

Chia Tai Enterprises International Limited

(Incorporated in Bermuda with limited liability)

(Stock Code: 3839)

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

Whistleblowing Policy

(adopted by the board (the “Board”) of directors (the “Directors”) of the Company on 10 August 2022)

1. Purpose

The Group is committed to high probity standards and ethical business practices. The Company believes that a whistleblowing system can help to detect and deter misconduct or malpractice in the Group.

This Policy aims to encourage all stakeholders of the Group to voice concerns or report any actual or suspected improprieties associated with the Group through a confidential reporting channel. The Company will handle the whistleblowing reports with due care.

2. Scope

This Policy applies to all directors, officers and employees of the Group (collectively, the “Employees”) and those external parties who are dealing with the Group.

The reporting procedures in this Policy are intended for reporting any actual or suspected improper conduct associated with the Group, which shall include, but not limited to:

- a. violation of any laws, rules or regulations;
- b. bribery or corruption;
- c. malpractice, impropriety or fraud in financial reporting, internal control or other matters;
- d. breach of rules, policies or code of conduct applicable to the Group;
- e. discrimination or harassment;
- f. improper conduct or unethical behaviour likely to prejudice the reputation or standing of the Group;
- g. safety, health and environmental issues; and/or
- h. deliberate withholding and/or concealment of information concerning the matters set out above.

3. Role and Responsibility

The Board, through delegation to the Audit Committee of the Company (the “Audit Committee”), is responsible for monitoring the implementation of this Policy.

The internal audit department of the Group (the “Group Internal Audit”) is responsible for the investigation of the whistleblowing reports.

4. Protection

The Group will protect whistleblowers who raise an issue or report a concern in good faith from retaliation. Any Employee who victimizes or retaliates against any whistleblowers who have genuinely raised concerns will be dealt with in an appropriate manner, which may include disciplinary actions.

The Group will treat all reports promptly in a sensitive and confidential manner. The whistleblower's identity will not be divulged without his/her consent wherever possible. However, there may be circumstances in which the Group is required or legally obliged to disclose the whistleblower's identity. For example, should an investigation lead to a criminal prosecution, it may become necessary for a whistleblower to provide evidence or be interviewed by relevant authorities. If this is the case, necessary steps will be taken to protect the whistleblower.

In making a report, the reporting person should exercise due care to ensure the accuracy of the information. Any Employee who is found to have deliberately submit whistleblowing reports with malicious intent shall be dealt with in an appropriate manner, which may include disciplinary actions.

The Company may consider to take legal action against external parties for falsifying whistleblowing reports with improper and/or malicious intents to recover any cost, loss or damage resulting from such whistleblowing reports.

5. Reporting Procedures

Whistleblowers can make a report as follows:

- a. in writing by post to the Audit Committee of the Company's Hong Kong office at 21/Floor, Far East Finance Centre, 16 Harcourt Road, Hong Kong; or
- b. by email to whistleblower@ctei.com.hk.

The whistleblowing report is required to contain information including the company or person the complaint is directed towards to, details of the complaint, clues and evidence. While anonymous reports are accepted, whistleblowers are also encouraged to disclose his/her identity and contact details so he/she can be contacted for further information, if necessary, and feedback on the complaints can be provided.

6. Investigation Procedures

Group Internal Audit is responsible for evaluating the whistleblowing reports. After verifying the information provided by the whistleblower, Group Internal Audit will decide whether an investigation is required. Where appropriate, the whistleblowing reports may:

- a. be investigated by the internal audit department, the human resources department or other departments of the Company as delegated by Group Internal Audit;
- b. be referred to the external auditor as instructed by Group Internal Audit; and/or

- c. form the subject of any other actions as Group Internal Audit may determine in the best interest of the Group.

The details (including progress and conclusion) of all whistleblowing cases will be reported to the Audit Committee and recorded and saved in a designated database.

Where appropriate, Group Internal Audit will communicate with the whistleblower the findings after completion of the investigation of the whistleblowing case.

If there is sufficient evidence to suggest that a case of possible criminal offence or corruption exists, the case will be reported to the relevant local authorities (for instance, the Independent Commission Against Corruption (ICAC) in Hong Kong).

7. Review

The Board will review this Policy from time to time, as appropriate, and approve any revisions that may be desired. The Audit Committee will be responsible for monitoring the implementation of this Policy.

8. Disclosure of Policy

This Policy may be disclosed in such manner as the Board considers appropriate and in compliance with any applicable regulatory requirements or guidelines.