

# CHIHO ENVIRONMENTAL GROUP LIMITED

## 齊合環保集團有限公司

(Incorporated in Cayman Island with limited liability)

### WHISTLEBLOWING POLICY (the “Policy”)

#### 1. PURPOSE

Chiho Environmental Group Limited (the “Company”) together with its subsidiaries (the “Group”) is committed to maintaining high standards of integrity, probity and accountability. To align with this, the board of directors (the “Board”) of the Company have approved and adopted this Policy such that employees of the Group and relevant third parties who deal with the Group (the “Whistleblower”) can raise concerns, in confidence, about suspected improprieties in any matters that have occurred or potentially occurred.

#### 2. SCOPE OF REPORTING

2.1 Reporting activities that constitute malpractice or misconduct may include, but not limited to the following:

- (1) Criminal offences (included bribery and corruption) or breaches of other legal or regulatory requirements;
- (2) Impropriety or fraud relating to accounting, financial reporting, internal controls and auditing matters;
- (3) Misuse or misappropriation of the Group’s assets or resources;
- (4) Any action which endangers the health and safety of Employees or other stakeholders;
- (5) Improper use or leakage of confidential or commercially sensitive information;
- (6) Deliberate concealment of any of the above.

#### 3. PROTECTION

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

3.2 Persons reporting the case should be in good faith which means that the reporting person has held a reasonable belief that the concern made is true and honest but not

made for personal interest or any ulterior motive.

3.3 Whistleblowers making genuine and appropriate reports are assured of fair treatment. In addition, all relevant employees are also assured of protection against unfair dismissal, victimization or unwarranted disciplinary action.

3.4 The Group reserves the right to take appropriate disciplinary actions, which may include summary dismissal, against anyone who initiates or threatens to initiate retaliation against the Whistleblowers. Management of the Group supports and encourages all the concerns raised by Whistleblowers without the worry of retaliation.

#### 4. CONFIDENTIALTY

4.1 The Group will make every effort to keep confidential all information received from a Whistleblower and the identity of the Whistleblower except consent from Whistleblower is obtained. However, in some cases, the Company may disclose the identity of the Whistleblower if there is a legal or regulatory requirement to disclose it or it is disclosed to law enforcement or comparable authorities. The Whistleblower will be informed of such situations.

#### 5. REPORTING CHANNELS

5.1 Reports made under this Policy are to be submitted in one of the following ways:

(1) by email: [whistleblower@chihogroup.com](mailto:whistleblower@chihogroup.com)  
(For Audit Committee/Internal Audit only)

(2) in writing: Audit Committee/Internal Audit,  
Chiho Environmental Group Limited  
Rm 1001, 10/F., Infinitius Plaza,  
199 Des Voeux Road Central, Hong Kong  
(Please mark: "Private and Confidential – To be Opened by Addressee")

5.2 While the Group does not expect the Whistleblower to have absolute proof or evidence of the concerns or issues reported, nevertheless the Whistleblower should provide sufficient, precise, and relevant information pertaining, among others, to dates, places, persons/witnesses, numbers, etc., so that a meaningful and feasible investigation can be conducted.

5.3 Even though details of the Whistleblower (including name, department, company, contact number, relationship with the party complained, address or email address) are not compulsory,

but it is encouraged to provide to facilitate the investigation and such details will be kept in the strictest confidentiality.

## 6. INVESTIGATION PROCEDURES

6.1 Upon receiving a report, Audit Committee will assign Internal Audit to promptly register it in a log of reports which is maintained in a secure location so as to protect the confidentiality of all Whistleblowers' identity.

6.2 Audit Committee will review each report case and decide whether to make investigations. 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, or the internal audit department or other appropriate departments of the Company, where appropriate;

(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.

6.3 During investigations, authorized internal and/or external professionals may need to contact the Whistleblower(s) for further information. They are requested to cooperate with the investigation, including by making themselves available for interviews and providing relevant documents as required.

6.4 In order not to jeopardize future investigation by the Company and/or a law enforcement agency, the Whistleblower is also required to keep confidential all information about and related to the whistleblowing report, including but not limited to the fact that a whistleblowing report has been filed, the nature of the concerns, the identities of those involved and any other information that the Company has shared in the course of handling the whistleblowing report.

6.5 The Whistleblower will be informed of the final results of the investigation, wherever reasonably practicable.

## 7. FALSE REPORTS

7.1 All whistleblowing reports must be made in good faith. If the Whistleblower makes a false whistleblowing report maliciously, with an ulterior motive, or for personal gain, the Company reserves the right to decline or discontinue investigation, to report to law enforcement agencies and to take appropriate actions against the Whistleblower to recover any loss or damage as a result of the false whistleblowing report. In particular, employees may face disciplinary action, including dismissal, where appropriate.

## 8. RESPONSIBILITY

8.1 The Audit Committee is responsible for monitoring and reviewing the effectiveness of this Policy and the actions resulting from the investigation. Any amendments or updates to this Policy shall be reviewed by the Audit Committee and approved by the Board.

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*Adopted by the Board on 29 March 2023*