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## **1. Purpose**

- 1.1 PF Group Holdings Limited (the “Company”), and its subsidiaries (collectively, the “Group”) are committed to achieving and maintaining the highest standards of openness, probity and accountability. In line with this commitment, the Company expects and encourages employees of the Group and those who deal with the Group (e.g. customers, suppliers, creditors and debtors) to report to the Company any suspected impropriety, misconduct or malpractice within the Group.
- 1.2 This whistleblowing policy (“Policy”) set forth the procedures for the receipt, retention, and treatment of complaints received by the Company relating to nonfinancial matters as well as accounting, internal accounting controls or auditing matters to ensure proper processes with regard to the same as well as for the purpose of combating bribery, fraudulent activities.
- 1.3 This policy is not intended to question financial or business decisions made by the Company or its management. Furthermore, this policy is intended to supplement any complaint resolution policies and procedures in place at the Company, and not to supersede those policies and procedures.
- 1.4 This policy is being implemented in accordance with the Company’s commitment to good corporate governance.

## **2. Scope**

This Policy applies to all employees at all levels of the Group as well as independent third parties who deal with the Group.

## **3. Responsibility for Implementation of Policy**

- 3.1 The Audit Committee has overall responsibility for this Policy.
- 3.2 Responsibility for monitoring and reviewing the operation of this Policy and any recommendations for action resulting from investigation into complaints lies with the Audit Committee.
- 3.3 Management must ensure that all employees feel able to raise concerns without fear of reprisals. All employees should ensure that they take steps to disclose any misconduct or malpractice of which they become aware.
- 3.4 The Company understands the importance of ensuring and maintaining the independence of all the personnel involved in the investigation of any report made by the Complainant. They must declare their interest before the proceedings of investigation start. Should any conflict of interest be found at any stage, the personnel involved must be replaced immediately.



## **4. Reporting of Information**

### **4.1 No Retaliation**

We will not tolerate any harassment, threats or acts of retaliation or any type of discrimination or other adverse employment action against any employee made a complaint or cooperated or assisted with an investigation in good faith. We will not tolerate attempts to harm or slander another through false accusations, malicious rumours, or other bad faith actions, all of which may result in disciplinary or other action up to and including termination of employment.

### **4.2 Reporting Mechanism**

Any person who wish to report a complain/concern should inform the Audit Committee by sending the Whistleblowing Report Form as attached in Appendix A, with supplemental information, if any, by mail to the following address:

Audit Committee  
PF Group Holdings Limited  
Room 4409, 44/F,  
COSCO Tower,  
183 Queen's Road Central, Hong Kong

### **4.3 Confidentiality/Anonymity**

All complaints will be handled in accordance with the procedures set forth in this policy. The identity of anyone making a complaint or reporting information will be kept confidential to the fullest extent permitted by law. However, there are cases it may not be possible to proceed with or properly conduct an investigation if the complainant is not identified, because it may be difficult or impossible to ask appropriate follow-up questions, locate relevant documents, or otherwise fully assess the situation.

All complaints will be processed in accordance with the procedures set forth in this policy. The Company will take all technical and organizational measures in order to preserve the security of the information and related personal data when it is collected, processed and stored.

### **4.4 Content of Complaints**

All complaints shall be submitted, if possible, using "Whistleblowing Report Form" (Appendix A). To assist the Company in the response or investigation of a complaint, the complaint should be factual rather than speculative, and contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of the matter that is the subject of the complaint. It is less likely that the Company will be able to conduct an investigation based on a complaint that contains unspecified wrongdoing or broad allegations verifiable evidentiary support.

Without limiting the foregoing, the Complaint should, to the extent possible, contain the following information:

- The alleged event, matter or issue that is the subject of the complaint;



- The name(s) of the person(s) involved;
- If the complaint involves a specific event or events, the approximate time and location of each event; and
- Any additional information, documentation or other evidence available to support the complaint.

## **5. Procedures for Processing Complaints**

### **5.1 Handling and Monitoring**

A copy of all complaints including any identified issues or risks of unethical behaviours or fraudulent activities shall be presented to the Audit Committee and be discussed in its next regularly scheduled meeting unless the nature of the Complaint dictates otherwise. All complaints will be reviewed and investigated under the direction of the Audit Committee.

Normally the Audit Committee will investigate the complaint; however, the Audit Committee reserves the authority to name another individual to perform an investigation if circumstances make it appropriate to do so. The individual conducting the investigation shall gather such documents and materials and interview such individuals as is reasonably necessary to complete the investigation. The results of any investigation conducted pursuant to this policy shall be reported to the Audit Committee and the Board of the Company (unless clearly inappropriate due to the nature of the report).

The Audit Committee shall have the authority to, at any time request a briefing regarding any investigation of a complaint and/or findings regarding a complaint.

### **5.2 Completion of Investigation**

Upon completion of the investigation, the Audit Committee shall review the results and determine the corrective action, if any, to be taken in response to a complaint and to direct additional investigation of any complaint.

At the conclusion, the Audit Committee shall direct a designated person to prepare a written response to the complaint. Upon completion of the written response, it shall be submitted to the Audit Committee for review and approval prior to sending it to the complainant. A copy of the response letter shall be maintained with the complaint and documentation compiled during the investigation.

If complainant is not satisfied with the outcome, they could raise the matter again with Audit Committee. Complainant should make another report explaining why this is the case. If there is a good reason, the Company will investigate into their concerns again.

## **6. Policy Review**

This Policy will be monitored and reviewed regularly by Audit Committee. Any change to this Policy should be submitted to the Board through the Audit Committee for approval.



### Appendix A – Whistleblowing Report Form

Please read the Whistleblowing Policy carefully before you fill in this Form

<b>STRICTLY PRIVATE AND CONFIDENTIAL -TO BE OPENED BY ADDRESSEE</b>	
<b>To: Chairman - Audit Committee of the Company</b>	
<b>Office Address:</b> Room 4409, 44/F, COSCO Tower, 183 Queen’s Road Central, Hong Kong	
<i>Your Name / Contact Telephone Number and Email (Optional but strongly encouraged)</i>	<b>Name:</b> _____ Employee <input type="checkbox"/> Other stakeholder <input type="checkbox"/> Other <input type="checkbox"/> _____ (please specify) <b>Address:</b> _____ <b>Tel. no.:</b> _____ <b>Email:</b> _____ <b>Date:</b> _____ <b>Relationship with the complainee:</b> _____
<b>Details of concerns:</b>  <i>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.</i>	

**Personal Information Collection Statement**

All personal data collected will only be used for purposes which are directly related to the whistleblowing case you reported. Any anonymous reports not supplying such personal data in general may not be acted upon. Therefore, it is strongly recommended that the report should not be made anonymously. The personal data submitted will be held and kept confidential by the Group and may be disclosed as appropriate to parties with whom we will contact during our handling of this case, including the party being complained against or other parties concerned. The information provided may also be disclosed to law enforcement authorities or other concerned units. Where relevant, under the Personal Data (Privacy) Ordinance of Hong Kong, 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 Chairman – Audit Committee of the Company at office address shown in this Form.