



WHISTLEBLOWING POLICY

1. Objective

- 1.1. The Company and its subsidiaries (collectively, the “**Group**”) are committed to achieving and maintaining a high standard of integrity, openness, probity and accountability. In line with this commitment, the whistleblowing policy (this “**Policy**”) aims to encourage employees of the Group and those who deal with the Group (e.g. customers, contractors and suppliers) to raise concerns, in confidence, about any suspected impropriety, misconduct or malpractice within the Group (the “**Whistleblowing Concern(s)**”). We endeavour to respond to the Whistleblowing Concerns fairly and properly.

2. Scope

- 2.1. This Policy applies to:
- 2.1.1. employees at all levels and divisions of the Group, and any related third parties who deal with the Group that might be victims of staff misconduct, including business counterparts (e.g. customers, contractors and suppliers) (collectively, the “**Whistleblower(s)**”); and
- 2.1.2. Whistleblowing Concerns that may constitute impropriety, misconduct or malpractice, including but not confined to the following:
- (i) failure to comply with or breach of legal or regulatory requirements;
 - (ii) criminal offences, breach of civil law and miscarriage of justice;
 - (iii) malpractice, impropriety or fraud relating to internal controls, accounting, auditing and financial matters;
 - (iv) professional, ethical or other malpractice or wrongdoings;
 - (v) endangerment of the health and safety of an individual;
 - (vi) damage caused to the environment;
 - (vii) bribery or corruption;
 - (viii) discrimination or harassment;
 - (ix) violation of rules, policies or internal controls of the Group;
 - (x) improper conduct or unethical behaviour likely to prejudice the standing or reputation of the Group; and
 - (xi) deliberate concealment of any of the above

3. Protection

- 3.1. In raising a Whistleblowing Concern pursuant to this Policy, the Whistleblower should exercise due care to ensure the accuracy of the information.
- 3.2. The Whistleblower making a report in good faith is assured of fair treatment. The Company will make every effort to protect the Whistleblower reporting in good faith from any unfair dismissal, victimisation or unwarranted disciplinary action regardless of whether the allegation made is established. “Good faith” means that the Whistleblower holds a reasonable belief that the reported matter is true, and the report is made based on honesty rather than for personal interests or with other malicious motives.
- 3.3. The Company shall ensure that the Whistleblower feels easeful to raise concerns and is not troubled by the fear of retaliation. Any type of retaliation is considered inappropriate.
- 3.4. If the Whistleblower makes a false report maliciously, with an ulterior motive, or for personal gain, the Company reserves the right to take appropriate actions against the Whistleblower to recover any loss or damage as a result of the false report. In particular, employees may face disciplinary action, including dismissal, where appropriate.

4. Reporting Procedures

Making a Report

- 4.1. Any Whistleblower who becomes aware of any existing or potential improprieties, misconduct or malpractice within the Group or other matters as described in clause 2.1.2 above, may report to the audit committee of the Company (the “**Audit Committee**”) via the following mean(s):
 - (i) Email: auditcommittee@ibotech.com.cn
 - (ii) Post: Chairman – Audit Committee
IBO Technology Company Limited
23/F., Sunshine Plaza
353 Lockhart Road
Wanchai, Hong Kong

The chairman of the Audit Committee shall determine the course of action to pursue, with the power to delegate, with respect to the report.

- 4.2. If the Whistleblowing Concern involves the chairman of the Audit Committee, the Whistleblower may raise the concern and submit his/ her report directly to the chairman of the board of directors of the Company (the “**Board**”) via the following mean(s):
- (i) Email: board@ibotech.com.cn
 - (ii) Post: Chairman – Board
IBO Technology Company Limited
23/F., Sunshine Plaza
353 Lockhart Road
Wanchai, Hong Kong
- 4.3. A report can be made by using the standard form (Whistleblowing Report Form) attached as Annex I to this Policy which may be sent by post or by email to the chairman of the Audit Committee or chairman of the Board as mentioned above.
- 4.4. All written reports by post should be sent in a sealed envelope marked “Strictly Private and Confidential – To be Opened by Addressee Only” to ensure confidentiality.
- 4.5. Each Whistleblower is required to provide details of the reported Whistleblowing Concern, including the relevant incident(s), behaviour, activity or activities, name(s), date(s), place(s) or any other relevant information in the report together with any supporting evidence.
- 4.6. Each Whistleblower raising such Whistleblowing Concern is encouraged to disclose their identity and contact details so that they can be contacted for further information, if necessary. The Company will not divulge the identity of the person lodging the Whistleblowing Concern or complaint unless it is absolutely necessary to do so to facilitate the investigation or if required by the relevant regulatory authorities.

