

Whistleblowing Policy

Introduction

T.C.C. Technology Company Limited and its affiliated companies (“TCC Technology Group”) encourages all employees to report any well-founded suspicious wrongdoings as soon as practically possible. Suspected wrongdoings within TCC Technology Group will be taken seriously and employees will not be victimized or subject to any detriment if he/she raises legitimate concerns in good faith.

Scope of the Policy

The Whistleblowing Policy (“Policy”) applies to all TCC Technology Group’s member of Board of Directors, Executive Committee (“Executive Committee”), all TCC Technology Group’s Management Committee (employee ranging from Director level up to the Managing Director) and employees (“Employees”).

1. Purpose

1.1 The Policy provides a procedure to ensure that concerns about suspected wrongdoings within TCC Technology Group (“Whistleblowing”) are raised and handled timely and appropriately. It applies to member of Board of Directors, Executive Committee and Employees working at all levels of the organization as identified in TCC Technology Group’s regulations regarding the classification of positions, wages and salaries, which currently consist of contracted Employees, daily Employees and monthly Employees.

1.2 Employees are encouraged to report genuine concerns which he/she may have about suspected wrongdoings in accordance with the Policy, in the knowledge that his/her concerns will be taken seriously and investigated as deemed appropriate. TCC Technology Group will support him/her, provided that he/she raises genuine concerns in good faith, even if they turn out to be mistaken. Reasonable measures shall be taken to protect member of Board of Directors, Executive Committee and Employees from detriment, retribution or harassment from doing so.

2. Definition of Whistleblowing

Whistleblowing is the disclosure of information relating to wrongdoings or dangers at work. This includes criminal activities and other unlawful conducts, failure to comply with regulatory requirements, financial irregularities and actions that are dangerous to the health and safety of people or to the environment. For example, insider dealing, bribery, and forgery would constitute wrongdoing.

3. When to apply the Policy

Member of Board of Directors, Executive Committee and Employees shall proceed in accordance with the Policy if he/she has a genuine concern about past, current or future wrongdoings or dangers. It may not always be clear whether the conduct which concerns Employees amounts to wrongdoing and Employees will need to form his/her own judgment. TCC Technology Group encourages Employees to report Employees’ concerns when Employees are in doubt.

4. How to report a concern

4.1 If member of Board of Directors and Executive Committee has concerns, member of Board of Directors and Executive Committee should consider report to the Board of Directors.

4.2 If Employees have concerns, Employees should consider the process set out below and report it through the recommended channel(s) in writing with Employees' name and contact details.

4.3 Employees should raise his/her concerns in writing with Employees' supervisor/department/division in the first instance. Employees' supervisor/department/division/office head should assist Employees in finding a way of resolving the Employees' concerns quickly and effectively, or he/she may refer the matter to the designated persons as stated in the clause 4.4.

4.4 Where the matter is more serious, however, or Employees feel that Employees' supervisor/department/division has not addressed Employees' concerns, or Employees prefer not to raise them with such persons for any reason, Employees should raise the concerns to the Human Resources Department at "whistleblowing@tcc-technology.com". The Human Resources Department will report to the Management Committee to consider and take further necessary action and also report to the Executive Committee and the Board of Directors. TCC Technology Group may nominate different individuals as points of contact from time to time. Any changes in points of contact will be notified to Employees.

4.5 If TCC Technology Group decides that it is necessary and appropriate, a meeting may be arranged with Employees to discuss Employees' concerns. In these circumstances, TCC Technology Group will prepare a written summary of Employees' concerns and provide Employees with a copy after the meeting. Employees may bring a colleague to attend the meeting, but Employees' colleague must respect the confidentiality of Employees' disclosure and any subsequent investigation.

4.6 Any member of Board of Directors, Executive Committee and Employees who have any personal interest in the matter is obligated to declare it upon raising the concerns.

