

FUJIKON INDUSTRIAL HOLDINGS LIMITED

富士高實業控股有限公司*

(incorporated in the Bermuda with limited liability)

(於百慕達註冊成立之有限公司)

Whistleblowing Policy

1. Purpose

- 1.1 Fujikon Industrial Holdings Limited (the "Company", together with its subsidiaries collectively referred to as the "Group") is committed to maintaining good corporate governance and places great importance on the spirit of accountability by conducting its business in a fair and transparent manner. We believe in dealing appropriately with our employees, those with whom we do business and the communities in which we operate. In order to implement this commitment, the Company has established a confidential channel for all employees of the Group and third parties having business dealings with the Group (such as business partners and suppliers) as well as the public to report any suspected illegal deed, bribery, corruption, malpractice and behaviours that affect the Company's business operations.

2. Scope of application

- 2.1 This policy shall apply to all employees of the Group including employees in Hong Kong and Mainland China, as well as any person having dealings with the Group such as business partners, suppliers and the public.

3. General policy

- 3.1 "Whistleblowing" refers to a situation where any person (e.g. an employee) decides to report serious concerns about anyone may be intending to act any suspected illegal deed, bribery, corruption, malpractice and behaviours that affect the Company's business operations in the course of business activities within the Group. For instances of improprieties and irregularities, please refer to Clause 4 of this policy. The Company shall deal with such reports prudently and address the concerns raised by the whistleblower in a fair and appropriate manner.

4. Behaviours that should be concerned and reported

- 4.1 Reports may be made in accordance with this policy in case of violation or suspected violation of any of the following requirements by any person, including employees when engaging in the Company's business activities:

- Bribery or corruption;
- Breach of the Company's policies;
- Fraud and malpractice; and
- Breach of laws, rules and regulations.

** for identification purpose only*

5. Whistleblowing channels

- 5.1 The whistleblower should raise the matter to our Human Resources Department in writing in a sealed envelope clearly marked "Private and Confidential Documents - To be Opened by Addressee Only" by post to:

Head of Human Resources Department
Fujikon Industrial Holdings Limited
16th Floor, Tower 1, Grand Central Plaza, 138 Shatin Rural Committee Road,
Shatin, New Territories, Hong Kong

- 5.2 Where the whistleblower is an employee of the Group, he/she may submit a report directly to the Human Resources Department of the relevant subsidiary of the Company that he/she is employed by in person or in writing or via emails. In the event that such item reported relates to the senior management of the subsidiary of the Company, the whistleblower may report directly to the Head of Human Resources Department of the Company.
- 5.3 To facilitate the handling of the reports, a standard template (Whistleblowing Report Form) is attached in Appendix I of this policy for reference.
- 5.4 The Company shall take such reports as referred to in Clause 4 of this policy seriously and be authorised to carry out investigations into any potential and actual irregularities. Whistleblowers are strongly encouraged to provide their names and contact details, so that clarification of the reports made or further appropriate information can be obtained directly from them, where required. However, we understand that, under certain circumstances, the whistleblowers may not feel comfortable identifying themselves. In this case, anonymous report may be submitted but such reports generally will be dismissed.
- 5.5 Records shall be kept for all misconducts, malpractices and irregularities in the Group under Clause 5 of this policy. In the event a reported case leads to an investigation, the party responsible for leading/conducting the investigation shall ensure that all relevant information relating to the case is retained, including details of corrective action taken for a period not exceeding six years.
- 5.6 The form and duration of the investigation shall depend on the nature and actual situation of each report made. Upon receipt of a report, we will make a response to the whistleblower (if contactable) as soon as practicable upon authorisation to:
- (a) acknowledge the receipt of the report;
 - (b) notify the whistleblower whether further investigation shall be conducted in respect of the issue reported and, if applicable, the actions taken or to be taken or the reasons why no investigation shall be conducted;
 - (c) where practicable, provide an estimated timetable for the investigation and final results; and
 - (d) indicate if any remedial or legal actions shall be required.
- 5.7 In cases of suspected corruption practice or other criminal offences, a report will be submitted to the Independent Commission Against Corruption or the relevant authorities, as considered appropriate.

