

# **Whistleblowing Policy and Procedures**

## **Chapter I General Principle**

### **Article 1 Purpose**

This whistleblowing policy is formulated to provide an avenue for employees of the Group to raise any concerns about possible improprieties in matters of financial reporting, accounting, internal control and auditing matters or other operational matters, without fear of reprisal in any form (“Feedback”).

This policy applies to First Sponsor Group Limited and its subsidiaries (including subsidiaries in the PRC and Europe).

## **Chapter II Feedback Channels and Information**

### **Article 2 Procedures and Information**

1. Employees may raise Feedback anonymously;
2. In order to ensure all Feedback by employees are handled fairly and objectively, they should be raised via email to any one of the following representatives of the Group:

<b><u>Designation</u></b>	<b><u>Email Address</u></b>
Group Audit Committee Chairman	(ac@1st-sponsor.com.sg); or
Group CEO	(neotp@1st-sponsor.com.sg) ; or
Chengdu CEO	(gongyi.wang@1st-sponsor.com) ; or
Shanghai CEO	(akira@1st-sponsor.com) ; or
Guangdong CEO	(zhen.shu@1st-sponsor.com); or
FS NL CEO	(alexander.barentsen@1st-sponsor.nl).

3. As it is essential for the Group to have all critical information in order to effectively evaluate and investigate a Feedback, the Feedback made should provide as much detail and be as specific as possible. The Feedback should include details of the parties involved, dates or period of time, the type of concern, evidence substantiating the complaint, where possible, and contact details, in case further information is required.

## **Chapter III Feedback Scope and Management**

### **Article 3 Scope**

Employees may use the procedures set out in this policy to report any concern regarding questionable accounting or auditing matters, internal controls, disclosure matters, conflict of interest, insider trading, collusion with competitors, serious breaches of Group policy, unsafe work practices or any other matters involving fraud, corruption and employee misconduct.

### **Article 4 Feedback Requirements**

All Feedback raised by an employee should be factual and allegations should not be made with frivolous or malicious intent. If an employee makes an allegation in good faith but it is not confirmed by the investigation, no action will be taken against him or her. If, however, an employee has made an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against him or her. In addition, the Group reserves the rights to pursue legal action against the responsible parties.

### **Article 5 Investigative Actions**

The receiving officer may, in consultation with the other representatives of the Group (as stated in Article 2 (2)), direct the Feedback to the department best placed to address it, to ensure prompt

and appropriate investigation and resolution.

All information disclosed during the course of investigation will remain confidential, except as necessary or appropriate to conduct the investigation and to take any remedial action, in accordance with any applicable laws and regulations. The Group reserves the right to refer any Feedback to appropriate external regulatory authorities.

Depending on the nature of the Feedback, the subject of the Feedback may be informed of the allegations against him or her and be provided with an opportunity to reply to such allegations. Employees who fail to cooperate in an investigation, or deliberately provide false information during an investigation, shall be subject to strict disciplinary action up to, and including, immediate dismissal.

If, at the conclusion of an investigation, the Group determines that a violation has occurred or the allegations are substantiated, effective remedial action commensurate with the severity of the offence will be taken.

## **Chapter IV Miscellaneous**

### **Article 6**

This policy should be formulated and updated by The Group Audit Committee.

### **Article 7**

If there is any inconsistency between this policy and any previous version, this version shall prevail.