

## Chain Stores and Supermarkets – Control of Sales of High-Demand Goods



防止貪污處

Corruption Prevention Department



## Foreword

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For various reasons, there may be situations of demand outstripping supply for certain products such as formula milk powder for babies, new electronic equipment and smart phones. Some parallel goods traders may take such opportunities and make a profit by purchasing large quantities of the products and reselling them at higher prices either locally or elsewhere. In addition to affecting the supply of the products to genuine customers, this also gives rise to corruption risks as some traders/buyers may resort to corrupt means, i.e. offering advantages to shop managers or sales staff to secure their purchases. Therefore, both for protection of company reputation against bribery scams and good customer relationship management, it is necessary for chain store and supermarket operators to put in place a sound control system for managing the sale of goods in high demand.

This Practical Guide provides a list of recommended practices and safeguards for chain stores and supermarkets in managing the sale of high-demand goods. Chain stores and supermarkets are advised to adopt and adapt the recommended practices as appropriate to suit their respective organizational structure, resource capability, operational needs, and risk exposures.

*The Advisory Services Group of the Corruption Prevention Department of ICAC stands ready to provide free, confidential, and tailor made corruption prevention advice to private companies on request, including the ways to implement the recommended practices in this Practical Guide. For further information, please contact the Group at telephone no. 2526 6363 or fax no. 2522 0505 or email address at [asg@cpd.icac.org.hk](mailto:asg@cpd.icac.org.hk).*

### **Disclaimer**

Descriptions of legal requirements under the Prevention of Bribery Ordinance in this Guide are necessarily general for easy understanding by layman. If in doubt, users of the Guide are advised to seek legal advice. The ICAC will not accept any liability, legal or otherwise, for loss occasioned to any person acting or refraining from action as a result of any material in this Guide.



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**1.1 The Prevention of Bribery Ordinance**

Directors, staff and agents of the Company should have a basic understanding of the relevant provisions of the Prevention of Bribery Ordinance (Cap. 201, Laws of Hong Kong). The following is gist of the relevant section (Section 9) of the Ordinance<sup>1</sup>, its key elements and some examples relating to a retail company's environment.

**(a) Section 9 – Corrupt Transactions with Agents**

- ◆ Section 9 (1) - It is an offence for an agent to, without lawful authority or reasonable excuse, solicit or accept an advantage as an inducement to, or reward for, his doing or forbearing to do any act, or showing or forbearing to show favour or disfavour to any person, in relation to his principal's affairs, except with his principal's permission.
- ◆ Section 9 (2) - Any person who offers an advantage to an agent for the above purpose also commits an offence.
- ◆ Section 9 (3) - Any agent who, with an intent to deceive his principal, uses any receipt, account or other document which contains any statement which is misleading or false or defective in any material particular and in respect of which the principal is interested, is guilty of an offence.

**(b) Principal**

- ◆ The principal is the employer or any authorized persons of the employer.

**(c) Agent**

- ◆ An agent is a person acting for the principal. If a company appoints another person to act for it in business, that person becomes the agent, whether the appointment is full-time or part-time, and whether or not the agent receives a fixed salary or a fee from the company. Any employee acting for the chain store or supermarket is an agent of the company.

**(d) Advantage**

- ◆ An advantage includes money, gift, discount, commission, offer of employment or free service.

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<sup>1</sup> The full text can be accessed through the Department of Justice's Bilingual Laws Information System website at <http://www.legislation.gov.hk/eng/home.htm>.

- ◆ Entertainment, defined as food or drink provided for consumption on the occasion, is not an advantage under the Ordinance.

**(e) Principal's Permission**

- ◆ An agent may accept an advantage in his official capacity with his principal's permission.

**(f) Custom Constitutes No Defence**

- ◆ It is not a defence to claim that an advantage accepted or offered is customary in any profession, trade, vocation or calling.

**(g) Penalty**

- ◆ A person convicted of an offence under Section 9 of the Prevention of Bribery Ordinance is subject to a maximum penalty of seven years' imprisonment and a fine of HK\$500,000.

