

# **Wine's Link International Holdings Limited**

## **威揚酒業國際控股有限公司**

*(Incorporated in the Cayman Islands with limited liability)*

**(Stock code: 8509)**

### **Whistle Blowing Policy**

#### **INTRODUCTION**

This Whistle Blowing Policy is established to enhance mutual supervision by leveraging on the personal ethics and professional knowledge of the employees at work, thereby improving the quality of the Group's governance and internal control.

#### **SCOPE**

This Policy is applicable to all personnel of the Group, including the Directors and all employees of the Company and external parties (such as customers and suppliers) who deal with the Group. Any person of the Group shall not exempt from this Policy.

#### **PURPOSE**

The philosophy of establishing this Policy aims at:

- upholding high business ethics and corporate governance standards;
- improving the quality of internal control of the Company;
- leveraging mutual monitoring mechanism to avoid personal or partial interests or mistakes, which may affect the Company's operations, or even suffer losses;
- not being affected by the authority of any organizational hierarchy as this Policy is independent; and
- protecting the personal rights and safety of whistle-blowers.

## **RESPONSIBILITIES**

All personnel of the Company shall be in strict compliance with all relevant laws of the Group and its customers within Hong Kong region in respect of the philosophy and purpose of this Policy. When any personnel are aware of any violation or attempted violation, the personnel shall report and address the issue to the relevant organization or external governmental authority in order to prevent and expose any violation regardless of any department, work or conduct.

### **Misconducts include but not limited to the followings:**

- (i) Issues concerning the Group's financial matters, such as the provision of false data to external parties or the use of fictitious invoices for reimbursement;
- (ii) Issues concerning the Group's internal controls, such as loopholes identified in certain business processes or procedures;
- (iii) Issues concerning the Group's staff members committing bribery or corruption;
- (iv) Issues concerning the Group's staff members being suspected of money laundering, terrorist financing, tax evasion, weapons proliferation financing or violation of sanctions requirements;
- (v) Other possible improper conducts; and
- (vi) Any attempted behaviour to conceal the above misconducts.

## **NO RETALIATION**

As this Policy is designed to deter and expose any violation through mutual monitoring by departmental personnel, it shall not be subject to any external factors. Therefore, no officer in any rank or position shall have intent to deter, affect or harm the basic rights and obligations of whistleblowers with his/her delegated authority for work. If the person handling the whistleblowing is either the Group or related staff members, they shall also keep the identity and the content of the whistle-blower confidential to avoid leakage on best effort basis.

## **ACTING IN GOOD FAITH**

The purpose of this Policy is to expose and prevent any mechanism that harms the Company's interests or reputation, so as to improve the Company's internal governance level.

Therefore, on one hand, each personnel shall:

- maintain good ethical standards;
- endeavour to work in compliance based on their job position and procedures;
- supervise and remind other personnel to prevent and alert when potential violations are detected; and
- report to relevant organizations in accordance with the guidelines of this Policy if the situation becomes worse.

Management shall:

- maintain a good and high level of ethical standards; and
- focus on the overall situation and the interests of the Company and its shareholders, and instruct the staff of each department to work in a legal manner.

Therefore, neither person shall resort to this Policy due to any personal interest, dissatisfaction, misconceptions, or issues concerning relationship and others. Such complaints shall not be considered valid under this Policy.

In the event of malicious misrepresentation, the Group reserves the right to take appropriate action against the whistle-blower to recover any loss or damage caused by the misrepresentation.

## **HANDLING REPORTED VIOLATION**

The Audit Committee is solely responsible for the implementation of this Policy. Under this Policy, the Company has established a separate communication channel (Schedule A) through which any person who is aware of any violation may report such information to the Audit Committee of the Board of the Group. The Audit Committee shall exercise careful consideration to the issues raised therein. The Audit Committee shall put more emphasis on the complaint once such complaint is initiated. If there is sufficient evidence that the reported case may involve a criminal offence or corruption, the Group will report the case to law enforcement authorities. When the case is referred to law enforcement authorities, the Group will cooperate with the relevant law enforcement authorities for investigation.

## **RESPONSIBILITIES AND REVIEW OF THIS POLICY**

This Policy has been approved and reviewed by the Board from time to time to ensure that it is in line with the Group's needs and reflects current regulatory requirements. The Audit Committee will monitor the implementation and enforcement of this Policy on an annual basis.

### **Schedule A:**

Any person who is aware of any potential or occurring violation may contact the appropriate personnel through the following channels. Reports submitted under this Policy shall include full details of the misconduct, including relevant names, dates, locations and reasons. The reporting party shall provide all supporting evidence or documents.

### **Email:**

Audit Committee: [chester.chan@wines-link.com](mailto:chester.chan@wines-link.com) or [shirley.wong@wines-link.com](mailto:shirley.wong@wines-link.com)

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