

# FINANCIAL STREET PROPERTY CO., LIMITED WHISTLEBLOWING MANAGEMENT MEASURES

## CHAPTER 1 INTRODUCTION

**Article 1** Financial Street Property Co., Limited (the “**Company**”) is committed to upholding high standards of integrity and ethical business practices.

**Article 2** Whistleblowing Management Measures (the “**Measures**”) are formulated in accordance with the requirements of code provision D.2.6 of the Code on risk management and internal control set out in paragraph D.2 of Part 2 of the Appendix 14 Corporate Governance Code to the Listing Rules on The Stock Exchange of Hong Kong Limited and the Corporate Governance Guide for Boards and Directors issued by The Stock Exchange of Hong Kong Limited in December 2021.

**Article 3** The Measures are applicable to the employees (the “**Employees**”) at all levels of the Company and its subsidiaries (collectively the “**Group**”) and all entities who deal with the Group (the “**Third Parties**”), including customers and suppliers, etc.

## CHAPTER 2 PURPOSES

**Article 4** The purposes of the Measures are as follows:

1. to encourage the Employees and the Third Parties to report suspected misconduct as soon as practicable, believing that the Group will treat their whistleblowing issues seriously, promptly and without discrimination and take appropriate action to investigate the whistleblowing issues and to ensure the confidentiality of the whistleblowing issues;
2. to provide channels for the Employees and the Third Parties to report concerns and to determine the manner in which such reports are handled;
3. to ensure that the Group’s management is informed of misconduct as soon as possible;
4. to enhance the confidence of the Employees and the Third Parties in the whistleblowing mechanism, to promote the culture of “speaking up”, and to establish an open and honest corporate culture.

## CHAPTER 3 WHISTLEBLOWING

**Article 5** Whistleblowing refers to a report made by an Employee or a Third Party (the “**Whistleblower**”) for suspected or actual serious misconduct in relation to the Group, the Employees and other stakeholders who may be affected by Employees’ misconduct. Misconduct includes but not limited to:

1. non-compliance with legal obligations or regulatory requirements;
2. misconduct, impropriety or fraud in internal controls, accounting, auditing and financial issues;
3. causing harm to the health and safety of any person;
4. bribery or corruption;
5. any deliberate concealment of the above.

**Article 6** The Whistleblower shall report in good faith and shall have cause to believe that the whistleblowing issue is real. The Company reserves its right to take appropriate action against a Whistleblower who makes a false report out of malice or for the sake of personal interests.

## CHAPTER 4 WHISTLEBLOWING CHANNELS

**Article 7** The Whistleblower can report to the Audit Committee of the Company (the “**Audit Committee**”) through the following channels.

1. Send an email to: [ac@fsig.com.cn](mailto:ac@fsig.com.cn)
2. Send a letter in writing to: The Audit Committee, 24/F, Xihuan Plaza Tower 2, 1 Xizhimenwai Avenue, Xicheng District, Beijing

Details of the Whistleblower (including name, department/business unit, company, contact number, relationship with the complainee, address or email address) are not required but are encouraged to be provided so as to facilitate the investigation and such details will be kept in the strictest confidence.

**Article 8** To ensure confidentiality in the mailing process, the materials related to the whistleblowing should be sent in a sealed envelope marked “Strictly Private and Confidential – To be opened by Addressee only” on the cover.

## CHAPTER 5 HANDLING OF WHISTLEBLOWING

**Article 9** The whistleblowing issues received by the Company is recorded in the Whistleblowing Registration Form and all issues with the correct contact are followed up.

**Article 10** The form or timing of the investigation depends on the nature and specific circumstances of the whistleblowing issue. The handling of whistleblowing issue includes but not limited to: internal investigation, transfer to external audit institutions, establishment of an independent investigation team, and/or transfer to relevant departments and law enforcement agencies.

**Article 11** The Company's internal investigations shall not prejudice any future investigations by law enforcement agencies (including measures to ensure that suspected criminal offences reported or disclosed in the course of internal investigations are properly addressed) and shall be reported to the appropriate law enforcement authorities whenever there is reasonable suspicion that the whistleblowing issue involves a criminal offence.

## CHAPTER 6 PROTECTION AND CONFIDENTIALITY

**Article 12** The Company will endeavour to keep the identity of the Whistleblower confidential and will handle all whistleblowing issues in a discreet manner. If the identity of the Whistleblower is required for any investigation, the Company will negotiate with them. Each report will be treated as confidential. Without the consent of the Whistleblower, the Company will not disclose the identity of them. However, there may be circumstances where the Company is required or has legal obligation to disclose the identity of the Whistleblower, such as in the event of legal action arising from the investigation of the whistleblowing or it is required to be disclosed in compliance with any applicable law or regulation, by any relevant governmental or regulatory authority including The Stock Exchange of Hong Kong Limited, or by the order or directive of any court having jurisdiction over the Company. In such circumstances, the Company will take all reasonable steps to ensure that the Whistleblower will not be harmed.

**Article 13** Whistleblower may raise concerns, both covertly and anonymously, about any matter that may be inappropriate in relation to the Group.

**Article 14** No person shall be subjected to any form of intimidation, retaliation, attack or other malicious treatment for the Whistleblower who report a problem in good faith. Such conduct is a serious violation of discipline and if proven, the Company will take appropriate disciplinary action or transfer the matter to law enforcement agencies.

## CHAPTER 7 SUPPLEMENTARY PROVISIONS

**Article 15** The Measures are published on the Company's website ([www.jrjlife.com](http://www.jrjlife.com)).

**Article 16** The Company will review the Measures periodically to ensure its effectiveness.