

AEON CREDIT SERVICE (ASIA) COMPANY LIMITED

WHISTLEBLOWING POLICY

1. Purpose

AEON Credit Service (Asia) Co. Ltd. (the “Company”), as well as its subsidiaries (collectively, the “Group”), is committed to achieving and maintaining the highest standards of openness, probity and accountability in all respects. All members of the Group are expected to conduct their business with integrity, impartiality and honesty. To this end, the Group expects and encourages employees and related third parties who deal with the Group (e.g. customers, suppliers and business partners) (the “Third Parties”) to report to the Group any suspected misconduct, malpractice or irregularity in any matters related to the Group and to voice their concerns in confidence.

2. Objective

This Policy aims to:

- a) provide formal reporting channels and guidance on reporting possible improprieties in financial reporting, internal control or other matters;
- b) encourage report of such improprieties as soon as possible, in the knowledge that such report will be taken seriously and investigated as appropriate, and that confidentiality will be respected; and
- c) reassure to whistleblowers of the protection that the Group will extend to them against unfair disciplinary action, retaliation or victimization for any genuine reports made under this Policy, even if they might turn out to be mistaken.

3. Scope

3.1 The Policy applies to all employees of the Group as well as the Third Parties (the “Whistleblowers”).

3.2 This Policy is not designed for furthering any personal grievances or disputes, or questioning financial or business decisions legitimately taken by the Group.

3.3 It is impossible to give an exhaustive list of activities that constitute misconduct, malpractice or irregularity, but the Policy is intended to cover serious concerns that could have an adverse impact on the Group, which generally include but not limited to the following:

- a) breach of any law, regulation or code of conduct/ practice;
- b) criminal offence;
- c) miscarriage of justice;
- d) improper or misleading accounting or financial reporting practices;
- e) fraud, whether through act or omission, and including misrepresentation, which willfully misleads or attempts to mislead, a party to obtain financial benefit or to avoid an obligation;

- f) corruption, which usually involves the offering, giving, receiving, or soliciting, directly or indirectly, anything of value to unduly influence the actions of another party;
- g) endangerment of the health and safety of an individual;
- h) discrimination or harassment;
- i) violation of rules, regulations, policies or internal controls of the Group; or
- j) deliberate concealment concerning any of the above.

4. Protection of Whistleblowers

- 4.1 While Whistleblowers should exercise due care to ensure the truthfulness and accuracy of the information they provided, Whistleblowers making genuine and appropriate reports in good faith are assured of protection against unfair dismissal, victimization or unwarranted disciplinary action, even if their reports subsequently prove to be unsubstantiated.
- 4.2 The Group reserves the right to take appropriate actions against anyone who initiates or threatens to initiate retaliation against the genuine Whistleblowers. In particular, employees of the Group who initiate or threaten retaliation will be subject to disciplinary actions, which may include summary dismissal.

5. Confidentiality and Anonymous Reports

- 5.1 It is the Group's policy to make every effort to treat all reports in a confidential and sensitive manner, and to keep the Whistleblower's identity confidential.
- 5.2 In order not to jeopardize an investigation, the Whistleblower is also required to keep confidential the fact that he/ she has filed a report, the nature of concerns and the identities of those involved.
- 5.3 There may be circumstances in which it will be necessary to disclose the Whistleblower's identity, including without limitation,
 - a) to comply with applicable law, rules, regulations, orders or directives; and
 - b) to assist in statutory or regulatory investigations, proceedings or enforcement actions as required of the Group.
- 5.4 If such circumstances in paragraph 5.3 above exist, to the extent as permitted and practicable, the Group will endeavor to inform the Whistleblower that his/ her identity is likely to be disclosed in advance.
- 5.5 Even though the Group's ability to investigate a report and/ or to follow up with the Whistleblower may be severely restricted, it is recognized that, for various reasons, Whistleblowers may wish to file an anonymous report. In case of an anonymous report, the Whistleblower is encouraged to at least leave behind some anonymous contact information (e.g. anonymous email address) for the purpose of facilitating further communication for meaningful investigation of such report.

