

## 第四章 CHAPTER 4

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# 制度防貧

SYSTEMIC  
PREVENTION

## 策略

- 與政府部門和公共機構建立伙伴關係，透過強化管治及內部管控措施，預防貪污。
- 優先審查關乎民生或公眾安全的公共行政範疇、涉及公眾利益或備受市民關注的事宜，以及涉及大量公帑的項目和工程。
- 從源頭防貪，主動就政府部門和公共機構的新政策、服務和系統及早向有關機構提供防貪建議；並於主要項目（例如大型基建工程）的籌劃及落實等主要階段同步提供防貪服務，確保項目能適時加入防貪措施。
- 與各行各業的監管機構／團體及專業團體建立伙伴關係，透過於行業規例／守則中加入防貪及誠信元素、提供防貪指南及培訓，提升私營機構的防貪能力。
- 與相關政府部門及機構合作，推動工作流程和公共服務數碼化以加強他們的防貪能力。

## 工作回顧

年內，廉署持續致力減低公共行政範疇的貪污風險，重點放在關乎民生和公眾安全及備受公眾關注的事宜，以及涉及大量公帑的項目，包括公共工程、樓宇維修、政府採購、公眾健康和 safety、政府資助計劃、執法及規管職能。

## STRATEGIES

- Adopt a partnership approach with government departments and public bodies to prevent corruption through good governance and internal control systems.
- Accord priority to areas of public administration impacting on people's livelihood or safety, issues of public interest or concern, and programmes and projects involving substantial amounts of public money.
- Adopt a prevention-at-source strategy by providing proactive and early corruption prevention input to government departments and public bodies in respect of their new initiatives, services and systems, and offer concurrent corruption prevention services at key stages including formulation and implementation of major programmes (such as large-scale infrastructure projects) to ensure corruption prevention safeguards are put in place in a timely manner.
- Establish partnership with the regulatory authorities/ regime and professional bodies of different industries to enhance the corruption prevention capabilities of the private sector by incorporating corruption prevention and integrity elements in the trade regulations/codes of practice and providing preventive guidelines and training.
- Collaborate with the relevant government departments and organisations for promoting the digitalisation of work processes and public services to enhance their corruption prevention capabilities.

## REVIEW OF WORK

During the year, the ICAC continued to address and prevent corruption risks in public administration with emphasis on issues which are important to people's livelihood or public safety, issues of public interest or concern, and programmes and projects involving substantial amount of public money, covering areas such as public works, building maintenance, public procurement, public health and safety, government funding schemes, law enforcement and regulatory functions.

## 二零二四年完成的工作項目： Deliverables achieved in 2024:



## 重點防貪工作

### 樓宇維修及物業管理

樓宇管理與民生息息相關，其中，樓宇維修往往涉及龐大款項，貪污風險較高。由於不少大廈均聘用物業管理公司提供專業服務，物業管理在整體樓宇管理中擔當重要角色。廉署一直採取不同策略加強樓宇維修及物業管理的防貪工作，當中包括：

## MAJOR CORRUPTION PREVENTION INITIATIVES

### Building Maintenance and Property Management

While building management is closely related to people's livelihood, building maintenance remains a corruption-prone area given the huge sums involved. As most buildings engage property management companies (PMCs) to provide professional services, property management plays a pivotal role in overall building management. The ICAC has been implementing various strategies to enhance corruption prevention in building maintenance and property management. These include:

### 協助業主在樓宇維修中防止貪污

廉署於二零二四年五月推出《防貪攻略 — 樓宇維修（業主篇）》單張（“攻略”），以簡明的方式列出大維修項目中常見的貪污風險及業主可採取的防貪措施；並透過不同形式推廣“攻略”（例如短片），提升業主抵禦貪污的能力。



《防貪攻略 — 樓宇維修（業主篇）》

*Corruption Prevention 101 - Building Maintenance Tips for Owners*

### Assisting Owners to Prevent Corruption in Building Maintenance

In May 2024, the ICAC published a leaflet titled *Corruption Prevention 101 - Building Maintenance Tips for Owners* which highlighted the corruption risks commonly associated with large-scale maintenance projects and provided property owners with corresponding safeguards. The ICAC promoted the leaflet in various ways (e.g. short video) in order to enhance the owners' anti-corruption capabilities.

### 就樓宇管理及維修加強制度預防

因應樓宇日益老化，為推動業主進行樓宇維修，相關政府部門及公共機構推出了多項資助及支援計劃。廉署一直與有關部門及機構緊密合作，適時就最新的計劃及進展提供防貪建議，減低維修工程中出現貪污的機會。在二零二四年，廉署為市區重建局檢視了“招標妥”的工作指引、第三輪“樓宇更新大行動 2.0”的優化措施及“樓宇復修公司登記計劃”的管理。此外，因應《2023 年建築物管理（修訂）條例草案》於二零二四年七月通過並於一年後實施，民政事務總署修訂了相關的行政指引，廉署亦已檢視相關行政指引，並作出多項防貪建議。

### Optimising Corruption Prevention in Building Management and Maintenance through System Enhancement

To address the issue of aging buildings, relevant government departments and public bodies have introduced various subsidy and assistance schemes to encourage building maintenance by property owners. The ICAC has been working closely with different stakeholders, offering timely corruption prevention advice on the latest schemes and developments to minimise corruption risks in maintenance projects. In 2024, the ICAC reviewed for the Urban Renewal Authority the guidance notes on "Smart Tender", the enhancement measures for the third-round of "Operation Building Bright 2.0" and the administration of the "Building Rehabilitation Company Registration Scheme". Given that the *Building Management (Amendment) Bill 2023* will come into force one year after its passage in July 2024, the ICAC had also reviewed the relevant administrative guidelines revised by the Home Affairs Department and recommended a number of safeguards.



