



**HONGKONG CHINESE LIMITED**

**香港華人有限公司**

*(Incorporated in Bermuda with limited liability)*

**WHISTLEBLOWING POLICY**

**(Revised on 13 December 2023)**

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# WHISTLEBLOWING POLICY

## 1. POLICY AND PURPOSE

1.1 This Whistleblowing Policy (this “**Policy**”) of Hongkong Chinese Limited (the “**Company**”) applies to the Company and its subsidiaries (collectively, the “**Group**”).

1.2 “Whistleblowing” refers to a situation where an employee or a third party (a “**Whistleblower**”) decides to report a concern about any suspected misconduct, malpractice or irregularity (the “**Concern**”). The Group is committed to the high standards of openness, probity and accountability. This Policy is designed to encourage and assist any of the employees of the Group (the “**Employee(s)**”) or third parties (e.g. customers, suppliers etc. of the Group) to raise the Concern and disclose related information confidentially. It is also the responsibility of the Employees at all levels to report any suspected misconduct or malpractice within the Group. The following are the foundation and rationale of this Policy that:

- (1) Provides reporting channels and guidance on whistleblowing to Employees or third parties to raise concerns rather than neglect it;
- (2) Promotes a climate of accountability and disclosure with respect to the Group’s accounting, internal controls and auditing matters; and
- (3) Reveal inappropriate practices or misconducts before these activities cause disruptions or losses to the Group.

## 2. PROTECTION FOR WHISTLEBLOWERS

2.1 Persons making Concerns in good faith under this Policy are assured of fair treatment. In addition, the Employees are assured of protection against unfair dismissal, victimization or unwarranted disciplinary action, even if the Concerns turn out to be unsubstantiated. “Good faith” means that the reporting person has held a reasonable belief that the Concern made is true and honest but not made for personal interest or any ulterior motive.

2.2 Management must ensure that Whistleblowers feel easeful to raise Concerns without fear of reprisals. Any kinds of retaliation against a Whistleblower will be considered as misdemeanors.

2.3 However, if a Whistleblower makes a false report maliciously, with an ulterior motive, or for personal advantage, the Group reserves the right to take appropriate actions against anyone (Employees or third parties) to recover any loss or damage as a result of the false report. In particular, Employees may face disciplinary actions, including dismissal.

### **3. RESPONSIBILITY FOR IMPLEMENTATION OF POLICY**

3.1 The Audit Committee of the Board of Directors of the Company (the “**Audit Committee**”) has the overall responsibility for this Policy, but has delegated the day-to-day responsibility for overseeing and implementing this Policy to the Head of Internal Audit and Risk Management Department of the Company (the “**GIA**”). Responsibility for monitoring and reviewing the effectiveness of this Policy and actions resulting from the investigation of complaints lies with the Audit Committee.

3.2 For any questions about the application of this Policy, please contact the GIA at (852) 2867 6894.

### **4. MISCONDUCT AND MALPRACTICE**

4.1 Activities which constitute misconduct or malpractice may include, but not limited to, the following:

- (1) Criminal offence and miscarriage of justice;
- (2) Non-compliance with legal or regulatory requirement;
- (3) Impropriety or fraud relating to accounting, financial reporting, internal control and auditing matters;
- (4) Any action which endangers the health and safety of any individual;
- (5) Any action which causes damage to the environment;
- (6) Violation of the policies of the Group;
- (7) Bribery or corruption; and/or
- (8) Deliberate concealment of any of the above.

4.2 Whistleblowers are not required to make absolute proof of the complaints reported. The concerns would be appreciated if it is reported in good faith; even it is not confirmed by an investigation.

## 5. CONFIDENTIALITY

- 5.1 The Group will make every effort, within its capacity to do so, to keep any Whistleblower's identity and Report (as defined in paragraph 6.2 below) strictly confidential. In order not to jeopardise the investigation, the Whistleblower should also keep strictly confidential the fact that he or she has filed a Report, the nature of the Concern, the identities of those involved and other related information.
- 5.2 The Group will endeavour to advise a Whistleblower in advance if his or her identity may become apparent or need to be disclosed under certain circumstances. If such circumstances exist, reasonable steps will be taken to protect him or her from detriment. The Whistleblower should, however, be aware that in some circumstances, the Group may have to refer the Concern to the relevant statutory authority(ies) without any prior notice to or prior consultation with the Whistleblower. Should an investigation lead to any civil or criminal proceedings, it may become necessary for the Whistleblower to provide evidence to or be interviewed by the relevant statutory authorities and/or to be involved in such proceedings.