Investigation Procedures

- 4.7. The format and length of an investigation will vary according to the nature and particular circumstances of each report submitted. Where appropriate, the reports raised may:
- (i) be investigated internally by the Audit Committee, or if determined by the chairman of the Audit Committee, the company secretary, the internal audit department, the human resources department or other departments of the Company;
 - (ii) be referred to the external auditor as instructed by the chairman of the Audit Committee;
 - (iii) be referred to the relevant public or regulatory bodies as instructed by the chairman of the Audit Committee; and/or
 - (iv) form the subject of any other actions as the chairman of the Audit Committee may determine in the best interest of the Group.

- 4.8. A final report, with recommendations for change (if appropriate), will be produced to the Audit Committee. The Audit Committee will review the final report and make recommendations to the Board.
- 4.9. The chairman of the Audit Committee will, or via the company secretary or the internal audit department or the human resources department or other departments of the Company (as the chairman determines appropriate), respond to the Whistleblower, if contactable, as soon as practicable upon receipt of the report:
 - (i) acknowledging receipt of the report;
 - (ii) advising the Whistleblower as to whether or not the matter will be investigated further and, as appropriate, the actions taken or being taken or the reasons for no investigation being made;
 - (iii) where practicable, giving an estimate of the timeline for the investigation and final response; and
 - (iv) indicating if any remedial or legal action is or is to be taken.

- 4.10. The procedures described in clauses 4.7 to 4.9 above at the same time apply to report submitted to the chairman of the Board.
- 4.11. Where the report discloses a possible criminal offence, the Company, after consulting its legal advisers, will decide if the matter should be referred to the relevant authorities, such as the Hong Kong Police Force, Independent Commission Against Corruption and the Securities and Futures Commission, as appropriate, for further action. Once the matter is referred to the authorities, the Company will not be able to take further action on the matter, including advising the Whistleblower of the referral.

5. Confidentiality

- 5.1. The Company will make every effort to treat all reporting under this Policy in a strictly confidential and fair manner. Likewise, the Whistleblower should keep strictly confidential about the details of a reported Whistleblowing Concern, such as its nature, related persons, etc. The identity of the Whistleblowers making the report will not be disclosed without such Whistleblowers' consent, unless the Company is legally obliged to reveal the Whistleblowers' identity and other information.

6. Consistency with Laws and Regulations

- 6.1. This Policy shall be read in conjunction with and subject to any relevant laws, regulations, rules or guidelines that The Stock Exchange of Hong Kong Limited (the "**Stock Exchange**") or any other regulatory bodies may from time to time prescribe or issue on the matters governed by this Policy.
- 6.2. In the event that any matters and procedures under this Policy are inconsistent or in conflict with any relevant laws, regulations, rules, directives or guidelines as prescribed by the Stock Exchange or any relevant governmental or regulatory bodies, the latter shall prevail to the extent of such inconsistency or conflict.

7. Monitoring and Review of this Policy

- 7.1. The Audit Committee is responsible for monitoring and reviewing this Policy and its implementation on a regular basis to improve its effectiveness.
- 7.2. Any amendments and updates of the Policy shall be reviewed by the Audit Committee and subsequently approved by the Board.

8. Disclosure of this Policy

- 8.1. This Policy is available on the Company's website (www.ibotech.hk).

If there is any inconsistency or conflict between the English and Chinese versions of this Policy, the English version shall prevail.

Adopted on 20 September 2022

Annex I

IBO TECHNOLOGY COMPANY LIMITED
艾伯科技股份有限公司
(incorporated in the Cayman Islands with limited liability)
(Stock Code: 2708)

WHISTLEBLOWING REPORT FORM

If you wish to make a report, please fill in this form. All information will be kept in a strictly confidential manner.

Please read the Whistleblowing Policy carefully before you fill in this form.

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| To: Chairman - Audit Committee/ Board* IBO Technology Company Limited 23/F., Sunshine Plaza, 353 Lockhart Road, Wanchai, Hong Kong | |
| Your Name/ Telephone Number and Email (<i>Optional but strongly encouraged</i>) | Name: |
| | Employee <input type="checkbox"/> Other Stakeholder <input type="checkbox"/> (Please specify: _____) |
| | Relationship with the complainee: |
| | Address: |
| | Tel No.: |
| | Email: Date: |
| Details of Whistleblowing Concerns: Please provide full details, such as names, dates, places and the reasons for the whistleblowing concerns (continue on separate sheet if necessary) together with any supporting evidence. | |
| Personal Information Collection Statement All personal data collected will only be used for purposes which are directly related to the whistleblowing case you reported. 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 of the audit committee of the Company at office address shown in this form. | |

* Delete where appropriate