



Whistle-blowing Policy

1. Purpose

CITIC Telecom International Holdings Limited (“the Group”) places vital emphasis on internal controls and risk management. To protect the Group’s interests and reputation, the Group encourages employees and related third parties (such as customers, suppliers, and individuals who have dealings with the Group) (“Third Parties”) to report illegal behavior or actions which pose risks to the Group's business. This whistle-blowing policy (the “Policy”) sets out a series of the principles and procedures for guiding the directors and employees of the Group to handle suspected cases of fraud, corruption and other misconduct in a fair and proper manner; and for preventing malicious allegations and to shield the whistle-blower from any possible harm and loss.

This Policy applies to the Group, and the Group’s subsidiary companies and overseas offices.

2. Definition of Whistle-blower

A whistle-blower (including all real-name and anonymous whistle-blowers) is any person who conveys a concern, allegation or any information indicating that fraud, corruption or any other misconduct is occurring or has occurred in the Group; with the knowledge or good faith belief that the concern, allegation or information is true.

3. Coverage and Scope

In line with the laws and rules, the whistle-blower can report acts related to fraud, corruption, or any other misconduct of an employee or a group of employees or directors that come to his/her attention. Such contents include, but not limited to, the following:

- unlawful acts or orders which violate a law, non-compliance with statutory obligations, abuse of authority, of substantial and specific dangers to public health or safety;
- fraud, which means any act or omission, including a misrepresentation, that knowingly and recklessly misleads, or attempts to mislead, a party to obtain financial or other benefits or to avoid an obligation;
- corruption, which means bribing, offering, giving, receiving, soliciting, or accepting any advantage directly or indirectly;
- misconduct, which means failure to observe the Group’s rules or standards of behavior, or misuse of company resources;
- any other activity which undermines the Group’s business or reputation.

Whistle-blowing should be made in a reasonable belief that what is being reported is true and complete. The person making the report is encouraged to identify himself/herself as this facilitates the investigation. However, if preferred, allegations and concerns may be expressed anonymously (as noted in Section 6 below).

4. Whistle-blower Confidentiality

The Group encourages employees of the Group and Third Parties to report information on any fraud, corruption or misconduct of which they have knowledge. The Group will make every effort to protect the whistle-blower's identity and information in a confidential manner and above all that they will be protected against retaliation.

Retaliation will not be permissible against any whistle-blower. Retaliation means any act of discrimination, harassment, threat, punishment or monetary demand.

The Group shall keep the whistle-blower's identity as confidential unless (i) such whistle-blower agrees his or her identity to be unveiled, (ii) such disclosure of identity to the authorized persons from the Group or the appropriate law enforcement authority is necessary for the investigation, (iii) such disclosure of identity is required by law, (iv) the person accused has the right to obtain such identity for the purpose of litigation. In the case(s) of (iv), the whistle-blower shall be informed prior to revealing his/her identity.

However, in the event that such employees or Third Parties do not wish to report the potential violations directly, anonymous reports may be submitted to the Group.

5. Consequence of False or Malicious Accusations

No abuse of the whistle-blowing mechanism shall be tolerated. Any whistle-blowing has to be made in good faith. Any malicious allegations will lead to disciplinary action. The Group reserves the right to take appropriate actions against anyone (employees or Third Parties) to recover any losses or damages as a result of the false report.

6. Reporting Channels and Procedures

A. The whistle-blower should report allegations or concerns to Internal Audit department via any of the following:

1. By email to compliance@citictel.com (This email address is only accessible by Internal Audit department)
2. In writing, addressed to: Head of Internal Audit, P.O. Box 91149, Tsim Sha Tsui Post Office.

- B. A whistle-blowing involving any member of the Board of directors of the Group may be reported to the Internal Audit department through the channels abovementioned, or directly addressed to the Group Chairman or the Chairman of the Audit Committee.
- C. Allegations received by the Group's subsidiary companies or other managerial staff on fraud, bribery or other misconducts should also be communicated to the Internal Audit department.

Internal Audit department should registered and evaluated to determine the credibility, materiality and verifiability of all allegations received. To this end, the allegation will be evaluated to determine whether there is a legitimate basis to warrant an investigation. The Head of Internal Audit will report the result of this evaluation to the Group Chairman as appropriate. If the problem is clearly defined, a further detailed investigation will be conducted.

The whistle-blower (if identified) will be informed of the outcome of the investigation as soon as possible, normally within one month from the date of disclosure, and will be informed if a longer period is needed for the investigation.

7. Dispute Resolution Mechanism

If the whistle-blower is not satisfied with the response received and any subsequent action is taken, he/she could put his/her concerns in writing to the Group Chairman, or the Chairman of the Audit Committee (those who have a conflict of interest should be excluded) who will arrange any further investigation as they think appropriate. A written response will be sent to the whistle-blower afterward.

8. Protection for whistle-blower

The Group reserves the right to take appropriate actions against anyone (employees or Third Parties) who initiates or threatens to initiate retaliation against the whistle-blower under this Policy. In particular, any employee who initiated or threatened to initiate retaliation shall be subject to disciplinary actions by the Group, which may include summary dismissal. The Group supports all employees and encourage them to raise concerns without fear of reprisals.

Upon receipt of a complaint of retaliation, an investigation shall be initiated and appropriate interim relief shall be provided by the Group to the whistle-blower. At the same time, appropriate interim remedial action shall be taken by the Group to address the underlying circumstances, and appropriate recommendations will be made to the Group Chairman.

9. Others

Such revised version of the Policy is effective from the date of the announcement. The Board and the Corporate Management have the final decision to explain and interpret this Policy.

Revised in March 2023