## 推動物業管理業界持廉守正

年內，廉署持續推廣於二零二三年推出的《物業管理公司防貪指南》。為了協助業界理解這《指南》，廉署製作了動畫短片，重點闡述其中四個物管工作範疇的貪污警號和防貪措施。廉署在二零二四年四月為大型物業管理公司高級管理人員舉辦的“物業管理反貪專業課程”中，向參加者解釋《指南》的內容，並鼓勵業界採用。廉署又全面檢視了物業管理業界的發牌制度，以確保行業的專業及誠信。同時，廉署亦就物業管理業監管局向物業管理公司發出的《處理委任代表的文書》操守守則及相關指南提供防貪建議，以減低過程中的貪污風險。

## Upholding Integrity in Property Management Sector

During the year, the ICAC continually promoted the *Corruption Prevention Guide for Property Management Companies* launched in 2023. To assist stakeholders in understanding this Guide, the ICAC produced an animation video highlighting the red flags and corresponding safeguards across four areas in property management. The ICAC organised the "Professional Anti-corruption Training in Property Management" for major PMCs in April 2024, during which the Guide was explained to the participating senior executives, who were encouraged to adopt the recommended measures. The ICAC also conducted a comprehensive review on the licensing and the regulatory systems to uphold professionalism and integrity of the industry. Meanwhile, the ICAC also offered corruption prevention advice to the Property Management Services Authority on the Code of Conduct entitled *Handling Instrument of Appointing a Proxy* and the relevant guidelines it issued to PMCs to mitigate corruption risks involved in the procedures.



廉署於“物業管理反貪專業課程”中推廣《物業管理公司防貪指南》

The ICAC promoting the *Corruption Prevention Guide for Property Management Companies* during the "Professional Anti-corruption Training in Property Management"

廉署人員於“物業管理反貪專業課程”中推廣及講解《物業管理公司防貪指南》

ICAC officers promoting and explaining the *Corruption Prevention Guide for Property Management Companies* during the "Professional Anti-corruption Training in Property Management"



## 體育總會及體育界

政府近年投入龐大資源推動本地體育發展，運動員在世界級賽事屢創佳績，作為各項運動的代表機構，體育總會的角色舉足輕重，廉署一直積極協助體育總會加強內部管控。廉署於二零二四年一月舉辦了“體育總會誠信領導課程”，為體育總會提供一個分享和交流關於體育領域良好管治經驗和觀點的平台，獲業界高度評價。廉署其後於九月推出《體育總會誠信防貪指南》，涵蓋誠信管理、運動員選拔、教練、裁判員與訓練課程的管理、行政管理及科技應用五大範疇；透過個案分析，以模擬個案情境剖析體育總會運作上常見的貪污漏洞，並提供相應的防貪措施。《指南》已分發予各體育總會，並上載至防貪諮詢服務網站。廉署正逐步與各體育總會會面，就其運作提供度身定造的防貪建議，務求營造業界的廉潔風氣和良好管治。

## National Sports Associations and Sports Sector

In recent years, the Government has invested substantially in promoting sports development in Hong Kong, and many local athletes have attained remarkable achievements in world-class competitions. As the representative organisations for various sports, National Sports Associations (NSAs) play a vital role, the ICAC has been proactively assisting NSAs in enhancing their internal control. The "Integrity Leadership Training for NSAs" organised by the ICAC in January 2024, which provided a platform for experience sharing and exchanges on good governance among NSAs, was well received by the sector. Subsequently in September, the ICAC launched the *Integrity and Corruption Prevention Guide for National Sports Associations*, covering five major areas, namely integrity management, selection of athletes, management of coaches, umpires and training courses, administration of NSAs and application of technology. Through case studies featuring hypothetical scenarios in perspective, the Guide highlights common corruption loopholes associated with the operations of NSAs and the corresponding safeguards. The Guide has been distributed

to NSAs and uploaded to the dedicated website of the Corruption Prevention Advisory Service. The ICAC has been reaching out to individual NSAs to provide tailored corruption prevention advice on their operations, striving to foster a culture of integrity and good governance in the sports sector.



《體育總會誠信防貪指南》及《體育總會誠信防貪要點》

*Integrity and Corruption Prevention Guide for National Sports Associations and Corruption Prevention Tips for National Sports Associations*



中國香港體育協會暨奧林匹克委員會副會長在“體育總會誠信領導課程”中，向 43 個不同運動項目的體育總會管理人員致閉幕辭

Vice President of the Sports Federation & Olympic Committee of Hong Kong, China delivering the closing remarks to the managerial staff from 43 NSAs of various sports attending the Integrity Leadership Training for NSAs



廉署人員在課程的案例分析與交流環節中，帶領體育總會管理人員探討日常運作中的誠信挑戰，並剖析相應的防貪策略

ICAC officers leading managerial staff of NSAs to discuss the integrity challenges in their daily operations and analysing corresponding preventive measures during the case study and sharing sessions



## 《公務員操守行為指引樣本》

廉署與公務員事務局一直保持緊密合作，協助維護公務員的誠信。公務員事務局於二零二四年六月頒布更新版《公務員守則》，闡明公務員應有的基本信念和操守準則。廉署與公務員事務局隨即於七月推出更新的《公務員操守行為指引樣本》（《指引樣本》），供各政府決策局／部門在制定其誠信指引時作參考及採納。《指引樣本》有多項更新以加強對公務員的行為指引，包括強化有關處理利益衝突、審慎理財、督導責任、舉報罪行（包括貪污）的要求等規定。廉署會與公務員事務局合作推廣《指引樣本》，並協助各決策局／部門檢視和更新其守則或指引。



《公務員操守行為指引樣本》

*Sample Guide on Conduct Matters for Civil Servants*



廉署與公務員事務局向政府代表推廣《指引樣本》

The ICAC and CSB promoting the *Sample Guide* to government representatives

## *Sample Guide on Conduct Matters for Civil Servants*

The ICAC has been working closely with the Civil Service Bureau (CSB) to assist in upholding integrity in the civil service. The CSB promulgated the updated *Civil Service Code* in June 2024 to clearly spell out the core values and standards of conduct of civil servants. Soon afterwards, the ICAC and the CSB issued the updated *Sample Guide on Conduct Matters for Civil Servants (Sample Guide)* in July for reference and adoption by government bureaux/departments (B/Ds) when formulating their own guideline. The updates made to the *Sample Guide* provide further guidance on civil servants' conduct matters, including strengthened requirements regarding the handling of conflict of interest, prudent financial management, supervisory accountability and reporting of crimes (including corruption). The ICAC will collaborate with the CSB in promoting the *Sample Guide*, and assist B/Ds in reviewing and updating their codes or guidelines.

