



**Vincent
Medical**

Vincent Medical Holdings Limited

永勝醫療控股有限公司

(the “Company”, together with its subsidiaries, the “Group”)

(Incorporated in the Cayman Islands with limited liability)

(Stock code: 1612)

ANTI-CORRUPTION POLICY

(the “Policy”)

Date of first adoption: 17 August 2021

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Article 1 Purpose

- 1.1 To promote a culture of compliance, ethical conduct and good corporate governance within the Group, the Company prohibits all forms of corruption, bribery, extortion, fraud and money laundering and is committed to preventing, deterring, detecting and investigating all forms of corruption, bribery, extortion, fraud and money laundering. The Company believes that integrity, honesty, probity, fairness and ethical conduct are among the core corporate values that all directors and staff of the Group must uphold at all times.
- 1.2 The Company is fully committed to adopting a zero-tolerance attitude towards any form of corruption, bribery, extortion, fraud and money laundering by regulating the Group’s business management practices, strengthening the Group’s internal control and supervision of key personnel of the Group, preventing all kinds of actual, potential and possible corruption, racketeering, bribery and fraud in the course of production and operation, and maintaining the highest ethical standards and integrity in the conduct of its business and operations. To prevent the occurrence of any acts that are detrimental to the interests of the Group, the Policy has been formulated in accordance with the relevant laws and regulations of listed companies and securities trading markets and regulatory authorities, the relevant regulations and requirements of the Corporate Internal Control System, with consideration of the actual situation of the Group.
- 1.3 The Policy sets out the basic standards of conduct that must be observed by the directors and employees of the Group as well as the policy on the accepting and offering an advantage and declaring conflicts of interest when dealing with the Group’s affairs.

Article 2 Scope of Application

- 2.1 Fraud within the meaning of the Policy, including but not limited to any form of fraud, bribery, corruption, money laundering and financing of terrorism, whether in the PRC, Hong Kong or elsewhere, may result in criminal prosecution or regulatory action against the Group and its directors and/or employees, resulting in criminal or civil penalties, including fines and imprisonment. This may also damage the Group's business and reputation and the Group's relationships with regulators and its customers, business partners and competitors.
- 2.2 The Policy applies to all levels of directors and employees of the Group (including all full-time, part-time and temporary staff) and to external parties who have business dealings with the Group and parties who act on behalf of the Group in an agency or fiduciary capacity.
- 2.3 The Policy focuses on the supervision of the Company's directors, supervisors, senior management, managers, supervisory personnel, key position personnel (such as buyers, receivers, quality control, project engineers, technicians, IT staff, sales staff, finance staff, etc.) and their associates (meaning those who are directly related to them by blood or marriage).

Article 3 Responsibilities of Various Departments

- 3.1 **ESG (Environmental, Social and Governance) Committee:** is responsible for steering the Group's anti-fraud efforts. It oversees the establishment of an anti-fraud (including anti-bribery, anti-racketeering and anti-corruption) culture by the Company's management and the establishment of a sound internal control system to prevent fraud, bribery, racketeering and corruption.
- 3.2 **Board of Directors:** is responsible for establishing effective mechanisms for fraud risk assessment, fraud prevention and anti-fraud procedures. It is also responsible for establishing a reporting and complaint channel to prevent and detect fraud, implementing controls to reduce the likelihood of fraud and taking appropriate and effective remedial actions against fraud.
- 3.3 **Chief Financial Officer:** is responsible for the oversight of anti-fraud practices.
- 3.4 **Administration Department:** is responsible for the Group's anti-fraud enforcement work, receiving reports and complaints, etc. Its work includes but is not limited to:
 - (1) Assist management in establishing a robust anti-fraud mechanism, and evaluate key areas of focus, key aspects and key elements of anti-fraud.

