

Best Pacific International Holdings Limited
External Whistleblowing Policy

1.0 Objective

- 1.1 Best Pacific International Holdings Limited (the “**Company**”) and its subsidiaries (collectively, the “**Group**”) are committed to achieving and maintaining the highest standards of openness, probity and accountability. In line with this commitment, the Company has set out detailed procedures enabling employees to raise their concerns about any suspected misconduct or malpractice within the Group in confidence and without fear of reprisal or victimisation. We also expect and encourage those who deal with the Group (e.g. customers, suppliers, contractors, creditors and debtors) to report to the Company any suspected impropriety, misconduct or malpractice within the Group.
- 1.2 This policy (the “**Policy**”) and the procedures herein aim to provide reporting channels and guidance on reporting possible improprieties in matters relating to the Group, and reassurance to the reporting person or entity (the “**Reporter**”) of the protection 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.

2.0 Scope

- 2.1 Whilst it is impossible to provide an exhaustive list of the activities that constitute impropriety, misconduct or malpractice, this Policy is intended to cover serious concerns that could have an impact on the Group, which include but not limited to:
- 2.1.1 criminal offences;
 - 2.1.2 breach of legal or regulatory requirements;
 - 2.1.3 miscarriage of justice;
 - 2.1.4 malpractice, impropriety or fraud in financial reporting, internal control or other financial matters of the Group;
 - 2.1.5 breach of rules, policies or internal controls of the Group;
 - 2.1.6 endangerment of the assets of the Group;
 - 2.1.7 endangerment of the health and safety of an individual;
 - 2.1.8 discrimination or harassment;
 - 2.1.9 damage caused to the environment;
 - 2.1.10 professional, ethical or other malpractices or wrongdoings;
 - 2.1.11 improper conduct or unethical behaviour likely to prejudice the standing of the Group; and
 - 2.1.12 deliberate concealment of any of the above.

3.0 Protection

- 3.1 In making a report, the Reporter should exercise due care to ensure the accuracy of the information.
- 3.2 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.

4.0 Confidentiality

- 4.1 Each report will be treated as confidential. The identity of the Reporter will not be divulged save with such Reporter's consent or where:
 - 4.1.1 in the opinion of the Audit Committee of the Company (the "**Audit Committee**"), it is material to the investigation or in the interest of the Company to disclose the identity;
 - 4.1.2 the report is frivolous or is lodged in bad faith with malicious or mischievous intent or in abuse of this Policy;
 - 4.1.3 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 Hong Kong Limited (the "**Stock Exchange**"), or by the order or directive of any court having jurisdiction over the Company; or
 - 4.1.4 the report and the identity of the Reporter are already public knowledge.

5.0 Procedures

5.1 Making a report:

- 5.1.1 A report may be made in writing and/or by post to the Audit Committee at 38/F, 9 Wing Hong Street, Lai Chi Kok, Kowloon, Hong Kong (via the Company Secretary) or by email to the Audit Committee (via AC_B@bestpacific.com). The Chairman of the Audit Committee shall determine the course of action to pursue, with power to delegate, with respect to the report;
- 5.1.2 All written reports by post shall be sent in a sealed envelope clearly marked "Strictly Private and Confidential – To be Opened by Addressee" and addressed to the Chairman – Audit Committee of the Company to ensure confidentiality;
- 5.1.3 Each Reporter is required to provide details of improprieties (including relevant incident(s), behaviour(s), activity or activities, name(s), date(s), place(s) and any

other relevant information) on the report together with any supporting evidences;
and

- 5.1.4 Details of the Reporter (including name, department/business unit, company, contact number, relationship with the complaine, 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.

5.2 Investigation procedures:

- 5.2.1 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:
 - 5.2.1.1 be investigated internally by the Audit Committee, or if determined by the Chairman of the Audit Committee, the Company Secretary, the internal audit department, the human resources department or other departments of the Company;
 - 5.2.1.2 be referred to the external auditor as instructed by the Chairman of the Audit Committee;
 - 5.2.1.3 be referred to the relevant public or regulatory bodies as instructed by the Chairman of the Audit Committee; and/or
 - 5.2.1.4 form the subject of any other actions as the Chairman of the Audit Committee may determine in the best interest of the Group.
- 5.2.2 The Chairman of the Audit Committee will, or via the Company Secretary or the internal audit department or the human resources department or 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:
 - 5.2.2.1 acknowledging receipt of the report;
 - 5.2.2.2 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;
 - 5.2.2.3 where practicable, giving an estimate of the timeline for the investigation and final response; and
 - 5.2.2.4 indicating the investigation result and if any remedial or legal action is or is to be taken.
- 5.2.3 All investigations will be conducted in confidence and any investigation of sexual harassment will be conducted by person(s) of the same gender with the victim.

5.3 Keeping records:

- 5.3.1 All the reports, evidences and relevant information (including the information of the Reporter (if any), correspondence and corresponding follow up actions) shall

be kept in the strictest confidence and maintained in order by the designated officer or department as determined by the Chairman of the Audit Committee.

6.0 Consistency with laws and regulations

6.1 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.

6.2 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.

7.0 Maintaining this policy

7.1 The Audit Committee shall supervise the implementation and enforcement of this Policy and the procedures herein and is responsible for the review of all the rules and procedures set out herein from time to time. This Policy may be amended by the board of directors of the Company (the “**Board**”) at any time and the interpretation of the Policy will also be determined by the Board.

7.2 This Policy is effective from the date when the Board approved this Policy.