## 政府內部審計

內部審計透過系統性審視，就風險管理、管控機制及管治程序的成效進行獨立評估，為政府決策局／部門高級管理層提供客觀的意見。內部審計是良好管治的基本元素，有助預防貪污及其他不當行為。為提升內部審計人員對高貪污風險程序的了解及敏感度，廉署於二零二四年十月為 60 名來自 25 個決策局／部門的內部審計人員舉辦研討會，透過真實個案，協助他們更深入了解如何在日常審計工作中，辨別部門運作或程序中潛在的貪污漏洞，及相應的管控措施。

## *Internal Auditors of Government*

Through system reviews, internal audit conducts independent assessments and provides the senior management of government B/Ds with objective advice on the effectiveness of risk management strategies, control mechanisms and governance processes. Internal audit is also an essential element of good governance conducive to the prevention of corruption and other malpractices. To raise internal auditors' awareness and understanding of corruption-prone procedures, the ICAC organised a seminar for 60 internal auditors from 25 government B/Ds in October 2024. Through case studies, internal auditors could understand more about identifying corruption loopholes in operations and procedures of individual departments as well as the corresponding control measures.



廉署人員於研討會上分享防貪經驗

ICAC officers sharing corruption prevention experience during the seminar

## 大專院校

廉署一直與本港大專院校合作，為他們不同的工作範疇識別貪污漏洞。廉署於二零二四年中向八間接受大學教育資助委員會資助的大學，就收生程序和相關內部指引提供防貪建議，並於其後舉辦防貪研討會，進一步協助他們優化收生程序及加強彼此溝通以偵測可疑入學申請。廉署將於二零二五年編製收生防貪指南供所有大專院校參考。

## Tertiary Education Institutions

The ICAC has all along been working with local tertiary education institutions (TEIs) to identify corruption loopholes in their various operational areas. In mid-2024, the ICAC provided corruption prevention advice to eight universities funded by the University Grants Committee on their student admission procedures and relevant internal guidelines, and hosted a corruption prevention seminar afterwards to further assist them in enhancing the student admission procedures and strengthening their communications with a view to detecting suspicious applications for admission. In 2025, the ICAC will develop a corruption prevention guide on admission of students for reference by all TEIs.



廉署人員與大學教職員會面，就收生程序提供防貪建議

ICAC officers meeting with universities' staff and providing corruption prevention advice on student admission procedures



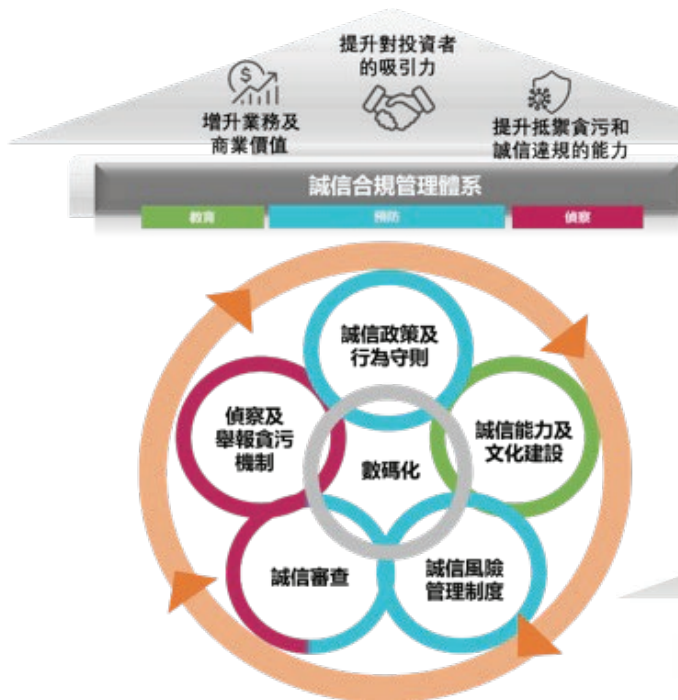


## 企業“誠信合規管理體系”

廉署正建構企業“誠信合規管理體系”，首階段研究已於二零二四年完成，訂立了體系的總體框架及五大要素，包括“誠信政策及行為守則”、“偵測及舉報貪污機制”、“誠信風險管理”、“誠信能力及文化建設”及“誠信審查”。第二階段研究亦已開始，為各項要素訂立具體要求。稍後，廉署將編製全新的企業防貪指南，並與相關監管機構及持份者合作，提供能力建設培訓和其他防貪服務，以協助企業採用“誠信合規管理體系”。

