



ANTA Sports Products Limited

安踏體育用品有限公司

Anti-corruption Policy

Effective date of this Policy:

Adopted by the Board on 30 December 2022 and effective on 30 December 2022.

1 Statement of Commitment

- 1.1 Integrity is one of the Company's core values. It comprises honesty, fairness, impartiality and ethical business practices. The Company is committed to pursuing ethical and anti-corruption business practices with a high standard of integrity and zero tolerance to corruption. To this end, the Company has adopted this Policy to complement all applicable anti-corruption laws and regulations and to achieve the Company's desired anti-corruption culture.
- 1.2 If the Group is involved in any form of bribery or corruption, money laundering or terrorist financing, whether in the PRC, Hong Kong or elsewhere, the Group may be subject to criminal or civil penalties, and it will cause reputation damage to the Group as well.
- 1.3 The Group (including any Directors and employees) should comply with the relevant anti-corruption laws and regulations in the PRC (including the Supervision Law of the PRC) and other relevant anti-corruption laws and regulations of Hong Kong and other countries or regions as applicable.
- 1.4 The Group prohibits all forms of political contributions that contravene the legal requirements of the countries or regions as applicable.
- 1.5 The Group strictly prohibits charitable donations from being used for bribery or corruption, and ensures that charitable donations and sponsorships are compliant, legal and ethical.

2 Purpose

- 2.1 This Policy aims to complement all applicable anti-corruption laws and regulations, and to promote an anti-corruption culture within the Group.

3 Personnel to whom this Policy applies

3.1 This Policy is applicable to all Directors (including independent non-executive Directors), all employees of the Group at all levels, external parties having business dealings with the Group (including suppliers, services providers, business partners, etc.) and persons acting in an agency or fiduciary capacity on behalf of the Group (e.g. agents, consultants and contractors of the Group).

4 Integrity Requirement for Directors and Employees

4.1 Directors and employees of the Group shall uphold at all times the Group's corporate core value of integrity, honesty, fairness, impartiality and ethical business practices.

4.2 Directors and employees of the Group should not accept any Advantage from any person, company or organisation having business dealings with the Group, whether or not any undue favour is involved. They may only accept (but not solicit) an Advantage when such Advantage is offered on a voluntary basis and such Advantage is disclosed to and approved by the Group. If a Director or an employee is unsure as to whether the acceptance of an Advantage could (i) affect the proper discharge of his duties or (ii) place such Director or employee under an obligation to act against the Group's interests, he should always decline to accept the Advantage.

4.3 Directors and employees of the Group shall avoid any conflict of interest or potential conflict of interest with the Group, and should declare any conflict of interest or potential conflict of interest as appropriate.

4.4 Directors and employees of the Group shall not give any Advantage to any person, company or organisation having business dealings with the Group for inappropriate advantage or any other illegitimate purpose.

4.5 Directors and employees of the Group shall not, in their personal capacity or acting in an agency or fiduciary capacity on behalf of the Group, provide any form of facilitation payments to any individual or entity.

4.6 All employees of the Group are required to sign the "Integrity and Self-discipline Commitment" confirmation which sets out detailed integrity and conduct requirements of the Group's employees. All employees of the Group shall also comply with other internal anti-corruption guidelines issued by the Group from time to time.

4.7 Proper records shall be maintained when offering or accepting gifts, entertainment, sponsorships, travel and accommodation or other Advantages, or when engaging in charitable donations, political expenditure or recruitment matters.

5 Specific Terms in relation to Anti-Corruption

5.1 “Advantage” means:

- (1) any gift, loan, fee, reward or commission consisting of money or of any valuable security or of other property or interest in property (howsoever described);
- (2) any office, employment or contract;
- (3) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- (4) any other service, or favour, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted;
- (5) the exercise or forbearance from the exercise of any right or any power or duty; and
- (6) any offer, undertaking or promise, whether conditional or unconditional, of any advantage within the meaning of any of the preceding paragraphs (1), (2), (3), (4) and (5).

5.2 “bribery” means:

the provision of monetary advantage, item of value or intangible benefit for inappropriate advantage or for any other illegitimate purpose to detriment of the entity’s interests.

5.3 “corruption” means:

the abuse of authority or position to solicit or accept any monetary advantage, item of value or intangible benefit for individual or stakeholder.

5.4 “conflict of interest” means:

A conflict of interest can arise when an employee’s personal interests conflict or interfere with the Group’s best interests. Conflict of interest may exist when employees have personal or business relationships with external stakeholders, or in personal or business relationships between employees, including romantic relationships.

