

## **Whistle blowing policy & procedure 投诉政策**

### Objective 目的

This policy provide an avenue for employee, supplier, tenants, distributor and reseller, customer, business associate and consultant, as well as general public to raise their concerns and voice out any malpractices, wrongdoing, abuse of power, conflict of power, corruption or noncompliance with Xidelang without any fear of repercussions. The concerns to be raised are not limited but includes any violation against the company that are constituted as part of the Code of Conduct of the company.

本政策提供一个渠道给雇员，供应商，租户，分销商和零售商，客户，商业伙伴和顾问，公众提出他们关于喜得狼的不当行为，渎职，滥用职权，权利冲突，贪污或违规的意见和所关注的事项，而不会遭受不必要的恐惧。要提出的意见和所关注的事项不限，但包括任何违反公司的行为准则的事项。

The company refers to “Xidelang Holdings Ltd”.

以上公司指：“喜得狼控股有限公司”。

### Application 范围

This policy applies to all the companies within the group of Xidelang, either the company is 100% owned or not, such as associate company.

本政策适用于喜得狼集团下的所有母公司和子公司，包含独资子公司或者联营公司。

### Confidentiality 保密

The company shall treat all the information, report and disclosure received as confidential. The company shall only reveal when such information, report is required by the applicable law or Court or authorities.

公司会对所有收到的信息，报告和披露高度保密。公司只会在适用法律、法院或当局要求下披露该信息。

### Protection 保护

The whistle blower will be protected under the policy provided the disclosures are made in good faith, and without fear of repercussion in making their report to the company.

所有告密者在本政策下受到保护，告密者本着忠诚和信仰向公司投诉。

The internal employee who reports the concerns may choose to remain anonymous. However, employees are encouraged to disclose their identity in making any report under this Policy, especially if further Investigation is required.

内部员工可以选择匿名的方式向公司投诉。然而，公司鼓励员工在本政策下实名投诉，特别是需要协助进一步调查的情况下。

### Reporting procedure 投诉程序

Should you become aware of the possible allegation, you should raise the issue to the immediate superior; if this is not appropriate, you should direct all the complaints about the allegation to the following designated person :-

如果发现任何可疑事项，你可以直接向上级投诉，若你觉得不合适，可以直接向以下授权人士投诉：

Name: xxxxx(suggestion, AC chairman)

姓名：

Hotline: xxxx(dedicated hotline)

电话：

Email address: hotline@xdl.com

邮箱：

### Investigation procedure 调查程序

The company will take the necessary action as per the complaint received and the whistle blower may be contacted by the person in charge of the investigation for further assistance and information.

公司收到投诉后将采取必要的行动，投诉者可以通过负责人的调查作进一步的援助和信息联络。

All the information and report received will be treated anonymously and in a strict and confidential manner. 所有收到的信息和报告将以匿名和严格保密的方式处理

Upon completion of the investigation, the company will take the necessary action against the possible violation. The company may also implement the appropriate disciplinary or preventive action where it deemed necessary. In order to ensure the action is satisfactorily taken, the implementation may be subject to the review by the Chairman of the Board Of Directors or any other appropriate and authorized person deem to be suitable to carry out the review.

在调查完成后，公司将对违规者采取必要的行动。公司也将采取必要的措施，防止类似事情重演。

为确保所采取的措施真正落实，公司主席将跟进和关注该事项的执行或者将有关事项授权给合适的人员执行。

### Timeline 时间表

The company shall commence the investigation on the matter reported within 60 days from the date of complaints received.

公司将在收到报告的 60 天内展开调查。

Whistle blowing form 投诉表格

The whistle blower should consider using the form attached to report the incident on next page.

投诉者可以考虑使用以下表格：

Form 表格

**XIDELANG HOLDINGS LTD 喜得狼控股有限公司**

**COMPLAINT DETAILS 投诉内容**

Date :日期		No.:编号	
<b>COMPLAINT DETAILS 投诉内容</b>			
Name of person alleged 违规者姓名			
Designation of person alleged 违规者职位			
Company of person alleged 涉及公司			
Other party involved? 其他关联方	Yes [        ], please indicate,有, 请注明		No [        ] 没有
	1. Name / company : _____ 2. Name / company : _____ 3. Name / company : _____ 4. Name / company : _____ 姓名/公司		
Complaints details 投诉内容			
Incident date & time 事件日期、时间			
Is this first incident you have known 是否首次发现违规	Yes [        ] 是	No [        ] 否	Remark : 备注
Supporting evidence 证据			
<b>Reported by 投诉人</b>			
Contact/mobile phone number: 联系电话			
Name : 姓名			
Email : 邮箱			
Company : 公司			