## **1.2 Ethical Business Culture**

To enhance the integrity of its staff and prevent corrupt practices and employee fraud, the Company should promote and foster an ethical business and law-abiding culture in the Company. Actions that should be taken include:

### **Guidelines and Instructions**

- ❑ Make an explicit commitment and disseminate a clear message of commitment to business ethics and integrity, e.g. by including Integrity and Business Ethics in the company's stated Core Values.
- ❑ Lay down and specify the ethical and integrity standard expected of all staff in a Code of Conduct, which should be endorsed by the Board or the Managing Director / Chief Executive Officer to signify top-level commitment.

### **Education and Training**

- ❑ Provide training on the Prevention of Bribery Ordinance, other relevant laws and regulations for the Company's industry, business ethics, provisions of the Code of Conduct, etc. in staff's orientation training and regularly in refresher training.
- ❑ Provide training on corruption prevention awareness and measures to management staff and store managers.

## Action and Enforcement

- ❑ The top and senior management should lead by example by conducting the company's business in compliance with relevant laws and regulations and ethical business practices.
- ❑ Provide channels for feedback/enquiry channels for customers, and also for staff for making enquiries or reporting of misconduct.
- ❑ Establish a disciplinary system (e.g. a compliance / internal audit unit, procedures and guidelines on disciplinary actions) for investigation and taking of disciplinary action.
- ❑ Report illegal activities to the regulatory or law enforcement authorities concerned, such as suspected corruption to the ICAC.

### 1.3 Code of Conduct

The Code of Conduct should set out the Company's policies regarding acceptance of advantages in relationship to its affairs, providing adequate guidelines to directors, staff and agents to prevent breaches of the Prevention of Bribery Ordinance. A sample Code of Conduct is provided at the *Appendix* (where considered necessary, separate Codes may be issued for Board members and staff).

Further advice or points to note are as follows.

#### (a) Acceptance of Advantages

- ❑ The Code should specify the permissible value (i.e. limit) of gift/advantage that staff are allowed to accept from persons having business dealings with the Company, and specify the occasions on which such advantage may be accepted (e.g. during festivals or events when gifts are traditionally exchanged). The limit should not be of an amount that would influence the staff's impartiality (e.g. by taking into consideration the staff's income and social norm).
- ❑ However, staff should not be allowed to accept any advantages in return for giving favour to the offeror in relation to the Company's business affairs.

## **(b) Offering Advantages**

- ❑ It is also important to remind staff not to offer any advantages to:
  - employees or agents of other companies/persons to in relation to the latter's business affairs without the latter's permission (such as to secure business for the Company);
  - employees of any government department or public body with which the Company or staff has business dealings (e.g. Government employees responsible for inspecting or conducting investigations on the Company's stores).

## **(c) Avoidance and Declaration of Conflict of Interest**

- ❑ It is useful to provide some examples applicable to the Company's environment to help staff assess whether they have conflict of interest. An example of conflict of interest is where a staff having control of the supply of high-demand goods reserves a quantity of these goods for his relatives or for himself.

## **(d) Protection of Valuable Information**

- ❑ Staff should be reminded that information on planned promotional offers and timing of availability of new products not yet publicly announced are classified and should not be disclosed to others without authorization.

## **(e) Promulgation**

- ❑ Issue the Code to each employee/agent and Board/Council member upon appointment, or incorporate it into the staff handbook, and consider requiring the recipients to acknowledge receipt.
- ❑ Re-circulate the provisions or post notices in the offices/stores on acceptance of advantages before major festivals when gifts are traditionally given.
- ❑ Make known the policies on acceptance of advantages to customers and business partners, e.g. posting of notices at stores, on the corporate website, etc.

**2.1 Policy and Procedures on Sale of High-Demand Goods**

- ❑ Lay down the policy and procedures for dealing with the sale of high-demand goods, and issue instructions and guidelines for compliance by shop managers and store staff (see 2.2–2.4 for recommended practices and procedures).
- ❑ Issue, and from time to time update as necessary, a list of goods that are regarded as high-demand goods and thus subject to the above policy and procedures.
- ❑ Make sure that the instructions and guidelines and the list of high-demand goods are promulgated and effectively communicated to all shop staff.
- ❑ Publicize the relevant policy, e.g. by posting notices at prominent areas of the shops and on the company's website.