- (2) Organise anti-fraud publicity campaigns and training, etc. in all subsidiaries, in particular to provide appropriate training (including integrity training) relevant to their business areas for management and staff who are more likely to be tempted to engage in bribery, corruption, money laundering and terrorist financing or be in breach of any applicable laws, rules and regulations relating to anti-bribery and corruption.
- (3) Supervise fraud risk assessments in subsidiaries and departments, respectively, and inspect acts of potential fraud.
- (4) Receive reports of fraud, investigate and collect evidence, give opinions and report to the Board, Audit Committee and Supervisory Board.
- (5) Make public the reporting channels (reporting telephone numbers, mailbox, mailing addresses, etc.), ensure that the reporting channels are open and that the materials of the reports and investigated fraud cases are filed in a timely manner in accordance with the location where the fraud occurred.
- (6) Arrange for a copy of the Policy to be posted and downloaded from the Company's website.

3.5 **Departmental heads:** The head of each department is the first responsible person for anti-fraud work. In addition to leading by example, they are also required to supervise, educate and remind their subordinate staff, and to cooperate with the Company in anti-fraud publicity and investigation. Each department head is required to make the Policy available to all subordinate staff (whether in printed or online form) and to provide relevant briefings to subordinate staff.

3.6 **Departmental supervisors:** Departmental supervisors are the second responsible person for anti-fraud work. In addition to leading by example, they are also required to supervise, educate and remind their subordinate staff, and to cooperate with their departmental heads in anti-fraud publicity and investigation.

3.7 **All employees:** They are obliged to ensure that they are informed of, understand and comply with the Policy and to comply with local laws and regulations and the regulations and systems established by the Company and other applicable laws and regulations (including but not limited to all applicable laws, rules and regulations relating to anti-bribery and corruption, such as (where applicable) the Prevention of Bribery Ordinance of Hong Kong and the guidelines issued by the Independent Commission Against Corruption and the Securities and Futures Commission). Any fraud, if found, should be reported through the proper channels. Employees are encouraged by the Company to report all types of corruption, bribery and acts of fraud as well as material violation of regulations.

Article 4 Fraudulent Conduct

4.1 Definition:

“**Fraud**” includes any form of fraud, bribery, corruption, money laundering and financing of terrorism by directors, supervisors, senior management, managers, supervisory personnel, key position personnel at all levels of the Company and their associates, whether in the PRC, Hong Kong or elsewhere; the use of deception to the detriment of the legitimate economic interests of the Group and its shareholders for their own advantage; the use of fraudulent means to gain an improper advantage over a competitor, its employees or its agents, or the giving, or the promise of giving, of a financial or other advantages to a counterparty or its employees or its agents in order to achieve a greater advantage; or intentional improper acts for illegal advantages; abuse of power and convenience of a position for the purpose of obtaining any unjust enrichment; failure to perform or act in one’s work position, unwillingness to follow orders or act within restrictions, decadence of thoughts, insensitivity, and other behaviours that cause losses to the Group.

Examples of “**advantages**” include, but are not limited to, gifts, fees, remuneration, sponsorship, travel, accommodation, employment, hired work or contracts.

4.2 Fraudulent practices include, but are not limited to:

(1) Acceptance of commercial bribes or kickbacks:

- (a) receiving kickbacks from suppliers, agents, service providers, etc., receiving cashbacks, commissions from customers, bribing government officials;
- (b) allowing related parties to use one’s position or status in the Group to solicit or accept property or cash from suppliers, agents, service providers, etc.;
- (c) intentional concealment and misleading statements made for the purpose of accepting bribes or kickbacks.

(2) The act of offering an advantage to a party as a reward or inducement to provide favour or assistance:

- (a) offering any advantage to an agent of another person as a reward or inducement, for any act performed or preference given in connection with the business of his/her principal, in relation to the affairs of the Company;