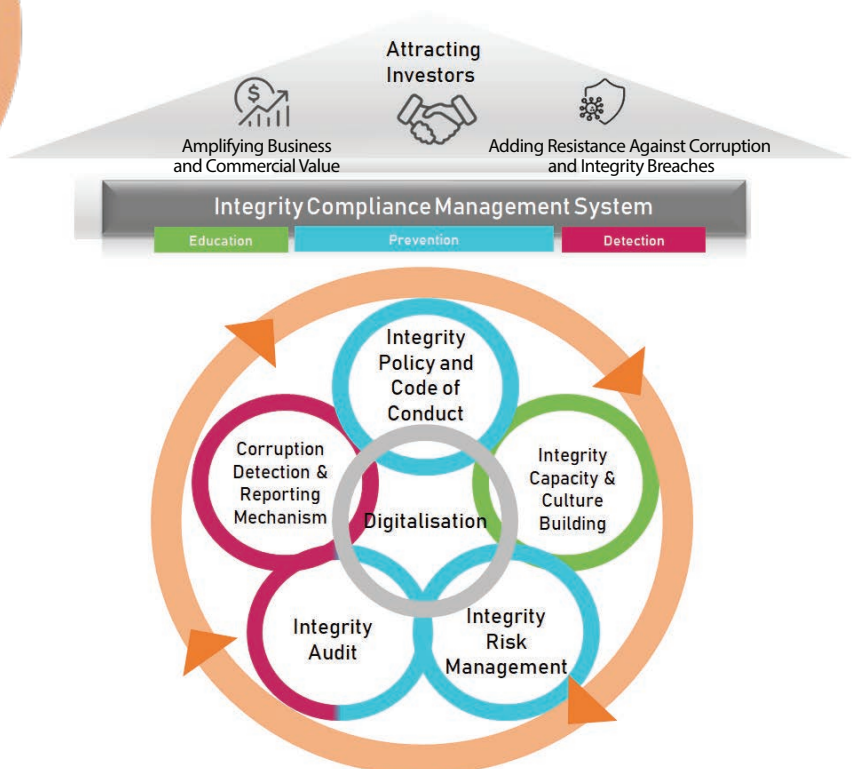
## Integrity Compliance Management System for Corporations

The ICAC is developing an "Integrity and Compliance Management System" (ICMS) for adoption by corporations. The first phase of research was completed in 2024, with the overall framework and five core components established, namely "Integrity Policy and Code of Conduct", "Corruption Detection and Reporting Mechanism", "Integrity Risk Management", "Integrity Capacity and Culture Building" and "Integrity Audit". The ICAC is currently conducting the second phase of research looking into the specific requirements for each core component, after which the ICAC will compile a new corruption prevention guide for corporations and collaborate with relevant regulatory bodies and stakeholders to provide multi-faceted corruption prevention services such as capacity building training, with a view to assisting corporations in adopting the ICMS.



### “誠信合規管理體系”總體框架

Overall framework of the ICMS



## 工程項目誠信管理框架

由於來年將有多項涉及大量公帑的公共工程項目開展，廉署正參考國際標準及良好做法，研究制定一套“工程項目誠信管理框架”（框架），以協助工程項目持份者於項目週期（即由起始階段到完工結算）中更有效應對誠信風險。誠信是工程成功交付的重要基石，廉署將透過框架強化公共工程項目的誠信管理，日後亦會協助政府和公共機構採用框架及為持份者舉辦能力建設培訓。

## 建造業輸入勞工計劃

針對建造業輸入勞工被索取非法回佣的問題，廉署向發展局建議多項防貪措施，希望及早偵測違法違規情況，並確保涉及輸入勞工的住宿及生活費用屬合理水平，收費安排具透明度。此外，廉署已為超過 300 名有意申請輸入勞工配額的建築公司管理人員舉辦防貪講座，涵蓋招聘工人所涉及的誠信風險及管控措施。廉署會繼續與發展局及其他持份者緊密聯繫，以防止輸入勞工被索取非法回佣。

廉署人員於建造業輸入勞工宿舍傳遞防貪信息

ICAC officers disseminating integrity messages at the Construction Sector Imported Labour Quarters



## Project Integrity Management Framework

As a vast number of public works projects that involve large amounts of public money will kick start in the coming years, the ICAC is developing a systematic "Project Integrity Management Framework" (the Framework) by drawing reference from international standards and best practices to assist stakeholders in managing integrity risks more effectively throughout the project life cycle (from initiation to completion). Given "integrity" is the cornerstone of successful delivery of works projects, the ICAC will enhance "Integrity Management" in public works management projects through the Framework. It will assist the Government and public bodies in adopting the Framework and organise capacity building trainings for stakeholders.

## Labour Importation Scheme for Construction Industry

To address the issue of solicitation of illegal rebates from imported construction workers, the ICAC proposed a number of corruption prevention measures to the Development Bureau (DEVB) in order to facilitate early detection of irregularities and ensure the fees chargeable to imported workers in relation to their accommodation and living needs are transparent and set at a reasonable level. Besides, the ICAC has organised corruption prevention briefings for over 300 managerial staff of construction companies interested in applying for labour importation quotas, covering topics such as integrity risks and control measures in the recruitment of workers. The ICAC will continue to maintain close liaison with the DEVB and other stakeholders to prevent solicitation of illegal rebates from imported construction workers.

## 簡約公屋

政府於二零二二年推出簡約公屋措施，由建築署負責相關的建造工程，三份採用新工程合約的設計及建造合約亦先後批出，項目於二零二三年十二月起陸續動工。另外，房屋局於二零二四年透過公開招標批出兩份營運及管理服務合約，委任非政府機構／物業管理公司負責營運簡約公屋，包括住戶事務管理、物業管理、日常保養維修及一系列社會服務。廉署已為建築署完成了關於新工程合約的防貪審查，涵蓋工程付款、合約管理等程序，並就建築署採購“組裝合成”組件的程序提供防貪建議。廉署亦已就房屋局揀選及監管營運機構的程序，以及申請簡約公屋的流程提供防貪建議，並向營運機構提供防貪培訓。

## Light Public Housing

The Government launched a Light Public Housing (LPH) initiative in 2022. The Architectural Services Department (ArchSD) which took charge of the construction works concerned awarded separately three design and build contracts in the form of New Engineering Contracts (NEC), and the projects kicked off gradually starting from December 2023. Besides, through open tender, the Housing Bureau awarded two operation and management contracts in 2024 to appoint NGOs / PMCs as operators of LPH projects, encompassing tenancy management, property management, daily maintenance and a range of social services. The ICAC has already completed assignment studies on ArchSD's adoption of NEC, covering procedures such as processing of payment and contract administration, and provided recommendations to ArchSD on their procurement of Modular Integrated Construction modules. In addition, the ICAC has offered corruption prevention advice to the Housing Bureau on the procedures for the selection and performance monitoring of LPH operators, as well as the LPH application process. Corruption prevention training was also provided for the LPH operators.

