



CHINA-HONGKONG PHOTO PRODUCTS HOLDINGS LIMITED
中港照相器材集團有限公司
(Incorporated in Bermuda with limited liability)
(Stock Code: 1123)

WHISTLEBLOWING POLICY

(Adopted by the Company pursuant to the Board resolution passed on 28 June 2022)

1. INTRODUCTION

- 1.1 The Company and its subsidiaries (collectively known as the “Group”) is committed to achieving and maintaining the highest standards of openness, probity and accountability.
- 1.2 The Group’s employees at all levels should conduct themselves with integrity, impartiality and honesty.
- 1.3 The Group encourages reporting of concerns and actual or suspected misconduct (see 3.1 (ii)) or unethical acts by any employees, those who deal with the Group and any other stakeholders who might be victims of staff misconduct in any matter related to the Group.

2. PURPOSE

This Policy aims to enable the Group’s employees, those who deal with the Group and any other stakeholders who might be victims of staff misconduct to raise concerns, in confidence or anonymity, with the Audit Committee of the Group about possible improprieties in matters related to the Group, in order to help detect and deter misconduct (see 3.1 (ii)) or unethical acts in the Group.

3. SCOPE

This Policy applies to:

- (i) employees at all levels of the Group, those who deal with the Group (e.g. customers, contractors and suppliers) and any other stakeholders who might be victims of staff misconduct; and
- (ii) concerns about possible improprieties in the Group’s financial reporting, internal control or other matters including, but not limited to, the following:
 - Violation of rules of conducts applicable within the Group
 - Failure to comply with / breach of legal or regulatory requirements
 - Criminal offences and breach of civil law
 - Malpractice, impropriety or fraud relating to internal controls, accounting, auditing and financial matters

- Endangerment of the health and safety of an individual
- Damage to the environment
- Improper conduct or unethical behaviour likely to prejudice the standing of the Group
- Acceptance of benefit, bribery or corruption
- Deliberate concealment of any of the above

4. DEFINITIONS

Some of the key terms used in this Whistleblowing Policy are defined below and shall have the meanings assigned herewith:

- 4.1 The “Audit Committee” means the Audit Committee of the Group which has been established with written terms of reference setting out duties, responsibilities and authorities delegated to them by the Board.
- 4.2 “Fraudulent Activity” is intended to be broad and comprehensive for the purpose of this Whistleblowing Policy, to cover matters relating to business operations, accounting, internal controls and/or legal compliance issues. Examples are contained in 3.1 (ii).
- 4.3 “Whistleblower” means a person or an entity in a role as a reporting party is making protected disclosure.
- 4.4 “Allegation” means any report relating to the Fraudulent Activity or retaliatory action, if any. For the avoidance of doubt, a complaint relating to any retaliatory action taken will be treated in the same manner as a complaint of Fraudulent Activity.
- 4.5 “Retaliation” means any adverse employment action taken against the employee in connection with an Allegation, including but not limited to demotion, suspension, termination, denial of promotion or benefits, threats, harassment and/or any manner otherwise amounting to a discrimination against the employee in the terms and conditions of his/her employment.
- 4.6 “Investigator” means any personnel/entity be authorized and appointed by the Board, including but not limited to external parties to whom the matter is referred to for investigation.

5. CONTENTS

- 5.1 Communication of the Whistleblowing Policy
To ensure the Board, officers, employees, those who deal with the Group and other stakeholders who may be victims of staff misconduct are aware of this Whistleblowing Policy, the Whistleblowing Policy is saved in the share folder of the Group’s network and is uploaded to the Group’s website: www.chinahkphoto.com.hk

- 5.2 Submission of Allegations
The Whistleblowing Policy provides for the confidential named submission of an Allegation by an employee or an External Party, anonymous disclosure will be handled with sufficient document support. (e.g., contract no. / sales order no.)
- 5.3 All Allegations can be addressed to the Internal Audit Manager via any one of the following channels:
- (i) Regular mail** to 8/F., Tsuen Wan Industrial Centre, 220-248 Texaco Road, Tsuen Wan, Hong Kong; or
 - (ii) Email** to whistleblowing@chinahkphoto.com.hk (it is recommended to send by employee's personal email account); or
 - (iii) Call and leave voice message at phone number: 2406 3192
- ** All Allegation mails should be marked "Private and Confidential".
- 5.4 All Allegations should be factual and written in a legible manner and contain sufficient material information.
- 5.5 An employee who makes a false accusation or allegation maliciously and in bad faith will be subject to disciplinary action which may include immediate termination of employment without prior notice or payment in lieu of notice.
- 5.6 The Internal Audit Department (on behalf of the Audit Committee) will review all Allegations received and respond as soon as possible and, where necessary, will endeavour to contact the Whistleblower for more information.

6. TREATMENT OF COMPLAINTS

- 6.1 The Internal Audit Department (on behalf of the Audit Committee) is responsible for receiving, recording, retaining and investigating all Allegations.
- 6.2 Upon receipt of an Allegation, the internal Audit Department shall, so soon as possible proceed to review the Allegation and where sufficient facts are available, conduct an investigation.
- 6.3 The Audit Committee may, as its discretion and at the expense of the Group, engage and consult external investigators, independent legal counsels, forensic accountants and other specialists as required, in consultation with the Board during its investigation of an Allegation.

- 6.4 The Audit Committee may also assign any personnel of the Group to assist in the investigation without disclosure of Whistleblower's identity. Any such personnel involved may be required by the Audit Committee to enter into a confidentiality and non-disclosure agreement to protect the interests of the Whistleblower and the Group.
- 6.5 The Internal Audit Department shall monitor the investigation process and issue relevant reports to the Audit Committee (as delegated by the Board) as appropriate. A final report, upon the completion of the investigation, shall be issued together with its recommendation.

7. RECORDING AND RETENTION OF ALLEGATIONS

- 7.1 The Internal Audit Department shall maintain a proper record of all Allegations received for at least 3 years from the date of the Allegation and each record should set out the date of the Allegation received, a brief description of the nature of the Allegation, the findings of the investigation and action taken.
- 7.2 All documents associated with any Allegation are considered confidential information unless otherwise required by law or by any company policy in effect at that time.
- 7.3 To protect the identity of the Whistleblower and maintain confidentiality of all Allegations, any information relating to the Allegations will only be made available to authorized personnel for legitimate purposes and at the sole discretion of the Audit Committee, unless otherwise required by law or by any Group's policy in effect at that time.

8. REVIEW OF POLICY

The Human Resources Department shall periodically review this Whistleblowing Policy and any amendments made to the Whistleblowing Policy shall require the approval from the Board.

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