

WHISTLEBLOWER POLICY

CREDIT GLORIOUS PROPERTY HOLDINGS LTD.

COMPLIANCE AND REGULATORY AFFAIRS DEPARTMENT

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WHISTLEBLOWER POLICY

INTRODUCTION

Welcome and Purpose:

Welcome to the Whistleblower Policy of Credit Glorious Property Holdings Ltd. This policy is a testament to our unwavering commitment to fostering an ethical, transparent, and accountable work environment. The purpose of this policy is to outline a clear framework for reporting and addressing concerns related to any aspect of our company's operations. It is designed to protect and empower those who, acting in good faith, come forward to report instances of malpractice, impropriety, legal infringements, or other serious irregularities.

Our Ethical Commitment:

At Credit Glorious Property Holdings Ltd., we hold ourselves to the highest ethical standards. Integrity, honesty, and accountability are not just principles; they are the foundation of every action we undertake. This policy is a reflection of our dedication to these values and our commitment to upholding them in every aspect of our business.

Empowering Our Community:

We recognize the crucial role that each member of our community, from employees to external stakeholders, plays in maintaining these standards. Therefore, this policy is crafted to provide a safe, confidential, and supportive avenue for reporting concerns. We assure all members of our community that their voices are important, and we are dedicated to listening and responding appropriately.

ARTICLE 1 – POLICY STATEMENT

Credit Glorious Property Holdings Ltd. (hereinafter referred to as "the Company") is committed to the highest standards of openness, integrity, and accountability. It is the Company's policy to provide an avenue for employees and external parties to raise concerns about any aspect of the Company's work, and to reassure them that they will be protected from reprisals or victimization for whistleblowing in good faith.

Commitment to Standards

- **Exemplifying Openness:** The Company prioritizes a culture of transparency. This means encouraging an environment where employees and stakeholders feel comfortable to share insights, ask questions, and report irregularities. Openness is not just a policy but a fundamental aspect of the company's ethos.
- **Upholding Integrity:** Integrity is central to the Company's operations. This encompasses honesty in dealings, ethical conduct in all business transactions, and a steadfast adherence to moral and ethical principles. The Company recognizes that integrity is crucial in maintaining trust among employees, clients, and the public.
- **Accountability as a Core Value:** The Company is dedicated to upholding accountability at all levels. This includes responsibility for decisions made, actions taken, and their consequences. The commitment to accountability ensures that all aspects of the Company's operations are conducted responsibly and are subject to scrutiny.

Providing an Avenue for Concerns

- **Channels for Reporting:** The Company has established multiple channels through which concerns can be raised, including direct communication with supervisors. These channels are designed to be accessible and user-friendly to encourage reporting.

- **Scope of Concerns:** The Company acknowledges that concerns can vary widely, from ethical dilemmas to legal violations. Employees and external parties are encouraged to report any issue they perceive as a deviation from the Company's standards of integrity and ethical conduct.
- **Guidance and Support:** The Company provides guidance on how to raise concerns.

Protection for Whistleblowers

- **Protection from Reprisal:** The Company ensures that individuals who report concerns in good faith are protected from retaliation. This includes protection against any form of workplace reprisal, such as demotion, harassment, or termination.
- **Confidentiality and Anonymity:** The Company commits to maintaining the confidentiality of the whistleblower's identity, respecting their choice to remain anonymous if they so wish. Only essential personnel involved in investigating the concern will be informed of the whistleblower's identity, and only with the whistleblower's consent.
- **Legal and Emotional Support:** Recognizing the emotional toll that whistleblowing can take, the Company provides support mechanisms. This includes access to counseling services and legal advice to ensure that whistleblowers are supported throughout the process.
- **Training and Awareness:** The Company invests in regular training and awareness programs for employees at all levels, ensuring they understand the importance of the whistleblower policy and how it functions. This includes educating employees about the types of concerns that should be reported and the protections available to those who report.

ARTICLE 2 – POLICY SCOPE

Scope of Policy This policy is designed to enable employees of the Company, as well as contractors, suppliers, and other external parties, to raise concerns internally and at a high level about evidence of malpractice, impropriety, legal infringements, or other serious irregularities within the Company, without fear of reprisals.