- (b) provision of any advantage to a public officer (including staff of government and public bodies) as a reward or inducement for any act performed in connection with the officer's official duties, or provision of preferential treatment or assistance in the affairs of the relevant government department or public body;
 - (c) offering an advantage to members or staff of any government department or public body in the course of dealings with the relevant government department or public body.
- (3) **Unauthorised or unlawful use or occupation of the Company's resources for improper gain:**
- (a) embezzlement, misappropriation, misuse, fraud, theft of the Company's assets for various reasons;
 - (b) corruption, misappropriation, transfer or theft of the Company's property for profit;
 - (c) unauthorised or abusive use of authority to enter into external contracts or engage in related activities that may result in improper gain.
- (4) **Use of official position for personal gain:**
- (a) carrying on for oneself or for others a business in the same or a similar line of business as that of the Group and to derive an advantage therefrom while in office;
 - (b) the act of transferring to another person, knowingly or otherwise, a transaction which would ordinarily be profitable to the Company;
 - (c) using the convenience of one's position to procure various materials or commodities from one's relatives, friends, closely related business operations or individuals at prices higher than those of the market; or to sell the Company's products to one's relatives, friends or closely related business operations or individuals at prices significantly lower than those of the market;
 - (d) using the convenience of one's position to misappropriate the Company's funds for personal use or lending to others;
 - (e) using the convenience of one's position to obtain unlawful advantages such as property, promotion or salary adjustment for a subordinate or another person in exchange for personal gain;

- (f) using the convenience of one's position, to disclose or divulge to third parties outside the Group the bids, technical specifications, drawings and trade secrets relating to the Company's business, projects, engineering undertakings and tenders for goods, and collude or rig bids in exchange for property, money or other benefits.
- (5) **Intentional concealment, misrepresentation of a transaction, leading to a false entry, misleading statement or material omission in a disclosure:**
- (a) authorising another person or oneself to falsify or alter accounting records or evidence and providing false financial reports;
 - (b) providing false financial accounting reports or concealing material facts in financial reports;
 - (c) misrepresentation or wilful misrepresentation of a transaction or other matter whereby the Company pays for or incurs a liability in connection with a false transaction.
- (6) **Other fraudulent practices that harm the economic interests of the Group and its shareholders:**
- (a) acts that harm the interests of the Company by exploiting loopholes or defects in e-commerce technology;
 - (b) gaining improperly advantage by divulging the Company's trade or technical secrets;
 - (c) corrupt practices in any other way to obtain improper financial gain from the Company;
 - (d) abuse of authority or deliberate failure to act by directors, supervisors, managers, other senior management and persons in key positions, resulting in loss to the Company.

4.3 The following acts shall be considered as fraud if they exceed the specified standards:

- (1) receiving cash or items of equivalent value (including but not limited to: cash, bank cards, red packets, marketable securities, goods redemption vouchers, membership cards, discount cards, tokens, etc.) in excess of RMB500;
- (2) an intentional act, resulting in the gains of oneself or a related person to the extent of more than RMB500;

- (3) through wilful negligence or inaction, causing a colleague or related company to profit exceeding RMB500;
- (4) acceptance of banquets other than normal meals provided by business-related establishments and other forms of consumption, the amount of which exceeding RMB500;
- (5) receiving any other forms of commercial bribes in the name of friendship from business-related establishments and personnel, including but not limited to offering various kinds of rebates, favours, lucky draws, gambling, etc., the amount of which exceeding RMB500.

Article 5 Prohibited Conduct

Directors and employees and their associates are prohibited by the Group from the conducts (including but not limited to):

5.1 Gifts, gratuities, entertainment and other payments and hospitality in excess of the prescribed amount shall not be accepted.

- (1) Using one's employment, positions or status with the Group to solicit or accept any personal advantages or gratuities are prohibited. These include, but are not limited to, kickbacks, bribes, personal commissions, below-market loans, cash or cash equivalents (including gift certificates and securities), whether they are offered to suppliers, partners, customers, etc., are all prohibited, except for small gifts of non-cash or normal meals which are less than RMB500 received in the course of business dealings that are consistent with business practice;
- (2) The acceptance of bribes or acts that give rise to suspicion of bribery are prohibited. Any gift that may affect the business relationship with the Group is prohibited; direct or indirect solicitation of gifts or advantages from business related units is strictly prohibited; the acceptance of any rebates, commissions, tips, etc. is strictly prohibited; under certain special circumstances, where money or gifts not consistent with normal business practice are received and cannot be returned, the person in charge of the department shall be notified, and the money or gifts shall be submitted to the Administration Department of the Company after returning to the factory in accordance with the reporting procedures.
- (3) Reimbursements of any expenses that should be paid by individuals from suppliers, distributors or business units are prohibited. No collaboration with distributors or business units to obtain or retain company fees, prizes or gifts is allowed; using one's position to request or accept a supplier, distributor or business unit to facilitate personal activities such as wedding, funeral or travel is not allowed.

