


INTERBUILD.CN **REAL WOOD**
Interbuild Far East (HK) Ltd.

Room 803, Futura Plaza
111 How Ming Road, Kwun Tong
Hong Kong
www.interbuild.cn

Our Integrity and Professional Conduct Policy

Interbuild Far East (HK) Ltd. is committed to conduct its business with Integrity and in a manner that is recognized as 'World-Class' by all stakeholders. We value, will maintain and protect our good reputation for ethical behaviour and reliability.

The purpose of this Policy is to firm down our rules and behaviours in our dealings for the company and to provide guidance in our day-to-day business for employees and other stakeholders.

These rules apply to all employees. Also our partners, agents, intermediaries, consultants, customers and suppliers shall be required to comply with them.

No deviation can or will be tolerated and no employee will suffer any adverse consequence for reporting suspected violations.

Anti-Bribery

Interbuild Far East (HK) Ltd. fully support and adhere to the **Business Principles for Countering Bribery** issued jointly by **Transparency International** www.transparency.org and **Social Accountability International** www.sa-intl.org.

Our aim is to limit our exposure to bribery by:

- Setting out a clear anti-bribery rule.
- Training all employees so that they can recognise and avoid the use of bribery by themselves and others.
- Encouraging our employees to be vigilant and to report any suspicion of bribery, ensuring sensitive information is treated appropriately.
- As a pre-requisite for Suppliers and as an integral part of our Purchase Orders, get written commitments to adherence of our anti-bribery rule.
- Promote and Declare our anti-bribery rule in Offers to Customers.
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution.
- Taking firm and vigorous action against any individual(s) internally and externally involved in bribery.

Our Anti-Bribery Rule

Interbuild Far East(HK) Ltd. forbids the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement ***to or from*** any person or company, wherever they are situated and whether they are a public official or body or private person or company ***by*** any individual employee, agent, customer, supplier or other person or body acting on Interbuild's behalf ***in order to*** gain any commercial, contractual or regulatory advantage for Interbuild, the Customer or the Supplier in a way which is unethical ***or in order to*** gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

Further Clarification

This rule prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take actions or decisions which they otherwise not would have taken.

Examples of breaching this rule are:

- ✓ An Interbuild employee accepting cash or other advantages
 - from a supplier or customer for disclosing Interbuild business secrets such as buying or selling prices from/to others
 - from a supplier for giving the supplier Interbuild orders
 - from a supplier for accepting a delivery or a product fault in production that do not conform to our requirements.
 - from a customer for giving them extraordinary discounts or compensations
- ✓ A Customer or Supplier offering an Interbuild employee whatever personal advantage as compensation for acting against the interest of Interbuild.

Breaching the Rule is also a serious Crime in all countries where Interbuild operates.

Small gifts, hospitality and entertainment might be appropriate under certain conditions but must always be related to a genuine business purpose. They may not be intended, or appear to be intended to, influence a decision or action and must be kept within what is socially acceptable and legally permissible.

Consequences of non compliance to the Rule

All involved, whatever the size of the Crime, will by the management of Interbuild be reported to the Police, the Local Authorities, the Law Enforcement authorities or whatever authority responsible for the jurisdiction of the Crime committed, in the Country where it was committed. Employees will immediately be made redundant and business will cease with Customers or Suppliers, should top management be involved in the Crime committed. Interbuild will seek compensation for whatever damage the Crime has caused the Company, both from the employees and from Customers or Suppliers and/or their employees involved.

These consequences might seem very hard but we are committed to pay our employees over average local salaries for the work they are performing, we inform them about the consequences of non compliance and we thereby do not expect employees to line their pockets by not following this rule.

Common Sense Principles

Our rule is fairly simple. However, when in doubt, apply the following common sense principles:

- Do not do anything which you know or believe to be illegal or unethical
- Do not engage into any transaction which does not have a genuine, legitimate business purpose
- Ask yourself whether any contemplated transaction or business practice would withstand the scrutiny of the public eye if exposed
- Do not do anything which could require you to be untruthful
- Seek advice when in doubt

Professional conduct

Interbuild Far East (HK) Ltd. has in its Mission Statement clearly stated that it performs its business in a 'World-Class' manner. We by this mean that whatever we do and in whatever way we do this, it will always be perceived as having been done in the most professional way to the highest of standards by the majority of the stakeholders that noticed whatever we did. It entails a lot of things and it sets high demands on all employees.

A few clarifications and rules below:

- Employees are to
 - ◆ pro-actively seek, identify and promote enhancements to our Customers Satisfaction, our organisation structure, our procedures, our products, our controls of the business and our competitive advantages, thereby long term safeguarding the work opportunities we offer, our profitability and our existence as a World Class Company and Supplier.
 - ◆ demonstrate courtesy, respect, honesty and fairness with customers, suppliers, competitors, other employees and other stakeholders of the business.
 - ◆ demonstrate compliance with health, safety, legal and security regulations applicable to the business.
 - ◆ establish, maintain and develop business relationships based on mutual confidence and trust.
 - ◆ strive to provide the highest quality products, presentations and services, working for constant improvement of the quality within all areas of the business.
 - ◆ conduct business operations in an ethical and humanistic fashion.
 - ◆ ensure the understanding of customers, suppliers, business partners and other stakeholders interests and respond to them in a balanced manner.
 - ◆ act in a manner which supports the company's overall objectives and contributes to the achievement of targets set.
 - ◆ assume responsibility and be accountable for achieving the objectives, projects and tasks undertaken.
 - ◆ safeguard and protect the reputation of the company
 - ◆ be in compliance with relevant laws, regulations and policies.
 - ◆ protect and use assets of the business in a fair and responsible way. Assets of the business include, but are not limited to its; employees, products, services, business equipment, property, trade secrets, customer base, supplier base, financial resources and other business information.
 - ◆ maintain confidentiality of all records in their care and possession including information about: customers, suppliers, other employees, shareholders, other stakeholders, developments, product and price information.
 - ◆ recognize the diversity of the work force and that the company can only be successful through the respect, fair treatment, cooperation and empowerment of its employees.
 - ◆ be environmentally conscious in conserving resources and protecting the environment in which the company operates.
 - ◆ recognize that a healthy and safe working environment both internally and at suppliers is critical to the overall success of the business. At all times, employees are responsible and accountable for maintaining a healthy and safe environment for the business.
 - ◆ exhaust all available internal remedies for dealing with matters perceived to be improper, not resorting to public disclosure.
 - ◆ exhibit high standards of personal integrity and professional behaviour.

- Employees are not to
 - ◆ engage in any activity that is (or gives the appearance of being) unhealthy, unsafe, illegal, immoral or harmful to the business, its employees, customers, suppliers or to the environment.
 - ◆ engage in activities which conflict with or impair the performance of their duties.
 - ◆ provide false or misleading information about the business, its products or services to any party.
 - ◆ collect business information for the company in an unethical manner.
 - ◆ during business hours and during business discussions internally and externally and with whoever, make political or religious statements or stances of any kinds, as the company policy is to be totally neutral in all its actions, policies and statements within this area.