Inclusivity in Coverage

- **Broad Applicability:** The policy extends beyond just the employees of Credit Glorious Property Holdings Ltd. It encompasses contractors, suppliers, and various external parties who interact with the Company. This broad scope acknowledges that concerns and insights can arise from any level or area of interaction with the Company.
- **Diverse Range of Concerns:** The policy is not limited to specific types of issues. It includes a wide array of potential concerns, such as:
 - **Malpractice:** This could involve unethical business practices, professional misconduct, or negligence in the Company's operations.
 - **Impropriety:** Any form of inappropriate or unethical behavior, whether financial, operational, or interpersonal, falls under this category.

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- **Legal Infringements:** Violations of laws, regulations, or legal obligations that the Company is expected to adhere to.
- **Serious Irregularities:** This broadly covers any significant deviations from standard practices or expectations that could harm the Company's integrity or reputation.

Encouraging Reporting

- **Internal Reporting Mechanisms:** The Company has established clear and accessible channels for reporting concerns. These mechanisms are designed to ensure that reports are received and addressed by the appropriate levels within the Company, ensuring that concerns are escalated to a high level when necessary.
- **High-Level Attention:** Reports made under this policy are given serious attention by senior management. This ensures that concerns are not just recorded, but actively investigated and addressed.
- **Training and Communication:** Regular training sessions and communication campaigns are conducted to make all potential reporters aware of the policy, how to use it, and the types of issues that should be reported. This is to ensure that everyone in the Company's ecosystem is informed and empowered to act when they encounter potential violations.

Safety and Reassurance

- **Protection from Reprisals:** The Company guarantees that anyone who reports a concern in good faith will not face retaliation. This assurance is pivotal to fostering a culture where individuals feel safe to report issues without fear of adverse consequences.
- **Support for Reporters:** The Company offers support to individuals who raise concerns. This includes providing advice on the reporting process, and where necessary, offering protection measures for individuals who might be at risk due to their whistleblowing.
- **Confidentiality and Anonymity:** Ensuring the confidentiality of reports and, if requested, the anonymity of the reporter, is a key aspect of this policy. This is to encourage more individuals to come forward with information without fear of exposure or subsequent backlash.

ARTICLE 3 – PROTECTION UNDER POLICY

The Company recognizes that the decision to report a concern can be a difficult one. However, the Company will not tolerate harassment or victimization of a whistleblower and will take action to protect those who raise concerns in good faith. The Company assures that any individual raising a genuine concern will not be at risk of suffering any form of retribution or disadvantage as a result of their disclosure.

- **Recognition of Challenges:** The Company understands the personal and professional dilemmas faced by individuals deciding to report a concern. This acknowledgment is key in shaping a supportive environment for potential whistleblowers.
- **Zero Tolerance for Harassment:** A strict policy against harassment or victimization of whistleblowers is in place. The Company will actively monitor for signs of

retaliatory behavior and take immediate corrective action if such behavior is detected.

- **Active Protective Measures:** The Company commits to proactive steps to protect whistleblowers. This includes, but is not limited to, measures like ensuring the whistleblower's role and work environment remain unaffected, providing legal support if necessary, and ensuring their concerns are addressed seriously and impartially.
- **Support System:** A network of support, including access to counseling services and a dedicated point of contact within the Company for guidance and reassurance, is available to individuals who report concerns.
- **Reassurance Against Retribution:** The Company guarantees that no individual who reports a concern in good faith will face negative consequences, be it in their employment status, career progression, or workplace environment.
- **Encouragement of Good Faith Reporting:** Emphasizing the importance of integrity, the Company encourages reporting based on genuine concerns and ensures that such reports are treated with the utmost seriousness and respect.

ARTICLE 4 – CONFIDENTIALITY

Confidentiality will be maintained at all times and the identity of the whistleblower will not be revealed without their consent, unless required by law.

- **Strict Confidentiality Protocols:** The Company has robust systems in place to maintain confidentiality throughout the reporting and investigation process. This includes secure channels for submitting reports and safeguarded records.
- **Control Over Disclosure:** The identity of the whistleblower will be a closely guarded secret, only disclosed with the express consent of the individual, except where disclosure is compelled by legal requirements.
- **Training on Confidentiality:** Regular training for employees involved in handling whistleblower reports is conducted to ensure they understand and adhere to confidentiality protocols.
- **Confidentiality in Investigations:** During any investigation arising from a whistleblower report, confidentiality is maintained to protect the parties involved and ensure the integrity of the investigation.
- **Legal Compliance:** In cases where legal obligations necessitate the disclosure of a whistleblower's identity, the Company will take all possible steps to inform and prepare the whistleblower for such disclosure.

