

SING TAO NEWS CORPORATION LIMITED
(Incorporated in Bermuda with limited liability)
(Stock Code: 1105)
(the “Company”, together with its subsidiaries, the “Group”)

Whistleblowing Policy

(approved and adopted by the board (the “Board”) of directors (the “Directors”) of the Company
on 22 March 2023)

1. Purpose

The Group is committed to high probity standards and ethical business practices. The Company believes that a whistleblowing system can help to detect and deter misconduct or malpractice in the Group.

This Policy aims to encourage all stakeholders of the Group to voice concerns or report any actual or suspected improprieties associated with the Group through a confidential reporting channel. The Group will handle such reports with due care and handle the concerns raised by the whistleblowers fairly and appropriately.

2. Scope

This Policy applies to all directors, officers and employees of the Group (collectively, the “Employees”) and independent third parties who are dealing with the Group.

The reporting procedures in this Policy are intended for reporting any actual or suspected improper conduct associated with the Group, which shall include, but not limited to:

- a. violation of any laws, rules or regulations;
- b. bribery or corruption;
- c. malpractice, impropriety or fraud in internal control, accounting, auditing and financial reporting matters;
- d. breach of rules, policies or code of conduct applicable to the Group;
- e. discrimination or harassment;
- f. improper conduct or unethical behaviour likely to prejudice the reputation or standing of the Group;
- g. hazards to safety, health and environmental issues; and/or
- h. deliberate withholding information concerning any of the matters set out above.

3. Role and Responsibility

The Board, through delegation to the Audit Committee of the Company (the “Audit Committee”), is responsible for monitoring the implementation of this Policy.

The internal audit department of the Group (the “Internal Audit Department”) or human resources department (the “Human Resources Department”) is responsible for handling the whistleblowing reports.

4. Protection

The Group will protect whistleblowers who report honestly and appropriately from retaliation. The Group reserves the rights to take appropriate actions if anyone (employees or other stakeholders) retaliates or threatens to retaliate against whistleblowers. Any Employee who retaliates or threatens to retaliate will be dealt with in an appropriate manner, which may include disciplinary actions.

The Group will treat all reports promptly in a sensitive and confidential manner. The whistleblower’s identity will not be divulged without his/her consent wherever possible. However, in some cases, there may be circumstances in which the Group is required or legally obliged to disclose the whistleblower’s identity. For example, should an investigation lead to a criminal prosecution, it may become necessary for a whistleblower to provide evidence or be interviewed by relevant authorities. If this is the case, necessary steps will be taken to protect the whistleblower.

In making a report, the reporting person should exercise due care to ensure the accuracy of the information. Any Employee who is found to have deliberately submit whistleblowing reports with malicious intent shall be dealt with in an appropriate manner, which may include disciplinary actions.

The Company may take legal action against external parties for falsifying whistleblowing reports with improper and/or malicious intents to recover any cost, loss and damages resulting from such whistleblowing reports.

5. Reporting Procedures

Whistleblowers can make a report as follows:

- a. in writing by post to the Head of Internal Audit Department (the “Head of Internal Audit Department”) or the Head of Human Resources Department (the “Head of Human Resources Department”) of Sing Tao News Corporation Limited, at Sing Tao News Corporation Building, 7 Chun Cheong Street, Tseung Kwan O Industrial Estate, Tseung Kwan O, New Territories, Hong Kong. Please use a sealed envelope and mark “Personal and Confidential –To be opened by addressee only; or
- b. by email to whistleblowing@singtaonewscorp.com.

The whistleblowing report is required to contain specific information including the contact information of whistleblower, the information of the company or person the complaint is directed towards to, and the reasons, details and supporting evidence of the complaint.

Whistleblowers may be required to cooperate with the subsequent investigation if necessary.

The Group respects the wish of whistleblowers to report anonymously. However, anonymous allegations are difficult to be followed up due to failure to obtain further information for proper assessment. Therefore, anonymous reports are generally not accepted. The Group does not encourage anonymous reports.

6. Investigation Procedures

Upon receipt of a report, the Head of Internal Audit Department or the Head of Human Resources Department of the Group is responsible for evaluating the whistleblowing report and deciding whether an investigation is required. If a report has grounds for a comprehensive investigation, it should be reported to the chairman of the Audit Committee and decide the appropriate means of the investigation.

The manner and time required for an investigation will depend on the nature and individual circumstances of the report. The whistleblowing reports raised may:

- a. be subject to internal investigations;
- b. be referred to the external auditor; and/or
- c. be referred to the Audit Committee; and/or
- d. be referred to relevant public bodies, regulators or law enforcement agencies; and/or
- e. be used for such other actions made at the discretion of the Group's Chief Executive and/or the Audit Committee if it is in the best interests of the Group to do so.

The details of all whistleblowing cases will be recorded and saved in a designated database. The investigation report will be sent to the Audit Committee together with recommendations for changes or improvements as appropriate. The Audit Committee will review the Investigation Report and make recommendations to the Board as appropriate.

If there is sufficient evidence to suggest that the whistleblowing incident may involve criminal offence or corruption, the matter will be reported to the relevant local authorities (for instance, the Independent Commission Against Corruption in Hong Kong).

Where appropriate, the Head of Internal Audit Department or the Head of Human Resources Department will communicate with the whistleblowers the findings after completion of the investigation of the whistleblowing case.

7. Review

The Board will review this Policy from time to time, as appropriate, and approve any revisions that may be desired. The Audit Committee will be responsible for monitoring the implementation of this Policy.

8. Disclosure of Policy

This Policy may be disclosed in such manner as the Board considers appropriate and in compliance with any applicable regulatory requirements or guidelines.