

WHISTLE BLOWING

The Company has set in place policies, procedures, codes and guidelines to ensure that the highest standards of conduct and integrity are observed by employees and those who deal with the Company (e.g. customers and suppliers). Nonetheless, they may still spot malpractice and wrongdoing within the Company during day to day operations. “Whistle-blowing” aims to provide a secured and confidential channel for reporting malpractice and wrongdoing within the Company directly to the Audit Committee.

Scope

Malpractice and wrongdoing include but not limited to the following:

- Fraud or corruption
- Theft/ unauthorized use of the Company’s properties, assets and information
- An unlawful act
- Reckless act endangering environment, health and safety
- Abuse of authority/ position for unauthorized use if for personal gain
- Deliberate violation of the Company’s policies and Codes of Conduct
- Discrimination or harassment
- Deliberate concealment of any of the above

Procedure to raise a concern (Whistle Blowing Channels)

Concerns can be raised through any of the following channels:

a) By writing to the “Whistle Blowing Officer, SmarTone” at 31/F, Millennium City 2, 378 Kwun Tong Road, Kowloon, Hong Kong

b) By email to whistle-blowing-officer@smartone.com

Cases reported will be timely and vigorously investigated. Appropriate actions will be taken to ensure such malpractice and wrongdoing is prevented in future.

The Company respects the confidentiality of any concerns raised and will not reveal the name or identity of the complainant in any form of correspondence or investigation report, unless there is a need to do so by law.