



SOUTHERN PACKAGING GROUP LIMITED

WHISTLEBLOWING POLICY

1. Introduction

The Whistleblowing Policy (the "**Policy**") of Southern Packaging Group Limited **Company** and **Group** is intended to promote and maintain high standards of corporate governance, fosters an open and transparent culture for secure whistleblowing without fear of repercussions. This policy provides employees and external parties such as clients, business partners, suppliers, and other stakeholders, with a channel to report any concerns or complaints regarding questionable accounting or auditing matters, insider trading, conflicts of interest, internal controls, collusion of competitors, or any other matters involving fraud, ethics, and employee misconduct.

2. Reportable Incidents

2.1. Reportable incidents covered under this Policy include, but are not limited to:

- (a) _____, or auditing matters.
- (b) Impropriety, corruption, fraudulent, properties, assets, or resources.
- (c) Conduct that violates laws or regulations.
- (d) Serious conflicts of interest.
- (e) Significant breaches _____ internal controls.
- (f) Insider trading or other securities trading violations.
- (g) Any other serious improper matters which may cause financial or non-financial loss to the Group, or damage its reputation.
- (h) Distinct effort to mislead, deceive, manipulate, coerce, or fraudulently influence any internal or external auditor in connection with the preparation, examination, audit, or review of any financial statements or records of the Group.

2.2. For general enquiries and feedbacks about the operations, pricing, and etc, please send to sp.investor@southern-packaging.com or contact us at [Contact Us](#).

3. Reporting procedures

- 3.2.** For concerns related to financial reporting, internal controls, or auditing, the matter may be reported to the Chief Financial Officer or the AC Chairman.
- 3.3.** All incidents or concerns may be raised verbally or in writing (or in the form as per **Appendix A**). Written reports are preferred, providing as much detail as possible about the incident or concern. The incident or concern should include (i) details of the parties involved, (ii) dates, periods of time and location, (iii) description of the incident or concern, (iv) evidence substantiating the complaint (where possible), and (v) contact details in case further information is required. Individuals are encouraged to identify themselves and provide their name and contact details if further clarification or information is needed. All concerns or irregularities raised will be treated with strict confidence, and every effort will be made to ensure that confidentiality is maintained throughout the process.
- 3.4.** All incidents or concerns reported will be acknowledged receipt and reviewed within a reasonable timeframe (within 4 weeks of the acknowledgement). After consulting with the Executive Chairman and/or senior management, the report will be directed to the appropriate department for actions, and a decision will be made on whether to proceed with detailed investigation after due consideration and inquiry. The whistleblower will be informed of the estimated time to complete the investigation and the progress of addressing the reported issue. Where the reported incident or concern involves any director or member of the Management, that director or member shall abstain from participating in the deliberations relating thereto. Management should report all reported concerns, including actions taken, recommended actions (if any), and progress to the AC or seek their guidance.
- 3.5.** Appropriate and fair disciplinary actions, including dismissal, will be meted out by the Company against those who are found guilty after investigations. In instances where relevant laws have been infringed, the Company will report such infringement to the relevant regulatory authorities. The AC will be informed of any follow-through measures (such as implementing additional internal control measures and procedures), where necessary, to ensure that such incidents will not recur. The AC will report to the Board accordingly.

~~CONFIDENTIAL AND PROPRIETARY INFORMATION~~

- 3.7.** The Group does not tolerate discrimination, harassment, or victimisation of any kind against a whistleblower who reports a concern in good faith. If it is determined that a whistleblower has experienced any reprisal or retaliation as a result of his/her report, appropriate remedial

4. Protection for the whistleblowers

- 4.1.** The Company prohibits discrimination, retaliation, or harassment of any kind against a whistleblower who submits a complaint or report in good faith. If an employee raises a genuine complaint pursuant to this Policy, he or she will not be at risk of losing his or her job or suffering from retribution or harassment as a result. The Human Resources Department will monitor for signs of harassment or victimisation against the whistleblower.

- 4.2.** However, this assurance does not extend to any whistleblower who intentionally provides information in a complaint or report which he or she knows or reasonably believes to be untrue.

5. Confidentiality

- 5.1.** To ensure that whistleblowers are not victimized, black-listed or discriminated by their superiors or fellow colleagues, the Group assures whistleblowers that it will not reveal their identities or information leading to their identities being known. The Company views such victimization, black-listing, or discrimination as a serious matter and will not hesitate to take disciplinary actions against those who are involved in such malpractices.

- 5.2.** The Group reserves the right to refer any concerns or complaints to appropriate external regulatory authorities. Depending on the nature of the complaint, the subject of the complaint may be informed of the allegations against him/her and given an opportunity to respond.

- 5.3.** All reports are handled confidentially, except as necessary or appropriate to conduct investigation and to take remedial action, in accordance with the applicable laws and regulations. In this regard:

- (a) The identity of the whistleblower making the allegation will be kept confidential and confined to the investigating team so long as it does not hinder or frustrate any investigation.

- (b) The investigation process may reveal the source of the information to persons involved in the investigation or resolution of the investigation report.
- (c) The whistleblower making the report may need to provide a statement as part of the gathering of evidence required.

6. Contact details

Any concerns should be raised with immediate superior or human resource department. If for any reason this is not possible, the following channels of reporting are available:

By Email :

- a) Email directly to the office email address of top management such as Executive Chairman, Vice Chairman, Chief Executive Officer **CEO** , Deputy CEO or Chief Financial Officer.

(,)

- b) Audit Committee Chairman
Email **sp.feedback@southern-packaging.com**

By Mail:

- a) **Strictly Confidential**
SOUTHERN PACKAGING GROUP LIMITED
No. 9 Foping Road 4, Guicheng Sub-district, Nanhai District,
Foshan City, Guangdong Province, China
Attention: AC Chairman

4 9

7. Modification

The adequacy and relevance of the Policy will be overseen by the AC. The Group may modify the Policy to maintain compliance with applicable laws and regulations or accommodate organisational changes.

Approved and recommended by the AC on 25 February 2025

Approved by the Board on 25 February 2025