位於元朗攸壘路的第一個簡約公屋項目

The first LPH project at Yau Pok Road, Yuen Long



## 創新及科技資助計劃

為建設香港成為國際創新科技中心，政府公布了《香港創新科技發展藍圖》，並推出了一系列創新及科技資助計劃，例如創新科技署的“新型工業化及科技培訓計劃”、“新型工業加速計劃”和“產學研1+計劃”，以支持研發、推動科研成果轉化及支援科技初創企業的發展等。廉署早在政府推出各項計劃前已經就其申請指引、資助協議等提供防貪建議，包括加強項目採購的管控措施、為科研成果轉化和商品化制定指引等，亦就一些大

## Innovation and Technology Funding Schemes

To develop Hong Kong into an international innovation and technology (I&T) centre, the Government promulgated the *Hong Kong Innovation and Technology Development Blueprint* and launched a series of I&T funding schemes, for example, the "New Industrialisation and Technology Training Programme", the "New Industrialisation Acceleration Scheme" and "the Research, Academic and Industry Sectors One-plus Scheme" of the Innovation and Technology Commission, with the objectives of supporting research and development (R&D), fostering transformation of R&D outcomes and facilitating development of technology start-ups, etc. Before the launch of the various programmes, the ICAC had already provided the Government with



型資助計劃進行防貪審查。廉署將編製有關創新及科技資助計劃的防貪指南，以加強創新及科技界的誠信管理和防貪能力。



corruption prevention advice on the application guides, funding agreements, etc., including enhancement of control measures for project procurement and formulation of guidelines for transformation and commercialisation of R&D outcomes. Assignment studies were also conducted on some major funding schemes. The ICAC will develop a corruption prevention guide on I&T funding schemes to enhance the integrity management and corruption prevention capabilities of the I&T industry.

廉署人員觀察香港科技園公司人工智能工具的應用

ICAC officer observing the application of artificial intelligence tools by the Hong Kong Science and Technology Parks Corporation

### 打擊洗黑錢及恐怖分子資金籌集

貪污與洗黑錢有密切關係。由於犯罪分子會利用銀行體系隱瞞和清洗來自非法活動的資金，香港金融管理局（金管局）在《反洗錢及反恐怖分子融資條例》（第615章）（《條例》）的框架下建立了健全的機制，以監管認可機構（包括持牌銀行）在反洗黑錢和反恐怖分子融資方面的工作。廉署已就金管局的相關制度和程序完成審查，並提出措施以強化其監管機制。廉署將進一步檢視金管局有關《條例》的執法工作，並按需要向金管局提供防貪建議。

### 新資本投資者入境計劃

政府於二零二四年三月推出新資本投資者入境計劃，旨在吸引資產擁有人在香港落戶發展，並發掘本港多元的投資機會。投資推廣署轄下新資本投資者入境計劃辦公室負責審查計劃申請人的金融資產和投資，並監察獲批申請人是否持續符合投資規定和投資管理規定。在計劃出台前，廉署已向投資推廣署就計劃的規則、申請表格及參考指引提供一系列防貪建議，以加強申請及審查程序的管控。

### *Anti-Money Laundering and Counter-Terrorist Financing Work*

Corruption and money laundering are often inextricable. As the banking system can be exploited for concealing and laundering funds from illicit activities, the Hong Kong Monetary Authority (HKMA) has established a robust mechanism under the framework of the *Anti-Money Laundering and Counter-Terrorist Financing Ordinance* (Cap. 615) (the Ordinance) to supervise the anti-money laundering and counter-terrorist financing work of authorized institutions, including licensed banks. The ICAC has completed an assignment study on the relevant systems and procedures of the HKMA and recommended measures to strengthen its regulatory regime. The ICAC will further examine the HKMA's enforcement of the Ordinance and offer corruption prevention advice as necessary.

### *New Capital Investment Entrant Scheme*

In March 2024, the Government launched the New Capital Investment Entrant Scheme (New CIES) to attract asset owners to settle in Hong Kong and explore its diverse investment opportunities. The New CIES Office under Invest Hong Kong is responsible for assessing the financial assets and investments of New CIES applicants as well as monitoring their continuous compliance with the investment and portfolio maintenance requirements. Before the launch of the New CIES, the ICAC had provided Invest Hong Kong with a range of corruption prevention recommendations on the rules, application forms and reference guidelines of the New CIES to tighten control of the application and assessment procedures.

## 公私營合作

廉署與不同界別的合作伙伴攜手合作，積極推動業界進一步加強防貪意識和提升管治。有關工作包括：

### 誠信營商約章

廉署與本港主要商會積極協作，共同推出“誠信營商約章”（約章）。繼二零二三年十一月與香港中華廠商聯合會（廠商會）合作，廉署於二零二四年八月與香港中華總商會（中總）聯手推廣約章，推動會員公司實施“誠信管理制度”，以維護並提升工商界的防貪意識及能力，締造廉潔營商環境，貢獻國家高質量發展。參與公司須承諾執行誠信政策、委派“誠信執行官”協助落實並監察誠信政策及良好企業管治，以及安排“誠信執行官”或高級管理人員每年參加由廉署舉辦的誠信培訓。

約章啟動禮於二零二四年八月八日舉行，由律政司副司長、廉政專員及中總會長擔任主禮嘉賓，並向首批參與約章的中總會會員公司頒發承諾宣言。

首批香港中華總商會會員公司參與“誠信營商約章”，推動良好管治

The first batch of CGCC member companies pledging to join BSIC to promote good governance

