

**BeijingWest Industries International Limited**  
*(Incorporated in the Cayman Islands with limited liability)*

**Whistleblowing Policy**

(Adopted on 27 January 2014, and substantially updated on 30 June 2022)

# WHISTLEBLOWING POLICY

## 1. INTRODUCTION

BeijingWest Industries International Limited (the “**Company**”) and its subsidiaries (collectively “**Group**”) are committed to achieving and maintaining high standards of openness, probity and accountability. It is also critical to maintain a good corporate image and raise the standard of corporate governance of the Company. The term “whistleblowing” refers to a situation where an employee or a third party (“**Whistleblower**”) decides to report serious concerns about any malpractice which he/she has become aware of or genuinely suspects that the Group has been or may become involved in. We believe that dealing appropriately with our employees and those with whom we do business can enable the Group to maintain good business ethics and corporate governance. To this end, the Company has devised this whistleblowing policy (the “**Policy**”).

## 2. PURPOSE AND APPLICABLE AREA

The purpose of formulating the Policy is to (a) increase the awareness of maintaining internal corporate justice and regard this as a kind of internal control mechanism; (b) provide the employees with guidance on whistleblowing and reporting channels; and (c) provide third parties with reporting channels to raise concerns about possible improprieties on any matter relating to the Group. The content of this Policy is applicable to all directors, senior management and staff members (permanent or temporary employees) of the Group (together, the “**Employees**”) in Hong Kong or outside Hong Kong, as well as third parties who deal with the Group (e.g. customers, suppliers, consultants and agents) (the “**Third Party(ies)**”).

## 3. POLICY

This Policy is intended to assist individual Employee and Third Party to disclose internally and at a high level, information which the individual believes shows malpractice or impropriety. It is not designed to further any personal disputes, question financial or business decisions taken by the Group nor should it be used to reconsider any staff matters which have been addressed under the grievances procedure already in place. Whistleblowing matters may include but are not confined to:

- Breach of legal or regulatory requirements
- Criminal offences, breach of civil law and miscarriage of justice
- Malpractice, impropriety or fraud relating to internal controls, accounting, auditing and financial matters
- Endangerment of the health and safety of an individual
- Damage caused to the environment
- Violation of the rules and regulations of the Group or the rules of

conducts applicable within the Group

- Improper conduct or unethical behaviour likely to prejudice the standing of the Group or to adversely affect other staff of the Group
- Deliberate concealment of any of the above

### **3.1 Protection and Confidentiality**

The Company is committed to the fair treatment of all persons making genuine and appropriate reports under this Policy and making every effort to treat all disclosures in a confidential and sensitive manner, except where the Company is required by law or regulation to disclose it, for legal or audit purposes or where the Company refers the matter to relevant regulators or law enforcement authorities. Reasonable steps will be taken by the Company to keep the identity of the individual Whistleblower making the reports confidential and will not be divulged without his/her consent. However, there may be circumstances where the Company may be required or legally obliged to reveal the identity of such Whistleblower (such as situation where the report leads to an investigation by regulators or authorities). If this is the case, the Company will take all reasonable steps to ensure that the relevant Whistleblower suffers no detriment. Harassment or victimization of a genuine Whistleblower will be treated as gross misconduct, which if proven, may result in dismissal.

### **3.2 Untrue Allegations**

In making a disclosure, individual Whistleblower should exercise due care to ensure the accuracy of the information. No matter the allegations are being proven, Whistleblower will not be at risk of suffering any form of retribution as a result provided that he/she is acting in good faith and reasonable manner. Disciplinary action may be taken against the Employee (as the Whistleblower) who is proven to raise false and malicious allegations deliberately. In an extreme case, if any part of the complaints made by Whistleblowers is vexatious or wild allegation, this could give rise to legal action by the Company.

### **3.3 Acknowledgement and Recognition**

The Company places great value upon creating an environment where Employees would maintain the highest standard of ethics, honesty, openness and accountability. The Company recognizes that it requires courage and personal quality such as righteousness, loyalty and impeccable integrity for an employee to step out and blow the whistle. These personal qualities and positive behaviours demonstrated by the whistleblowers are well acknowledged by the Company.

## 4. PROCEDURE

### 4.1 Reporting Channel

Employee or Third Party who has a legitimate malpractice concern can make his/her report in writing or, by prior appointment, in person to the Company's Company Secretary who shall report the matter to the Chairman of the Audit Committee.