5.5 “facilitation payment” means:

Facilitation payment is monetary advantage or item of value offered to individual or entity for the purpose of expediting a service or circumventing a business process, typically in form of “tips” or “gifts”.

6 Customer Due Diligence

6.1 As part of the measures to prevent corruption, proper due diligence shall be conducted against customers and records of such due diligence shall be properly kept in accordance with the due diligence procedures adopted by the Group from time to time after taking into account factors including products and services offered, types of customers and geographical locations involved.

7 Treatment of Breach of this Policy

7.1 Any breach of this Policy should be reported to the Company through reporting channels under the Whistleblowing Policy, whether it is known who may be responsible for the breach or how it may have occurred. The Company takes reports of corruption seriously, and may conduct investigations pursuant to the Whistleblowing Policy if necessary. Material incidents relating to breaches of this Policy shall be brought to the attention of the Board by the Risk Management Committee.

7.2 Directors and employees of the Group who commit acts of corruption, whether or not such acts are civil or criminal offenses, are considered to be in serious violations of the Group's internal rules and policies, and may be subject to disciplinary actions, including furlough, demotion and dismissal.

7.3 The Group reserves the right to take appropriate actions against any person who commits acts of corruption or breaches this Policy, including but not limited to disclosing the identity of such person to internal or external investigators, or relevant law enforcement agencies or governmental, judicial or regulatory bodies for appropriate action without notifying such person to the extent permissible by law. The Group also reserves its right to take any actions against such person to recover any loss or damages resulted from such breach. Employees who breach this Policy may be subject to disciplinary actions, including dismissal, where appropriate.

8 Anti-corruption Programme and Trainings

8.1 The Group shall establish anti-corruption programme with mechanism to identify and assess corruption risks and controls in place to mitigate such corruption risks.

8.2 To mitigate corruption risks, the Group offers trainings (including integrity training) through different channels to the Directors, management and employees, in particular those who are more likely to be exposed to the risks of bribery, corruption, money laundering, terrorist financing or non-compliance of other relevant anti-corruption laws and regulations. Such trainings shall address how they can identify and handle the corruption risks.

9 Responsibility for this Policy

9.1 The Risk Management Committee assumes the overall responsibility for the implementation and oversight of this Policy, review and investigation of reports, and consideration and approval of changes to this Policy. The Risk Management Committee has delegated the day-to-day responsibility of administering this Policy to the Internal Audit Department.

10 Review of this Policy

10.1 The Risk Management Committee shall regularly review the implementation and effectiveness of this Policy to ensure that this Policy remains relevant to the Company's needs and reflects both current regulatory requirements and good corporate governance practice, and shall also discuss and consider any revisions that may be required.

11 Disclosure of this Policy

11.1 Full text of this Policy will be published on the Company's website. A summary of this Policy together with the Risk Management Committee's review of the implementation and effectiveness of this Policy will be disclosed in the corporate governance report as a part of the Company's annual report.

12 Definitions

12.1 In this Policy, the following expressions shall have the meanings set out below unless the context requires otherwise:

“Advantage”	has the meaning ascribed to it in section 5.1 of this Policy
“bribery”	has the meaning ascribed to it in section 5.2 of this Policy
“Board”	means the board of directors of the Company
“Company”	means ANTA Sports Products Limited
“conflict of interest”	has the meaning ascribed to it in section 5.4 of this Policy
“corruption”	has the meaning ascribed to it in section 5.3 of this Policy
“Director(s)”	means the director(s) of the Company

“Ethics Officers”	means the chairman of the Risk Management Committee and the chairman of the Board collectively
“facilitation payment”	has the meaning ascribed to it in section 5.5 of this Policy
“Group”	means the Company and its subsidiaries
“Hong Kong”	means the Hong Kong Special Administrative Region of the People’s Republic of China
“Internal Audit Department”	means the internal audit department of the Group, which reports directly to the Risk Management Committee
“Policy”	means this anti-corruption policy
“PRC”	means the People’s Republic of China, and for the purposes of this Policy only, excludes Hong Kong, the Macao Special Administrative Region and Taiwan region
“Risk Management Committee”	means the risk management committee of the Company
“Whistleblowing Policy”	means the whistleblowing policy of the Company

13 Language

13.1 If there is any inconsistency between the English and Chinese versions of this Policy, the English version shall prevail.