

# **Evergreen Products Factory Limited**

## Whistleblowing Policy

(Date: 11 January 2022)

## 1. PURPOSE

Evergreen Products Factory Limited (the “Company”) and its subsidiaries (collectively the “Group”) are committed to maintain the highest possible standards of openness, probity and accountability. We expect all level employees to conduct themselves with honesty, integrity and impartiality.

To formalize these commitments, and set forth our specific obligations, we have a longstanding Code of Conduct (the “Code”) and Employee Handbook. The Code provides the guiding principles for all employees to behave with integrity and honesty, obey all laws, and accept accountability.

This policy is designed to encourage employees of the Group and other third parties who deal with the Company (e.g. customers, suppliers, debtors, creditors, etc.) (the “third party”) to report any misconduct, in confidence, malpractice, in confidence or irregularities in any matters related to the Company.

## 2. GENERAL POLICY

“Whistleblowing” refers to a situation in which an employee or other stakeholder decides to report serious concerns about any suspected misconduct, malpractice or irregularity within the Company. See Section 6 for examples of misconducts, malpractice or irregularities.

This policy is intended to encourage and assist Whistleblowers to disclose information relevant to suspected misconduct, malpractice or irregularity through a confidential reporting channel. The Company will handle the report with care and will treat the Whistleblower’s concerns fairly and properly.

## 3. RESPONSIBILITY TO REPORT

Under the Code, employees are required to promptly alert their supervisor or higher management of business and work-related situations that could be damaging to the Company or cause harm to others; and to take reasonable action to prevent damage or harm. Employees could be in breach of the Code if they assist or authorize others in activities that breaches by others. Employees and third parties may also have a duty to report corruption to the authorities if required to do so by local regulations.

## 4. PROTECTION

Whistleblowers making appropriate complaints under this policy are assured of protection against unfair dismissal, victimization or unwarranted disciplinary action, even if the concerns turn out to be unsubstantiated.

Persons who victimize or retaliate against those who have raised concerns under this policy will be subject to disciplinary actions.

## 5. CONFIDENTIALITY

The Group will make every effort to keep the Whistleblower's identity confidential. In order not to jeopardize the investigation, you should also keep the fact that you have filed a report, the nature of your concerns and the identity of those involved confidential. There may be circumstances in which, because of the nature of the investigation, it will be necessary to disclose your identity. If such circumstances exist, the Group will endeavor to inform you that your identity is likely to be disclosed.

## 6. TYPES OF MISCONDUCT, MALPRACTICE AND IRREGULARITY

It is impossible to give an exhaustive list of the activities that constitute misconduct, malpractice or irregularity covered by this policy. For example, the Group expects all employees to observe and apply the Code principles in the conduct of the Group's business. Employee behavior that is not in line with the Code principles could constitute a misconduct, malpractice or irregularity that should be reported.

The principles of the Code include but are not confined to:

- ~ No fraudulent or corrupt conduct
- ~ Compliance with laws and regulatory requirements
- ~ Endangerment of the health and safety of an individual
- ~ Protecting our information, records and assets
- ~ Avoiding conflicts of interest
- ~ Compliance with financial controls and reporting requirements
- ~ Abide by professional ethics and business integrity

## 7. REPORTING CHANNELS

In general, Whistleblowers should make their reports, by using the standard form attached as Appendix I of this policy, to the Head of Internal Audit of the Group in writing by post in a sealed envelope clearly marked "To be opened by addressee only" at:-

Hong Kong Office  
Head of Internal Audit of the Group  
Evergreen Products Factory Limited  
11/F., Chiap Luen Industrial Building,  
30-32 Kung Yip Street, Kwai Chung,  
N.T., Hong Kong.

Whistleblowers may, at their own discretion, choose to report directly to the Chairman

of the Audit Committee of the Company (the “Audit Committee”) by post at the same address above.

#### 8. INVESTIGATION

Internal Audit will assess every report received through the general reporting channel to decide if a full investigation is necessary. For cases involving general staff and middle management staffs, which are not reported anonymously, Internal Audit is required to report to the President of the Group and the Chairman of the Audit Committee within 5 working days. For cases involving senior management staff, Internal Audit is required to report to the Chairman of the Audit Committee within 5 working days. For reports directed to the Chairman of the Audit Committee, the Chairman of the Audit Committee will decide if a full investigation is necessary and if so, how the investigation should proceed or delegate the investigation to Internal Audit. During the investigation, Internal Audit or the Audit Committee may seek external auditors or other agencies for assistance.

