



## **Fintech Chain Limited Anti-bribery And Corruption Policy**

**Scope of application:** All members of the FTC.

**Objective:** Encourage all members of the FTC to adhere to high standards of ethics and integrity in their business practices; Resolutely abide by applicable anti-bribery and corruption laws and regulations, and eradicate any form of corruption and bribery.

**Principle:** Regardless of the country or region in which we conduct business, we adhere to a code of integrity and transparency in our dealings with business partners and governments to ensure compliance.

**Measures:** Establish and improve the anti-bribery and corruption compliance system to ensure that the compliance system effectively prevents, monitors and responds to corruption and bribery.

### **1. Anti-bribery and Corruption Coverage**

- 1.1 In any business activities of FTC and companies (including but not limited to benefit fees, secret commissions, improper payments, provision or acceptance of gifts, entertainment, hospitality).
- 1.2 In the dealings with any government of FTC and companies (including but not limited to collection and payment of benefit fees, improper payments, political donations, provision or acceptance of gifts, entertainment, hospitality).

### **2. Department**

- 2.1 Specific guidance from the Corporate Audit Committee.
- 2.2 Legal Department and Internal Audit Department specifically responsible.

### **3. Organisational Responsibility**

- 3.1 All members of the FTC involving bribery and corruption in their work will cause the company to suffer severe civil or criminal penalties from the jurisdiction or governing body (department) in the company's location.

## **4. Acceptance Process**

- 4.1 The Corporate Audit Committee may authorise the legal or Internal Audit Department to investigate and obtain evidence based on relevant clues obtained from internal and external sources.
- 4.2 All FTC members can report and reflect in real name by on-site, email, phone, etc. The internal acceptance department is Corporate Audit Committee or Legal Department. The data and clues are ultimately collected in Corporate Audit Committee. The internal acceptance department shall set up reporting registration personnel, and keep a clear and neat record of all reported matters. The relevant email, letter or interview must be archived. Relevant emails need to be printed and archived. Relevant letters need to be archived with envelopes and text.
- 4.3 Based on the conditions, Corporate Audit Committee will:
  - 4.3.1 Make a decision on internal acceptance within 2 working days and give written feedback to the whistleblower.
  - 4.3.2 Depending on the seriousness, decide whether to set up an Internal Joint Investigation Team and authorised personnel to conduct investigations and obtain evidence. For major matters and reporting involving company directors, supervisors, and executives, they must be reported to members of the Board of Directors at the same time.
- 4.4 All members have the right to report externally in accordance with laws and regulations.

## **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](mailto: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](mailto:johnxiong@ttg.cn)

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

## 6. Investigation Process

6.1 According to the actual situation of the specific reported matters, the investigation personnel shall legally make use of professional investigation procedures and appropriate working methods to conduct investigations and obtain evidence in accordance with regulations.

6.2 If the investigation finds that the relevant matters involve relevant departments and personnel of government organizations, Corporate Audit Committee shall apply to convene an interim board meeting to discuss and vote on specific action plans, in order to protect the company's reputation and avoid punishment.

## 7. Reporting Process

7.1 After the investigation is completed, according to the facts verified by the investigation, an investigation form is issued and reported to the chairman of Corporate Audit Committee. The Corporate Audit Committee considers and forms the investigation report, and at the same time copies it to the Board of Directors.

- 7.2 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.

## **8. Archive Keeping**

- 8.1 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.
- 8.2 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.
- 8.3 Storage period is 15 years. Data scrapping must go through written approval procedures.

## **9. Confidentiality Measures**

- 9.1 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;
- 9.2 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.

- 9.3 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;

## **10. Reward and Punishment Measures**

- 10.1 In accordance with the company's relevant reward and punishment system, the Board of Directors and Corporate Audit Committee shall punish the FTC internal personnel who conducted bribery and corruption.
- 10.2 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.

## **11. Policy Training**

- 11.1 The company's Internal Audit Department shall organise a training of reporting system for all staff since the date of promulgation of this policy.
- 11.2 The content of the Anti-bribery And Corruption Policy must be included in pre-job training and examination for new employees.
- 11.3 If the policy is updated, all members of the FTC shall be notified in a timely manner in an appropriate form.

## **12. Inspection Process**

- 12.1 According to the overall policy operation, the Corporate Audit Committee conducts an annual operation inspection, and adjusts in time for the areas that need to be increased or decreased, to ensure the effective operation of the policy.

## **13. Supplementary Provisions**

11.1 This policy is explained by the Corporate Audit Committee.

11.2 This policy is approved and issued by the company's Board of Directors.

11.3 This policy will be implemented from the date of promulgation.

Board of Directors of Fintech Chain Limited  
2020.02.21