

## **Loscam International Holdings Co., Limited**

# Whistleblowing Policy Version 2

Issued on 20 December 2024

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#### 1 Purpose

- 1.1 This policy applies to Loscam International Holdings Co., Limited (the "Company") and its subsidiaries, joint ventures or companies in which the Company holds a controlling interest (collectively the "Loscam Group") in the Asia Pacific Region excluding Mainland China, Australia and New Zealand, for which separate policies which are no less stringent than this policy apply.
- 1.2 The Loscam Group is committed to maintaining good corporate governance, emphasizing accountability and a high degree of transparency which enable our stakeholders to have trust and faith in the Loscam Group to take care of their needs and to fulfill its social responsibility. In line with this commitment, the Loscam Group expects and encourages its employees and related third parties who deal with the Loscam Group (e.g. business partners, customers, contractors, suppliers, creditors and debtors, etc.) ("**Third Parties**" and each a "**Third Party**") to feel safe to speak up and to report any actual or suspected misconduct, malpractice or irregularity within the Loscam Group without fear of retaliation.
- 1.3 This policy designates reporting channels and provides guidance on the reporting of actual or suspected misconduct, malpractice or irregularity related to the Loscam Group, and provides reassurance to the reporting persons ("Whistleblower(s)") about the protection that the Loscam Group will extend to them against unfair disciplinary action or retaliation for any reports made honestly and in good faith. All employees, current and future, will be made aware of this policy as part of their orientation and onboarding process.

## 2 General Policy

- 2.1 "Whistleblowing" refers to a situation in which an employee or a Third Party reports concerns about any actual or suspected misconduct, malpractice or irregularity within the Loscam Group. See Section 5 of this policy for a list of non-exhaustive examples of misconduct, malpractices or irregularities.
- 2.2 This policy is intended to encourage and assist Whistleblowers to disclose information relevant to actual or suspected misconduct, malpractice or irregularity within the Loscam Group through confidential reporting channels. The Company will handle the reports with care and will treat the Whistleblowers' concerns fairly and properly, in line with this policy.

## 3 Protection for Whistleblowers

- 3.1 Whistleblowers who make honest reports in good faith are assured of fair treatment. In addition, Whistleblowers are also assured of protection against unfair dismissal, discrimination, victimization or unwarranted disciplinary action.
- 3.2 The Loscam Group reserves the right to take appropriate actions against anyone (employees or Third Parties) who initiates or threatens to initiate retaliation against a Whistleblower. In particular, employees who initiate or threaten retaliation will be subject to disciplinary actions, which may include summary dismissal in applicable jurisdictions.

## 4 Confidentiality

- 4.1 The Loscam Group will make every effort, within its capacity to do so, to keep a Whistleblower's identity confidential pursuant to our Privacy Policy and all Applicable Laws (defined in the paragraph below) that protect the privacy of the Whistleblower's personal information. The Loscam Group will endeavor to advise a Whistleblower in advance if his or her identity may become apparent or needs to be disclosed to a third party, only if a communication channel with the Whistleblower is available. Should an investigation lead to a criminal prosecution, it may become necessary for a Whistleblower to give evidence or be interviewed by the relevant authorities.
- 4.2 In order not to jeopardize the investigation into a Whistleblower's report, a Whistleblower should maintain confidentiality over the fact that he or she has filed a report as well as the nature of concerns and the identities of those involved, unless such Whistleblower is required by any laws, rules, statutes and regulations, as may be amended from time to time, applicable to the Loscam Group ("Applicable Laws") to make such disclosure. In such an event, the Whistleblower should, to the extent permitted by Applicable Laws, notify the Loscam Group before making the disclosure.
- 4.3 In certain circumstances, the Loscam Group may have to refer the matter to relevant authorities without prior notice or consultation with the Whistleblower, to the extent permitted by Applicable Laws. However, the Whistleblower's identity shall remain confidential, unless required to be disclosed by the relevant authorities or Applicable Laws.