**2.2 Control of Availability and Sale of High-Demand Goods**

- ❑ Consider adopting the following policies to enhance control of the availability and sale of high-demand goods to customers:
  - set a quota (limit on the number of items) for purchase of such items by each customer;
  - adopt a first-come-first-served policy;
  - adopt a “customers first” policy, i.e. restricting the purchase of such goods by staff to after business hours, or after a certain period (e.g. one day) since arrival of the stock.
- ❑ Require shop staff to upload the high-demand goods onto the sales racks (for self-served items) or display shelves (for items given on request) within a specified time limit upon arrival of new stock, and also refill the racks within a specified time limit when the goods are sold out. The time limit should be as short as practicable.
- ❑ Require the retrieval of stock of high-demand goods from the storeroom (for uploading onto sale racks or display) to be approved by the shop manager.
- ❑ For high-value items, consider the need to restrict their sale to a designated cashier counter to facilitate better control and monitoring.

- ❑ For items out of stock, where appropriate, register customer requests on a first-come-first-served basis and notify customers on the waiting list when the items are available, and put in place controls for the maintenance of the waiting list (e.g. amendment to the waiting list requires the approval of supervisor).
- ❑ As far as practicable, make transparent to customers the arrival schedules and stock availability of the high-demand goods at the sales outlets.
- ❑ For sale of new products in high demand, set the date and time for commencement of sale or advance ordering, lay down the policy and procedure (e.g. first-come-first-served or computer ballot), issue clear instructions to all sales staff and inform customers of the arrangements.
- ❑ Put in place controls for the sale/ordering of new products, e.g. handle all advance orders centrally, or assign a designated counter or staff members in each store to handle the sale/ordering under the supervision of the store manager, and spot check the advance orders to ensure they are genuine.
- ❑ Where feasible and practicable, provide alternative channels/methods for purchase of high-demand goods, such as:
  - on-line store for making electronic purchases, followed by home delivery or delivery to designated stores for pickup by the customers, which could be subject to a quota limit if necessary;
  - on-line channel for placing orders or registering requests for out-of-stock items, followed by notification of availability for purchase by the customers at designated stores, which could be subject to a quota limit if necessary;
  - for items repeatedly purchased by customers, establish a registration or “loyalty/membership” system where registered, regular customers are given priority in ordering/purchasing the products concerned.

### **2.3 Supervisory and Audit Checks**

- ❑ Require shop managers to vigorously monitor the inventory, display and sales activities of high-demand goods to ensure compliance with policy and guidelines and to deter and detect irregularities.
- ❑ Require area managers to conduct surprise checks at specified frequencies on the outlets to ensure compliance with the laid down policy and procedures, and require them to report irregularities to the head office. Consider arranging “cross-district” spot checks by area managers occasionally.

- ❑ Require Head Office (e.g. Internal Audit) to conduct similar surprise audit checks.
- ❑ Require the audit checks to include checking of physical inventory of high-demand goods against the computer inventory records or point-of-sale data, and timely uploading of the high-demand goods onto the sales racks, and to investigate into the discrepancies detected.
- ❑ Require the timing/schedule of the checks be kept confidential and disclose to relevant staff only on a “need-to-know” basis.
- ❑ Require the managers / audit staff to communicate with randomly selected front-line sales staff during the checks to collect information/feedback on the sale of high-demand goods at the shop.
- ❑ Provide an inspection checklist for the conduct of the audit checks and documentation of the findings, which should cover the date and time of the checks, the checker, the goods checked, findings on the physical inventory, inventory records, display of goods, feedback by staff, and any irregularities spotted.
- ❑ Where resources permit, carry out computer-aided auditing by analyzing point-of-sale data of high-demand goods and generating exception reports to help detect possible non-compliance, suspicious patterns or irregularities, e.g. handling of large volume of sale of high-demand goods by a particular staff, a number of consecutive transactions where settlement of payment is made by the same credit card for the same high-demand goods, items sold out right after replenishment of new stock, unusual high or increase in sales volume at specific stores.
- ❑ Consider the need and feasibility of engaging independent third parties or “mysterious customers” to help conduct covert checks on the outlets.
- ❑ Make all staff aware of the company’s practice of conducting checks to deter malpractice.
- ❑ Head office (e.g. Internal Audit) should regularly analyse findings of the audit checks to detect any possible irregularities (e.g. frequent inventory discrepancies, failure to upload/display high-demand goods for sale, etc. at the same shop), and initiate enquiries or investigations where necessary.