ARTICLE 5 – ANONYMOUS ALLEGATIONS

This policy encourages individuals to put their name to their allegation whenever possible. Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Company.

- **Encouragement for Named Allegations:** The policy strongly encourages individuals to identify themselves when making allegations. This is because named

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allegations tend to carry more weight and facilitate a more effective investigation process.

- **Acknowledging the Role of Anonymous Allegations:** The Company recognizes that in certain situations, individuals may choose to remain anonymous due to fear of retaliation or other personal concerns. Therefore, anonymous allegations are still considered valuable and will be taken seriously.
- **Discretion in Investigating Anonymous Allegations:** Each anonymous allegation will be evaluated on a case-by-case basis. The decision to pursue an investigation will depend on the credibility of the information provided, the seriousness of the issue, and the feasibility of conducting an effective investigation without the whistleblower's identity.
- **Mechanisms for Anonymous Reporting:** The Company provides secure and confidential channels for anonymous reporting, ensuring that individuals can voice their concerns without fear of being identified.
- **Assurance of Fair Assessment:** The Company assures that anonymous allegations will be assessed impartially, focusing on the content and gravity of the concern rather than the anonymity of the source.

ARTICLE 6 – UNTRUE ALLEGATIONS

If an individual makes an allegation in good faith but it is not confirmed by the investigation, no action will be taken against that individual. In contrast, if an individual makes malicious or vexatious allegations, and particularly if they persist with making them, disciplinary action may be taken against that individual.

- **Distinguishing Good Faith Allegations:** The Company recognizes the importance of differentiating between allegations made in good faith and those that are not. Good faith implies that the individual reporting genuinely believes their concern to be true, even if the investigation later finds it to be unsubstantiated.
- **No Penalty for Good Faith Allegations:** If an allegation made in good faith is not confirmed by subsequent investigation, the whistleblower will not face any adverse consequences. This policy is crucial to maintaining trust in the whistleblowing process and encouraging open communication.
- **Handling Malicious Allegations:** On the other hand, allegations made with malicious intent, or those that are vexatious and without merit, especially if repeated, will be subject to disciplinary action. This is to deter individuals from misusing the whistleblowing mechanism to harm others or the Company.
- **Investigating the Nature of Allegations:** The Company will conduct a thorough investigation to determine the nature of the allegation - whether it was made in good faith or with malicious intent.
- **Educational Approach:** The Company also commits to educating its workforce about

the importance of making responsible allegations and the consequences of false reporting, thereby fostering a responsible and ethical reporting culture.

ARTICLE 7 – REPORTING PROCEDURE

Concerns should be raised with the immediate supervisor. If this is not possible or appropriate, concerns should be raised with the Compliance Officer or a member of senior management. Concerns may be raised verbally or in writing.

Detailed Reporting Procedure

- **Initial Step - Reporting to Supervisor:** The primary channel for raising concerns is through the employee's immediate supervisor. This approach fosters a direct and swift response, allowing for immediate clarification and action where possible.
- **Alternative Reporting Channels:** In cases where reporting to a supervisor is not feasible (due to the nature of the concern or a conflict of interest), the employee is encouraged to approach the Compliance Officer or a member of the senior management team. These individuals are specially trained to handle sensitive reports and are committed to maintaining confidentiality.
- **Methods of Reporting:** Employees have the flexibility to report concerns either verbally or in writing. Verbal reports should be followed up in writing if possible, to ensure a clear and comprehensive record of the concern.
- **Guidance on Reporting:** The Company will provide templates and guidelines for writing reports, including the key information to include, such as the nature of the concern, any relevant dates or events, and any evidence that supports the concern.
- **Receipt Acknowledgement:** Upon receiving a report, the supervisor, Compliance Officer, or senior management member will acknowledge its receipt, providing the reporter with a reference number and an estimated timeline for the follow-up.

ARTICLE 8 – INVESTIGATION

All concerns raised under this policy will be investigated thoroughly and in a timely manner. The investigation process will involve an examination of the evidence available and, where necessary, interviews with relevant individuals.

Thorough and Timely Investigation

- **Prompt Initiation:** Investigations will commence as quickly as possible after a report is received. The goal is to address concerns promptly to mitigate any potential harm or escalation of the issue.
- **Comprehensive Examination of Evidence:** The investigation will involve a detailed examination of all available evidence. This includes reviewing relevant documents, emails, financial records, and other material that could shed light on the concern raised.
- **Interviews with Relevant Parties:** Where necessary, interviews will be conducted with individuals who may have knowledge of or involvement in the matter. These interviews will be conducted in a manner that respects the privacy and rights of all involved.