## PUBLIC-PRIVATE PARTNERSHIP

The ICAC works closely with its partners from different sectors to enhance industries' corruption prevention awareness and governance. Efforts were made in the following areas:

### Business Sector Integrity Charter

The ICAC has collaborated with major local chambers of commerce to launch the "Business Sector Integrity Charter" (BSIC). Following the partnership with the Chinese Manufacturers' Association of Hong Kong (CMA) in November 2023, the ICAC joined hands with the Chinese General Chamber of Commerce, Hong Kong (CGCC) in August 2024 to promote the BSIC, encouraging member companies of the CGCC to adopt the "Integrity Management System" (IMS) for upholding and enhancing the corruption prevention awareness and capabilities of the business sector, contributing to the building of a clean business environment and the high-quality development of the country. Companies joining the BSIC were required to commit to executing integrity policies, appoint an "Integrity Officer" to assist in implementing and monitoring the companies' integrity policies and corporate governance, and arrange their "Integrity Officer" or senior managerial staff to participate each year in integrity training conducted by the ICAC.

The launching ceremony of the BSIC was held on 8 August 2024. It was officiated by the Deputy Secretary for Justice, the ICAC Commissioner and the CGCC Chairman who presented statements of commitment to the first batch of CGCC member companies joining the BSIC.



## 銀行業誠信約章

繼二零二一年在建造業界推出“『誠』建商約章”計劃後，在金管局及香港銀行公會（銀行公會）的全力支持下，廉署於二零二四年十月推出“銀行業誠信約章”，目的是結合廉潔與金融兩項香港優勢，體現銀行業對誠信的要求和重視，鞏固香港國際金融中心地位；同時亦配合國家“一帶一路”倡議，加強政府和企業合作，共同預防和打擊貪污，協助建設“廉潔之路”。

“銀行業誠信約章”啟動禮於二零二四年十月九日舉行，由廉政專員、金管局總裁及銀行公會主席擔任主禮嘉賓，並有近 60 名來自 30 家銀行的高級管理層出席。參與銀行須按“誠信約章”要求，承諾推行誠信文化、制訂行為守則、委派“誠信執行官”協助落實誠信管治、為員工提供誠信培訓，並及時向廉署或其他執法機構舉報懷疑貪污和詐騙等非法行為。

## Banking Industry Integrity Charter

Subsequent to the launch of the "Construction Industry Integrity Charter" in 2021, the ICAC released the "Banking Industry Integrity Charter" (BIIC) in October 2024 with the full support of the HKMA and the Hong Kong Association of Banks (HKAB). The BIIC aimed to combine probity and finance, the two distinctive edges of Hong Kong, underlining the banking industry's pursuit of and commitment to integrity, while sustaining Hong Kong's status as an international financial centre. It also tied in with the country's "Belt and Road Initiative" by strengthening collaboration between the Government and enterprises in preventing and combating corruption, thus contributing to the building of a "Clean Silk Road".

Officiated by the ICAC Commissioner, the Chief Executive of the HKMA and the Chairperson of the HKAB, the launching ceremony of the BIIC was held on 9 October 2024, and was attended by around 60 senior executives from 30 banks. Participating banks were required to promote a sound integrity culture, establish a code of conduct, assign an "Integrity Officer" to assist in implementing good governance, provide integrity training to staff, as well as reporting suspected corruption, fraud and other illicit activities to the ICAC or other law enforcement agencies promptly.



金管局副總裁主持對談環節，與副廉政專員兼執行處首長及業界代表分享“銀行業誠信約章”如何透過公私營合作模式，鼓勵銀行業管理層以承諾及行動加強誠信管理

Deputy Commissioner-cum-Head of Operations of the ICAC, Deputy Chief Executive of the HKMA, and representatives from the banking industry taking part in a fireside chat, sharing how the BIIC would ride on the public-private partnership model to motivate managements of the banking industry to reinforce integrity management through commitments and actions

廉政專員、金管局總裁及銀行公會主席為“銀行業誠信約章”標誌揭幕，標誌以萬里長城為主題，象徵守護銀行誠信

ICAC Commissioner, Chief Executive of the HKMA, and Chairperson of the HKAB unveiling the new logo of the BIIC, which features the Great Wall, symbolising efforts to safeguard integrity in the banking industry





## 建造業議會誠信管理獎

廉署聯同建造業議會於本屆“傑出承建商大獎”增設“誠信管理獎”並攜手參與評審工作，鼓勵建造業持續推行誠信管理，秉持廉潔文化。“誠信管理獎”不但體現香港建造業界支持“一帶一路”廉潔建設，更落實第十屆《聯合國反腐敗公約》締約國會議決議中透過激勵措施推動業界做好防貪工作的精神。參賽的承建商均採取多元化的誠信管理措施，包括參照廉署推出的誠信風險管理計劃書範本，制定超過100項防貪措施，反映業內廉潔文化不斷提升，亦顯示廉署以公私營合作模式提升企業誠信管理的成效。廉署將會與建造業議會及得獎承建商合作，攜手向業界推廣誠信管理工作。

“傑出承建商大獎 2024 頒獎典禮”由發展局局長擔任主禮嘉賓，並聯同建造業議會主席及評審委員會成員，頒發各個獎項

The officiating Guest of Honour, Secretary for Development, along with Chairman of the CIC and Members of the Judging Panel presenting awards to the winners

## Integrity Management Award of the Construction Industry Council

To encourage the construction industry to implement integrity management continually and uphold a probity culture, the ICAC joined hands with the Construction Industry Council (CIC) to launch the "Integrity Management Award" in the "Outstanding Contractor Award (OCA) 2024" and took part in its assessment. The "Integrity Management Award" not only demonstrated Hong Kong construction industry's support for the "Belt and Road" Integrity Building, but also its commitment to promoting corruption prevention work by incentive measures as resolved at the 10<sup>th</sup> Session of the Conference of the States Parties to the *United Nations Convention against Corruption*. All participating contractors adopted diversified integrity management measures, including more than 100 corruption prevention measures drawn up as recommended by the ICAC's Integrity Risk Management Toolkit. This showed that the industry was striving to enhance its integrity culture, and the public-private partnership approach of the ICAC was effective in strengthening enterprises' integrity management. The ICAC will maintain collaboration with the CIC and the awardees to enhance integrity management in the industry.