## 2.4 Other Management Controls

- ❑ Rotate the posting of shop managers/supervisors among outlets within the same region, and posting of area managers across regions, regularly (with a higher frequency for the former).
- ❑ Where practicable, install CCTV system with recording function to monitor activities at the outlet, including the cashier counters and loading bays, and require area managers / head office staff (e.g. internal audit) to regularly review the recordings.
- ❑ Provide and publicize a customer feedback channel for reporting shortages or other feedback.
- ❑ Establish an internal feedback channel, pledging confidentiality, for staff feedback or reporting of breaches.
- ❑ Establish a mechanism (incl. head office staff responsible for investigating irregularities, investigation and reporting procedure, approving authority for decision/action) to investigate complaints and suspected irregularities.

## Introduction

1. The (*name of company*) (hereafter referred to as the Company) regards honesty, integrity and fair play as our core values that must be upheld by all directors and staff<sup>1</sup> of the Company at all times. This Code sets out the basic standard of conduct expected of all directors and staff, and the Company's policy on acceptance of advantage and handling of conflict of interest when dealing with the Company's business.

## Prevention of Bribery

### Prevention of Bribery Ordinance

2. Under the Prevention of Bribery Ordinance (the Ordinance), any director or staff member who, without the permission of his employer or principal (i.e. the Company), solicits or accepts an advantage as a reward or inducement for doing any act or showing favour in relation to the latter's business, commits an offence. The person offering the advantage also commits an offence.

(The relevant provisions of Section 9 of the Ordinance and the definition of "advantage" are detailed at **Annex 1**.)

### Acceptance of Advantage

3. It is the Company's policy that directors and staff should not solicit or accept any advantage for themselves or others, from any person, company or organization having business dealings with the Company, except that they may accept (but not solicit) the following advantages when offered on a voluntary basis:

- (a) advertising or promotional gifts or souvenirs of a nominal value; or
- (b) gifts given on festive or special occasions, subject to a maximum limit of \$\_\_\_\_\_ in value; or
- (c) discounts or other special offers given by any person or company to them as customers, on terms and conditions equally applicable to other customers in general; or
- (d) gifts or souvenirs of nominal value presented to them in official functions.

No director or staff member should accept any advantage from a subordinate, except those mentioned in paragraphs (a) and (b) above.

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<sup>1</sup> "Staff" cover full-time, part-time and temporary staff, except where specified.

4. Gifts or souvenirs described in paragraph 3(d) above are deemed as offers to the Company. The directors and staff members concerned should report the acceptance to the Company and seek direction as to how to handle the gifts or souvenirs from *the approving authority*<sup>2</sup> using Form A (**Annex 2**). If a director or staff member wishes to accept any advantage not covered in paragraph 3, he/she should also seek permission from *the approving authority* using Form A.

5. However, a director or staff member should decline an offer of advantage if acceptance could affect his/her objectivity in conducting the Company's business or induce him/her to act against the interest of the Company, or acceptance will likely lead to perception or allegation of impropriety.

6. If a director or staff member has to act on behalf of a client in the course of carrying out the Company's business, he/she should also comply with any additional restrictions on acceptance of advantage that may be set by the client.

### **Offer of Advantage**

7. Directors and staff are prohibited from offering advantages to any director or staff of another company or organization, for the purpose of influencing such person or company in any dealings, or any member or staff of a government department or public body while having business dealings with the latter, whether directly or indirectly through a third party, when conducting the Company's business.

### **Entertainment**

8. As defined in Section 2 of the Ordinance, "entertainment" refers to food or drink provided for immediate consumption on the occasion, and any other entertainment provided at the same time. Although entertainment is an acceptable form of business and social behaviour, a director or staff member should avoid accepting overly lavish or frequent entertainment from persons with whom the Company has business dealings (e.g. suppliers or contractors) or from his/her subordinates to avoid placing himself/herself in a position of obligation.

### **Records, Accounts and other Documents**

9. Directors and staff should ensure that all records, receipts, accounts or other documents they submit to the Company, give a true representation of the events or business transactions as shown in the documents. Intentional use of documents containing false information to deceive or mislead the Company, regardless of whether there is any gain or advantage involved, may constitute an offence under the Ordinance.

### **Compliance with Laws of Hong Kong and in Other Jurisdictions**

10. Directors or staff must comply with all local laws and regulations when conducting the Company's business, and also those in other jurisdictions when conducting business there.

