February 2021

HMEC Integrity Management Policy

Mitsubishi Elevator Hong Kong Company Limited (HMEC) and its group subsidiaries have full commitment on integrity, honesty and anti-corruption practices in doing business and compliance with the Prevention of Bribery Ordinance (Cap. 201) and Competition Ordinance (Cap. 619) in Hong Kong and relevant laws in all areas of our operations.

We prohibit the solicitation and acceptance of any advantage by a staff member from business counterparts or any person having business relations of any kind with the Company, except advertising or promotional material of nominal value.

Under no circumstances may a staff member offer any advantage to any person having business dealings with the Company, or any person employed by a Company having business dealings with the Company unless with the prior written approval from our Company.

Unless prior approval by our Company is obtained, officers and employees of the Company shall not, directly or through a third party, offer, propose to offer, or promise to offer, any Gifts & Entertainment to Public Officials.

Our staff must declare to the Company any financial and/or personal interest, direct or indirect, which they or their immediate family may have, in any corporation, partnership or other organisation with which the Company has business dealings. The Company will not allow the leaking of confidential corporate information by staff to anybody outside the Company.

The Ethics & Legal Compliance Hotline System is maintained as the contacts, to which complaint on any illegal and/or unethical conducts committed by employee(s) either individually or in conspiracy is to be notified. Any personnel in breach of integrity requirements will be subject to internal disciplinary action and may, in some circumstances, lead to prosecution under Section 9 of the Prevention of Bribery Ordinance.

We are committed to partner with ethical business counterparts who share the same value and are committed to the same integrity standard.