## 5 Types of Misconduct, Malpractice and Irregularity

- 5.1 It is impossible to give an exhaustive list of the activities that constitute misconduct, malpractice or irregularity. The Loscam Group expects all employees and Third Parties to observe and apply high standards of business and personal ethics and to comply with all Applicable Laws in the conduct of the Loscam Group's business and in dealing with the Loscam Group. Behaviour that is not in line with these principles could constitute misconduct, malpractice, or irregularity that should be reported under this policy.
- 5.2 The principles of business and personal ethics include but are not limited to the following:
  - no bribery, fraudulent or corrupt conduct;
  - compliance with the Loscam Group's policies and procedures (e.g. Employees' Code of Conduct or internal labour regulations under Applicable Laws);
  - compliance with all Applicable Laws, rules, regulations and professional obligations;
  - compliance with financial controls or reporting requirements;
  - protection of the Loscam Group's information, records or assets;
  - prompt response to incidents and compliance with any obligation to escalate to senior management;
  - compliance with all applicable health, safety and environment requirements of Loscam Group;
  - no discrimination, retaliation or victimization against another person by reason of a person's disability, sex, family status or race in accordance with any Applicable Laws;
  - no discrimination, retaliation or victimization against an individual who assists authorities with investigations, makes a report or gives evidence in legal proceedings in accordance with any Applicable Laws;
  - no harmful, discriminatory or retaliatory action against a Whistleblower for having made a report under this policy;
  - no breach of competition law (e.g. price fixing, bid rigging, market sharing or allocation, or misuse of market position); and
  - no deliberate concealment of information concerning any of the matters listed above.

## **6 Reporting Channels**

- 6.1 Whenever it is observed or reasonably believed that a wrongdoing has been, is being or is likely to be committed, Whistleblowers who are employees of the Loscam Group are encouraged to first bring their concerns to their reporting manager or any member of senior management. However, if he or she is not comfortable to do so, such concerns could be reported in accordance with this Section 6.
- 6.2 Subject to Sections 6.4 to 6.7, Whistleblowers could make their reports online through a secure and confidential whistleblowing platform, the Loscam Integrity Line supported by EQS ("Loscam Integrity Line").
- 6.3 The Loscam Integrity Line is accessible at <a href="https://loscam.integrityline.com">https://loscam.integrityline.com</a>. To submit a report, click 'Make a report' and complete the necessary information. User instructions on how to make a report are attached at <a href="Annex 1">Annex 1</a> of this policy for reference. As part of the reporting process, Whistleblowers will be required to set up a 'Secure Inbox' to enable safe and easy communication between the Whistleblower and the case manager.
- 6.4 In case the Loscam Integrity Line cannot be accessed or the Whistleblowers prefer to use an alternative way of making reports, Whistleblowers could make their reports in writing in a sealed envelope clearly marked "To be opened by addressee only" and sent by post to the following address:

Loscam International Holdings Co., Limited Unit 3103-6, 31/F Infinitus Plaza,

199 Des Voeux Road Central,

Hong Kong

Attention: Linda Tsui

Executive Vice President - Finance

or

(where the whistleblowing report is related to the

Executive Vice President – Finance)

Sirin Limpaitoon

**Chief Executive Officer** 

6.5 Alternatively, Whistleblowers can submit a report via email to the following email address:

Whistleblow@loscam.com

- 6.6 To facilitate the handling of Whistleblower reports under Sections 6.4 or 6.5, a standard template of Whistleblower Report Form is attached in Annex 2 of this policy for reference. Please use this template as far as possible. Information that cannot fit the template (e.g. supporting documents) should be appended to the template.
- 6.7 For any competition law related matters, Whistleblowers should first call or speak in person to his or her Regional Head and/or the Executive Vice President Finance, instead of reporting through the Loscam Integrity Line.
- 6.8 In the event that Whistleblowers have doubt as to whether the subject matter is competition law related, Whistleblowers can call or speak in person to his or her Regional Head and/or the Executive Vice President Finance to identify the subject matter and/or raise his or her concerns.
- 6.9 If any business units or supervisors or Regional Head receive a written or oral report alleging any of the misconduct, malpractices or irregularities as stated in Section 5 of this policy, subject to paragraphs 6.7 and 6.8 above, they shall promptly forward the report to the Loscam Integrity Line.

## 7 Reporting and Supporting Documentation

- 7.1 While the Loscam Group does not expect Whistleblowers to have absolute proof or complete evidence of the misconduct, malpractices or irregularities reported, the report should explain the reasons for the concerns and provide full disclosure of any relevant details and supporting documentation. Even if the report is not confirmed by any subsequent investigation, Whistleblowers' concerns would be valued and appreciated as long as Whistleblowers make the report honestly and in good faith.
- 7.2 If continuous and/or multiple complaints have been submitted against the same individual or organization and those complaints have been found to be unsubstantiated after investigations have been conducted, then the Loscam Group reserves the right to require further relevant and material evidence and supporting documents to be submitted before taking any further action.

