

## **WHISTLEBLOWING POLICY AND PROCEDURES:**

This Policy aims to providing guidance and procedures for stakeholders of the Group (“**Whistleblowers**”) to raise their complaints against any suspected misconduct, malpractice or irregularity, e.g. fraud, corruption, non-compliance with the Group’s policies and procedures, non-compliance with any relevant laws, rules and regulations, and deliberation of concealment of information, by any employee, contractor or supplier of the Group. However, this Policy is not applicable to general complaints in relation to products or customer services unless misconduct, malpractice or irregularity is involved.

All complaints should be supported by evidence for facilitating evaluation and investigation. All Whistleblowers are assured of fair treatment, and employees making any complaints are protected from any unfair dismissal or disciplinary action provided always that all such complaints are substantiated by evidence in the absence of any malice, defamation, retaliation or any purpose for personal advantage. The Group will keep the identity of the Whistleblower confidential; the Whistleblower on the other hand is required to keep the matter he/she complains of confidential. For the avoidance of doubt, if a complaint is criminal in nature after assessment, the complaint will be referred to the relevant authorities, and the identity of the Whistleblower will be disclosed. Given the foregoing, it is recommended that all complaints should not be made anonymously.

In general, the Whistleblower should make his/her complaint directly to the Internal Audit Department by email or post in a sealed envelope marked “Confidential and Opened by the Addressee Only” as follows:

Email: [whistleblowing@sctrade.com](mailto:whistleblowing@sctrade.com)

Address: 28<sup>th</sup> Floor, Bank of China Tower, 1 Garden Road, Central, Hong Kong

If any director of the Group or any staff of Internal Audit Department is the concerned person in the complaint, the Whistleblower should make his/her complaint directly to the Chairman of the Board of Directors by post in a sealed envelope marked “Confidential and Opened by the Addressee Only” as follows:

Address: 28<sup>th</sup> Floor, Bank of China Tower, 1 Garden Road, Central, Hong Kong

Upon receipt of any complaint, the Internal Audit Department will review and evaluate it, and then determine mode of investigation. If the alleged misconduct, malpractice or irregularity is confirmed, a report prepared by the Internal Audit Department will then be circulated to the relevant department head and the Human Resources Department, for the purpose of consideration and determination of any remedial and disciplinary actions to be taken. In the case of the concerned person in the complaint is either a director of the Group or any staff of Internal Audit Department, the Chairman of the Board of Directors or any other person(s) as he/she may delegate from time to time will review and evaluate the complaint, and then determine mode of investigation. If the alleged misconduct, malpractice or irregularity is confirmed, the Chairman of the Board of Directors will make a final decision on the actions to be taken.

The Whistleblower should disclose his/her contact mode, e.g. email, telephone number and/or address in the complaint as he/she will be informed of the final result of the complaint.