

KML Technology Group Limited

高萌科技集團有限公司

(Incorporated in the Cayman Islands with limited liability)

(the “Company”)

(Stock code: 8065)

Whistleblowing Policy

1. Policy

- 1.1 The Company is committed to maintaining the highest possible standards of openness, probity and accountability. In line with that commitment the Company expects and encourages you, our employees and external parties who deal with us (including but not limited to customers, suppliers, contractors) ("**External Parties**"), who have concerns about any suspected misconduct or malpractice within the Company to come forward and voice those concerns.
- 1.2 While the Company could not guarantee that the Company will handle the report in the way you might wish, the Company will endeavour to respond to your concerns fairly and properly.

2. Scope

- 2.1 Whistleblowing policy ("**Policy**") applies to employees at all levels and divisions (including temporary, contract staff and consultants) and directors of the Company and all of its subsidiaries (the "**Group**") as well as External Parties.

3. Protection and support for whistleblowers

- 3.1 Persons making appropriate complaints under this Policy are assured of protection against unfair dismissal, victimisation or unwarranted disciplinary action, even if the concerns turn out to be unsubstantiated.
- 3.2 Persons who victimise or retaliate against those who have raised concerns under this Policy will be subject to disciplinary action.

4. Responsibility for implementation of Policy

- 4.1 As authorised by the board of directors of the Company (the "**Board**"), the audit committee of the Company (the "**Audit Committee**") has the overall responsibility for the whistleblowing mechanism, including the implementation, monitoring and reviewing the effectiveness of this Policy. The day-to-day responsibility for overseeing and implementing this Policy is delegated to the designated senior officer: Compliance Officer or Company Secretary. Responsibility for monitoring and reviewing the operation of the Policy and any recommendations for action resulting from investigation into complaints lies with the Audit Committee.

- 4.2 Management must ensure that all employees feel able to raise concerns without fear of reprisals. All employees should ensure that they take steps to disclose any misconduct or malpractice of which they become aware. If you have any questions about the contents or application of this Policy, you should contact the designated senior officer.

5. Misconduct and malpractice

- 5.1 It is impossible to give an exhaustive list of the activities that constitute misconduct or malpractice but broadly speaking, the Group would expect you to report the following:

- (a) A criminal offence, including bribery or corruption;
- (b) A failure to comply with any legal obligations;
- (c) A miscarriage of justice;
- (d) Harassment or discrimination in any form;
- (e) A financial impropriety;
- (f) An action which endangers the health and safety of any individual;
- (g) An action which causes damage to the environment;
- (h) The deliberate concealment of information concerning any of the matters listed above.

- 5.2 While the Group does not expect whistleblowers to have absolute proof of the misconduct or malpractice reported, the report should show the reasons for the concerns. If you make a report in good faith then, even if it is not confirmed by an investigation, your concerns would be valued and appreciated.

6. False report

If you make a false report maliciously, with an ulterior motive, without reasonable grounds that the information in the report is accurate or reliable, or for personal gain, the Group also reserves the right to take appropriate actions against anyone and to recover any loss or damage as a result of such report.

7. Making a report

- 7.1 Whistleblowers may make a report in writing against employees by using the below channels.

- (a) Report against the Group's employees other than the designated senior officer:

Email: whistleblowing@kml.com.hk

Mailing address: Attn: Compliance Officer/ Company Secretary

B12, G/F., Shatin Industrial Centre, Siu Lek Yuen Road,
Shatin, New Territories, Hong Kong*

(b) Report against the designated senior officer only:

Email: whistleblowing_to_ac@kml.com.hk

Mailing address: Attn: Chairman of Audit Committee

B12, G/F., Shatin Industrial Centre, Siu Lek Yuen Road,
Shatin, New Territories, Hong Kong*

* Notes: Mail should be sent in a sealed envelope marked "Strictly Private and Confidential - To be Opened by Addressee Only"

- 7.2 In the report, you should provide full details and, where possible, supporting evidence.
- 7.3 Reports without sufficient information and/or contact method may delay or prevent further investigation.
- 7.4 The Group's employees can opt to make a report verbally. The Group would normally expect you to raise your concerns internally to your line manager (or his or her superior) within the department. If you feel uncomfortable doing this, for example, your line manager has declined to handle your case or it is the line manager who is the subject of the report, then you should contact the designated senior officer.

8. Confidentiality

- 8.1 The Group will make every effort to keep your identity confidential. In order not to jeopardise the investigation, you should also keep the fact that you have filed a report, the nature of your concerns and the identity of those involved confidential.
- 8.2 There may be circumstances in which, because of the nature of the investigation, it will be necessary to disclose your identity. If such circumstances exist, the Group will endeavour to inform you that your identity is likely to be disclosed. If it is necessary for you to participate in an investigation, the fact that you made the original disclosure will, so far as is reasonably practicable, be kept confidential. However, it is also possible that your role as the whistleblower could still become apparent to third parties during investigation.
- 8.3 Equally, should an investigation lead to a criminal prosecution, it may become necessary for you to provide evidence or be interviewed by the authorities. In these circumstances, the Group will, once again, endeavour to discuss with you the implications for confidentiality.
- 8.4 You should, however, know that in some circumstances, the Group may have to refer the matter to the authorities without prior notice or consultation with you.

