



Fintech Chain Limited Whistleblower Policy

Scope of application: All members of the FTC.

Objective: To avoid damage to the company and related public interests.

Principle: Establish a safe, independent, and timely mechanism for proper implementation and tracking of issues.

In order to prevent the interests of the company and related public interests from being damaged, to promptly and publicly correct wrongdoing or misconduct, and to reasonably and legitimately protect the safety and rights of internal good faith whistleblowers, this policy is hereby established.

1. Reporting Scope

- 1.1 The company management and employees in any form of fraud that harms the company and related public interests;
- 1.2 Violation of laws and regulations applicable to the company's location;
- 1.3 Violation of various financial systems of the company, affecting the authenticity and accuracy of the company's financial reports.

2. Reporting Principle

- 2.1 Internal reporting is preferred.
- 2.2 External reporting is possible under special circumstances.

3. Reporting Mode

- 3.1 Directly by letter (including email).
- 3.2 On-site report or telephone reporting. Receiving personnel make written materials for inspection.

4. Reporting Approach

According to the specific situation, whistleblower can freely choose the following three approaches to make reporting:

- 4.1 Internal Audit Department;
- 4.2 Corporate Audit Committee;
- 4.3 Official reporting agency with jurisdiction over the company.

5. Reporting Address

5.1 Internal Audit Department

Add.: Room 1201, 12/F, Building #2, Xunmei Tech Plaza, No. 8 Keyuan Boulevard, Nanshan District, Shenzhen 518000, P.R.C.

Tel.: +86 755-25546800

Email: lingzihan@ttg.cn

5.2 Corporate Audit Committee

Add.: Room 1806, 18/F, Gala Place, 56 Dundas Street, Mongkok, Kowloon, Hong Kong

Tel.: +852 69183533

Email: johnxiong@ttg.cn

- 5.3 Contact details of external agencies with jurisdiction over the company are based on its official announcement.

6. Reporting Process

6.1 Registration

- 6.1.1 The Internal Audit Department / Corporate Audit Committee has set up a reporting registration personnel to record all reported matters. The relevant emails, letters or interview records must be archived. The relevant emails need to be printed and archived, and the relevant letters need to be archived with envelopes and text;

- 6.1.2 After recording the reporting matter by the reporting registration personnel, discussion with the person in charge of the Internal Audit Department / Company Audit Committee will be carried out to determine whether the investigation requirements are met;
- 6.1.3 For reported matters that do not meet the investigation requirements, the reporting registration personnel shall record the reasons and report to the person in charge of the Internal Audit Department / Company Audit Committee for signature and archive.

6.2 **Acceptance**

- 6.2.1 For reporting matters that meet the investigation requirements, the person in charge of the Internal Audit Department \ Company Audit Committee will designate a specific reporting investigation project leader and establish a reporting investigation team to conduct investigation.
- 6.2.2 Whistleblower has the right to know the acceptance of the reporting, and can query the relevant personnel of the Internal Audit Department / Company Audit Committee.

6.3 **Investigation**

- 6.3.1 The reporting investigation project leader conducts investigation based on the actual situation of specific reported matters;
- 6.3.2 The reporting investigation project leader decides whether to contact the whistleblower for additional information based on the specific situation. If necessary, the reporting investigation team should try not to meet the whistleblower directly to reduce the risk of the whistleblower;
- 6.3.3 When the reporting investigation project leader performs his duties in investigating the reported matters, or engaging in the following behaviours, the person concerned shall not refuse, evade or obstruct without cause:
 - 6.3.3.1 Query the person concerned and, if necessary, make a meeting minutes or audio recording of the conversation;
 - 6.3.3.2 Notify relevant personnel to submit necessary reports, records and related documents or make necessary descriptions;
 - 6.3.3.3 The reporting investigation project leader may photocopy materials, take photos, videos, etc., if necessary.

6.4 **Report**

- 6.4.1 After the reporting investigation team has completed the necessary investigation procedures, based on the facts verified by the investigation, it will issue an investigation report and report it to the company's General Manager / Chairman of the Corporate Audit Committee. Major issues and reported matters involving the company's directors, supervisors and executives should be reported to the Corporate Audit Committee. In addition, reporting of misconduct related to financial reports are also reported to the Corporate Audit Committee.
- 6.4.2 Reporting matters that are true after investigation and violate national laws shall be transferred to the judiciary by the company's legal department.

