



# THE CROSS-HARBOUR (HOLDINGS) LIMITED

港通控股有限公司

*(Incorporated in Hong Kong with limited liability)*

**(Stock Code: 32)**

## **WHISTLEBLOWING POLICY SUMMARY**

### **Purpose**

This Policy aims to (i) promote ethical standards; (ii) assist any Employees or Third Parties to raise a serious concern about any suspected fraud, malpractice, misconduct or irregularity in relation to the Group (“Concern”), in confidence and anonymity; and (iii) provide reporting channels and guidance on whistleblowing to Employees or Third Parties to raise Concern. The Policy applies to all Employees and Third Parties.

### **Reportable Concern**

For the purpose of this Policy, “Whistleblowing” is where an Employee or Third Party (each a “Whistleblower”) reports a Concern.

Activities that constitute malpractice or misconduct may include, but not limited to the following:

- (a) Criminal offense, breach of civil law or miscarriage of justice
- (b) Non-compliance with laws and regulations
- (c) Impropriety or fraud relating to accounting, financial reporting, internal controls and auditing matters
- (d) Misuse or misappropriation of the Group’s assets or resources
- (e) Any action which endangers the health and safety of Employees or Third Parties
- (f) Violation of the policies or guidelines of the Group
- (g) Improper use or leakage of confidential or commercially sensitive information
- (h) Corruption or bribery
- (i) Deliberate concealment of any of the above

### **Reporting Channels and Confidentiality**

Any Whistleblower who wishes to report a Concern is encouraged to address it to the Chairman of the Audit Committee by sending a written report, with supplementary information, if any, to the registered office in Hong Kong of the Company by mail. In case of a Concern about the Chairman of the Audit Committee or he/she is otherwise conflicted, the report should be lodged to the other members of the Audit Committee.

Whistleblowers might wish to report anonymously though it is not encouraged as an anonymous allegation will hinder investigation and follow-up actions. Whistleblowers are encouraged to come forward and report as much specific information as possible for assessments and investigations.

To ensure confidentiality in the mailing process, the written report should be sent in a sealed envelope marked “Strictly Private and Confidential – To be Opened by Addressee Only”.

The Company will make every effort to keep all reporting and any Whistleblower’s identity confidential and assures that any Whistleblower reporting in good faith will be treated fairly. Each report will be treated as confidential. The identity of the Whistleblower will not be disclosed.

## ***Personal Information Collection Statement***

*“Personal Data” in this statement has the same meaning as “personal data” in the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong) (“PDPO”). All parties should strictly adhere to the PDPO in handling all personal data and treat them as private and confidential. We may transfer your Personal Data to an external third-party (e.g. auditors, counsels or other experts), and/or relevant public bodies or regulatory or law enforcement authorities who are authorised by law to request the information. Personal data must be collected in a lawful and fair way. Steps should be taken to ensure that personal data are accurate and not kept longer than is necessary. Personal data will only be used for the purpose for which they are collected or for a directly related purpose.*