



# TONTINE

## CHINA TONTINE WINES GROUP LIMITED

### 中國通天酒業集團有限公司

(於百慕達註冊成立的有限公司)

(股份代號：389)

中國總辦事處：中國吉林省通化縣團結路 2199 號  
香港辦事處：香港鰂魚涌英皇道 663 號泓富產業千禧廣場 2910-11 室

#### Whistleblower Policy

### 1. Introduction

**China Tontine Wines Group Limited** (the “**Company**”) and its subsidiaries (collectively the “**Group**”) are committed to maintaining our Company’s values which include high standard of corporate governance. This could be achieved by upholding a high standard of ethics, transparency, responsibility, and integrity in all respects of its business. The Company ensures that its affairs are conducted in accordance with applicable laws and regulations. The Company also promotes its ethnical corporate culture by observing the highest standard of fair dealing, honesty, and integrity in our business activities.

The Company has set up the Whistleblower Policy, (the “**Policy**”) pursuant to a resolution passed by the Company’s board of directors on 30 March 2023. The whistleblowing team has been set up to assist the Group in relation to matters arising under the Policy (the “**Whistleblowing Team**”). The Whistleblowing Team shall comprise of the Manger of Human Resources Department, the Deputy General Manager, and the Chief Financial Officer.

### 2. Objective

The Policy has been put in place to ensure any concerns raised regarding any actual misconduct, improper action, malpractice which is in contrary to the Company’s corporate governance commitment, are dealt with effectively. It aims to increase the awareness of maintaining internal corporate justice and serve as part of the internal control mechanism. It also provides whistleblower(s) which may be the Company’s employees, customers, contractors, suppliers, debtors or creditors, any stakeholders or parties reporting channels and guidance on whistleblowing. The Policy is not designed to further any personal disputes, challenge any financial or business decisions of the Group, nor should it be used to reconsider any Company’s policies and procedures which have been already in place.

The Policy shall be provided to all employees and officers of the Company upon their commencement of employment or engagement.

### **3. Policy**

#### **3.1 Reportable Matters**

Report may be provided to the Whistleblowing team when one has reasonable grounds to believe that a Company's director, officer, employee, contractor, supplier, consultant, or any other person who has business dealings with the Group has engaged in the following matters include:

- Conduct or practices which are illegal or breach any law, regulation, or code of conduct,
- Malpractice, impropriety, or fraud relating to internal control, financial reporting, accounting, auditing, or other financial matters of the Group,
- Criminal offences,
- Form of coercion, harassment, or discrimination,
- Endangerment of the health and safety of an individual or the environment,
- Violation of rules of conducts and policies applicable within the Company and or any company within the Group,
- Improper conduct or unethical behavior likely to prejudice the reputation of the Company and or any company within the Group,
- Deliberate withholding of information concerning the matters set out herein

#### **3.2 Confidentiality**

- The Group will make every effort to keep Whistleblower's identity and the reported Concern strictly confidential.
- Likewise, the Whistleblower should strictly keep confidential about the details of a reported Concern, such as its nature, related persons etc.
- Under certain circumstances where the Whistleblower's identity has to be revealed according to laws and regulations, the Group will endeavor to take reasonable steps to protect the Whistleblower from detriment.
- It is understood that a Whistleblower may wish to report anonymously. However, it is not encouraged as an anonymous allegation will hinder investigation and follow-up actions due to limited information.
- Whistleblowers are encouraged to come forward and report as much specific information as possible as assessment and investigation.

#### **3.3 Protection**

Persons making genuine and appropriate complaints under this policy are assured of fair treatment. In addition, the Group's employees are also assured of protection against unfair dismissal, victimization or unwarranted disciplinary action, even if the concerns raised turned out to be unsubstantiated. The Group reserves the right to make appropriate action against anyone (employees or Third Parties) who initiates or threatens to initiate retaliation against those who have raised concerns under this policy. In particular, employees who initiate or threaten retaliation will be subject to disciplinary actions under the Group's "Compilation of



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Administrative Management System” (「行政管理制度匯編」) implemented on 18 January 2022, which may include summary dismissal. Management will support all employees and encourage them to raise concerns without fear of reprisals.

#### **4. Procedure**

##### **4.1 Reporting Channels**

Any Employee or third party who wishes to report a Concern should send the Whistleblowing Report Form as per attached, with supplementary information, if any, by the following ways:

- (i) Email
  - a) Deputy General Manager  
Mr. Zhang Xuexin ([zhangxuexin@tontine-wines.com](mailto:zhangxuexin@tontine-wines.com))
  - b) Deputy General Manager and Chief Financial Officer  
Ms. Zhao Dan ([zhaodan@tontine-wines.com](mailto:zhaodan@tontine-wines.com))

- (ii) Letter  
Mr. Zhang Xuexin  
Deputy General Manager  
China Tontine Wines Group Limited  
No. 2199 Tuanjie Road, Tonghua City,  
Jilin Province, P.R.C. Post code 134100

##### **4.2 Reporting Format**

Reporting shall be made in writing by filing in the Report Form in Appendix. The completed Report Form should be sent to the Whistleblowing Team in a sealed envelope marked “Strictly Private and Confidential” – To be opened by Addressee Only” or via email.

##### **4.3 Investigation Procedure**

The format and the length of an investigation will vary depending on the nature and particular circumstance of each complaint. The complaints may: -

- be investigated internally,
- be referred to the relevant public or regulatory bodies,
- be referred to the External Auditor, and/or
- form the subject of an independent inquiry.

The Whistleblowing Team will contact the informant if circumstances require.

**STRICTLY CONFIDENTIAL**

**China Tontine Wines Group Limited**  
**WHISTLEBLOWING REPORT FORM**

<b>Informant's Particulars</b>	
We encourage you to provide your name with report. Concerns expressed anonymously are much less powerful but they will be considered as far as practicable.	
<b>Name:</b>	<b>Staff no.:</b>
<b>Mobile no.:</b>	<b>Email:</b>
<b>Incident to be reported</b> <i>(please supply as much information as possible on the particulars of the incident to be reported and use a separate sheet if the space provided is insufficient.):</i>	
<b>Time and Place:</b>	
<b>Person(s) involved:</b>	
<b>Details of the incident:</b>	
Please state the supporting documents, witnesses or evidence to substantiate your disclosure (if any) to facilitate investigation. You may also attach the relevant documents.	
<b>The informant hereby confirms that he/she is willing to give a statement in respect of the incident stated in this report (the "Incident"). The informant understands that all personal data submitted by him/her will only be used for purposes which are directly related to the Incident and may be transferred to parties who will be involved in (i) the processing and/or investigation of the Incident; (ii) the undertaking and/or conduct of disciplinary proceedings; and/or (iii) law enforcement. The informant shall have the right to request access to and correction of his/her personal data submitted in this report. The informant hereby declares that all information given herein is made voluntarily and true to the best of his/her knowledge, and he/she will ensure that his/her participation will be kept confidential.</b>	
<b>Signature:</b>	<b>Date:</b>