- (4) Directors or officers should decline an offer of advantage if such acceptance would influence their objective attitude in the conduct of the Group's affairs or the acceptance would be regarded or alleged to be improper.
- (5) Where a director or officer is required to act on behalf of a client of the Group in the conduct of the Group's affairs, the director or officer is also subject to additional restrictions on the acceptance of an advantage by such client (e.g. government and public bodies generally prohibit directors and officers of contractors responsible for the performance of government/public body contracts from accepting an advantage in connection with such contractual matters).

5.2 No illegal advantages shall be offered.

- (1) In the conduct of the Group's affairs, no advantage shall be given, directly or indirectly, to any director, officer or agent of another company or body for the purpose of influencing or attempting to influence the decisions of such persons in relation to their businesses.
- (2) In any dealings with a government department or public body, no advantage shall be given, directly or indirectly, to any such department or public body, or to its members or staff.
- (3) A director or officer should satisfy himself that the person to whom the advantage is offered has the permission of his employer or principal to accept the advantage before offering it, even if the advantage is not motivated by undue influence.

5.3 No interests shall be held in a company with business relationship with the Group or in competition with the Group.

Holding any interests in a company that competes with the Group (i.e., having the same or similar scope of business or operating projects or customer base or industry or mode of operation as the Company, or has a greater degree of overlap with the Company's tenders, or has the same controlling shareholder or person in effective control or carries on the same or similar business, either singly or in combination, resulting in substantial competition with the Company) without the prior written approval of the relevant officer of the Company; or holding any interest in a company with which the Group has business dealings (such as a customer, agent, reseller or supplier of the Company) are prohibited. (Investments in securities traded on a stock exchange, fund or trust through which the person or a related person holds only less than 5% of the issued and outstanding interests of that company are exempted).

5.4 Employment with an external employment relationship or activity with a competitor of the Group while being employed by the Group is not allowed.

- (1) Being employed by or associated in any way with a competitor of the Group (including activities in an advisory, consultancy, volunteer or other similar capacity) or acting as a director of such a competitor and engaging in other activities which are intended or could reasonably be expected to further the interests of the competitor, including but not limited to being a customer, agent, reseller or supplier of such competitor, are prohibited.
- (2) The marketing of any product or the provision of any service that competes with the Group's existing or potential business activities is prohibited during employment with the Group.

5.5 Engaging in or procuring its connected persons to engage in any connected transaction without prior written approval is prohibited.

- (1) Making loans to, securing loans for, obtaining loans from or obtaining loans with the assistance of any person or organisation with whom the Group has business dealings, such as the Company's customer, agent, reseller or supplier (except for normal borrowings with banks or financial institutions) are prohibited.
- (2) The establishment of joint ventures/partnerships, partnerships or participation in other business arrangements with the Group is prohibited.
- (3) Entering into any form of business dealings with the Group and/or causing any associated person to enter into any form of business dealings with the Group, including but not limited to the purchase or sale of goods, the purchase or sale of assets other than goods, the provision or receipt of management, labour or agency services, the leasing of assets or equipment, the provision of funds (including in cash or in kind), joint research and development projects, the entering into licensing contracts, the making of gifts or the entering into any non-monetary transactions, causing an employee or his/her associated person to become a customer, agent, reseller, supplier, or entering into any other transactional relationship with the Company, or failing to disclose the above to the Company with knowledge that it may occur, are prohibited. Employees are prohibited from participating in any procurement process, decision making process or other similar process involving their associates without the prior written approval of the head of department, even if these processes do not necessarily constitute an associated transaction under this Policy.

5.6 Avoid interference or involvement in the employment or promotion of family members and persons of close personal relationships.