## 8 Investigation

- 8.1 If considered appropriate, a committee will be formed by the Loscam Group to assess the validity and relevance of the concerns raised by a Whistleblower's report, and to decide if an investigation is necessary ("Committee"). If an investigation is warranted, an investigation team will be appointed to look into the reported matter confidentially with due care.
- 8.2 The format and length of an investigation will vary depending upon the nature and particular circumstances of each report made. The matters raised may:
  - be investigated internally;
  - be referred to external auditors or legal advisors;
  - be referred to relevant public bodies or regulatory / law enforcement authorities; and / or
  - form the subject of any other actions as the Committee may determine in the best interest of the Loscam Group.
- 8.3 If the Loscam Group is not able to contact a Whistleblower to obtain sufficient information (for example, if the Whistleblower has made the report anonymously and have not provided contact details or cannot be reached through the Loscam Integrity Line), it may not be possible to proceed with investigation of a disclosure and the Loscam Group may decide not to pursue any further action.
- 8.4 If there is sufficient evidence to support a reasonable suspicion of the commission of a criminal offence including but not limited to bribery or corruption, or the circumstances give rise to a duty to disclose information to the authorities under Applicable Law, the matter may be reported by the Loscam Group to the relevant authorities.
- 8.5 In some situations (e.g. in case of possible criminal offence), the Loscam Group may have to refer the matter to and provide the authorities with the relevant information. Please note that once the matter is referred to the relevant authorities, the Loscam Group will not be able to control the authorities' investigations and eventual course of action.
- 8.6 Upon completion of any investigation into a Whistleblower's report, a report including its impact and action plan, as applicable, will be prepared without revealing the identity of the Whistleblower, regardless of whether the Whistleblower's report was made in an anonymous or

non-anonymous manner. For confirmed cases of violations of principles of business and personal ethics, the normal process is for the Regional Head (with the assistance of a Human Resources representative) to determine what disciplinary action is appropriate (after having discussed with the Chief Executive Officer), and where the senior management considers necessary, a final decision on the action required will be made by the Board of Directors.

- 8.7 The Loscam Group will send the Whistleblower an acknowledgement of receipt of the Whistleblower's report if a communication channel with the Whistleblower is available.
- 8.8 The Loscam Group may communicate the result of the investigation to the Whistleblower where deemed appropriate in Loscam Group's sole and absolute discretion. Information provided to a Whistleblower is subject to privacy considerations of those against whom the allegations are made and the Loscam Group's confidentiality practices. The Loscam Group will review the need to communicate the investigation result to the Whistleblower and approve any communication materials and required protocols. The detailed investigation report or any information on the outcome of the investigation will not be provided to the Whistleblower or the individual(s) to whom the report relates to, unless the Loscam Group considers this to be appropriate and a confidentiality agreement is signed by such Whistleblower or individual(s) in advance.

## 9 False Reports

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

## 10 Anonymous Reports and Personal Data Protection

10.1 It is understood that the Loscam Group takes the reporting of misconduct, malpractices, and irregularities seriously and commits to conducting warranted investigations of both potential and actual violations. However, if a Whistleblower's report is made anonymously, this may impede Loscam Group's ability to thoroughly investigate and address the concerns being raised, or to take appropriate or pursue any further action. For this reason, it is helpful for a Whistleblowing report to be made non-anonymously. Nevertheless, it should be stressed that the Loscam Group

respects a Whistleblower's decision to remain anonymous and will not make any effort to identify the Whistleblower.

10.2 In the event that a Whistleblowing report contains personal data (as defined in Applicable Laws), the Loscam Group shall ensure that the holding, processing, use or transfer of the personal data complies with privacy and personal data protection laws applicable to the Loscam Group in the relevant jurisdiction (including Loscam Group's data protection policy).

#### 11 Record Retention

11.1 Records shall be kept for all reported misconduct, malpractices, and irregularities by the Loscam Group under Section 6 above. In the event a reported irregularity leads to an investigation, the party responsible for leading or conducting the investigation shall ensure that all relevant information relating to the case is retained, including details or corrective action taken for a period not less than 7 years (or whatever other period may be specified by any relevant local legislation) but thereafter shall be deleted once there is no need to retain the information under Applicable Laws.

