Golden Phoenix
Global Limited

申訴與舉報機制公開說明

目的及適用範圍（COP 2.6）

GOLDEN PHOENIX GLOBAL LIMITED（「本公司」）為員工、求職者、供應商、客戶、承辦商、受影響人士、社區代表、民間社會組織及其他持份者提供安全、保密及有效的申訴與舉報渠道。

可提出的事項（COP 2.6）

可提出的事項包括涉嫌違反法律、RJC《行為準則》、人權、勞工權益、供應鏈盡職調查、洗錢、賄賂、產品聲明、保安、職業健康與安全、環境、私隱或公司政策的情況。

提出方式（COP 2.6）

- 電郵：report@goldenphoenix.hk；
- KYC 或供應鏈相關事項：kyc@goldenphoenix.hk；
- 書面信函（密封註明「私人及機密」，交予公司營業地址的指定接收人）或口頭渠道。

提出人可選擇具名或匿名方式，並應在可行範圍內提供事件日期、涉及人士、事實、文件或其他有助調查的資料。涉及洗錢或恐怖分子資金籌集的可疑活動，會按相關法例及公司程序交由洗錢報告主任處理。

若事項涉及合規主任，由 MLRO 處理；若涉及 MLRO，由無利益衝突的董事或指定外部獨立服務提供者處理；若同時涉及合規主任、MLRO 或總經理，直接轉交無利益衝突的董事／股東代表或外部獨立渠道。

處理原則（COP 2.6）

如提出人提供有效聯絡方式，公司須在三個工作日內確認收悉；

以公平、獨立、保密及與事件嚴重程度相稱的方式評估和調查；

一般案件以三十個工作日內完成為目標；如需延長，會在不影響保密或調查的前提下通知提出人；

容許提出人提供補充資料及就處理結果表達意見；

不限制提出人向監管機構、執法機關、法院、RJC 或其他外部渠道求助。

保密及禁止報復（COP 2.6）

本公司只會按「有需要知道」原則處理提出人身份及個案資料，並按照香港《個人資料（私隱）條例》處理記錄。本公司嚴禁對任何善意提出申訴、舉報、提供資料或參與調查的人士作出解僱、降職、騷擾、威脅、歧視或其他報復。

認可及生效

職銜：總經理｜生效日期：2026 年 9 月 24 日

本政策會定期覆核，並在適用法例、RJC 要求、業務範圍或主要風險出現重大變更時作出修訂。

Golden Phoenix
Global Limited

Grievance and Whistleblowing Mechanism – Public Statement

Purpose and Scope (COP 2.6)

GOLDEN PHOENIX GLOBAL LIMITED (the "Company") provides safe, confidential and effective grievance and whistleblowing channels for employees, job applicants, suppliers, customers, contractors, affected persons, community representatives, civil society organisations and other stakeholders.

Matters That May Be Raised (COP 2.6)

Matters that may be raised include suspected breaches of law, the RJC Code of Practices, human rights, labour rights, supply chain due diligence, anti-money laundering requirements, anti-bribery requirements, product claims, security, occupational health and safety, environmental requirements, privacy or Company policies.

How to Raise a Concern (COP 2.6)

- Email: report@goldenphoenix.hk;
- KYC or supply chain matters: kyc@goldenphoenix.hk;
- Written correspondence (sealed and marked "Private and Confidential" for the designated recipient at the Company's business address) or an oral reporting channel.

A reporting person may identify themselves or remain anonymous and should, where practicable, provide the date of the incident, persons involved, facts, documents or other information that may assist the investigation. Suspected money laundering or terrorist financing activity will be referred to the Money Laundering Reporting Officer (MLRO) in accordance with applicable laws and Company procedures.

If a matter concerns the Compliance Officer, it will be handled by the MLRO. If it concerns the MLRO, it will be handled by a director without a conflict of interest or a designated independent external service provider. If it concerns the Compliance Officer, MLRO or General Manager collectively, it will be referred directly to a director or shareholder representative without a conflict of interest, or to an independent external channel.

Handling Principles (COP 2.6)

Where valid contact details are provided, the Company will acknowledge receipt within three working days;

Assess and investigate fairly, independently, confidentially and in a manner proportionate to the seriousness of the matter;

Aim to complete ordinary cases within 30 working days. If more time is required, the reporting person will be informed where this does not compromise confidentiality or the investigation;

Allow the reporting person to provide additional information and comment on the outcome;

Do not restrict the reporting person from seeking assistance from regulators, law-enforcement authorities, courts, the RJC or other external channels.

Confidentiality and Non-Retaliation (COP 2.6)

The Company handles the identity of the reporting person and case information strictly on a need-to-know basis and processes records in accordance with Hong Kong's Personal Data (Privacy) Ordinance. The Company prohibits dismissal, demotion, harassment, threats, discrimination or any other retaliation against anyone who raises a grievance or concern in good faith, provides information or participates in an investigation.

Endorsement and Effective Date

Designation: General Manager | Effective date: 24 September 2026

This Policy is reviewed periodically and revised when there are material changes to applicable laws, RJC requirements, the scope of the business or key risks.