



MODERN HEALTHCARE TECHNOLOGY HOLDINGS LIMITED

(Incorporated in the Cayman Islands with limited liability)

(Stock code: 919)

WHISTLEBLOWING POLICY

Introduction

Modern Healthcare Technology Holdings Limited (“**Company**”, and its subsidiaries, collectively “**Group**”) is committed to the highest standards of openness, probity and accountability.

An important aspect of accountability and transparency is a mechanism to enable staff, other members of the Company and other parties who deal with the Group (e.g. customers, contractors, suppliers, creditors, debtors, etc.) (“**Other Stakeholders**”) to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer’s affairs. Nevertheless, where an individual discovers information which they believe shows any concerns and actual or suspected malpractice, impropriety, fraud or wrongdoing by any employee and/or Other Stakeholders in any matter related to the Group, then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

It should be emphasised that this policy is intended to encourage and assist individuals who believe they have discovered malpractice, impropriety, fraud or wrongdoing. It is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the "whistleblowing" procedures are in place, it is reasonable to expect staff and Other Stakeholders to use them rather than air their complaints outside the Company. All reports and the corresponding follow up actions shall be centrally recorded to ensure accountability. The Group will handle the reports timely with care and will treat the complainant’ concerns fairly and properly.

Scope of Policy

This policy is designed to enable employees of the Company and Other Stakeholders to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice, impropriety, fraud or wrongdoing. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

Safeguards

(1) Protection

This policy is designed to offer protection to those employees of the Company and/or Other Stakeholders who disclose such concerns provided the disclosure is made:

- in good faith
- in the reasonable belief of the individual making the disclosure that it tends to show malpractice, impropriety, fraud or wrongdoing and if they make the disclosure to an appropriate person (see below).

Complainants are protected in assisting investigations. The Company prohibits any act of discrimination or retaliation, and any person who takes any obstructive, intervening or hostile measures, discloses complaints, information of the complainant or takes retaliatory actions against the complainant, the Company will make warnings and/or internal disciplinary action, and if it violates the law, the Company will transfer such case to the relevant local authorities or law enforcement departments in accordance with the law.

It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.

(2) Confidentiality

The Company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

(3) Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make.

This policy also allows reports on an anonymous basis, but in the case of anonymous reports, the Company will consider the following factors to ascertain whether such reports can be handled:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

(4) Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual knowingly or irresponsibly makes false, malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

(5) Making a Report and Reporting Channel

Whistleblower can make a report in person or in writing with his/her name, full details of

concerns and supporting evidence (if any). A template whistleblowing report form (Annex 1) is attached for reference.

- In person:
Whistleblower who is an employee should raise his/her concerns to his/her division/department head. The division/department head should then raise the matter to the Chief Executive Officer and/or Company Secretary of the Company.
- In writing:
Report should be sent to the Chief Executive Officer and/or Company Secretary of the Company by post at the registered office of the Company situated at Workshops Nos. 66-68, 6th Floor, Sino Industrial Plaza, 9 Kai Cheung Road, Kowloon Bay, Kowloon, Hong Kong with a sealed envelope clearly marked “Strictly Private and Confidential” or by email to whistleblower@modernhealthcaretech.com.

Whistleblower is strongly encouraged to provide his/her name and contact details, so that clarification of the report made or further appropriate information can be obtained directly from him/her, where required. However, it is recognised that the Whistleblower may not feel comfortable identifying himself/herself in some cases. In these cases, anonymous report may be submitted.

If the report involves any of the directors, the Chief Executive Officer or Company Secretary of the Company, the Whistleblower can report directly to the chairman of the audit committee of the Company (the “Audit Committee”).

(6) Investigation Procedures

The Company will acknowledge receipt of the Whistleblower’s report within 5 working days. The Chief Executive Officer and/or Company Secretary of the Company will follow up the report.

The Company will evaluate the report and to decide if a full investigation is needed. If there is evidence of any criminal offence, the Company will refer the matter to the Audit Committee. The Audit Committee will then decide if the matter should be referred to the regulatory authorities after consultation with the legal advisers of the Company.

The Company will discuss with the Whistleblower before referring the matter to the regulatory authorities except in some special situations. No further actions will be taken if the matter is referred to the regulatory authorities.

Further information may be provided by the Whistleblower during the investigation process. The Chief Executive Officer and/or Company Secretary of the Company will produce an investigation report to the Audit Committee upon completion of the investigation, with recommendations (if any). The Audit Committee will review the investigation report and

recommend any further actions to the board of directors of the Company (the “Board”) for final decision.

The investigation outcome will be sent to the Whistleblower in writing within 2 months based on the complexity of the matter.

Please note that no details of the action taken or no copy of the investigation report will be given to the Whistleblower due to legal constraints. If the Whistleblower is not satisfied with the investigation outcome, he/she can raise the matter again with the Chief Executive Officer and/or Company Secretary of the Company and further investigation will be considered after examining all aspect of facts.

(7) Responsibility for Implementation of the Policy

The Audit Committee has responsibility for the Policy. It can delegate the day-to-day responsibility to the Chief Executive Officer and/or Company Secretary of the Company as the “designated senior officer(s)” to oversee and implement the Policy. However, the Audit Committee still has ultimate responsibility for monitoring and reviewing the operation of the Policy and any recommendations for actions resulting from investigation of the respective matters.

(8) Review of the Policy

The Company Secretary of the Company shall make recommendations to the Board on any amendments to the Policy in due course, in order to ensure strict compliance with the changing regulatory requirements and revised from time to time thereafter.

Any amendments to the Policy shall be approved by the Board.

Effective Date: 31 March 2023

(The English version of the Policy shall prevail in case of any discrepancy or inconsistency between the English version and its Chinese version.)

Annex 1

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Whistleblowing Report Form

Private & Confidential

The Company encourages employees and the third parties dealing with the Group to raise their concerns about any suspected misconduct or malpractice within the Group. The identity of the Whistleblower making the allegation will not be divulged without the Whistleblower's consent.

If you wish to make a written report, please use the format of this form. Once completed, this form becomes confidential.

This form should be sent to the Chief Executive Officer and/or Company Secretary of the Company by post at the registered office of the Company situated at Workshops Nos. 66-68, 6th Floor, Sino Industrial Plaza, 9 Kai Cheung Road, Kowloon Bay, Kowloon, Hong Kong with a sealed envelope clearly marked "Strictly Private and Confidential" or by email to whistleblower@modernhealthcaretech.com.

Your contact details: <i>(We encourage you to provide your name with this form. Concerns expressed anonymously are much less powerful but they will be considered as far as practicable.)</i>	Name :	
	Tel No. :	
	Address :	
	Email :	
	Date :	
The name(s) of those involved (if known):		
Details of concerns: <i>(Please provide full details of your concerns: name(s) of relevant person(s), date(s) and place(s) and the reasons for the concerns (continue on separate sheet if necessary) together with any supporting evidence.)</i>		