



Hi-P Whistle Blowing Policy & Procedure

Purpose and Scope

Hi-P International Limited (the “Company”) prohibits all forms of unlawful conduct, financial malpractice, impropriety, statutory non-compliance, or wrongdoing by any employee in the course of their work. This Whistle blowing Policy (the “Policy”) establishes a framework that enables employees of the Company and its subsidiaries (the “Group”), as well as external parties, including customers, suppliers, contractors, bankers, consultants, and other stakeholders, to report, in confidence, any concerns or disclosures regarding possible improprieties in areas such as financial reporting or other relevant matters. Reports made under this Policy shall be free from fear of reprisal, discrimination, or adverse consequences.

The Policy is intended to encourage employees of the Group and external parties to raise concerns or disclose information, in good faith, regarding any reasonable suspicions or knowledge of potential misconduct. Such misconduct may include (but is not limited to): accounting or financial improprieties, breaches of laws or regulations, violations of the Group’s Code of Ethics / Good Conduct, abuse of office or authority, retaliation against whistle blowers, and attempts to conceal any of the above.

Reporting Mechanism and Handling of Complaints

A Disciplinary Committee has been established to support the Audit Committee in managing the day-to-day operations of this Policy. This includes the submission, assessment, investigation, and resolution of all reported concerns or disclosures relating to possible improprieties. Reports may be submitted orally or in writing and should be directed on a strictly confidential basis to the Disciplinary Committee via the designated email address: whistle.blowing@hi-p.com.

The Group encourages employees and external parties to identify themselves when raising concerns or allegations, wherever possible, to facilitate an effective investigation. While anonymous reports are more challenging to investigate effectively, they will still be considered. Each report will be assessed based on the seriousness and credibility of the issues raised, as well as the possibility of verifying the allegations through available sources and information. All concerns and irregularities raised will be treated with the utmost confidentiality, and every effort will be made to maintain this confidentiality throughout the investigation process.

To assist the Disciplinary Committee in conducting a thorough and timely evaluation, the following information should be provided, where applicable:

(a) Description of the alleged event, misconduct, or concern;

- (b) The identity of individuals and/or departments involved, including external parties, if any;
- (c) The approximate date, time, and location of the incident(s); and
- (d) Any relevant supporting documentation, evidence, or further information.

All allegations will be reviewed and investigated by the Disciplinary Committee. Findings will be reported to the Audit Committee on a quarterly basis, or more frequently if circumstances require. Where warranted, appropriate corrective or disciplinary actions will be implemented in accordance with the Group's Human Resource Policies. This may include termination of employment or referral of the matter to legal authorities.

Safeguards

The Disciplinary Committee is responsible for ensuring that all reports and whistle blower identities are handled with the strictest confidentiality, to the extent practicable and in accordance with applicable legal requirements.

Any form of retaliation, whether direct or indirect, by management or any other individual against an employee or party who, in good faith, raises a concern or assists in an investigation under this Policy, will not be tolerated. Conversely, the submission of malicious, false, or frivolous allegations may result in disciplinary measures in accordance with internal policies and procedures.