

SHENZHEN INVESTMENT LIMITED

Whistleblowing Policy

1. OBJECTIVE

The Company and its subsidiaries (collectively, and maintaining the highest standards of openness, probity and accountability. In line with this commitment, the Company expects and encourages employees of the Group and those who deal with the Group (e.g. customers, suppliers, creditors and debtors) to report to the Company any suspected impropriety, misconduct or malpractice within the Group.

These Policy and procedures aim to provide reporting channels and guidance on reporting possible improprieties in matters relating to the Group, and reassurance to the reporting person that the Group will extend to them against dismissal, victimisation or any form of reprisal for any genuine and good faith reports made under this Policy.

2. SCOPE

This Policy applies to all employees of the Group as well as independent third parties who deal with the Group.

This Policy is intended to cover serious concerns that could have an impact on the Group, which include but not limited to:

- (a) criminal offences;
- (b) breach of legal or regulatory requirements;
- (c) malpractice, impropriety or fraud in financial reporting, internal control or other financial matters of the Group;
- (d) breach of rules, policies or internal controls of the Group;
- (e) endangerment of the health and safety of an individual;
- (f) damage caused to the environment;

- (g) professional, ethical or other malpractices or wrongdoings;
- (h) improper conduct or unethical behaviour likely to prejudice the standing of the Group; and
- (i) deliberate concealment of any of the above.

3. PROTECTION

In making a report, the Reporter should exercise due care to ensure the accuracy of the information.

The Reporter making appropriate reports under this Policy is assured of protection against dismissal, victimisation or any form of reprisal for any genuine and good faith reports under this Policy, even if the reports are subsequently proved to be incorrect or unsubstantiated. Harassment or victimisation of a genuine Reporter is treated as gross misconduct, which if proven, may result in dismissal.

4. CONFIDENTIALITY

The Company will make every effort to handle all disclosed information in a confidential and prudent manner. The identity of the Reporter will not be divulged save with such

- (a) it is required to be disclosed in compliance with any applicable law or regulation, by any relevant governmental or regulatory authority including The Stock Exchange of

having jurisdiction over the Company; or
- (b) the report and the identity of the Reporter are already public knowledge.

5. PROCEDURES

Making a report

- (a) A report may be made in person, in writing and/or by post to the Audit Committee of
at 8/F, New East Ocean Centre, 9 Science
Museum Road, Tsimshatsui, Kowloon, Hong Kong (via the Secretary to the Board)
or by email to the Audit Committee (via the Board Office at
bodoffice@shumyip.com.hk). The Chairman of the Audit Committee shall determine
the course of action to pursue, with power to delegate, with respect to the report;
- (b) Private and Confidential

Chairman Audit Committee to ensure confidentiality;

- (c) Each Reporter is required to provide details of improprieties (including relevant incident(s), behaviour, activity or activities, name(s), date(s), place(s) and any other relevant information) on the report together with any supporting evidences; and
- (d) Details of the Reporter (including name, department/business unit, company, contact number, relationship with the complainee, address or email address) are not required but are encouraged to be provided so as to facilitate the investigation and such details will be kept in the strictest confidence.

Investigation procedures

The format and length of an investigation will vary depending upon the nature and particular circumstances of each report made. Where appropriate, the reports raised may:

- (a) be investigated internally by the Audit Committee or if determined by the Chairman of the Audit Committee, be investigated by other departments of the Company;
- (b) be referred to the external auditor as instructed by the Chairman of the Audit Committee;
- (c) be referred to the relevant public or regulatory bodies as instructed by the Chairman of the Audit Committee; and/or
- (d) form the subject of any other actions as the Chairman of the Audit Committee may determine in the best interest of the Group.

The Chairman of the Audit Committee will, or via other departments of the Company (as the Chairman determines appropriate), respond to the Reporter, if contactable, as soon as practicable upon receipt of the report:

- (a) acknowledging receipt of the report;
- (b) advising the Reporter as to whether or not the matter will be investigated further and, as appropriate, the actions taken or being taken or the reasons for no investigation being made; and
- (c) where practicable, providing the progress of investigation and if any remedial or legal action is or is to be taking.

The frequency of communications between the Reporter and the person investigating the reported matters and information will vary depending on the nature and clarity of the reporting. Further assistance from the Reporter may be required from time to time along the investigation.

6. CONSISTENCY WITH LAWS AND REGULATIONS

This Policy shall be read in conjunction with and subject to any relevant laws, regulations, rules, directives or guidelines that the Stock Exchange or any relevant governmental or regulatory bodies may from time to time prescribe or issue on the matters governed by this Policy.

In the event that any matters and procedures herein are inconsistent or in conflict with any relevant laws, regulations, rules, directives or guidelines as prescribed by the Stock Exchange or any relevant governmental or regulatory bodies, the latter shall prevail to the extent of such inconsistency or conflict.

7. MONITORING AND REVIEW

The Audit Committee shall supervise the implementation and enforcement of this Policy and the procedures herein and is responsible for the interpretation, review and amendment of all the rules and procedures set out herein from time to time.

March 2022