

FSE Lifestyle Services Limited

Whistleblowing Policy (An excerpt)

Purpose

FSE Lifestyle Services Limited (the “Company”) and its subsidiary companies (together, the “Group”) is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, the Company encourages employees of the Group and related third parties (e.g. customers, suppliers, contractors, etc.) to raise concerns and report in confidence, about misconducts, malpractices or irregularities in any matters related to the Group.

Protection and Confidentiality

Persons making genuine and appropriate complaints under this policy are assured of fair treatment. The Company reserves the right to take appropriate actions against anyone (employees or Third Parties) who initiates or threatens to initiate retaliation against those who have raised concerns under this policy. Management will support all employees and encourage them to raise concerns without fear of reprisals. The Company will make every effort, within its capacity to do so, to keep a Whistleblower’s identity confidential.

Reporting and Investigations

Report can be made in writing (by post or by email) to **Head of Internal Audit** using the standard form (Whistleblower Report Form) attached as Annex 1 of this policy. Internal Audit Department will assess every report received to decide if a full investigation is necessary. The Head of Internal Audit will prepare a full report on the investigations conducted and report to the Audit Committee as appropriate.

False Reports

If a Whistleblower makes a false report maliciously, with an ulterior motive, or for personal gain, the Company 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. In particular, employees may face disciplinary action, including dismissal where appropriate.

This is an excerpt only. Please click [here](#) to read the full Whistleblowing Policy.

Annex 1

Whistleblower Report Form

(CONFIDENTIAL)

If you wish to make a written report, please use the report form below. Once completed, this report becomes confidential. You may send the report, marked “ **Confidential and To Be Opened By Addressee Only** ” to:

**Head of Internal Audit
FSE Lifestyle Services Limited
8/F Chevalier Commercial Centre,
8 Wan Hoi Road, Kowloon Bay, Kowloon, Hong Kong**

or by email to whistleblowing@fse.com.hk (This email is only accessible by Head of Internal Audit)

To: Head of Internal Audit
<i>We encourage you to provide your name with this report. But, concerns expressed anonymously will also be considered as far as practicable.</i>
Your Name: Contact No.: Email: Date:
The names of those involved (if known):
Details of concerns: <i>Please provide full details of your concerns: names, dates and places and the reasons for the concerns together with any supporting evidence / documents. Continue on separate sheet if necessary.</i>

FSE Lifestyle Services Limited

Whistleblowing Policy

Purpose

The Board of Directors strongly believes the key to the Company's success is the firm commitment to a set of business principles and ethics. These principles and ethics cover all aspects of our operations.

This purpose of this policy is to provide the employees of the Company and its subsidiaries ("the Group") and related third parties (e.g. customers, suppliers, contractors, etc.) ("Third Parties") to raise concerns, in confidence, about misconducts, malpractices or irregularities in any matters related to the Group.

General Policy

"Whistleblowing" refers to a situation where an employee or a Third Party decides to report serious concerns about any suspected misconduct, malpractice or irregularity. This policy is intended to encourage and assist Whistleblowers to disclose information relevant to suspected misconduct, malpractice or irregularity through a confidential reporting channel. The Company will handle the report with care and will treat the Whistleblower's concerns fairly and properly.

Protection

Persons making genuine and appropriate complaints under this policy are assured of fair treatment. In addition, Employees are also assured of protection against unfair dismissal, victimization or unwarranted disciplinary action, even if the concerns turned out to be unsubstantiated. The Company reserves the right to take appropriate actions against anyone (employees or Third Parties) who initiates or threatens to initiate retaliation against those who have raised concerns under this policy. In particular, employees who initiate or threaten retaliation will be subject to disciplinary actions, which may include summary dismissal. Management will support all employees and encourage them to raise concerns without fear of reprisals.

Confidentiality

Anonymous allegations are discouraged. Whistleblowers providing information should, as far as possible, give their names and contact details to facilitate further investigation. The Company will make every effort, within its capacity to do so, to keep a Whistleblower's identity confidential. Should an investigation lead to a criminal prosecution, it may become necessary for a Whistleblower to provide evidence or be interviewed by the relevant authorities. For his or her part, in order not to jeopardize the investigation, the Whistleblower is also required to keep confidential the fact that he or she has filed a report as well as the nature of concerns and the identities of those involved.

Reporting and Investigations

1. Reporting Channels

In general, Whistleblowers should make their reports to Internal Audit Department ("IAD") for review. For employees, they may prefer to have an initial discussion with his/her manager or Human Resources (HR) representatives. However, the manager or HR must in turn report any potential or actual misconducts, malpractices or irregularities to IAD. If employees feel uncomfortable doing this (e.g., his/her manager has declined to handle the case or it is the manager who is the subject of the report), then the employee should contact IAD. Business partners, suppliers and Third Parties are encouraged to report directly to IAD.

Any Business Units in receipt of a letter or a verbal report alleging misconducts, malpractices or irregularities shall redirect the letter or the reportee to IAD. If it is considered desirable to take legal action or to refer the case to law enforcement authorities, advice from legal adviser should be obtained.

2. Reports and Supporting Documentation

While the Company does not expect the Whistleblower to have absolute proof or evidence of the misconducts, malpractices or irregularities reported, the report should show the reasons for the concerns and full disclosure of any relevant details and supporting documentation. If a Whistleblower makes a report in good faith then, even if it is not confirmed by any subsequent investigation, his/her concerns would be valued and appreciated.

Report can be made in writing (by post or by email) to IAD using the standard form (Whistleblower Report Form) attached as Annex 1 of this policy.

3. Investigations

IAD will assess every report received to decide if a full investigation is necessary. If there is sufficient evidence to suggest that a case of possible criminal offence or corruption exists, the matter should be reported to the Board of Directors for immediate action.

The Head of Internal Audit will prepare a full report on the investigations conducted without revealing the identity of the Whistleblower. For confirmed cases of violations, the normal process is for the responsible management (with the assistance of HR representative) to determine what disciplinary action is appropriate and make a recommendation to the Company's Board of Directors for final decision.

False Reports

If a Whistleblower makes a false report maliciously, with an ulterior motive, or for personal gain, the Company 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. In particular, employees may face disciplinary action, including dismissal where appropriate.

Anonymous Reports

As the Company takes reporting of misconducts, malpractices, and irregularities seriously and wants to conduct warranted investigations of both potential and actual violations, it is preferred that these reports are not made anonymously. However, it is recognized that for any reasons, employees or Third Parties may not feel comfortable disclosing his/her names or contact details when reporting violations. In these cases, anonymous reports may be accepted.

Record Retention

Records shall be kept for all reported misconducts, malpractices, and irregularities by the relevant parties. In the event a reported irregularity leads to an investigation, the party responsible for leading /conducting the investigation shall ensure that all relevant information relating to the case is retained, including details of corrective action taken for a period not exceeding seven years (or whatever other period may be specified by any relevant legislation).

Responsibility for Implementation and Review of Policy

This policy has been approved and adopted by the Board of Directors of the Company. The Audit Committee has overall responsibility for implementation, monitoring and periodic review of this policy. In addition, the Audit Committee has delegated the day-to-day responsibility for administration of the policy to IAD.

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Your Name: Contact No.: Email: Date:
The names of those involved (if known):
Details of concerns: <i>Please provide full details of your concerns: names, dates and places and the reasons for the concerns together with any supporting evidence / documents. Continue on separate sheet if necessary.</i>