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<sup>2</sup> Specify the post of the approving authority in the Code and the Form.

## Conflict of Interest

11. Directors and staff should avoid any conflict of interest situation (i.e. situation where their private interest conflicts with the interest of the Company) or the perception of such conflicts. They should not misuse their position or authority in the Company to pursue their own private interests which include both financial or personal interests and those of their family members, relatives or close personal friends. When actual or potential conflict of interest arises, the director or staff member should make a declaration to the management through the reporting channel using Form B (**Annex 3**).

12. Some common examples of conflict of interest are described below but they are by no means exhaustive:

- (a) A staff member involved in a procurement exercise is closely related to or has financial interest in the business of a supplier who is being considered for selection by the Company.
- (b) One of the candidates under consideration in a recruitment or promotion exercise is a family member, a relative or a close personal friend of the staff member involved in the process.
- (c) A director of the Company has financial interest in a company whose quotation or tender is under consideration by the Board.
- (d) A staff member (full-time or part-time) undertaking part-time work with a contractor whom he is responsible for monitoring.

## Use of Company Assets

13. Directors and staff in charge of or having access to any Company assets, including funds, property, information, and intellectual property, should use them solely for the purpose of conducting the Company's business. Unauthorized use, such as misuse for personal gain, is strictly prohibited.

## Confidentiality of Information

14. Directors and staff should not disclose any classified information of the Company without authorization or misuse any Company information (e.g. unauthorized sale of the information). Those who have access to or are in control of such information, including information in the Company's computer system, should at all times protect the information from unauthorized disclosure or misuse. Special care should also be taken in the use of any personal data, including directors', staff's and customers' personal data, to ensure compliance with the Personal Data (Privacy) Ordinance.

## Outside Employment

15. Any full time staff who wish to take up employment outside the Company, must seek the prior written approval of *the approving authority*. The approving authority should consider whether the outside employment would give rise to a conflict of interest with the staff's duties or the interest of the Company.

## Relationship with Suppliers, Contractors and Customers

### Gambling

16. Directors and staff are advised not to engage in frequent gambling activities (e.g. mahjong) with persons having business dealings with the Company.

### Loans

17. Directors and staff should not accept any loan from, or through the assistance of, any individual or organization having business dealings with the Company. There is however no restriction on borrowing from licensed banks or financial institutions.

*[The Company may wish to include other guidelines on the conduct required of directors and staff in their dealings with suppliers, contractors, customers, and other business partners as appropriate to specific trades.]*

## Compliance with the Code

18. It is the responsibility of every director and staff member of the Company to understand and comply with this Code, whether performing his company duties in or outside Hong Kong. Managers and supervisors should also ensure that the staff under their supervision understand well and comply with this Code.

19. Any director or staff member in breach of this Code will be subject to disciplinary action, including termination of appointment. In cases of suspected corruption, a report will be made to the ICAC, and of other criminal offences, to the appropriate authority.

20. Any enquiries about this Code or reports of possible breaches of this Code should be made to (post of designated senior staff).

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(Name of Company)

Date :

## Extracts of the Prevention of Bribery Ordinance

### Section 9

- (1) Any agent who, without lawful authority or reasonable excuse, solicits or accepts any advantage as an inducement to or reward for or otherwise on account of his –
- (a) doing or forbearing to do, or having done or forborne to do, any act in relation to his principal's affairs or business; or
  - (b) showing or forbearing to show, or having shown or forborne to show, favour or disfavour to any person in relation to his principal's affairs or business,

shall be guilty of an offence.

- (2) Any person, who, without lawful authority or reasonable excuse, offers any advantage to any agent as an inducement to or reward for or otherwise on account of the agent's –
- (a) doing or forbearing to do, or having done or forborne to do, any act in relation to his principal's affairs or business; or
  - (b) showing or forbearing to show, or having shown or forborne to show, favour or disfavour to any person in relation to his principal's affairs or business,

shall be guilty of an offence.

- (3) Any agent who, with intent to deceive his principal, uses any receipt, account or other document –
- (a) in respect of which the principal is interested; and
  - (b) which contains any statement which is false or erroneous or defective in any material particular; and
  - (c) which to his knowledge is intended to mislead the principal,

shall be guilty of an offence.

