



# CHOW SANG SANG HOLDINGS INTERNATIONAL LIMITED

(the “Company”)

*(Incorporated in Bermuda with limited liability)*

## WHISTLEBLOWING POLICY

(Adopted by the Company pursuant to the Board resolution passed on 25 August 2022)

### 1. Purpose

- 1.1 This policy aims to encourage the Company’s employees and third parties to raise concerns in good faith about any actual or suspected misconduct or malpractice acts (e.g. corruption) related to the Company, and to set out the Company’s handling procedures.

### 2. Scope

- 2.1 All employees of the Company and its subsidiaries (the “Group”) and third parties who deal with the Group (including customers, contractors and suppliers) may raise concerns (the “Whistleblowers”).
- 2.2 Concerns raised may cover areas such as financial reporting, internal control or other aspects, including but not limited to the following matters (the “Misconducts”):
- Violation of the Group’s code of conduct or policies
  - Breach of legal or regulatory requirements
  - Fraud, malpractice or deception relating to accounting, auditing and financial matters
  - Bribery or corruption
  - Endangerment of health and safety of individuals
  - Deliberate concealment of any of the above
- 2.3 If an employee believes that any of the above Misconducts exists but considers that it will not be appropriately addressed in accordance with the communication procedures outlined in the Employee Handbook, or if such behavior involves their immediate supervisor, they may take action pursuant to this policy.

### 3. Confidentiality

- 3.1 The Company will make every effort to treat all reporting made under this policy in strict confidence. The identity of the Whistleblower will not be disclosed without such Whistleblower’s consent, unless the Company is required to reveal the Whistleblower’s identity and other information at the request of the law enforcement authorities.
- 3.2 To ensure that the investigations are not hindered, the Whistleblower must also maintain confidentiality regarding the concern raised and the identities of the individuals involved.

#### **4. Protection**

- 4.1 An employee who acts in good faith but makes an erroneous report will not be dismissed or subject to any other disciplinary action.
- 4.2 If a Whistleblower makes a malicious or false report, the Company reserves the right to take appropriate action to recover losses or damages caused. Employee may face dismissal or even legal action.
- 4.3 If any person retaliates against or threatens retaliation against the Whistleblower, the Company reserves the right to take appropriate action against such person.

#### **5. Reporting Procedure**

- 5.1 Whistleblowers should report to Group General Manager or Head of Group Internal Audit in writing via the following channels:
  - Delivery: Group General Manager or Head of Group Internal Audit of 27/F, 9 Wing Hong Street, Cheung Sha Wan, Kowloon, Hong Kong (sealed envelope marked “Private and Confidential – To be opened by addressee only”)
  - Email: [gm.whistleblowing@chowsangsang.com](mailto:gm.whistleblowing@chowsangsang.com) (Group General Manager) / [ia.whistleblowing@chowsangsang.com](mailto:ia.whistleblowing@chowsangsang.com) (Head of Group Internal Audit)
- 5.2 If the Whistleblowers are unwilling to inform Group General Manager and Head of Group Internal Audit, they may report to the Audit Committee in writing via the following channels:
  - Delivery: Chairman of the Audit Committee of 27/F, 9 Wing Hong Street, Cheung Sha Wan, Kowloon, Hong Kong (sealed envelope marked “Private and Confidential – To be opened by addressee only”)
  - Email: [ac.whistleblowing@chowsangsang.com](mailto:ac.whistleblowing@chowsangsang.com)
- 5.3 Group General Manager, Head of Group Internal Audit or Chairman of the Audit Committee is responsible for reviewing and taking appropriate investigation arrangements.
- 5.4 The Company encourages Whistleblowers to disclose their identity and contact details to facilitate the collection of more information during follow-up actions, enabling accurate assessments. Should reports be submitted anonymously, they must include sufficient information for an effective investigation.

#### **6. Investigation Procedure**

- 6.1 Group General Manager, Head of Group Internal Audit or Chairman of the Audit Committee will acknowledge receipt of each report within seven working days.
- 6.2 Group General Manager, Head of Group Internal Audit or Chairman of the Audit Committee will evaluate every case to determine whether a full investigation is necessary, and depending upon the circumstances, an investigating officer with suitable seniority at the Company will be appointed or a special committee will be set up to investigate the matter.
- 6.3 During the course of investigation, the Company may request the Whistleblower to provide more information.
- 6.4 An investigation report, with recommendations for change or improvement (if applicable), will be produced to the Audit Committee. The Audit Committee will then review the investigation report and make recommendations to the Board, if appropriate.

6.5 Where the investigation report indicates a possible criminal offence, the Company will, after consulting its legal advisors, decide if the matter should be referred to the relevant regulatory authorities, such as Hong Kong Police Force, Independent Commission Against Corruption and Securities and Futures Commission, as appropriate for further action. Once the matter is referred to the authorities, the Company will not be able to take any further action on the matter, including notifying the employee/external party about the referral.

## **7. Record Keeping**

7.1 The Company shall maintain a register to record all reports and the related investigation reports.

7.2 The Audit Committee shall regularly review the register to assess the appropriateness of arrangements and actions taken in investigating the reports.

## **8. Responsibilities for Implementation and Oversight**

8.1 This policy has been approved and adopted by the Board of Directors of the Company. The Audit Committee bears overall responsibility for overseeing and reviewing this policy from time to time. Head of Group Internal Audit, authorised by the Audit Committee, is responsible for managing the daily responsibilities of this policy.

*Note: If there is any inconsistency between the English and Chinese versions of this policy, the Chinese version shall prevail.*