

ASTRUM FINANCIAL HOLDINGS LIMITED
阿仕特朗金融控股有限公司
(Incorporated in the Cayman Islands with limited liability)
(Stock Code: 8333)

WHISTLEBLOWING POLICY

1. BACKGROUND

- 1.1 Astrum Financial Holdings Limited (the “**Company**”) is committed to achieving and maintaining 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.

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 Audit Committee of the Company (the “**Audit Committee**”) has the overall responsibility for this Policy, but has delegated the day-to-day responsibility for overseeing and implementing this Policy to the Human Resources Manager of the Company (the “**HR Manager**”). The Audit Committee 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 board of the directors of the Company (the “**Board**”) as recommended by the Audit Committee. Any amendments or updates to this Policy will be subject to the Board’s approval.

4. REPORTABLE CONCERN

- 4.1 Activities that constitute malpractice or misconduct may include, but not limited to the following:
- (1) a failure to comply with any legal obligations or regulatory requirements;
 - (2) criminal offences, breach of civil law and miscarriage of justice;
 - (3) malpractice, impropriety or fraud relating to internal controls, accounting, auditing and financial matters;
 - (4) misuse or misappropriation of the Group’s assets or resources;
 - (5) improper use of commercially sensitive information;
 - (6) unauthorized trading activities;
 - (7) violation of the policies or guidelines of the Group;
 - (8) improper conduct or unethical behaviour likely to prejudice the reputation or standing of the Group;
 - (9) bribery or corruption; and
 - (10) deliberate concealment of any of the above.

4.2 When raising a Concern, Whistleblower should provide sufficient case specific information so that investigations can be conducted effectively. The disclosure must state clearly the reasons for the Concerns and Whistleblowers must reasonably believe that:

- (i) their disclosure evidences the Concerns happening in the past, happening now or likely to happen in the future; and
- (ii) such event compromises the reputation and standing of the Group and/or the interest of its shareholders, investors, customers and the investing public.

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 follow-up 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

- 7.1 Any Employee or third party who wish to report a Concern should inform the HR Manager by the following way:

Mail:

Attn: HR Manager of Astrum Financial Holdings Limited
Room 2704, 27/F, Tower 1, Admiralty Centre,
18 Harcourt Road, Admiralty, Hong Kong.

In case the person or matter concerned relates to HR Manager, Compliance Officer of the Company (the “**Compliance Officer**”) should be informed.

- 7.2 To ensure confidentiality in the mailing process, mail should be sent in a sealed envelope marked "Strictly Private and Confidential - To be Opened by Addressee Only".

8. INVESTIGATION PROCESS

- 8.1 The HR Manager will record all whistleblowing cases raised in the Whistleblowing Register. All reported cases with valid contacts will be followed up. The HR Manager 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 Audit Committee if the person or matter concerned does not relate to any members of the Audit Committee, or
- (2) referred to the Audit Committee Chairman if the person or matter concerned relates to any members of the Audit Committee;

- 8.2 Regarding the whistleblowing cases reported to respective Audit Committee or Audit Committee Chairman, the corresponding Committee or Audit Committee Chairman will assess each reported case and decide if an investigation is required accordingly. The Audit Committee and the Audit Committee Chairman will respectively review each investigation to determine the courses of actions.
- 8.3 Should the Audit Committee or the Audit Committee Chairman considers 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.
- 8.4 The Compliance Officer will undertake any investigations required by the Audit Committee or the Audit Committee Chairman, and will provide an investigation report to the respective Committee or Audit Committee Chairman accordingly. If deemed necessary, the Audit Committee or the Audit Committee Chairman may appoint an appropriate investigating officer other than the Compliance Officer to conduct or assist in the investigation.

9. REVIEW

- 9.1 The Company will review this Policy from time to time to ensure its implementation and effectiveness.

Adoption Date: 14 October 2022