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- **Specialized Investigative Teams:** Depending on the nature of the concern, specialized teams or external consultants may be brought in to provide expertise in areas such as forensic accounting, legal compliance, or workplace conduct.
- **Regular Updates:** The whistleblower, where their identity is known and it is appropriate to do so, will receive periodic updates about the progress of the investigation, respecting confidentiality, and legal constraints.
- **Objective and Impartial Approach:** The investigators will maintain neutrality and objectivity throughout the process, ensuring a fair and unbiased investigation.
- **Reporting the Outcome:** Upon conclusion of the investigation, a report will be compiled summarizing the findings and recommendations. This report will be reviewed by senior management and appropriate actions will be determined and implemented.

ARTICLE 9 – OUTCOME OF INVESTIGATION

Upon completion of the investigation, appropriate action will be taken. This could range from no action, if the concern is not substantiated, to internal disciplinary procedures or referral to external authorities for further investigation.

Comprehensive Approach to Investigation Outcomes

- **Determining Appropriate Action:** Once an investigation is completed, the findings are thoroughly reviewed to determine the appropriate course of action. This decision-making process is guided by the seriousness of the findings and the Company's commitment to ethical practices.
- **Range of Possible Actions:**
 - **No Action:** If the investigation finds that the concern is not substantiated, no further action will be taken. However, the process and findings will be documented for record-keeping and transparency.
 - **Internal Disciplinary Procedures:** If the investigation substantiates the concern, and it involves misconduct by employees, internal disciplinary procedures will be initiated. This could include warnings, mandatory training, reassignment, demotion, or even termination, depending on the severity of the misconduct.
 - **Referral to External Authorities:** In cases where the investigation uncovers illegal activities or serious regulatory violations, the matter may be referred to external authorities such as law enforcement or regulatory agencies for further investigation and possible legal action.
- **Feedback to the Whistleblower:** Where appropriate and possible, the whistleblower will be informed about the outcome of the investigation, respecting confidentiality, and legal considerations.
- **Learning and Improvement:** Each investigation is also an opportunity for the Company to learn and improve.

Findings are used to identify and address systemic issues and to enhance policies and procedures where needed.

ARTICLE 10 – POLICY REVIEW

This policy will be reviewed periodically and amended as necessary to ensure its effectiveness and alignment with current best practices and legal requirements.

Ongoing Policy Review and Enhancement

- **Periodic Review:** The policy will undergo regular reviews to ensure that it remains effective and relevant. This includes assessing its alignment with evolving best practices, legal standards, and organizational changes.
- **Incorporating Feedback and Learning:** Reviews will incorporate feedback from employees, findings from previous investigations, and changes in the external environment, such as new legal requirements or industry standards.
- **Stakeholder Involvement:** The review process will involve input from various stakeholders, including legal advisors, HR professionals, and representatives from different levels of the organization, to ensure a comprehensive perspective.
- **Updating and Communicating Changes:** Any amendments to the policy will be clearly communicated to all employees and relevant parties. Training sessions and informational materials will be updated to reflect the changes.
- **Continuous Improvement:** The Company commits to a philosophy of continuous improvement, recognizing that effective whistleblowing policies are crucial for maintaining trust, integrity, and accountability within the organization.

CONCLUSION

Reiteration of Commitment:

In conclusion, the Whistleblower Policy of Credit Glorious Property Holdings Ltd. is more than just a set of guidelines; it is a commitment to ethical excellence. We reiterate our dedication to maintaining the highest standards of integrity and accountability in all our business dealings.

Encouraging a Culture of Transparency:

We encourage every member of our community to embrace this policy not just in letter, but in spirit. It is through your courage and commitment to doing the right thing that we can continue to foster a culture of transparency and trust.

Ongoing Evaluation and Improvement:

We acknowledge that the landscape of business and ethics is ever-evolving. Therefore, this policy will be subject to periodic reviews and updates to ensure its continued relevance and effectiveness. We are committed to learning, growing, and improving this policy to serve our community better.

Thank You and Invitation for Feedback:

We thank you for taking the time to understand this policy. Your participation in this process is invaluable. We invite and appreciate any feedback that can help us improve this policy and our practices. Together, let us strive to create a workplace that is not only productive but also principled and just.