

Company Policy

on

Whistleblowing Policy

This company policy is applicable to all members of the Hip Hing Construction Group which comprises of but not limited to the below companies, its subsidiaries and associated companies:

- Hip Hing Construction Company Limited
- Hip Hing Engineering Company Limited
- Hip Hing Builders Company Limited
- Vibro (H.K.) Limited
- Vibro Construction Company Limited
- Vibro Foundation Limited

Hereinafter "Hip Hing Construction" or the "Company" shall be referred.

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1. Background

- 1.1 Hip Hing Construction (the “**Company**”) is committed to high standard of openness, probity and accountability. This Whistleblowing Policy (the “**Policy**”) forms an important part of effective risk management and internal control systems. This Policy applies to the Company and all of its subsidiaries (collectively, the “**Group**”).
- 1.2 Whistleblowing refers to a situation where an employee or a third party (a “**Whistleblower**”) decides to report a serious concern about any suspected fraud, malpractice, misconduct or irregularity (the “**Concern**”).
- 1.3 Whistleblowing serves as a useful way to uncover fraud, malpractice, misconduct, or significant risk within an organization.
- 1.4 To promote ethical standards, management of the associated companies, jointly controlled entities, etc. is encouraged to share this Policy with their employees and related parties according to actual business operations.

2. Purpose

- 2.1 To encourage and assist any employee(s) of the Group (the “Employee(s)”) or third parties (e.g. customers, suppliers etc.) to raise the Concern and disclose related information confidentially.
- 2.2 To provide reporting channels and guidance on whistleblowing to Employees or third parties to raise the Concern rather than neglecting it.
- 2.3 To reveal suspected fraud, malpractice or misconduct before these activities causes disruption or loss to the Group.

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3. Reportable Concern

3.1 Activities that constitute malpractice or misconduct may include, but not limited to the following:

- (1) Criminal offense or miscarriage of justice.
- (2) Non-compliance with laws and regulations.
- (3) Impropriety or fraud relating to accounting, financial reporting, internal controls and auditing matters. ‘
- (4) Misuse or misappropriation of the Group’s assets or resources.
- (5) Any action which endangers the health and safety of Employees or other stakeholders.
- (6) Violation of the policies or guidelines of the Group.
- (7) Improper use or leakage of confidential or commercially sensitive information.
- (8) Deliberate concealment of any of the above.

3.2 Whistleblower is not required to make absolute proof of the Concern reported. The Concern would be appreciated if it is reported in good faith; even it is not confirmed by an investigation.

4. Protection for Whistleblower

4.1 Persons reporting the Concern in good faith are assured of fair treatment. The Group will make every effort to protect the Employee against unfair dismissal, victimization or unwarranted disciplinary action, even if the Concern turns out to be unsubstantiated. Good faith 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.

4.2 Management must ensure that Whistleblowers feel easeful to raise Concern without fear of reprisals. Any kinds of retaliation against a Whistleblower will be considered as misdemeanors.

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4.3 However, if a Whistleblower makes a false report maliciously, with an ulterior motive, or for personal advantage, the Group reserves the right to take appropriate actions against anyone (Employees or third parties) to recover any loss or damage as a result of the false report.

5. Confidentiality

5.1 The Group will make every effort to keep Whistleblower's identity and the reported Concern strictly confidential.

5.2 Likewise, the Whistleblower should keep strictly confidential about the details of a reported Concern, such as its nature, related persons, etc.

5.3 Under certain circumstances where the Whistleblower's identity has to be revealed according to laws and regulations, the Group will endeavour to take reasonable steps to protect the Whistleblower from detriment.

5.4 It is understood that a Whistleblower may wish to report anonymously. However, it is not encouraged as an anonymous allegation will hinder investigation and follow-up actions due to limited information.

5.5 Whistleblowers are encouraged to come forward and report as much specific information as possible for assessment and investigation.

6. Reporting Channels and Form

6.1 Any Employee or third party who wishes to report a Concern should send the Whistleblowing Report Form (Form: HR054), with supplementary information, if any, by the following ways:

(1) Email

cy_fung@hiphing.com.hk

(This email address is only accessible by the Executive Director – Commercial)

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(2) Letter

Mr. CY Fung
Executive Director – Commercial
Hip Hing Construction Co., Ltd
11/F Chevalier Commercial Centre
8 Wang Hoi Road, Kowloon Bay
Hong Kong

6.2 To ensure confidentiality in the mailing process, the Form should be sent in a sealed envelope marked “Strictly Private and Confidential – To be Opened by Addressee Only”.

7. Investigation and Reporting Procedures

7.1 Whistleblowing Register

All whistleblowing cases raised will be recorded in the register.

7.2 Investigation Process

Upon receipt of any whistleblowing cases the Executive Director - Commercial should report the matter to the Executive Committee. They will review the matter and decide how the investigation should proceed. The investigation will be handled by an Investigation Panel comprising the Executive Director - Commercial, the Assistant General Manager (Administration) and one other member of staff nominated by the Executive Committee who shall be of General Manager grade or above. The investigation will be handled in a confidential and timely manner.

The objective of an investigation is to examine information relating to the reported case as quickly as possible, to consider the evidence collected and to draw conclusions in a manner that is objective and impartial.

The Executive Director - Commercial shall notify NWS Holdings Limited, Head of Audit and Risk Assurance if any reported case is considered to be of a serious nature or if it might cause damage (real or perceived) to NWS Holdings Limited.

7.3 Reporting

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An investigation report, together with recommendations for improvement (if appropriate), will be prepared and submitted to the Executive Committee, and Head - Group Audit & Risk Assurance of NWS Holdings Limited.

8. Escalation

8.1 As a wholly owned subsidiary of NWS Holdings Limited, the Group's Whistleblowing Policy is aligned with that of NWS Holdings Limited.

Any employee or third party who reports suspected Reportable Conduct in accordance with this Whistleblowing Policy may escalate the matter to NWS Holdings Limited if he/she considers it appropriate or necessary to do so.

8.2 If an employee or third party chooses to escalate the reporting of suspected Reportable Conduct to NWS Holdings Limited, the employee or third party should do so through one of the following channels.

(1) Email

whistleblower@nws.com.hk

(This email address is only accessible by Head – Group Audit & Risk Assurance, NWS Holdings Limited).

(2) Letter

Head – Group Audit & Risk Assurance
NWS Holdings Limited
28/F New World Tower,
18 Queen's Road Central,
Hong Kong

8.3 To ensure confidentiality in the mailing process, the Form should be sent in a sealed envelope marked "Strictly Private and Confidential – To be Opened by Addressee Only".

Where there are any discrepancies or differences of interpretation in the Policy between English text and Chinese translation, the English version shall prevail.