



## DIGITAL HOLLYWOOD INTERACTIVE LIMITED

遊萊互動集團有限公司\*

*(Incorporated in the Cayman Islands with limited liability)*

(Stock Code: 2022)

### Whistle-blowing Policy

(Adopted and amended on August 29, 2022 and December 30, 2022, respectively)

#### 1. Purpose

- 1.1 Digital Hollywood Interactive Limited (the “**Company**”, together with its subsidiaries, the “**Group**”) is committed to achieving and maintaining the highest standards of openness, probity and accountability. Employees at all levels are expected to conduct themselves with integrity, impartiality and honesty.
- 1.2 It is every employee’s responsibility and in the interest of the Company to ensure that any inappropriate behaviour or organizational malpractice that compromises the interest of the shareholders, investors, customers and the wider public does not occur. To this end, the Company has devised a Whistle-blowing Policy (the “**Policy**”).
- 1.3 The term ‘whistle-blowing’ refers to a situation where our employee or a third party decides to report (the “**Whistleblower**”) serious concerns about any malpractice which he has become aware or genuinely suspects that the Company and any member of the management has been or may become involved in.
- 1.4 The Policy and system are designed to encourage the Whistleblower to raise serious concerns without fear of reprisal or victimization, in confidence and anonymity with the audit committee of the Company (the “**Audit Committee**”) about possible improprieties in any matter related to the Group rather than overlooking the problem.
- 1.5 This Policy is applicable to all personnel of the Group, including the directors of the Company (the “**Director**”), all employees of the Company and external parties (such as customers and suppliers) who deal with the Group. Any person of the Group shall not be exempted from this Policy.

## **2. Policy**

- 2.1 This Policy is intended to assist the Whistleblower to disclose at a high level, information which the Whistleblower believes shows malpractice or impropriety.
- 2.2 This Policy is not designed to further any personal disputes, question financial or business decisions taken by the Company nor should it be used to reconsider any staff matters.
- 2.3 Whistle-blowing matters may include but are not confined to:
  - 2.3.1 non-compliance to laws or regulations;
  - 2.3.2 malpractice, impropriety or fraudulent acts relating to accounting, auditing and financial matters;
  - 2.3.3 violation of the internal policies and procedures of the Group;
  - 2.3.4 endangerment of the health and safety risks of staff members and other stakeholders;
  - 2.3.5 damage caused to the environment;
  - 2.3.6 professional or ethical business misconduct, malpractices or wrongdoings; and
  - 2.3.7 deliberate concealment of any of the above.
- 2.4 Protection and confidentiality
  - 2.4.1 It is the Company's policy that the Whistleblower should not suffer any form of intimidation, reprisal, retaliation or adverse reaction organizationally as a consequence of reporting a concern about any of the above matters.
  - 2.4.2 The Company will make every effort to treat all disclosures in a confidential and sensitive manner. The identity of the Whistleblower making the allegation will be kept in the strictest confidence. However, there may be circumstances in which the Company may be required or legally obliged to reveal the Whistleblower's identity, for example, where an investigation leads to legal proceedings being initiated. If this is the case, the Company will take all reasonable steps to ensure that the Whistleblower suffers no detriment.
- 2.5 Untrue allegations
  - 2.5.1 In raising concerns, the Whistleblower should exercise due care to ensure the accuracy of the information.
  - 2.5.2 If upon investigation, some of the concerns cannot be verified or confirmed or may not have substance, no action will be taken against the Whistleblowers raising concerns in good faith. Therefore, if the Whistleblower is mistaken, he will not be at risk of losing his job or suffering any form of retribution as a result provided that he is acting in good faith.

2.5.3 If a Whistleblower makes an untrue allegation maliciously, with an ulterior motive, or for personal gain, the Group reserves the right to take appropriate actions against any relevant person (including the Whistleblower) to recover any loss or damage as a result of the untrue allegation. In particular, the Whistleblower may face disciplinary action, including dismissal where appropriate.

## 2.6 No retaliation

2.6.1 As this Policy is designed to deter and expose any violation through mutual monitoring by departmental personnel, it shall not be subject to any external factors. Therefore, no officer in any rank or position shall have intent to deter, affect or harm the basic rights and obligations of the Whistleblowers with his delegated authority for work. If the person handling the whistleblowing is either the Group or related staff members, they shall also keep the identity of the Whistleblower and the content of their allegations confidential to avoid leakage on a best effort basis.

## 3. REPORTING CHANNEL

3.1 Reports made under this Policy are to be submitted to the Chairman of the Company through one of the following confidential means of communication:

3.1.1 In writing to the Chairman of the Company: Attn: “Chairman of the Company”  
Address: 11/F, Tai Sang Bank Building, 784 Nathan Road, Kowloon, Hong Kong in a sealed envelope clearly marked “Strictly Private and Confidential – To be Opened by Addressee Only”; or

3.1.2 By email to jubao@gamehollywood.com.

## 4. PROCEDURE

4.1 To enable the Chairman of the Company to assess the malpractice concern (the “**Specific Concern**”), the Whistleblower should provide as much detailed information, such as background, history and reason for the Specific Concern, together with names, dates, places and other information.

4.2 The Chairman of the Company will acknowledge receipt of the report by sending a written acknowledgement within 10 working days from the date that the report was made to the Whistleblowers.

4.3 The Chairman of the Company will then conduct a full investigation with the objective of establishing whether malpractice has occurred. The format of the investigation may vary depending upon the circumstances.

4.4 The Chairman of the Company will communicate the findings of the investigation to the Whistleblower; and if appropriate, the Audit Committee, the Board of Directors or external authority who may need to consider whether action should be taken on the basis of the findings.

- 4.5 If after evaluation and careful consideration, the Whistleblower is of the opinion the findings of the investigation taken by the Chairman of the Company are not in the best interest of the Company, the Whistleblower can report the Specific Concern to the Audit Committee of the Company through the Company Secretary.
- 4.6 The Audit Committee will then conduct a full investigation and assess each reported case to see whether it qualifies as malpractice and will inform the Whistleblower and the Board of Directors the findings of the investigation. The format of the investigation may vary depending upon the circumstances. The Board of Director shall consider whether action should be taken on the basis of the findings.

## **5. RESPONSIBILITIES AND REVIEW OF THIS POLICY**

- 5.1 This Policy has been approved and reviewed by the Board from time to time to ensure that it is in line with the Group's needs and reflects current regulatory requirements. The Audit Committee will monitor the implementation and enforcement of this Policy on an annual basis.

\* *For identification purpose only*