If there is sufficient evidence to suggest that a case of possible criminal offence or corruption exists, the matter will be reported by Internal Audit or the Audit Committee to the relevant local authorities (for instance, Independent Commission Against Corruption (ICAC) in Hong Kong).

In some situations (e.g. in case of possible criminal offence), Internal Audit or the Audit Committee may have to refer the matter together with the relevant information to the authorities. Once the matter is referred to the authorities, the Company may not be able to take further action on the matter.

Internal Audit will prepare a full report on the investigation conducted by it without revealing the identity of the Whistleblower and will submit the report to the Audit Committee. For report received by Internal Audit which decides that a full investigation is not necessary, Internal Audit will prepare a written explanation on reasons for not conducting a full investigation and submit the written explanation to the Chairman of the Audit Committee. For confirmed cases of Code violations, Internal Audit will suggest what disciplinary action is appropriate based on the results of the investigation and report to Audit Committee for final decision. For cases investigated by the Audit Committee, the Audit Committee will prepare, and may seek Internal Audit, external auditors or other agencies to prepare, the reports and decide on the appropriate disciplinary action.

Internal Audit or the Audit Committee will inform the Whistleblower the final results of the investigation.

9. FALSE REPORTS

If a Whistleblower makes a false report maliciously, with an ulterior motive or for personal gain, the Group reserves the right to take appropriate actions against any employees or Third Parties to recover any loss or damage as a result of the false report. In particular, employees may face disciplinary action, including dismissal.

10. ANONYMOUS REPORTS

As the Group takes reporting of misconducts, malpractices, and irregularities seriously and wants to conduct warranted investigations of both potential and actual violations, it is preferred that these reports are not made anonymously. However, it is recognized that for any number of reasons, employees or related Third Parties may not feel comfortable reporting potential violations directly to Internal Audit. In these cases, anonymous reports may be submitted to Internal Audit.

11. RECORD RETENTION

Records shall be kept for all reported misconducts, malpractices, and irregularities by the relevant parties. In the event a reported irregularity leads to an investigation, the party responsible for leading / conducting the investigation shall ensure that all relevant information relating to the case is retained, including details of investigative action taken for a period not exceeding six years (or whatever other period may be specified by any relevant legislation).

12. RESPONSIBILITY FOR IMPLEMENTATION AND REVIEW OF POLICY

This policy has been approved and adopted by the Board of the Company. The Audit Committee has overall responsibility for implementation, monitoring and periodic review of this policy. In addition, the Audit Committee has delegated the day-to-day responsibility for administration of the policy to the Head of Internal Audit.

If there are any questions about the contents or application of this policy, please contact Internal Audit.

## Appendix 1

### EVERGREEN PRODUCTS FACTORY LIMITED WHISTLEBLOWING REPORT FORM (CONFIDENTIAL)

Evergreen Products Factory Limited (the “Company”) and its subsidiaries (collectively the “Group”) are committed to maintain the highest possible standards of openness, probity and accountability. In line with that commitment, the Company encourages employees of the Group to raise concerns and report in confidence, about misconducts, malpractices or irregularities in any matters related to the Company.

The Whistleblowing Policy has been established to encourage and assist Whistleblowers to disclose information relevant to the misconducts, malpractices or irregularities through a confidential reporting channel (to the extent possible). The Company will handle this report with care and will treat the Whistleblower’s concerns fairly and properly.

If you wish to make a written report, please use the report form below. Once completed, this report becomes confidential. You may send the report, marked confidential and addressed to the Head of Internal Audit or the Chairman of the Audit Committee, by post to the relevant addresses below.

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| To: Head of Internal Audit / Chairman of the Audit Committee (please delete as appropriate)   |   |
| Evergreen Products Factory Limited<br>11/F., Chiap Luen Industrial Building,<br>30-32 Kung Yip Street, Kwai Chung,<br>N.T., Hong Kong   |   |
| Your Name / Contact Telephone<br>Number and Email<br><br>Anonymous reports in general will<br>not be acted upon. Therefore, it is<br>strongly recommended that the<br>report is not made anonymously.             | Name: _____<br><input type="checkbox"/> Employee <input type="checkbox"/> Other Stakeholder (please specify: _____)<br>Address: _____<br>Tel No: _____<br>Email: _____<br>Date: _____ |
| The names of those involved (if known):   |   |
| <b>Details of concerns:</b><br><br>Please provide full details, such as names, dates and places and the reasons for the concerns (continue on separate sheet if necessary) together with any supporting evidence. |   |