## 12 Responsibility for Implementation and Review of Policy

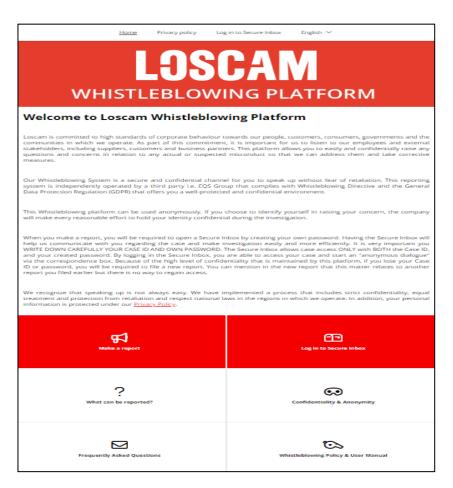
- 12.1 This policy has been reviewed by the Internal Control Department and Legal and Company Secretarial Department, and approved by the Executive Vice President Finance and the Chief Executive Officer of the Loscam Group. It is subject to periodic review by the above departments and persons at least once every two years, and may be amended, replaced or revoked at any time by the Loscam Group in its absolute discretion including to reflect any change of Applicable Laws.
- 12.2 The Group Legal & Company Secretarial Department has been delegated the day-to-day responsibility for administration of this policy. This policy is subject to the interpretation and revision of the Group Legal & Company Secretarial Department.
- 12.3 Should there be any questions about the contents or application of this policy, please contact our Group Legal & Company Secretarial Department at <a href="mailto:amy.chan@loscam.com">amy.chan@loscam.com</a> or (852) 2200 0616.

Issued Date: 20 December 2024

## Annex 1 – Instructions on how to make a Whistleblowing Report

## I. Make a Report

1. Go to the Loscam Integrity Line website (<a href="https://loscam.integrityline.com">https://loscam.integrityline.com</a>) or use your mobile device to scan the following QR code:

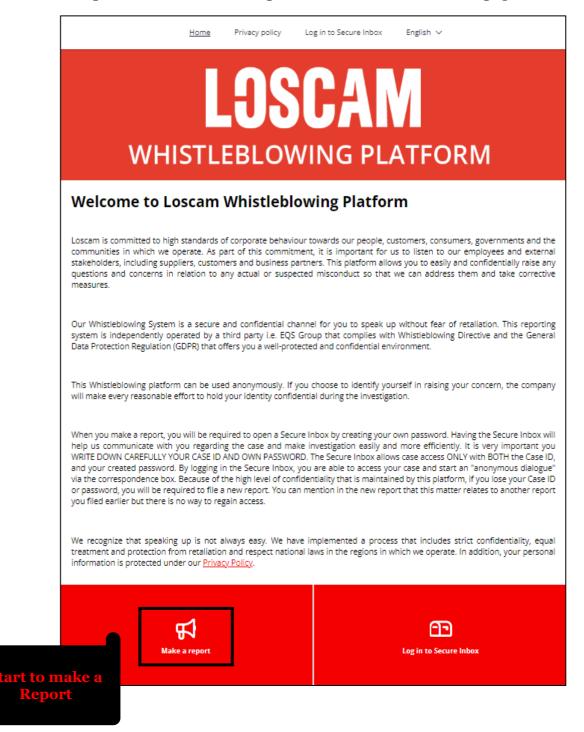




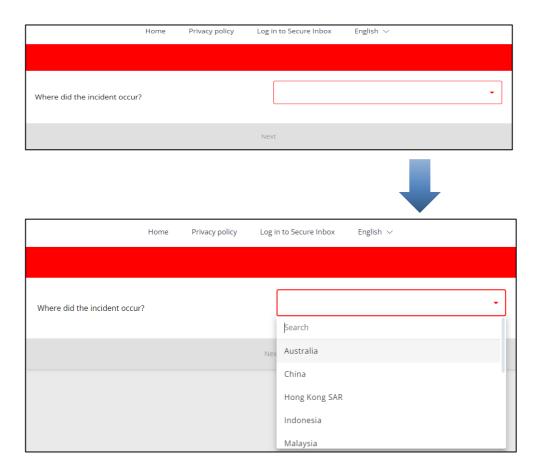
2. Click on language drop-down list at the menu bar to select language. The available languages are Burmese (Myanmar), English, Filipino (Philippines), Indonesian, Melayu (Malaysia), Vietnamese, Thai and Simplified Chinese.