- (1) Relationships with family members and close friends can influence the decisions of directors and employees. Care should therefore be taken in making decisions about the Company's business that involve close personal relationships. To prevent conflicts of interest (i.e. conflicts of interest arise when personal interests affect or appear to affect the interests of the Group in any way, or when actions are taken or interests are enjoyed in a way that makes it difficult for the director and employee to perform objectively, impartially and effectively perform the work or duties assigned to them by the Company), avoid interfering with or participating in the hiring or promotion of family members; avoid positions where there are access to or influence performance evaluations, wage information or other confidential information relating to family members.
- (2) The same precautions as above shall be taken if a person has a close personal relationship with another employee or a prospective employee outside the Company. If any of these situations occur, the employee must inform their supervising manager of such relationships. The manager will assess the situation, consult with his/her supervising manager as necessary and may choose to transfer the employee to another position where there is no conflict.

5.7 No misappropriation of Company's properties in any form or for any reason.

- (1) do not use one's position and duties to gain an advantage for oneself or others;
- (2) do not eat or drink at public expense when entertaining clients, etc.;
- (3) do not to use official business trips as a detour for travel;
- (4) no falsification, alteration or misrepresentation of expenses in reimbursement;
- (5) do not impose personal requirements and restrictions when negotiating business with suppliers;
- (6) no deliberate restriction shall be imposed, or disclosure of bids, etc. during the tendering process;
- (7) no illegal concessions or rebates etc. during the course of the transaction;
- (8) no association shall be used to prejudice the interests of shareholders, etc.

Article 6 Fraud Prevention, Control and Remedial Measures

Fraud prevention, control and punishment. The adoption of reporting channels to prevent and detect fraud; the implementation of controls to reduce the likelihood of fraud; and the adoption of appropriate and effective remedial measures to address the harm caused by fraud. Specific measures include, but are not limited to:

6.1 Preventive measures. Including but not limited to:

- (1) The anti-fraud policy and related measures are promoted and educated within the Company in various forms (through staff handbooks, company rules and regulations, training, etc.) to ensure that staff are familiar with the relevant code of conduct, rules and regulations, and develop habits of compliance and integrity in their work to resist the temptation of improper interests.
- (2) The directors, supervisors, management, senior management, managers and supervisory personnel of the Company shall set a good example and take the lead in complying with local laws and regulations and the Company's rules and regulations.
- (3) All staff members shall observe the law and engage in ethical and moral conduct in their daily work and dealings with the Company, and shall strictly comply with relevant laws and regulations, professional ethics and the Company's rules and regulations, to prevent acts that harm the interests of the Group and its shareholders.
- (4) The Administration Department should conduct background checks on people who are ready to be hired or promoted to key positions. The background check process should be formally documented and kept in the employee's file, such as educational background, work history, criminal record, etc.
- (5) For new recruits, the Administration and Human Resources Department shall fill out a "Staff Background Check Form" and key staff shall sign a "Corporate Trade Secret Confidentiality Agreement", while staff in other positions shall sign an "Integrity Agreement". All employees of the Company are subject to an "anti-bribery/anti-corruption investigation".
- (6) Anti-fraud training and education on laws, regulations and ethics of integrity shall be organised. All employees shall be aware of the Company's serious attitude towards fraud prevention as well as their own responsibilities to combat fraud, so as to elevate their level of anti-fraud awareness.
- (7) Business units should have all stakeholders, such as suppliers, customers, agents, etc., sign an "Anti-Corruption Pledge" and a "Confidentiality Pledge" and inform the stakeholders that the Company is committed to a culture of compliance with the law and ethics.

- (8) The Group will carefully consider terminating business with contractors, suppliers, agents and other potential business partners who are known to have offered bribes and/or been involved in corrupt practices.

6.2 Control measures. Including but not limited to:

- (1) Fraud risk assessment is incorporated into the corporate risk assessment, and fraud risk identification and assessment is carried out across branches and between departments. The assessment should include the materiality and probability of fraud risks.
- (2) Anti-fraud controls are established in all branches and departments of the Group. Fraud occurrences are controlled at the source through the establishment of internal control measures, the development of management system and business flowcharts, authorisation approval, audit check, verification, division of authorities and responsibilities, as well as the security protection of the Company's assets.
- (3) All departments of the Company will strengthen the management of staff in key positions and make their implementation of the "Enterprise Commercial Secrets Confidentiality Agreement" and the "Integrity Agreement" an important part of their inspection and assessment, as well as an important basis for appointment and dismissal.
- (4) The Company encourages the employees and companies with business dealings to report fraud cases based on facts, in accordance with national laws and regulations and the Company's systems, and through proper channels, either in name or anonymously.
- (5) In selecting new contractors, suppliers, agents and other business partners of the Group (such as joint venture partners) and in renewing contracts with the relevant contractors, suppliers, agents and other business partners, due diligence shall be conducted by skilled persons using appropriate levels of bribery and corruption risks prevention measures commensurate with the particular relationship and in accordance with established procedures and policies established by the Company from time to time.
- (6) In conducting due diligence on the Group's customers or potential customers, it shall be conducted by skilled persons using appropriate levels of bribery and corruption risks proportionate to the particular relationship and in accordance with established procedures and policies developed by the Company from time to time.