9. Anonymous report

- 9.1 The Group encourages the whistleblower to identify oneself when making a report as this will help the Group obtain further information from you for proper and appropriate investigations when necessary.
- 9.2 However, the Group respects that sometimes you may wish to file the report in confidence and accepts anonymous reports, provided that the report contains sufficient information to enable an effective investigation.

10. Investigation procedures

- 10.1 For quick reference, please refer to the flowchart in Annex II.
- 10.2 Upon the receipt of a report, a designated senior officer will be appointed to manage the report. In case the designated senior officer is the person of interest of the report received or is conflicted, the report will be dealt with by the chairman of the Audit Committee and the Audit Committee will be notified. The chairman of the Audit Committee will determine the appropriate replacement party.
- 10.3 The Group will evaluate every report received to decide if a full investigation is necessary. If an investigation is warranted, an investigator (with suitable seniority and without previous involvement in the matter) from the internal audit or compliance department will be appointed to look into the matter.
- 10.4 Where the report discloses a possible criminal offence, the Group will refer the matter to the Audit Committee. The Audit Committee, in consultation with our legal advisers, will decide if the matter should be referred to the authorities for further action.
- 10.5 As stated under the section “Confidentiality”, in most cases, the Group will endeavour to discuss with you before referring a matter to the authorities. However, in some situations, the Group may have to refer the matter to the authorities without prior notice or consultation with you.
- 10.6 Please note that once the matter is referred to the authorities, the Group will not be able to take further action on the matter, including advising you of the referral.
- 10.7 The Group will acknowledge receipt of your report within 5 working days confirming that:
- (a) Your report has been received;
 - (b) The matter will be investigated;
 - (c) Subject to legal constraint, you will be advised of the outcome in due course.
- 10.8 You may be asked to provide more information during the course of the investigation.
- 10.9 The investigation report will be reviewed by all the executive directors of the Company.
- 10.10 Possible outcomes of the investigation:
- (a) The allegation could not be substantiated;
 - (b) The allegation is substantiated with one or both of the following:
 - (i) Corrective action taken to ensure that the problem will not occur again;
 - (ii) Disciplinary or appropriate action against the wrongdoer.
- 10.11 A final report, with recommendations for change (if appropriate), will be produced to the Audit Committee. The Audit Committee will review the final report and make recommendations to the Board.

- 10.12 You will receive in writing the outcome of the investigation. Because of legal constraints, the Group will not be able to give you details of the action taken or a copy of the report.
- 10.13 The length of each investigation may vary depending upon the nature, complexity and particular circumstances of the matter.
- 10.14 The outcome decided by the Group is final in the absence of new relevant material information and cannot be appealed under this Policy. If a whistleblower persists in making a report in the absence of new relevant material information, the Group may refrain from entering into any further discussion or correspondence with that whistleblower about the report.
- 10.15 All reportable cases will be recorded in the whistleblowing register. The case details, supporting documents, investigation results, and applicable follow-up actions shall also be duly recorded. The records shall be kept for at least 7 years, from the date of the investigation completion, or any longer period specified by applicable policy, regulation or legislation.

11. Monitor and Review

- 11.1 The Audit Committee will monitor and review the effectiveness of all actions taken in response to reports made under this Policy.
- 11.2 This Policy shall be reviewed at least annually, and whenever deemed necessary. Any amendments or updates should be subject to the Board's approval.

Second edition, revised and approved by the Board on 8 February 2023

[The Chinese translation is for reference only. In case of any discrepancies between the Chinese translation and the original English text, the original English text shall prevail.]

ANNEX I WHISTLEBLOWING REPORT FORM
CONFIDENTIAL

The Group is committed to maintaining the highest possible standards of openness, probity and accountability. In line with that commitment the Group expects whistleblowers who have concerns about any suspected misconduct or malpractice within the Group to come forward and voice those concerns.

It is recognised that in most cases the person raising concerns will wish to be dealt with on a confidential basis. All reasonable efforts will therefore be made to avoid revealing the person's identity.

If you wish to make a written report, please complete this report form and send the report to the relevant addressee with reference to section 7.1 of this Policy.

<p>Your Name/Contact Telephone Number and Email</p> <p>The Group encourages you to provide your name with this report. Concerns expressed anonymously are much less powerful but they will be considered as far as practicable.</p>	<p>Name: _____</p> <p>Company Name (for External Parties only): _____</p> <p>Address: _____</p> <p>Tel No: _____</p> <p>Email: _____</p> <p>Date: _____</p>
<p>The names of those involved (if known):</p>	
<p>Details of concerns:</p> <p>Please provide full details of your concerns: names, dates and places and the reasons for the concerns (continue on separate sheet if necessary) together with any supporting evidence.</p>	

ANNEX II INVESTIGATION PROCEDURES