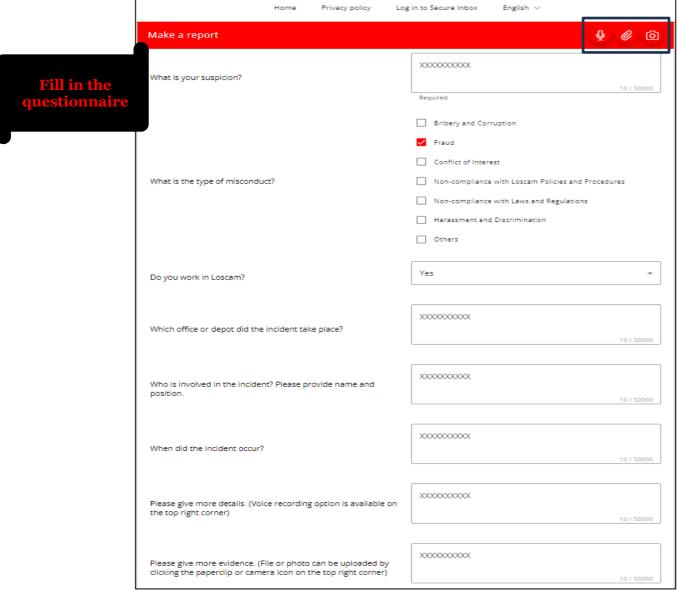
## 3. File a new report, click on 'Make a Report' icon located on the home page.



4. Select the jurisdiction where the incident occurred. Click on the field, a drop-down list will appear for selection.



## 5. Fill out the questionnaire.



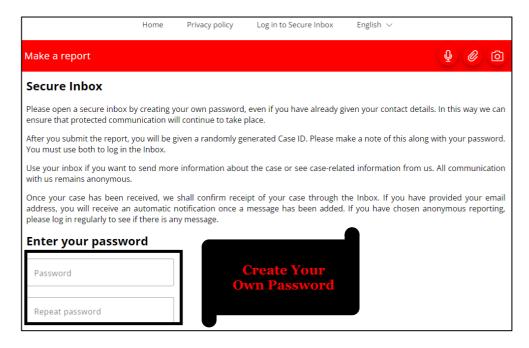
(Example for demonstration only)

- 6. The Mic icon allows Whistleblowers to record their voice which will then be distorted at the receiver end.
- 7. The Paperclip icon allows Whistleblowers to attach any documents.
- 8. The Camera icon allows Whistleblowers to take photo with a mobile device.

9. In the Contact Information section, Whistleblowers can choose to stay anonymous or provide their name, phone number and email address.



10. A Secure Inbox is required to be opened by Whistleblowers to enable safe and easy communication with Case Manager. Whistleblowers must create his or her own password.



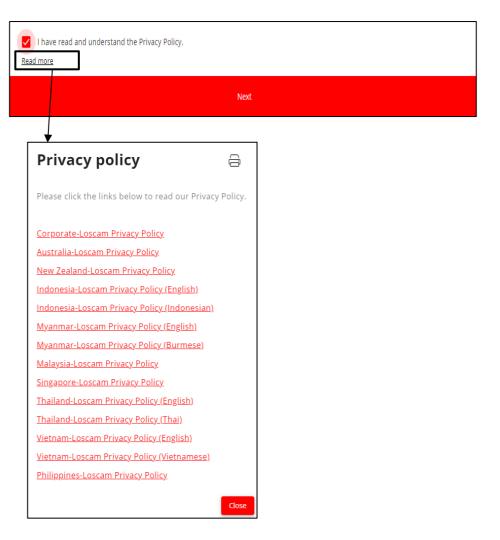
Whistleblowers should make note of the Password for accessing Secure Inbox in future.

11. A security validation will be displayed where the Whistleblowers need to enter the characters shown on the picture.



(Example for demonstration only)

12. Check the box to accept the Privacy Policy. Whistleblower can find the Privacy Policy by clicking on "Read more". Click on the Privacy Policy to download and read.



13. Then, a confirmation message will be displayed along with the Case ID after the case is submitted successfully. Whistleblowers should make note of both the Password and the Case ID for accessing Secure Inbox\*.