- (7) In certain circumstances, charitable donations and sponsorships may constitute a disguised form of bribery. Accordingly, if the Company considers or decides to make any charitable donations and sponsorships, such activities shall be determined solely by two of the Company's Executive Directors together with the Chief Financial Officer. Except with the prior written consent of such persons, directors and employees shall not use any funds or assets of the Group to make donations to any political party or candidate for public office, and directors and employees shall not make any political donations as the representatives of the Group or to create the impression that they are the representatives of the Group.

6.3 Penalties:

- (1) For reported or investigated fraudulent cases that are found to be true, the Company will deal with the persons responsible for the fraud in accordance with the provisions of this Policy and pursue his financial responsibility. If the offence of embezzlement is involved (embezzlement refers to the act of a Company personnel using the convenience of his or her duties to illegally take the Company's financial assets for himself or herself, in a relatively large amount), or if other laws and regulations are violated, the Company shall report to the local judicial authorities.
- (2) The Company protects its employees and all parties in the society who report illegal, undisciplined or unlawful conduct. The Company shall dismiss or terminate the employment contract of any person who leaks the information of a whistleblower or retaliates against a whistleblower. Those who are in violation of the law shall be reported to the local judicial authorities for proper legal proceedings.
- (3) If the fraudulent act involves internal staff, the employment relation will be terminated, and if any losses are involved, the Company shall proceed to recover the damage. Those who are in violation of the law shall be reported to the local judicial authorities for proper legal proceedings. Cooperating companies involved in the acts of fraud shall be blacklisted, the cooperative relationship shall be terminated and information of such acts shall be disclosed to internal and external parties. The Group shall not conduct business cooperation with such companies, and those in violation of the law shall be reported to the local judicial authorities for proper legal proceedings.
- (4) For proven cases of fraud, any improper financial benefits obtained shall be returned to the Company within 15 business days. The person directly responsible shall also be liable for the financial compensation for any additional financial loss caused to the Company.

- (5) On a case by case basis, the Company has the right to dismiss the person directly responsible for a serious case without providing corresponding compensation. Any necessary loss recovery and financial matters must be completed before the dismissal. The persons responsible shall be subject to penalties such as cancellation of annual bonus or salary increment. Those who are in violation of the law shall be reported to the local judicial authorities for action.

6.4 Remedial measures. Including but not limited to:

The Company shall pursue the accountability of fraudulent practices, including management accountability and direct accountability.

- (1) Management accountability is defined as the liability for financial loss resulting from the failure to detect fraud in a timely manner due to negligence or omission, subjective errors in judgment or favouritism on the part of a manager within his or her area of responsibility.
- (2) Direct accountability refers to the liability of any employees of the Group for any economic loss caused to the Company through fraud, abuse of authority or favouritism, direct operation or participation in decision making, or giving instructions, directions, orders, connivance or harbouring of others within the scope of their duties.
- (3) When a fraud case occurs, the relevant department shall take timely remedial action, take appropriate action against the offender and communicate the results internally (and to external third parties as necessary). The affected department shall evaluate and improve its efforts in anti-fraud.
- (4) Employees who are proven to have committed fraudulent acts will be punished by the Company in accordance with the relevant regulations. If the Company suspects that the violations are related to corruption or other criminal offences, the matter shall be reported to the relevant authorities or law enforcement agencies for action in accordance with the law.

