stakeholders of the Group should refer to this Policy for guidance.

2. Guidelines on Anti-corruption and Anti-bribery

2.1. Prohibition on acceptance of advantages

The Group strictly prohibits all employees, whether acting in a corporate or personal capacity, from soliciting or accepting any advantage from any person, company, or organisation that has business relationships with the Group. Prohibited advantages include, whether offered directly or indirectly, such as cash, gifts, meals, travel, entertainment, or hospitality, for the personal benefit of the employee or his or her immediate family members.

2.2. Avoidance of conflicts of interest

Employees must avoid actual, potential, or perceived conflicts of interest between their personal interests, or those of their immediate family members, and the interests of the Group or any of its related companies.

Employees must not misuse their position, authority, or rights within the Group or the Group's related companies to obtain personal benefits. "Personal Interests" includes the personal and financial interests of an employee and his or her immediate family members.

Employees must promptly declare any actual, potential, or perceived conflict of interest to their immediate supervisor to demonstrate their fairness to the matter. The supervisor shall report the declaration to the relevant member of management and ensure that appropriate follow-up action is taken.

2.3. Relationships with suppliers, contractors, and customers

Employees and their immediate family members must avoid participating in any form of gambling with any individual that has business relationships with the Group, such as playing mahjong.

2.4. Loans

Employees and their immediate family members must not lend money to, or act as a guarantor for any loan obtained by, any individual or organisation that has business relationships with the Group. Employees and their immediate family members must also not accept loans from, or obtain loans with the assistance of, any such individual or organisation. This restriction does not apply to ordinary borrowing from banks.

2.5. Compliance with the code of conduct

The Group requires every employee, whether based in Hong Kong or elsewhere, to comply with all applicable laws and regulations of the relevant jurisdiction, as well as the Prevention of Bribery Ordinance (Chapter 201 of the Laws of Hong Kong), when conducting business on behalf of the Group.

3. Policy Implementation and Review

3.1. Understanding and complying with this Policy is the personal responsibility of every employee of the Group. Management must also ensure that their subordinates fully understand and comply with the standards and requirements set out in this Policy. Management shall provide relevant training on a regular basis and continually remind employees of the anti-corruption requirements and the available channels for reporting suspected breaches or concerns.

3.2. Any employee who contravenes this Policy may be subject to disciplinary action, up to and including termination of employment in serious cases. Where the Group has reasonable grounds to suspect that a breach involves corruption, bribery, or any other criminal offence, the Group will report the matter to the Independent Commission Against Corruption ("ICAC") or other relevant authorities as appropriate.

3.3. Employees may direct any enquiries concerning this Policy, or any report or complaint regarding suspected breach of this Policy, to the Chairman of the Group, who shall be responsible for handling such matters. Where necessary, the Chairman may appoint a designated officer to handle any report or complaint. All information relating to a report or complaint shall be treated in strict confidence.

3.4. The Company has formulated a "Whistleblowing Policy". Where an employee identifies a matter reportable under this Policy, the employee should also refer to the Whistleblowing Policy, including its provisions on reportable matters and definition of fraud, reporting channels, confidentiality of whistleblowers, protection of whistleblowers, and handling and investigation.

4. Policy Implementation and Review

4.1. This Policy has been formally approved and adopted by the Board of Directors of the Company.

4.2. The Administration Division of the Group bears overall responsibility for implementing and regularly reviewing this Policy.

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(Effective from 2022,
and revised on 23 November 2026)