



Whistleblowing and Whistleblower Protection Policy

Purpose

In order to encourage the public to actively participate in exposing misconduct and corruption, and at the same time ensure that whistleblowers are protected from retaliation and discrimination, Delton Technology released the “Whistleblowing and Whistleblower Protection Policy” for the first time in March 2024 to safeguard the legitimate rights and interests of whistleblowers and promote organizational transparency.

Scope of application

This policy applies to all directors, officers and employees of DELTON TECHNOLOGY (GUANGZHOU) INC. and its subsidiaries, as well as business partners.

This policy applies to the following violations of integrity in the company’s trading behavior:

- Violations of company regulations and legal requirements that result in losses or potential risks to the company include malpractice, corruption, and infringement of trade secrets.
- The company’s employees and suppliers may engage in unethical practices during procurement, such as accepting or demanding bribes, kickbacks, or engaging in fraudulent activities like embezzlement, frauds and falsification. They may also misuse company resources for personal gain and create unfair advantages during the bidding process.



Our Principles & Positions

The whistleblower is responsible for the authenticity of the content of the report, and the content of the report requires a detailed description of the time, place, relevant persons and specific circumstances of the disciplinary violation, and provides relevant supporting materials as much as possible, such as audio recordings, photos, videos, etc. The content of the report must be factual, and must not fabricate or exaggerate facts, and must not fabricate facts to frame others.

Delton Technology advocates real-name reporting, gives priority to real-name reporting, and gives certain reporting rewards according to the verification situation. Anonymous reports are also accepted.

Based on the principle of “minimum scope of knowledge and permanent confidentiality” to protect the reported information, the company has established strict confidentiality measures in all aspects of the registration of reporting clues, investigation, report output and reward, and will strictly keep confidential the reporting unit, whistleblower and the content of the report.

Delton Technology is committed to strictly investigating and punishing any form of retaliation against whistleblowers, witnesses and investigators.

Policy review and whistleblowing handling

After the issuance of this policy, the ESG Office and the Audit Department are responsible for reviewing and revising the policy according to changes in the external environment, laws and regulations, and other factors.

To report any violations of integrity in the company’s trading behavior, please follow these steps:

- Upon receipt of the complaint, the Audit Department shall promptly register the report information and notify the department head. The identity of the informant including their name, department and work number will be kept confidential.
- The individual responsible for the Audit Department shall investigate or establish an independent investigation team based on the reported information. The members of the investigation team and the person under investigation are from different departments and have no direct interest relationship. During the investigation and evidence collection process, the Human Resources Department shall assist the investigation and personnel handling if necessary.



- After completing the investigation and assessing the impact of the incident, the head of the Audit Department shall report to the company's management and decide whether to publish the list or respond solely to the informant.
- The department head shall review and submit the results of the investigation and forward to the lawyer to ensure compliance with relevant provisions and regulations. Afterward, the management of the company shall sign off on the reply. Depending on the situation, the list may be published in the publicity column or the informant may read and sign for confirmation after reading.
- If there is a violation of law and discipline in the company, it is necessary to report it to the local political and legal department, and the senior leaders of the company need to be notified in advance.

Reporting channels

Phone number (86) 020-8221 0789

Email: audit@delton.com.cn



WeChat:

Report address: Audit Department, No. 22, Baoying South Road, Guangzhou Free Trade Zone, Guangzhou City, Guangdong Province, China 510700

Group General Manager:

Ruby Zeng