獲得首屆“誠信管理獎”的兩家大型承建商中國建築工程（香港）有限公司及金門建築有限公司分享得獎感受

Winners of the first-ever "Integrity Management Award", China State Construction Engineering (Hong Kong) Limited and Gammon Construction Limited, delivering their acceptance speeches



## 《非政府機構的管治及內部監控防貪指南》

廉署編製《非政府機構的管治及內部監控防貪指南》（《指南》），協助非政府機構加強防貪能力。為確保《指南》的內容切合機構的需要，廉署於編製《指南》時亦諮詢了社會福利署及相關持份者。廉署於二零二四年展開一系列活動推廣《指南》，包括與社會福利署、香港公益金及香港賽馬會合作，向非政府機構派發《指南》。廉署亦透過同年七月舉辦的“非政府機構反貪專業課程”推廣《指南》及鼓勵有關機構參考並落實當中的防貪措施。另外，廉署設立專題網頁，為非政府機構提供一站式的防貪資源，並邀請東華三院行政總監兼防止貪污諮詢委員會委員、香港社福界心連心大行動副主席及其他非政府機構代表拍攝短片宣傳《指南》。廉署會繼續透過不同渠道向非政府機構推廣《指南》，並會因應個別機構要求，提供防貪意見及培訓。



在小組討論中，非政府機構代表探討如何應用《指南》的防貪措施

Representatives of NGOs exploring on how to adopt the corruption prevention measures recommended in the Guide during group discussions

## Corruption Prevention Guide on Governance and Internal Control for Non-governmental Organisations

The ICAC has compiled the *Corruption Prevention Guide on Governance and Internal Control for Non-governmental Organisations* to assist non-governmental organisations (NGOs) in strengthening their corruption prevention capabilities. To cater for the need of NGOs, the ICAC has consulted the Social Welfare Department (SWD) and relevant stakeholders in the development of the Guide. In 2024, a series of activities were launched for promoting the Guide, including distributing the Guide to NGOs in collaboration with the SWD, the Community Chest of Hong Kong and the Hong Kong Jockey Club. The ICAC also promoted the Guide through the "Professional Anti-corruption Training for NGOs" in July 2024, and encouraged NGOs to adopt the corruption prevention measures in the Guide. Moreover, the ICAC has set up a dedicated webpage to provide NGOs with a one-stop platform for corruption prevention resources, and also invited the Chief Executive of Tung Wah Group of Hospitals, who is a member of the Corruption Prevention Advisory Committee and the Vice Chairperson of the Connecting Hearts to appear in a promotional video. The ICAC will continue to promulgate the Guide to NGOs through different channels and provide corruption prevention advice and training according to the request by individual NGOs.



勞工及福利局副局長出席“非政府機構反貪專業課程”並推廣《指南》

Under Secretary for Labour and Welfare promoting the Guide through the "Professional Anti-corruption Training for NGOs"



東華三院行政總監及香港社福界心連心大行動副主席拍攝短片宣傳非政府機構防貪資源及專題網頁

Chief Executive of Tung Wah Group of Hospitals and Vice Chairperson of the Connecting Hearts in a promotional video on corruption prevention resources and dedicated webpage for NGOs



## 科技防貪

工作流程電子化和善用科技，不但可提升工作效率及服務質素，亦可藉此加強機構的防貪能力。乘著政府近年大力開展電子政府服務，數碼化是重點防貪策略，以下是有關推動科技防貪工作的例子：

