

Future World Holdings Limited



Whistleblowing Policy

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Introduction

Future World Holdings Limited (the “Company” , together with its subsidiaries collectively the “Group”) is committed to the highest standards of openness, integrity and accountability. All employees are required to act with integrity, in a fair and impartial manner, and with honesty. Each employee has a duty, having regard to the overall interests of the Company, to ensure that no improper or unacceptable conduct occurs which may prejudice the interests of shareholders, investors, customers and the public. Accordingly, the Group has adopted this Policy.

Purpose and Scope

The purpose of this Policy is to enhance employees’ or other parties’ awareness of maintaining fairness within the Group. This Policy also serves as an internal control mechanism and provides, in respect of whistleblowing, channels and guidance to employees or other parties.

For the purpose of this Policy, “whistleblowing” means a report made by an employee or other party, based on information and in the genuine belief that the Group has, or may have, been involved in any serious concern relating to improper conduct.

This Policy is intended to encourage employees or other parties to raise serious concerns internally within the Group in a responsible and effective manner, rather than ignoring problems or reporting to persons outside the Group. The provisions of this Policy apply to all employees and other parties within the Group.



General Policy

“Whistleblowing” means a report made by an employee or other party expressing serious concern regarding any suspected improper conduct, fraud and breach of compliance within the Group. For examples of improper conduct, fraud and breach of compliance, please refer to the section headed “Misconduct and Unacceptable Conduct” of this Policy.

This Policy is designed to encourage and assist whistleblowers to disclose, as far as practicable, information concerning suspected improper conduct, fraud and breach of compliance through confidential whistleblowing channels. The Group will handle such reports with due care and will deal with the concerns raised by whistleblowers in a fair and appropriate manner.

Misconduct and Unacceptable Conduct

The Group cannot list exhaustively all activities that may constitute improper conduct, fraud or breach of compliance under this Policy. The Group requires all employees and other parties to observe and consistently implement ethical principles in the conduct of business and in their dealings with the Group. Failure to comply with such principles may constitute improper conduct, fraud and breach of compliance, and such conduct must be reported.

Matters for whistleblowing include, but are not limited to:

1. Breach of laws or regulatory requirements;
2. Criminal offences, breaches of civil law and unfair proceedings;
3. Illegal conduct, improper conduct or fraud relating to internal control, accounting, auditing and financial matters;
4. Endangering individuals’ health and personal safety;
5. Damage to the environment;
6. Breach of the Group’s rules and regulations or codes of conduct;
7. Improper behaviour or unethical conduct that may prejudice the Group’s reputation; and
8. Deliberate concealment of any of the above matters.



Protection and Confidentiality

Protection of Whistleblowers

This Policy ensures that all whistleblowers who make reports that are accurate and appropriate will be treated fairly. In addition, the Group will ensure that employees will not be subjected to unfair dismissal, harm or inappropriate disciplinary action.

Where any person (whether an employee or other party) retaliates against, or threatens to retaliate against, a whistleblower, the Group reserves the right to take appropriate action against such person. Any employee who retaliates, or threatens retaliation, will be subject to disciplinary action, which may include immediate dismissal.

Confidentiality

The Group shall use its best endeavours to ensure that the identity of whistleblowers is kept confidential. To ensure that the investigation is not hindered, whistleblowers are also required to keep confidential: (i) the facts of the matters reported; (ii) the content of the report; and (iii) the identity of the persons involved.

In certain circumstances, Future World Holdings Limited may be required, due to the nature of the investigation, to disclose the identity of the whistleblower. Where such circumstances arise, the Group will use its best endeavours to notify the whistleblower that their identity may be disclosed. If the matter develops into criminal prosecution, the whistleblower may be required to provide evidence to, or cooperate with, the relevant authorities. In some cases, the Group may be required to refer the whistleblowing matter to the relevant authorities without being able to notify or consult the whistleblower in advance.

Reporting Channels and Investigation Procedures

Where an employee reasonably believes that any improper conduct exists, the employee may notify his or her departmental head. The departmental head shall report to the Directors. If the matter involves the departmental head, or if the employee, for any reason, considers it inappropriate to notify the departmental head, the employee may report directly to the Board of Directors. If the matter involves the Directors, the employee may report directly to the Chairman. The Directors or the Chairman may appoint appropriate persons or establish a committee to investigate such matters. If the matters involve the Chairman or the Directors, the employee may report directly to the Chair of the Audit Committee. The Chairman may consider appointing



appropriate investigators or establishing a special committee to investigate such matters independently, depending on the circumstances. In the above situations, the Directors or the Chairman shall report the matters to the Audit Committee as appropriate.

If an employee, for any reason, considers it inappropriate to report improper conduct to his or her departmental head, the Directors and the Chairman, the employee may submit the relevant complaint directly to the Chair of the Audit Committee. Other parties may also report directly to the Chair of the Audit Committee. The Chair of the Audit Committee shall review the complaint and determine how the investigation should be carried



Reporting Format

Information disclosed may be submitted in person or in writing. Where submitted in writing, to ensure confidentiality of the information, it should be sent in a sealed envelope clearly marked:

“ABSOLUTELY PRIVATE AND CONFIDENTIAL – ONLY TO BE OPENED BY THE ADDRESSEE” to the Directors or the Chairman or the Chair of the Audit Committee at:
Room 612, Tai Yau Building, 181 Johnston Road, Wanchai, Hong Kong.

Alternatively, it may be delivered by email to: whistleblower@fw-fh.com.hk. Employees shall ensure that all attachments sent by email are password-protected for confidentiality purposes.

All complaints made by employees or other parties must be signed. Anonymous complaints will not be dealt with.

Any attempt by any person, or on that person’s behalf, to hinder the submission of a complaint relating to improper conduct to the Directors, the Chairman or the Chair of the Audit Committee, or to obstruct any investigation, shall be regarded as a serious breach of discipline.

Where there is evidence to show that the Group may be involved in criminal activity, or may solicit and receive profit-making activities, or where there is a breach of laws or regulatory requirements, the persons responsible for internal investigation may be required, as required by law, to appropriately notify relevant public or regulatory authorities such as the Hong Kong Police Force, the Independent Commission Against Corruption, the Securities and Futures Commission, or other relevant Mainland authorities (if applicable).

Investigation Procedures

The form and expected timeline for investigation will vary depending on the nature and special circumstances of each complaint. The investigation may include:

- investigations conducted internally;
- submission to the Hong Kong Police Force or Mainland law enforcement agencies;
- submission to external auditors; and/or
- the establishment of an independent advisory panel.

The Directors or the Chairman or the Chair of the Audit Committee, or the person(s) appointed to investigate the complaint, shall respond in writing to the complainant’s reasonable whistleblowing by:

- confirming receipt of the whistleblowing matter;
- advising whether the whistleblowing matter requires further investigation, and, if so, providing the nature of such further investigation;



- providing an estimated time required to complete the investigation through to its final outcome, informing the complainant whether any initial consultation is carried out and whether further investigation is required; and where further investigation is not required, setting out the grounds.

Interpretation, Monitoring, Amendment and Effectiveness of the Policy

The Board of Directors of the Group is responsible for interpreting this Policy and monitoring its implementation.

Any amendment to this Policy must be approved by the Board of Directors of the Group by way of a resolution prior to implementation.

This Policy shall come into effect from the date on which it is approved by the Board of Directors of the Company.