

FAR EAST HORIZON LIMITED

Anti-corruption Management Statement

Far East Horizon Limited (hereinafter referred to as "Far East Horizon" or the "Company") attaches great importance to and earnestly promotes anti-corruption works. In order to strengthen the establishment of anti-corruption mechanism and effectively prevent risks of corruption, Far East Horizon has developed several documents, including "Regulations on Anti-fraud Management of Far East Horizon Limited" (《远东宏信有限公司反舞弊工作管理规定》), and "Professional Code of Conduct for Staff of Far East Horizon Limited" (《远东宏信有限公司员工职业操守规范》), pursuant to the laws and regulations such as the "Criminal Law of the People's Republic of China", the "Anti-Unfair Competition Law of the People's Republic of China", the "Company Law of the People's Republic of China", "Regulations on Internal Audit of the People's Republic of China" and the "Prevention of Bribery Ordinance" (the Laws of Hong Kong Special Administrative Region), to continue to improve the anti-corruption-related management system, and guide all employees of the Company to keep the professional bottom line and preserve integrity in work.

Pursuant to the requirements of laws, regulations and self-regulation for the industry, the Company updates relevant anti-corruption systems on

an annual basis to ensure the effectiveness and binding force of management principles. Meanwhile, the Company conducts annual review on the anti-corruption management system and compliances of all employees, and promptly rectifies potential risks to continuously improve internal control, thus creating a management system that effectively prevents corruption. The Company adopts "zero tolerance" attitude towards any violation of the laws, and such violation, once discovered, will never be tolerated and will be handed over to the judicial bodies and handled in accordance with the laws. Moreover, the Company organizes various forms of warning and advocacy for its managers and employees at all levels on an annual basis in terms of typical internal and external cases, and sticks to integrating punishment and prevention, so as to create a clean corporate culture.

I. Scope of Application

Requirements under the anti-corruption management apply to Far East Horizon Limited and its subsidiaries (including wholly-owned subsidiaries, holding subsidiaries, and other subordinate body corporates or unincorporated entities actually controlled by the Company, whether directly or indirectly).

II. Management Structure

The board of directors of the Company is responsible for urging the management to establish a company-wide anti-corruption culture, and setting up a sound internal control system including the prevention of corruption risks. It is accountable for the effectiveness of anti-corruption management.

The responsibility of the Company's management is to establish, improve and effectively implement internal control to prevent, detect and rectify corrupt behaviors. The management is responsible for assessing corruption risks and establishing specific control procedures and mechanisms, and clarifying a permanent organization for anti-corruption works to provide necessary conditions for it to carry out anti-corruption work. Also, the management is subject to supervisions from the audit committee, the board of supervisors and the board of directors.

The business departments and functional departments of the Company are responsible for the anti-corruption works of their respective department, conduct legal and compliance operations within authorization from the Company, establish, improve and effectively implement the internal control system and the corruption prevention management system.

The audit department of the Company is the permanent organization for anti-corruption works. It is responsible for the daily anti-corruption work on a company-wide basis, including provision of assistance to the management to establish a corruption prevention management system and

a corruption case accountability mechanism, carrying out publicity and education activities in relation to anti-corruption, and acceptance of internal and external reporting on corruptions, and conducting investigations, reports, and proposing handling suggestions.

III. Anti-corruption Requirements and Related Management Measures

(I) Anti-corruption requirements

All employees of the Company shall be devoted to their duties, abide by the code of conduct of the Company, ethics codes and laws and regulations related to the country and industry, prevent any corruption, and not, whether directly or indirectly, transfer illegitimate benefits to or solicit illegitimate benefits from others.

In carrying out business activities, all employees of the Company are strictly prohibited from seeking illegitimate benefits in the following ways: Acceptance of benefits that may affect independent judgments, such as bribes, rebates, etc.; Asking for and accepting any gift and payment in any form; Exploiting the advantages of positions to seek gains for others or organizations; Charging referral fees, commissions, rebates or remuneration fees related to the business activities of the Company; Other situations of seeking illegitimate benefits.

In carrying out business activities, all employees of the Company are

strictly prohibited from transferring illegitimate benefits in the following ways: Payment of benefits that may affect independent judgments, such as bribes, rebates; Giving cash, stocks, securities, gift cards, cash coupon or similar substitutes; Establishment of business relationships with customers through illegal acts such as bribery; Provision of business secrets related to procurements of the Company to suppliers or other third parties in any form; Other situations of transferring illegitimate benefits.

(II) Whistleblowing channels and protection of whistleblower

Employees and all stakeholders of the Company can make whistleblowing on corruption, in their real names or anonymously, through legitimate whistleblowing channels of the Company, including but not limited to e-mail, reporting hotlines, whistleblowing boxes, etc. Meanwhile, the Company has established a specific reward fund for audit trails, to detect and restrain phenomena and behaviors that may harm the Company's interests in a timely manner. For the reported information received, the Company will carry out investigations pursuant to relevant requirements and on the principles of objectivity and seeking truth from facts, and report the results of investigations and handling in a timely manner as required.

Regarding the protection of whistleblowers, the Company clearly specifies the relevant requirements in relation to the protection of whistleblowers in accordance with the regulations and rules including the

“Regulations on Letters and Visits” and internal systems such as the “Measures for the Supervision and Administration of Complaints and Whistleblowing” (《投诉举报监督管理办法》) and strictly prohibits any discrimination or retaliation against complainants and whistleblowers. Meanwhile, the Company has established and improved the confidentiality-based whistleblowing management system. The whistleblowing channels are managed in ways including dedicated telephones, dedicated mailboxes and dedicated personnel, and relevant personnel are required to sign a confidentiality agreement to effectively protect the interests and rights of whistleblowers.

(III) Accountability mechanism

After investigations, if any employee of the Company violates relevant laws and regulations or requirements of the Company in relation to anti-corruption and any corrupt behavior has been ascertained, the Company will confirm relevant liability pursuant to the "Regulations on Liability Confirmation and Punishment Management" (《责任认定与处罚管理规定》) and based on the facts verified through investigations, the severity of the corruption, etc., and then impose penalties on the personnel involved. Those who breach the laws will be handed over to the judicial bodies and handled in accordance with the laws.