### 推動數字化加強防貪

廉署在過去一年開展了一系列與推動數字防貪的相關工作，主要範疇如下：

## LEVERAGING TECHNOLOGY IN CORRUPTION PREVENTION

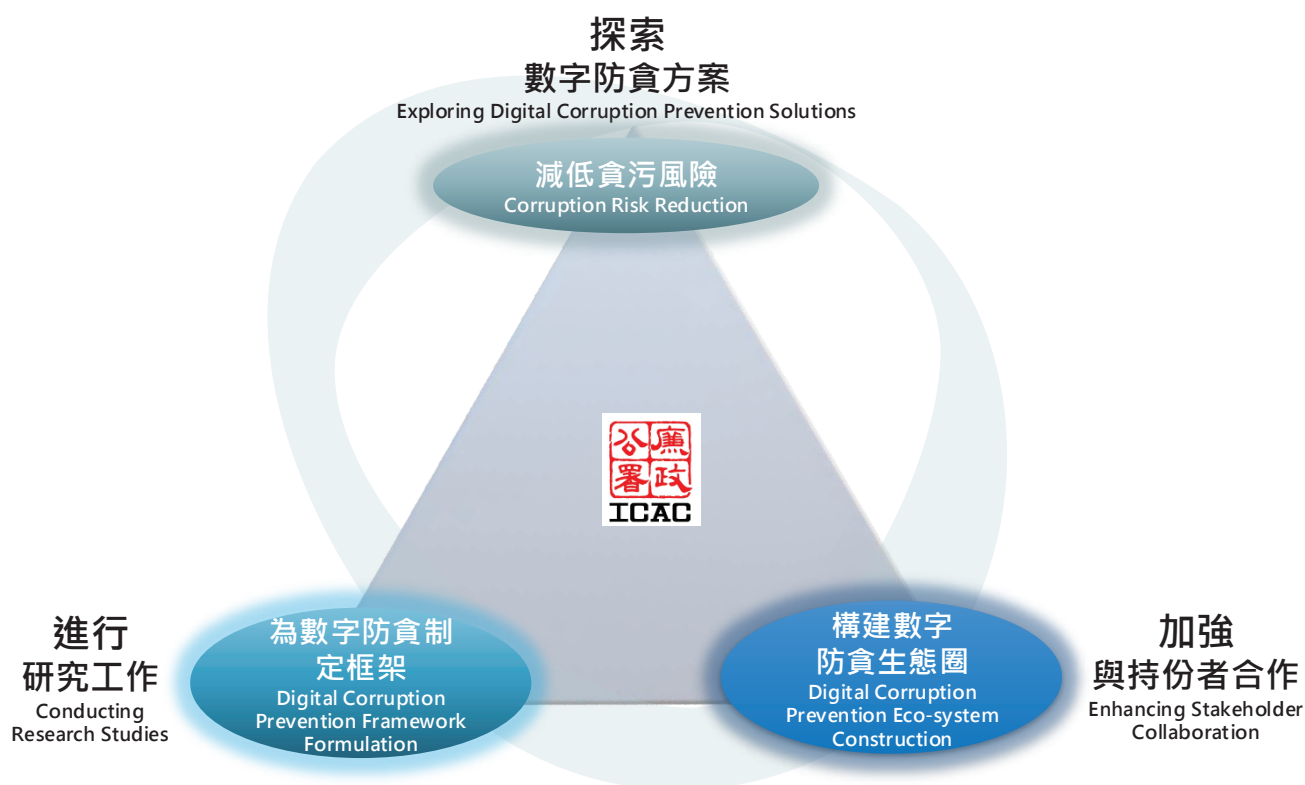
Digitalisation of work processes and effective adoption of technology can improve efficiency and service quality of organisations, and strengthen their anti-corruption capabilities. Riding on the momentum of the e-Government initiatives launched in recent years, digitalisation becomes a key strategy in corruption prevention. Efforts made to embrace technology in enhancing resilience against corruption are summarised below:

### *Enhancing Corruption Prevention through Digitalisation*

Over the past year, the ICAC has embarked on an array of initiatives for promoting digital corruption prevention. The major areas of work are as follows:

### 數字防貪三大工作範疇：

Three major areas of work in digital corruption prevention:





## 進行研究工作

《行政長官二零二四年施政報告》提到，廉署將優化現有“數字防貪框架（框架）”，並提供實質建議及方案。廉署現正進行研究，包括與創科界及學術界交流，計劃在二零二五年推出進階版“框架”。



## Conducting Research Studies

As announced in the *Chief Executive's 2024 Policy Address*, the ICAC will optimise the existing "Digital Corruption Prevention Framework" (the Framework) and provide practical suggestions as well as solutions. The ICAC is now conducting research studies, including exchanges with professionals from the I&T industry and academia, aiming at launching an upgraded version of the Framework in 2025.

廉署人員與創科界交流內控科技的最新發展

ICAC officers exchanging with I&T practitioners on the latest development of internal control technologies

## 提供數字防貪建議及與持份者合作

過去一年，廉署就多項公共服務程序，向政府決策局／部門和公共機構提供逾160項以數字化提升防貪能力的建議。廉署同時致力與相關部門及機構加強數字防貪的應用。

廉署會繼續透過培訓及交流，與數字政策辦公室、創科界及學術界在內的各持份者強化聯繫，交流創科成果及探討數字方案，共建數字防貪協作的生態系統。

## Advising on Digital Corruption Prevention and Promoting Collaboration with Stakeholders

During the past year, the ICAC provided government B/Ds and public bodies with more than 160 recommendations on improving corruption prevention capabilities through digitalisation for a number of public service processes. At the same time, the ICAC also worked with the relevant departments and organisations to strengthen the application of digital solutions for corruption prevention.

Through training and exchanges, the ICAC continued to establish connections with stakeholders, including the Digital Policy Office, I&T industry and academia, to share on I&T deliverables and explore digital solutions in furtherance of the common goal of developing an eco-system to facilitate collaboration in digital corruption prevention.



廉署與數字政策辦公室探討於數字防貪上的應用和合作空間

The ICAC and the Digital Policy Office exploring the application of digital corruption prevention and the room for cooperation



廉署人員為海外反貪機構高級人員及來自不同上市公司的管理人員提供以數字防貪為題的防貪培訓並進行交流

ICAC officers conducting training for and exchanging with senior officers of overseas anti-corruption agencies and senior executives from various listed companies on the topic of digital corruption prevention



### 新工程合約中合約管理及付款系統的應用

政府近年更廣泛地應用新工程合約開展工務工程，並利用科技提高工作效率以降低運作成本。廉署採取同步預防的策略，於土木工程拓展署開發新工程合約的數碼合約管理系統和數碼付款系統時，向該署提供防貪建議，包括使用人工智能和數據分析等去處理和分析相關資料，以偵測及避免貪污舞弊及相關的不當行為，達到防貪效果。廉署未來會繼續與發展局合作，把該兩個系統推展到其他工務部門。

### Application of Contract Management and Payment Systems in New Engineering Contracts

The Government has recently extended the application of NECs in public works projects and leveraged technology to enhance efficiency and reduce costs. The ICAC has therefore adopted the concurrent approach in providing corruption prevention advice to the Civil Engineering and Development Department (CEDD) in its development of Digital Contract Administration and Digital Payment System for NEC contracts, including the use of artificial intelligence and data analytics to process and analyse relevant data so as to detect and prevent corrupt practices. The ICAC will collaborate with the DEVB to extend the application of these systems to other works departments in the future.



廉署協助土木工程拓展署在工程項目中使用科技提升防貪能力

The ICAC assisting CEDD to enhance corruption prevention capability in public works projects through the adoption of technology