(Example for demonstration only)

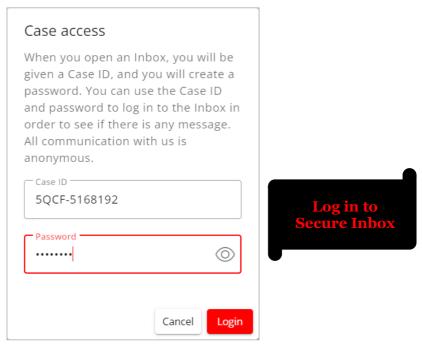
\*It is very important that Whistleblowers should remember both Password and Case ID in order to log in to the Secure Inbox. If any one of them is forgotten, the information stored cannot be recovered and a new report must be submitted by the Whistleblowers.

## II. Secure Inbox (Log in)

1. Click on "Login in to Secure Inbox" either from the menu bar on the top or from the bottom below for Whistleblower to retrieve case details, check case updates and communicate with the Case Manager anonymously.



## 2. Enter the Case ID and Password and click on Login.



(Example for demonstration only)

For details, please refer to User Manual of Whistleblowing Platform.

## Annex 2 - Whistleblower Report Form

If you wish to make a written report of any actual or suspected misconduct, malpractice or irregularity within the Loscam Group, please use this Form. This Form allows you to speak up about your relevant concerns in an anonymous or non-anonymous manner. If you choose to provide your name and contact details, this will assist us in the investigation of your concern being raised. However, should you not wish to provide your name, reported incidents will still be accepted and investigated, as appropriate.

The Loscam Group will treat all protected disclosures in a confidential and sensitive manner, regardless of whether a report is made anonymously or non-anonymously. The process has been designed so as to protect your identity when communicating your concern. Also, your personal information is protected by our Privacy Policy. For details, please read and understand our Whistleblowing Policy and Privacy Policy published on our website.

## **INSTRUCTIONS:**

Please complete the Form and provide as much details as possible. If you need more room to complete the Form, please attach additional pages.

1.	Where did the incident occur?					
	☐ Australia		Malaysia		Singapore	
	☐ China		Myanmar		Taiwan	
	☐ Hong Kong		New Zealand		Thailand	
	☐ Indonesia		Philippines		Vietnam	
	7.77					
2.	What is your suspicion?					
3⋅	What is the type of miscond	duct?				
	☐ Bribery and Corruption	n		-	ce with laws and regulations	
	☐ Fraud			Harassment an	nd Discrimination	
	☐ Conflict of Interest			Others		
	☐ Non-compliance with 1	Loscam	Policies			
	and Procedures					
4.	Do you work in Loscam?					

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5.	Which office or depot did the incident take place?				
6.	Who is involved in the incident? Please provide name and position.				
7.	When did the incident occur?				
8.	Please give more details.				
9.	Please give more evidence.				
	(Where necessary, please append the relevant supporting evidence to this Form)				
Contact Information					
	You can either choose to submit the report anonymously or provide your name and contact details				
in the fields below.					
	Stay anonymous				
	Contact details				
	Name:				

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Phone Number:	
Email:	

Please print out and submit this duly completed Form together with additional pages or supporting evidence (if any) (i) by post in a sealed envelope clearly marked "**To be opened by addressee only**" to our Executive Vice President – Finance or (where the whistleblowing report is related to her) Chief Executive Officer at **Loscam International Holdings Co., Limited, Unit 3103-6, 31/F Infinitus Plaza, 199 Des Voeux Road Central, Hong Kong**; or (ii) via email at <a href="https://www.whistleblow@loscam.com">Whistleblow@loscam.com</a>.

#### Personal information collection statement:

All personal data will be used for the purposes which are directly related to the whistleblowing case you reported. The personal data submitted will be held and kept confidential by the Loscam Group and may be transferred to parties with whom we shall contact during our handling of this issue, whilst keeping your identity anonymous to the extent possible. The information provided may also be disclosed to the applicable law enforcement authorities or other governmental or regulatory bodies if deemed necessary by the Loscam Group. Where relevant, under the applicable personal data laws, you shall have the right to request access to and correction of your personal data. If you wish to exercise these rights, requests should be made in writing to the Executive Vice President – Finance of the Loscam Group or (where the whistleblowing report is related to this individual) Chief Executive Officer at Loscam International Holdings Co., Limited at the address provided in this Form.