6. False Reports

Disciplinary action and/ or other appropriate actions to recover any cost, loss or damage as a result of any false report may be taken against the Whistleblower who makes a false report maliciously, with ulterior motive, without any reasonable ground, or for personal gain.

7. Reporting Channels and Mechanism

7.1 Reporting Channels

Reports may be made through the following channels:

(a) Reporting by letter or email

A Whistleblower can make a report to in writing addressing to all members of the Audit Committee and the Company Secretary, who will be the only recipients,

- i. by email at whistleblowing@aeon.com.hk; or
- ii. by post to 20th Floor, Mira Place Tower A, 132 Nathan Road, Tsim Sha Tsui, Kowloon, Hong Kong.

(b) Reporting Through AEONHK999 Hotline (telephone)

A Whistleblower can also make a report by calling the Deputy Managing Director of the Company/ the head of the division responsible for legal and compliance matters of the Company via a dedicated hotline (852 – 223 99 999). The conversation through this dedicated hotline will be recorded to help subsequent investigations. The Whistleblower can also leave voice messages on this telephone.

(c) Reporting Through AEONHK999 system page, AEON Financial Service Compliance Hotline or AEON Compliance Hotline

- i. The AEONHK999 page can be accessed from the Company's intranet portal or at externally www.aeon.com.hk/aeonhk999. Whistleblowers can make a report using this link from anywhere. The source of such reports (identities and technical information e.g. I.P address etc.) will not be captured or recorded by the AEONHK999 system.
- ii. The reports received through AEONHK999 system will be automatically forwarded to a special encrypted Mailbox accessible only to the Managing Director and the Chairman of the Compliance Committee and its other designated members of the Company (the "Monitoring Group"). The reports received through AEONHK999 system will be forwarded as encrypted emails to the Monitoring Group. These emails cannot be accessed or opened by any other staff of the Group other than the persons in the Monitoring Group.

- iii A report may alternatively be filed through AEON Compliance Hotline at <https://aeon-ethics.secure.force.com/> (User ID: ACSA001, Password: 9999) or through AEON Financial Service Hotline by email at report_aeonglobal@yglpc.com, which are respectively maintained by AEON China (under the supervision of AEON Co., Ltd.) and AEON Financial Service Co., Ltd.
- (d) Reporting Through the Legal Attorney Hotline run by external legal attorney as engaged by AEON Co., Ltd.

A whistleblower can additionally opt to file a report involving any member of the senior management who is a general manager or of a higher designation through the Legal Attorney Hotline by email to report_aeonglobal@yglpc.com. This will be run by an external legal attorney engaged by AEON Co., Ltd.

8. Investigation

- 8.1 Reports received through all channels will be brought to the attention of the Audit Committee of the Company, who will assess whether a full or further investigation is necessary. The assessment will be based on the information and/or documentary evidence provided by the Whistleblower or gathered from any preliminary inquiry. Where there is tangible and credible information and/or evidence, full investigation or further will be launched and such investigation will be conducted by the Company Secretary and/or such other internal or external parties as the Audit Committee may appoint.
- 8.2 Anyone being a subject of a whistleblowing report shall not participate or be involved in any related investigation in any manner.
- 8.3 If there is sufficient evidence to suggest that a case of possible criminal offence or corruption exists, the matter will be reported to the relevant authorities such as the Police, the Independent Commission Against Corruption (ICAC), etc.

9. Retention of Records

The related records of whistleblowing reports, investigation details and subsequent action will be kept for a period of at least 6 years. Such records will be retained by the Chairman of the Compliance Committee of the Company.

10. Reporting

All whistleblowing report investigation results and subsequent actions taken, if any, will be reported to the Audit Committee.

11. Review of the Policy

- 11.1 The Audit Committee shall review this Policy at least every two years.

11.2 Any major amendment, revision or abolition of this Policy shall be presented to the Board for discussion and approval.

July 2024