### 4.2 Reporting Format

Reports can be made in writing, by submitting a Whistleblowing Report Form (the "Form") (see Appendix I) or in person (by prior appointment). If the report is made in writing or by submitting the Form, it should be sent to the **Company Secretary at Rooms 1005 to 1006, 10/F., Harcourt House, 39 Gloucester Road, Wanchai, Hong Kong**, in a sealed envelop clearly marked "Strictly Private and Confidential – To be Opened by Addressee" to ensure the confidentiality. Whistleblower who make the report are required to put their name to any disclosures they make.

**It is understood that in some case individual Whistleblower may wish to make a report anonymously. However, it is not encouraged as an anonymous allegation will hinder investigation and follow-up actions due to limited information. Nevertheless, anonymously whistleblowing will also be considered as far as practicable.**

The Company will hold it a serious disciplinary offence for any person to seek to prevent a communication of malpractice concern reaching to the Company Secretary (who shall report to the Chairman of the Audit Committee), or to impede any investigation which he/she or anyone on his/her behalf may make.

If there is evidence of criminal activity, activity on solicitation and acceptance of advantages or breach of legal and regulatory requirements, the party responsible for the internal investigation may legally be obliged to inform the relevant public or regulatory bodies such as the Hong Kong Police Force, the Independent Commission Against Corruption or the Security and Futures Commission or other relevant regulatory body as appropriate.

### 4.3 Investigation Procedure

The Chairman of the Audit Committee shall determine the course of action to pursue when he/she receives the whistleblowing matter.

The format and the length of an investigation will vary depending upon the nature and particular circumstances of each complaint made. The matters raised may

- be investigated internally;
- be referred to the relevant regulatory body;
- be referred to the external auditor;
- form the subject of an independent inquiry; and/or
- engage a third party service provider to investigate.

The Managing Director, the Chairman, the Chairman of the Audit Committee, human resources department in-charge, General Manager of overseas subsidiaries or any other person designated to investigate the complaint will write to the complainant wherever reasonably practicable of the concern being received:

- acknowledging that the concern has been received;
- advising whether or not the matter is to be investigated further and if so what the nature of the investigation will be;
- giving an estimate of how long the investigation will take to provide a final response; telling the complainant whether any initial enquiries have been made, and whether further investigations will take place, and if not, why not.

## **5. EFFECTIVENESS, INTERPRETATION, ENFORCEMENT AND AMENDMENT OF THE POLICY**

- 5.1 The Policy is implemented on the date of approval of the board of directors of the Company (the “**Board**”).
- 5.2 The Board is responsible for the interpretation of this Policy and supervise the enforcement of this Policy.
- 5.3 The Policy shall be reviewed, as appropriate, to ensure its relevance and effectiveness. Any amendment to this Policy must be reviewed by the Audit Committee and then submitted to the Board for approval.

Should there be any discrepancy between the English version and the Chinese version of this Policy, the English version shall apply and prevail.

**BEIJINGWEST INDUSTRIES INTERNATIONAL LIMITED**  
*(Incorporated in the Cayman Islands with limited liability)*  
*(the "Company")*

**Whistleblowing Report Form**

Please fill in this form if you wish to report a whistleblowing concern. You may send this form, in a sealed envelop clearly marked "Strictly Private and Confidential – To be Opened by Addressee". Please read the Whistleblowing Policy of the Company carefully before you fill in this form.

Attention: Company Secretary  
 BeijingWest Industries International Limited  
 Rooms 1005 to 1006, 10/F., Harcourt House, 39 Gloucester Road, Wanchai, Hong Kong

**Reporter's Information:-**

Name <sup>note:</sup> \_\_\_\_\_

Capacity:  Employee  Other Stakeholder (please specify: \_\_\_\_\_)

Company Name: \_\_\_\_\_

Department: \_\_\_\_\_ Job title: \_\_\_\_\_

Tel no.: \_\_\_\_\_ Email: \_\_\_\_\_

**Details of concerns:-**

Please provide full details of your concern, such as names, dates and places and reasons for the concerns etc., together with any supporting evidence (continue on separate sheet if necessary)

**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 Company and/or its subsidiaries (the "Group") and may be transferred by the Group 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 Company at Hong Kong address shown in this form.

*Note: It is understood that in some case individual whistleblower may wish to make a report anonymously. However, it is not encouraged as an anonymous allegation will hinder investigation and follow-up actions of the Company due to limited information. Nevertheless, anonymously whistleblowing will also be considered as far as practicable.*