6. Confidentiality

- 6.1 The Company will make every effort to keep the whistleblower's identity confidential. In order not to jeopardise the investigation, the whistleblower should also keep confidential the facts that he/she has filed a report, the nature of concerns and the identities of those involved confidential.
- 6.2 There may be circumstances in which, because of the nature of investigation, the Company may be necessary to disclose the whistleblower's identity.
- 6.3 Under certain circumstances, the Company may refer the report to the relevant authorities, it may become necessary for the whistleblower to provide the evidence to the relevant authorities in conducting the investigation.
- 6.4 Internal investigations shall not impede any future investigation to be conducted by law enforcement agencies, including taking steps to ensure appropriate treatment of any suspected criminal offence reported or disclosed during the course of the internal investigation.

7. Protections for whistleblowers

- 7.1 The Company is committed to the fair treatment for all whistleblowers making genuine and appropriate reports under this policy. In addition, the Company shall protect such employee against unfair dismissal, victimisation or unwarranted disciplinary actions. Reasonable steps will be taken by the Company to protect the whistleblower from reprisal or disadvantage as a results of making a report under this policy.
- 7.2 The Company reserves the right to take any appropriate actions against anyone who retaliates or threatens to retaliate against whistleblowers. In particular, employees who initiate or threaten retaliation will be subject to disciplinary actions, which may include demotion, dismissal and other arrangements.

8. False report

- 8.1 If the whistleblower makes a false report maliciously or for personal gains, the Company reserves the right to take appropriate actions against that person to recover any losses or damages suffered as a results of the false report. In particular, employee may face disciplinary actions, including the possibility of demotion, dismissal and other arrangements.

9. Responsibility for implementation of policy

- 9.1 This policy has been passed by the Board of the Company. Human Resources Department has overall responsibility for the implementation of this policy, and has delegated the day-to-day responsibility for the administration of this policy to the Group's Internal Audit Department.
- 9.2 This policy is subject to review by the Board from time to time.

Approved by the Board: 29 June 2022

"Private and Confidential Documents - To be Opened by Addressee Only"

WHISTLEBLOWING REPORT FORM

The Company is committed to maintaining good corporate governance and attaches great emphasis to accountability. This whistleblowing policy serves to encourage and assist the whistleblower in disclosing any information in relation to any illegal deed, bribery, corruption, malpractice and other actions which may affect the business operation of the Company via confidential whistleblowing channels as much as possible. The Company will take a prudent approach in dealing with such reports, and address the issue raised by such whistleblower in a fair and appropriate manner. Following receipt of such report, a response will be made to the whistleblower (if contactable) as soon as practicable upon authorisation. Should you wish to make a written report, please use this report form. Once completed, this report becomes confidential.

Please read carefully this whistleblowing policy before completing the form below.

To: Fujikon Industrial Holdings Limited – Head of the Human Resources Department	
Address: 16th Floor, Tower 1, Grand Central Plaza, 138 Shatin Rural Committee Road, Shatin, New Territories, Hong Kong	
Name/ telephone number and email address of the whistleblower	Name:
	Reports submitted anonymously generally will be dismissed. Employee <input type="checkbox"/> Other stakeholders <input type="checkbox"/> (please specify: _____)
	Address:
	Tel:
	Email:
	Date:
Details of concerns: Please provide full details of your concerns: names, dates and places and the reasons for the concerns (continue on separate sheet if necessary), together with any supporting evidence.	
Confidentiality <i>All personal data collected will only be used for purposes which are directly related to the whistleblowing case you reported. Any anonymous reports not supplying such personal data in general will not be acted upon. The personal data submitted will be held and kept confidential by the Company and may be transferred to parties whom we will contact during our handling of this case, including the party being complained against or other parties concerned. The personal data provided may also be disclosed to law enforcement authorities or other relevant units.</i>	