

Lee Kee Group

Whistleblowing Policy for External Party (Effective from 1 April 2022)

Purpose

1. Lee Kee Group (the “Group” which includes Lee Kee Holdings Limited (“LKH”) and its subsidiaries) is committed to achieving and maintaining the high standard of corporate governance. The purpose of this Policy is to encourage external party who is not a staff and deals with the Group (such as, customers, suppliers, business associates)(the “External Party”) to inform the Group any inappropriate behaviour as set out in Clause 2 of this Policy while providing them a reporting channel of such concerned areas.

Note 1: ‘Whistleblowing’ refers to a situation where an External Party decides to report serious concerns about any malpractice which he/she has become aware of or genuinely suspects that the Group’s employee has been or may become involved in. An External Party reports under this Policy will be called as Whistleblower hereinafter.

Policy

2. The Policy is intended to assist the External Party to disclose to the appropriate responsible personnel in the Group when they believe certain persons in the Group have engaged in cases of malpractice or impropriety. It is not designed to further any personal disputes, question financial or business decisions taken by the Group nor should it be used to report any commercial matters. Whistleblowing matters may include but are not confined to:
 - Breach of legal or regulatory requirements
 - Criminal offences and breach of civil law
 - Malpractice, impropriety or fraud
 - Endangerment of the health and safety of an individual
 - Damages to the environment
 - Violation of rules of conducts
 - Improper conduct or unethical behaviour
 - Deliberate concealment of any of the above

Protection and Confidentiality

3. The Group will make every effort to treat all disclosures in a confidential and sensitive manner. The identity of the Whistleblower will not be divulged without that Whistleblower’s consent, except circumstances under which the Group may be required or legally obliged to reveal the Whistleblower’s identity and may not be able to give prior notice to the Whistleblower (e.g. in cases involving possible criminal offences).

Untrue Allegations

4. In making a report, the Whistleblower should exercise due care to ensure, as far as possible, the accuracy of the information. If the Whistleblower is mistaken, he/she will not be at risk of being claimed by the Group provided that he/she is acting in good faith and a reasonable manner. On the other hand, if the Whistleblower makes an unfounded disclosure maliciously, fraudulently, with an ulterior motive or for personal gain, the Group reserves the

right to decline to investigate or discontinue an investigation, and take appropriate actions against the Whistleblower to recover any cost, loss or damage as a result of the disclosure.

Reporting Channel

5. A Whistleblower who has a legitimate malpractice concern may, as an initial step, inform the the matter to the LKH’s Corporate Governance Committee (“CG Committee”).

The CG Committee may designate appropriate persons or set up a committee to investigate the matter. The designated persons (or the committee) should summarize the complaints received and report any matter of significance to the CG Committee semi-annually or at an appropriate time, where necessary. If for any reason the Whistleblower would prefer the CG Committee not to be told, the Whistleblower may raise the matter directly to the Audit Committee of LKH (the “Audit Committee”). The Audit Committee may, with the support and resources from the Group, designate appropriate persons or set up a committee to investigate the matter with clear authority and responsibility.

Reporting Format

6. Report, with all relevant information, evidence and supporting documents, can be made in writing sending in the following manner to ensure confidentiality, or through sending email to the following addressees:

Addressee	By mail	By email
CG Committee	<u>Strictly Private and Confidential – To be Opened by Addressee</u> Corporate Governance Committee Lee Kee Holdings Limited No. 16 Dai Fat Street, Tai Po Industrial Estate, New Territories, Hong Kong	Send with the subject “Strictly Private and Confidential” to: the email address: cg_committee@leekeegroup.com
Audit Committee	<u>Strictly Private and Confidential – To be Opened by Addressee</u> The Audit Committee Lee Kee Holdings Limited No. 16 Dai Fat Street, Tai Po Industrial Estate, New Territories, Hong Kong	audit_committee@leekeegroup.com

Whistleblowers should ensure all necessary evidence is provided with their name and contacts. The Group is committed to protecting the reporting person’s identity and treating all disclosures with strict confidentiality. In some cases, however, reports may be submitted anonymously if the Whistleblower is uncomfortable disclosing his/her identity. **Anonymous reporting will be considered as far as practicable** . The Group will hold it a serious disciplinary offence for any Employee who seeks to prevent a communication of malpractice concern reaching the appropriate party, or to impede any investigation which he/she or anyone on his/her behalf may make. If there is evidence of criminal activity, activity of solicitation and acceptance of advantages or breach of legal and regulatory requirements, the party responsible for the internal investigation must immediately inform the delegated authority to promptly inform the relevant public or regulatory bodies such as the Police Force, the Independent Commission Against Corruption, the Security and Futures Commission or relevant regulatory body as appropriate.

Investigation Procedure

7. The format and the length of an investigation will vary depending upon the nature and particular circumstances of each complaint made. The matters raised may:
- be investigated internally;
 - be referred to the relevant public or regulatory bodies;
 - be referred to the external professional party; and/or
 - form the subject of an independent inquiry.

The person designated to investigate the complaint will write to the Whistleblower wherever reasonably practicable of the concern being received:

- acknowledging that the concern has been received;
- telling the complainant whether any initial enquiries have been made and the related results, where appropriate and if available;
- advising whether or not the matter is to be investigated further and if so what the nature of the investigation will be;
- providing justification if no further investigations will take place.

Note 2: Along the investigation, further assistance from the complainant may be required from time to time. Confidential records will be kept for at least 7 years for all matters raised through this policy.

Upon conclusion of the investigation, a written reply will be issued to the Whistleblower stating the outcome of the investigation, where reasonably practicable and subject to any data privacy and confidentiality requirements. The outcome decided by the Group is final in the absence of new relevant material information and cannot be appealed under this Policy. If the Whistleblower persists in pursuing more disclosure about the investigation in the absence of new relevant material information, the Group may refrain from entering into any further discussion or correspondence with that Whistleblower about such request.