

Code of Conduct for Employees of HKIHA

Introduction

The Hong Kong, China Ice Hockey Association (the Association) believes that honesty, integrity and fair play are important values in an organisation's governance. This Code sets out the basic standard of conduct expected of all staff members and our policy on acceptance of advantage and conflict of interest in connection with one's official duties.

Prevention of Bribery

Prevention of Bribery Ordinance

2. Under the Prevention of Bribery Ordinance (Cap. 201), any staff member who, without the permission of his employer or principal (i.e. the Association), 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.

3. It is also an offence under the Ordinance for any staff member to use any document containing false information with the intent to deceive his employer or principal.

[Section 9 of the Ordinance and the definition of "advantage" are detailed at **Appendix 1.**]

Acceptance of Advantage

4. It is our policy that staff members, in their private capacity, should not solicit or accept any advantage from any persons or companies having business dealings with the Association (e.g. service recipients, suppliers, contractors), 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;
- (b) gifts given on festive or special occasions subject to a maximum limit of \$ 1,000 in value; or
- (c) discounts or other special offers from any person or company, on terms and conditions applicable to other customers;
- (d) gifts or souvenirs presented to the staff member acting on behalf of the Association in official functions.

No staff member should, in his/her private capacity, accept any advantage from a subordinate, except those mentioned in paragraphs (a) and (b) above.

5. Gifts or souvenirs in (d) above are deemed as offered to the Association and should only be retained by the staff member with permission. The recipient should report the acceptance to and

seek direction on its disposal from the approving authority¹ using Form A (**A sample at Appendix 2**). If a staff member wishes to accept any other advantage not listed in paragraph 4, he/she should specify the item in Form A when seeking permission from the approving authority.

6. A staff member should decline an offer of advantage if the acceptance could affect his/her objectivity in conducting the Association's business or induce him/her to act against its interest, or where he/she believes the offeror has such an intention, or acceptance will likely lead to perception or allegation of impropriety.

Offer of Advantage

7. Staff members are prohibited from offering advantages to any staff member of any company or organisation, for the purpose of influencing such person or company in any dealings, or any public official, whether directly or indirectly through a third party, when conducting the business of the Association.

Entertainment

8. As defined in Section 2 of the Prevention of Bribery 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 staff member should avoid accepting lavish or frequent entertainment from persons with whom the Association has business dealings (e.g. service recipients, suppliers or contractors) or from his/her subordinates to avoid placing themselves in a position of obligation to the offeror.

Records, Accounts and Other Documents

9. Staff members should ensure, to the best of their knowledge, that any record, receipt, account or other document they submit to the Association gives a true representation of the events or transactions reported in the document. Intentional use of documents containing false information to deceive or mislead the Association may constitute an offence under the Ordinance.

Compliance with Local Laws in Other Jurisdictions

10. Staff members must comply with all local laws and regulations when conducting the Association's business, and also those in other jurisdictions, when conducting business there.

Conflict of Interest

11. Staff members should avoid any conflict of interest situation (i.e. situation where their private interest conflicts with the interest of the Association) or the perception of such conflicts. They should not misuse their position or authority in the Association to pursue their own private interests. Private interest includes both financial and personal interests of the staff member and those of

¹ *Specify the post of the approving authority in the Code and the Form.*

his/her connections including family and other relations, personal friends, the clubs and societies to which he/she belongs, and any person to whom he/she owes a favour or obligated in any way. When actual or potential conflict of interest arises, the staff member should make a declaration to the management through the reporting channel using Form B (**A sample at Appendix 3**). Failure to do so may give rise to criticism of favouritism, abuse of authority or even allegation of corruption.

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 process is closely related to or has beneficial interest in a supplier being considered by the Association.
- (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 responsible for the exercise.
- (c) A staff member accepts frequent or lavish entertainment from the Association's service recipients, suppliers or contractors.
- (d) A staff member (full-time or part-time) undertaking part-time work with a contractor whom he is responsible for monitoring.

Use of Association Assets

13. Staff members in charge of or having access to any assets of the Association, including funds, property, information, and intellectual property should use them solely for the purpose of conducting the Association's business. Unauthorised use to make personal gain is strictly prohibited.

Confidentiality of Information

14. Staff members should not disclose any classified information of the Association without authorisation or misuse any such information. Those who have access to or in control of such information should at all times ensure its security and prevent any abuse, unauthorised disclosure or misuse of the information. Special care should be taken when handling any personal data to ensure compliance with the Personal Data (Privacy) Ordinance (Cap. 486) and the Association's data privacy policy.

Outside Employment

15. If a full-time staff member wishes to take up concurrent employment, either on a regular or consulting basis, they must seek the prior written approval of (post of a nominated officer). The approving authority should take into consideration whether the employment would pose a conflict of interest with the staff member's duties in the Association.

Relationship with Suppliers, Contractors and Service Recipients

Gambling

16. Staff members are strongly advised not to engage in frequent gambling of any kind, including games of mahjong, with persons having business dealings with the Association. In social games of chance with service recipients, suppliers or business associates, they must exercise judgment and withdraw from any high stake games.

Loans

17. Staff members should not accept a loan from, or through the assistance of, any person or organisation having business dealings with the Association. There is, however, no restriction on borrowing from a licensed bank or financial institution.

Hotel Accommodation Arrangements

18. At any training camp or hotel accommodation, no player(s) shall stay overnight or take rest in the dormitory/room allocated to a player of the opposite sex nor may any player, save and except entry thereof which are actually required for collection and/or dispatch of gear or personal items of either player from each other, stay for substantial time at the dormitory/room allocated to a player of the opposite sex. Players should sleep in their own assigned room.

Compliance with the Code

19. It is the responsibility of every staff member of the Association to understand and comply with this Code, whether performing the duties of the Association in or outside Hong Kong.

20. Any staff member in breach of the Code will be subject to disciplinary action, including termination of appointment. In case of suspected corruption or criminal offences, a report will be made to the ICAC or the appropriate law enforcement agencies.

21. Any enquiries about the Code should be channelled to the Chairman for advice.

Hong Kong, China Ice Hockey Association

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