Article 7 Fraud Reporting, Investigation and Reporting

7.1 Reporting:

- (1) Target: All staff of the Group and all parties in the community who have direct or indirect economic relationships with the Company.
- (2) Reporting methods: Real name or anonymous.

- (3) Reporting principles: Must be fact-based, compliant with national laws, relevant company systems and requirements in the staff handbook, fair and impartial.
- (4) Reporting channels:
 - (a) The Group's email: suggestion@vincentmedical.com
 - (b) Letter: delivery directly to the Company's complaint mail box or by post to the Company's address
Attention to: Chairman or Chief Executive Officer/Chief Financial Officer

7.2 Surveys and Reports

- (1) Upon receipt of a report, the Group Chairman or Chief Executive Officer/Chief Financial Officer shall conduct a preliminary screening and forward the report to the Administration Department if deemed admissible. The Administration Department shall report to the Company's management and Chief Financial Officer within 3 working days of receipt of the report with real name from the Group Chairman or Chief Executive Officer/Chief Financial Officer, or within 5 working day of receipt of the report in anonymous form, whether or not a case shall be opened for investigation.
- (2) If, after investigation, the Administration Department does not find any illegal or fraudulent conduct on the part of the person being reported, the results of the investigation will be passed back to Management and the Chief Financial Officer. With the consent of management and the Chief Financial Officer, the investigation may be closed.
- (3) If, after investigation, the Administration Department finds that the person being reported has committed a fraudulent act, it shall promptly open a formal investigation and report the matter to the Management and the Chief Financial Officer for their attention. When the Administration Department conducts a fraud investigation, it must obtain the approval of the management if it is necessary to engage an external party to conduct the investigation, or the approval of the Board of Directors if the fraud involves senior management.
- (4) When the Administration Department organises an investigation into a fraud case and requires the assistance of staff from the relevant departments in the investigation or access to information and data of the relevant departments, the relevant departments shall cooperate and maintain strict confidentiality.

- (5) Staff who receive complaints or are responsible for the investigation of fraud cases shall not provide information about the whistleblower or the contents of the report to any department or individual without permission. If there is a need to access information relating to a complaint, prior approval must be obtained from the Chief Financial Officer and a record must be kept of the contents accessed, as well as the time and circumstances of the person making the access.
- (6) Whistleblowers are protected while assisting with investigations. The Company prohibits any discriminatory or retaliatory behaviour or any obstruction, interference or hostile measures by any personnel. The Company will warn, dismiss or terminate the employment contract of any person, who discloses the information of a complainant or whistleblower, or takes retaliatory action against a complainant or whistleblower. Those who are in violation of the law shall be reported to the relevant departments of the local government or judicial authorities according to laws.
- (7) Complaints reported in good faith will not be subject to disciplinary action. However, the Company will take disciplinary action against any director and employee who knowingly provides false or malicious information constituting a suspected breach of the law or the Policy.
- (8) Retaliation or threats against those involved in the investigation are prohibited and any employee who engages in retaliation will face disciplinary action including termination of labour or employment relationship.
- (9) The Company will hold the whistleblower responsible for any retaliation reports that deliberately misrepresent the facts, if found to be true.
- (10) For complaints of fraud that are opened for investigation, the Administration Department shall file and maintain the investigation information after the investigation is completed. The Administration Department shall provide feedback to the whistleblower on the decision to open a case and the outcome of the investigation, whether or not a case will be opened.
- (11) If the Corporation suspects that a breach involves corruption or other criminal offences, it shall report the matter to the relevant authorities or law enforcement authorities. The Company shall not contact the relevant authorities or law enforcement authorities to make a report or similar action without the prior review of the Chief Financial Officer and the approval of two of its Executive Directors.

Article 8 Others

This Policy was first adopted by a resolution of the Company's ESG (Environmental, Social and Governance) Committee on 17 August 2021, and all changes were adopted by a resolution of the Company's Board of Directors on 23 March 2022. The Chief Financial Officer and the Administration Department shall review this Policy as and when appropriate to ensure that its continued effectiveness. Any amendments that may be required shall be discussed and approved by the ESG Committee.

A copy of this Policy is published and available for download on the Company's website.

Note: In the event of any discrepancy between the English and Chinese versions of this document, the English version shall prevail.