- (4) If an agent solicits or accepts an advantage with the permission of his principal, being permission which complies with subsection (5), neither he nor the person who offered the advantage shall be guilty of an offence under subsection (1) or (2).
- (5) For the purpose of subsection (4) permission shall –
- (a) be given before the advantage is offered, solicited or accepted; or
  - (b) in any case where an advantage has been offered or accepted without prior permission, be applied for and given as soon as reasonably possible after such offer or acceptance,

and for such permission to be effective for the purpose of subsection (4), the principal shall, before giving such permission, have regard to the circumstances in which it is sought.

### Section 2

#### **'Advantage' means :**

- (a) any gift, loan, fee, reward or commission consisting of money or of any valuable security or of other property or interest in property of any description;
- (b) any office, employment or contract;
- (c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- (d) any other service, or favour (other than entertainment), 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;
- (e) the exercise or forbearance from the exercise of any right or any power or duty; and
- (f) any offer, undertaking or promise, whether conditional or unconditional, of any advantage within the meaning of any of the preceding paragraphs (a), (b), (c), (d) and (e),

but does not include an election donation within the meaning of the Elections (Corrupt and Illegal Conduct) Ordinance (Cap. 554), particulars of which are included in an election return in accordance with that Ordinance.

#### **'Entertainment' means :**

The provision of food or drink, for consumption on the occasion when it is provided, and of any other entertainment connected with, or provided at the same time as, such provisions.

### Section 19

In any proceedings for an offence under this Ordinance, it shall not be a defence to show that any such advantage as is mentioned in this Ordinance is customary in any profession, trade, vocation or calling.

**(Company Name)**  
**REPORT ON GIFTS RECEIVED**

**Part A – To be completed by Receiving Staff**

To : (Approving Authority)

Description of Offeror :

*Name & Title of Offeror :* \_\_\_\_\_

*Company :* \_\_\_\_\_

*Relationship (Business / Personal) :* \_\_\_\_\_

Occasion on which the Gift  
was / is to be received :

\_\_\_\_\_

Description & (assessed) value of the Gift :

\_\_\_\_\_

*Suggested Method of Disposal :*

*Remark*

Retain by the Receiving Staff \_\_\_\_\_

Retain for Display / as a Souvenir in the Office \_\_\_\_\_

Share among the Office \_\_\_\_\_

Reserve as Lucky Draw Prize at Staff Function \_\_\_\_\_

Donate to a Charitable Organization \_\_\_\_\_

Return to Offeror \_\_\_\_\_

Others (please specify) : \_\_\_\_\_

(Date)

\_\_\_\_\_  
(Name of Receiving Staff)

(Title)

**Part B – To be completed by Approving Authority**

To : (Name of Receiving Staff)

The recommended method of disposal is **\*approved / not approved**. \*The gift(s) concerned should be disposed of by way of : \_\_\_\_\_

(Date)

\_\_\_\_\_  
(Name of Approving Authority)

(Title)

\* Delete as appropriate.

**(Company Name)**  
**Declaration of Conflict of Interest**

**Part A – Declaration** *(To be completed by Declaring Staff)*

To : (Approving Authority) via (supervisor of the Declaring Staff)

I would like to report the following actual/potential\* conflict of interest situation arising during the discharge of my official duties:-

<b>Persons/companies with whom/which I have official dealings</b>
<b>My relationship with the persons/companies (e.g. relative)</b>
<b>Relationship of the persons/companies with our Company (e.g. supplier)</b>
<b>Brief description of my duties which involved the persons/companies (e.g. handling of tender exercise)</b>

\_\_\_\_\_  
(Name of Declaring Staff)  
(Title / Department)

(Date)

**Part B – Acknowledgement** *(To be completed by Approving Authority)*

To : (Declaring Staff) via (supervisor of the Declaring Staff)

**Acknowledgement of Declaration**

The information contained in your declaration form of     (Date)     is noted. It has been decided that:-

- You should refrain from performing or getting involved in performing the work, as described in Part A, which may give rise to a conflict.
- You may continue to handle the work as described in Part A, provided that there is no change in the information declared above, and you must uphold the Company’s interest without being influenced by your private interest.
- Others (please specify) : \_\_\_\_\_

\_\_\_\_\_  
(Name of Approving Authority)  
(Title / Department)

(Date)

\* Delete as appropriate.







## Corruption Prevention Department

Independent Commission Against Corruption

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