



WHISTLEBLOWING POLICY

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1. BACKGROUND

- 1.1 APC (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 cause disruption or loss to the Group.

3. RESPONSIBILITY

- 3.1 The Group CEO of the Company (the “CEO”) has the overall responsibility for this Policy, but has delegated the day-to-day responsibility for overseeing and implementing this Policy to the Compliance Officer. The Compliance Officer is responsible for monitoring and reviewing the effectiveness of this Policy and the actions resulting from the investigation.
- 3.2 This Policy has been approved by the Compliance Team. Any amendments or updates to this Policy will be subject to the Compliance Team’s approval. The Compliance Team is formed by a Compliance Officer, the Group CEO and the Group CFO.

4. REPORTABLE CONCERN

4.1 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

4.2 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.

5. PROTECTION FOR WHISTLEBLOWER

- 5.1 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 turn 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.
- 5.2 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.
- 5.3 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.

6. CONFIDENTIALITY

- 6.1 The Group will make every effort to keep Whistleblower's identity and the reported Concern strictly confidential.
- 6.2 Likewise, the Whistleblower should keep strictly confidential about the details of a reported Concern, such as its nature, related persons, etc.
- 6.3 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.

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

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

7. REPORTING CHANNELS AND FORM

7.1 Any Employee or third party who wish to report a Concern should inform Compliance Officer by sending a Whistleblowing Report (the "Form"), with supplementary information, if any, by the following ways:

(1) Email: whistleblower@apclogistics.com

(This email can only be accessed by Compliance Officer)

8. INVESTIGATION PROCESS

8.1 Compliance Officer will record all whistleblowing cases raised in the Whistleblowing Register. All reported cases with valid contacts will be followed up. Compliance Officer will evaluate the validity and relevance of the cases received, and to decide the categorization of whistleblowing cases for reporting to appropriate parties. The whistleblowing matters raised should be:

(1) referred to the Group CEO and CFO unless they are the matter of the whistleblowing;



- 8.2 Regarding the whistleblowing cases reported to the Compliance Officer, the Compliance Officer (together with the CEO and/or CFO if necessary) will assess each reported case and decide if an investigation is required accordingly.

- 8.3 Should the Compliance Officer consider appropriate, the case may be referred to relevant regulatory authority(ies), such as the Hong Kong Police Force, the Independent Commission Against Corruption, the Securities and Futures Commission, etc. or similar institution in which country it is reported.

- 8.4 Compliance Officer will undertake any investigations required, and will provide an investigation report to the respective CEO or CFO accordingly. If deemed necessary, the CEO or the CFO might appoint an additional officer to conduct.

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