6.5 **Feedback**

- 6.5.1 An investigation report of general internal reporting matters must be issued within 20 working days. The results of the investigation will be reported back to the whistleblower within 5 working days after the investigation report is issued. The time limit for major matters may be appropriately extended, but the whistleblower must be informed.

6.6 **Custody of reporting files**

- 6.6.1 A reporting file refers to all the materials that record the entire process of registration, acceptance, investigation, and reports, including text materials, audio recording materials, and all other materials in other forms.
- 6.6.2 After the investigation report is issued, the reporting investigation project leader needs to collect relevant report files and transfer them to the person in charge of file management, and all report files are archived in confidential management. In preventing personal data from being stolen, tampered with, lost, or leaked, personnel involved in the investigation of reported cases must not alter, conceal, fabricate factual reports and disclose the source of the reporting or complaint without authorisation, so as to prevent the whistleblower from being treated unfairly, revenged or threatened.

6.6.3 Documents for the acceptance and investigation of reported cases should be properly stored and archived. The relevant data, including relevant documents and records obtained during the investigation, investigation results or reports, subsequent disposal and internal control improvements, should be stored for at least five years.

7. Reporting Requirements and Regulations

- 7.1 The reporting investigation staff should strictly keep the relevant information of the whistleblower and the specific content of reported matters confidential. Relevant investigations should be conducted without revealing the identity of the whistleblower. Unless the whistleblower agrees, under no circumstances should the whistleblower's name, work unit, contact information and other information be disclosed. Reporting investigation staff who violate confidentiality regulations or improperly perform their duties need to be dealt with seriously according to the circumstances and consequences;
- 7.2 Avoidance mechanism is adopted for reporting investigation. If the reporting investigation staff has a relative or friend relationship with the whistleblower or the person being reported, or if the reporting investigation staff himself/herself, his/her relative or friend has an interest in the matter being reported, and under other circumstances that may affect the reported matter being handled fairly, the reporting investigation staff should take the initiative to raise withdrawal. The whistleblower also has the right to ask any reporting investigation staff who is related to or involved in the reported matters to withdraw.
- 7.3 Whistleblower should as much as possible provide the name of person being reported, work unit, and specific circumstances and evidence of violation of laws and disciplines. The whistleblower is responsible for the reporting content, and may not report on behalf of others or use the reporting system to retaliate against the person being reported. Anyone who has been verified as a malicious obituary / defamation against person being reported shall be dealt with in accordance with relevant laws and regulations;
- 7.4 The whistleblower should report the problem through the company's normal channels, not through other abnormal channels, and must not use extreme methods to reflect the problem;
- 7.5 When a whistleblower is required to cooperate with the investigation and evidence collection, the whistleblower should actively cooperate, not provide false information, and must not interfere with the reporting investigation work;

- 7.6 Relevant departments and personnel must actively cooperate with the reporting investigation staff to carry out investigation and evidence collection work;
- 7.7 No unit or individual may use any pretext to stop or suppress the whistleblower from reporting, and shall not take any measures to combat and retaliate against the whistleblower. Anyone who combats or retaliates against the reporter shall be dealt with seriously in accordance with relevant company regulations once verified. If it constitutes a crime, it shall be sent to and handled by judiciary, according to law, in the place where the company is located.

8. Reporting Training

- 8.1 The company's Internal Audit Department shall organise a training of reporting system for all staff since the date of promulgation of this policy.
- 8.2 The content of the reporting system must be included in pre-job training and examinations for new employees.

9. Reporting Reward

- 9.1 If the reporting is verified as true through investigation, which can protect the company's rights and interests and avoid losses. The Corporate Audit Committee shall submit an application for rewards to the board of directors based on the specific reports and will give the whistleblower appropriate rewards for commendation, in order to express the company's firm standpoint at implementation of corporate governance and the prevention of fraud.

10. Supplementary Provisions

- 10.1 This policy is explained by the Corporate Audit Committee.
- 10.2 This policy will be implemented from the date of promulgation.
- 10.3 The details and regulations of the above process will be checked once a year to examine whether it is operating effectively and if any update is required.

Corporate Audit Committee of Fintech Chain Limited
2020.02.19