5. Confidentiality

TCC Technology Group encourages Employees to raise any genuine concerns openly under the Policy. However, TCC Technology Group will not respond to disclosures made anonymously, since it will make proper investigation difficult or even impossible, and may lead to groundless accusations. If Employees would like to raise Employees' concerns confidentially, TCC Technology Group will take reasonable steps to keep Employees' identity secret. Disclosure of Employees' identity may, however, become unavoidable in the case of an investigation by the government officials or court proceedings.

6. How TCC Technology Group will handle the matter

6.1 Once the member of Board of Directors and Executive Committee has reported his/her concern under the clause 4.1, the Board of Directors will consider and take necessary action.

6.2 Once Employees have reported his/her concern, the matter will be assessed to determine the proper action to be taken, which might include internal investigation or a referral for external investigation. Employees will be informed who is responsible for handling the matter, how the person can be contacted and whether any further assistance may be needed from Employees. Employees may, for example, be required to attend additional meetings in order to provide further information.

6.3 TCC Technology Group may, where confidentiality allows, give Employees feedback on the matter, including the progress of the investigation and likely timescale, but TCC Technology Group is not obliged to do so. Nonetheless, in the case where confidentiality is of concern, it may hinder TCC Technology Group from providing Employees with any details of the investigation or disciplinary punishment which may be the result of the whistleblowing action. Employees must treat any feedbacks given to Employees about the investigation as entirely confidential.

6.4 If it is considered more appropriate to deal with concerns of Employees as a grievance matter as stated in the "Employee Handbook", Employees will be informed accordingly. In this case, Employees' concerns will be further submitted through the responsible departments or divisions.

6.5 If Employees are dissatisfied with the manner in which TCC Technology Group has dealt with any concerns Employees have reported, or with the outcome of an investigation, Employees may contact any other designated persons set out in the clause 4.4. The persons may carry out further investigations as deemed appropriate.

7. Warning on misuse of the Policy and protection to the whistleblower

7.1 Any complaint made which is later found false, or in bad faith, or with malicious intent, or in a careless manner, or for personal benefit is considered a serious violation. Such action is considered gross misconduct which leads to disciplinary actions as stated in the topic of the disciplinary and penalties in the "Employee Handbook".

7.2 TCC Technology Group will not tolerate harassment or victimization of Employees raising a genuine concern under the Policy and any person involved in either threatening or retaliation against a whistleblower will be subject to disciplinary action(s). If Employees are harassed or victimized in any way, Employees are advised to inform the matter to the person responsible for the investigation of the matter so that appropriate actions may be taken.

8. External reporting mechanism

The objective of this Policy is to determine an internal mechanism for submitting report, conducting an investigation and correcting any suspicious wrongdoings within TCC Technology Group's workplaces. It is recognized, however, that there may be circumstances where Employees feel that Employees should properly report matters to external bodies, such as regulators or the police if he/she feels that his/her safety and health may be compromised or; if he/she is unable to discuss the matter internally with one of the designated persons named in the clauses 4.3 and/or 4.4 or; if such matter involves a serious crime.

Whistleblowing concerns usually relate to the conduct of Employees. However, they sometimes involve actions committed by a third party, such as a customer, a supplier or a service provider to TCC Technology Group, Employees are strongly advised to first internally raise a concern in good faith to the one of the designated persons as per the clauses 4.3 and/or 4.4. Nevertheless, after the Employees have raised their concerns if he/she still reasonably believes it relates mainly to an action of that third party and it is under responsibility of that third party as stipulated by law, may raise a concern in good faith with the related governing authorities. Unless required by the laws, Employees are advised to internally raise a concern in good faith, where he/she reasonably believes it relates mainly to an action of that third party and it is legally under responsibility of that third party. In case Employees are in doubt, Employees should contact one of the designated persons named in the clauses 4.3 and/or 4.4 for guidance in the first instance.

Please note that it is inappropriate for Employees to go to the media with a concern about suspected wrongdoings.

9. Seeking independent advice

Any inquiries regarding the Policy, Employees may discuss them (without being required to make a formal report) with any of designated persons named in the clauses 4.3 and/or 4.4. Employees can, of course, also seek advice from a lawyer of his/her own choice and expense.

The implementation of the Policy reinforces relevant guidelines and policies.