## 6. REPORTING CHANNELS AND FORM

- 6.1 Any Employee or third party who has a Concern should inform the GIA. The Employee may also elect to raise the Concern to his/her respective Manager or Head of Department. The Manager or Head of Department should then report such matter to the GIA. If the Concern involves the Manager or Head of Department, the Employee should directly contact the GIA or the Chief Executive Officer of the Company (the "CEO"). If for any reason the Whistleblower would prefer not to raise the Concern with the above parties, he or she may directly report to the Audit Committee.
- 6.2 Disclosures can be made by completing a standard whistleblowing report form (the "Report") attached to this Policy as Appendix 1. The form should be sent in a sealed envelope marked "Strictly Private and Confidential – To be Opened by Addressee Only" to ensure confidentiality, or through email to the following address:

	<b>Address</b>	<b>Party Receiving Reports</b>
1.	Address: 40th Floor, Tower Two, Lippo Centre, 89 Queensway, Hong Kong <i>(Attention: Head of Internal Audit and Risk Management Department of Hongkong Chinese Limited)</i> Email: concern@lippohk.com	GIA
2.	Address: 40th Floor, Tower Two, Lippo Centre, 89 Queensway, Hong Kong <i>(Attention: Chief Executive Officer of Hongkong Chinese Limited)</i>	CEO of Hongkong Chinese Limited
3.	Address: 40th Floor, Tower Two, Lippo Centre, 89 Queensway, Hong Kong <i>(Attention: Audit Committee of Hongkong Chinese Limited)</i>	Members of the Audit Committee of Hongkong Chinese Limited

6.3 It is understood that a Whistleblower may wish to file the Report anonymously. Nevertheless, that is not encouraged as an anonymous allegation will cause difficulty in follow-up since further information cannot be obtained from the Whistleblower. Whistleblowers are encouraged to come forward and report as much specific information as possible for assessment.

## **7. INVESTIGATION PROCEDURES**

7.1 The Audit Committee will assess every Report received and decide if an investigation is required. The Audit Committee will review each investigation to determine the courses of actions.

7.2 The Audit Committee will also decide if the Concern:

- (1) should be referred to the relevant regulatory authority(ies), such as the Hong Kong Police Force, the Independent Commission Against Corruption, the Securities and Futures Commission, etc. or similar authorities in the other relevant jurisdictions. Once the Concern is referred to the relevant authority(ies), the Group may not be able to take further actions on the Concern; and/or

(2) should form the subject of an independent inquiry when appropriate.

7.3 The GIA will undertake any investigation required by the Audit Committee and will provide an investigation report to the Audit Committee. The GIA may contact the Whistleblower:

- (1) Acknowledging that the Report has been received;
- (2) Telling the Whistleblower whether an investigation has been warranted; and/or
- (3) Subject to legal constraints, notifying the outcome of the investigation.

7.4 If deemed necessary, the Audit Committee may appoint an appropriate investigating officer other than officers from the GIA to conduct or assist in the investigation.

7.5 Due to legal constraints, details of the actions taken or a copy of the investigation report may not be provided to the Whistleblower. If the Whistleblower does not agree with the outcome, he or she can appeal by making another Report explaining his or her disagreement. If the Audit Committee decides that there is justification for such disagreement, it may give instructions to conduct a further investigation.

## **8. MONITORING POLICY AND IMPLEMENTATION**

8.1 The implementation and effectiveness of this Policy will be monitored and reviewed periodically by the Head of the GIA.

8.2 In the event of any conflict between this Policy and the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited, the applicable laws and regulations and the articles of association or constitutional documents or similar whistleblowing measures of the companies within the Group, the strictest one shall prevail.

*(If there is any inconsistency between the English version and the Chinese version of this Policy, the English version shall prevail.)*

APPENDIX 1



**HONGKONG CHINESE LIMITED**  
**香港華人有限公司**

*(Incorporated in Bermuda with limited liability)*

**WHISTLEBLOWING REPORT FORM**  
**(STRICTLY CONFIDENTIAL)**

If you wish to make a whistleblowing report, please fill in this form. Your report will be kept in a strictly confidential manner.

**Reporter's Information:**

Name and Title: \_\_\_\_\_

Department and Company Name: \_\_\_\_\_

Address: \_\_\_\_\_

Tel No.: \_\_\_\_\_ Email Address: \_\_\_\_\_

**Details of Concern:**

Please provide full details of your concern: names of the persons involved, dates, places, reasons, etc. and any other supporting evidence. (Continue on separate sheet if necessary)

Signature: \_\_\_\_\_

Date: \_\_\_\_\_



*Note: Please deliver your report to your Manager or Head of Department, or one of the recipients below in accordance with paragraph 6.1 of the Whistleblowing Policy:*

Audit Committee

Hongkong Chinese Limited

*Address: 40/F., Tower Two,  
Lippo Centre, 89 Queensway,  
Hong Kong*

Chief Executive Officer

Hongkong Chinese Limited

*Address: 40/F., Tower Two,  
Lippo Centre, 89 Queensway,  
Hong Kong*

Head of Internal Audit and

Risk Management Department

Hongkong Chinese Limited

*Address: 40/F., Tower Two, Lippo  
Centre, 89 Queensway, Hong Kong  
Email: [concern@lippohk.com](mailto:concern@lippohk.com)*

***Personal Information Collection Statement***

*All personal data collected will only be used for purposes which are directly related to the whistleblowing case you reported. The personal data submitted will be held and kept confidential by the Group and may be disclosed as appropriate to parties with whom we will contact during our handling of this case, including the party being complained against or other parties concerned. The information provided may also be disclosed to law enforcement authorities or other concerned units. Where relevant, under the Personal Data (Privacy) Ordinance of Hong Kong, you shall have the right to request access to and correction of your personal data. If you wish to exercise these rights, requests should be made in writing to the Head of Internal Audit and Risk Management Department at office address shown in this Form.*