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	WHISTLER BLOWING GUIDELINES	Document No	:
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1.0 INTRODUCTION

Heritage Foods Group and its group of companies is responsible and fully committed to protecting its assets including all direct and indirect information of sensitive and valuable nature and the goodwill it has established over its business tenor as well as the properties it owns.

The Whistleblowing Policy directly supports Heritage Foods Group’s Core Values and Corporate Code of Ethics. Ours principles of “Worthy of Trust” and “Winning with Integrity” entail that we remain consistent and honest in our dealings with others and strive to treat people with trust and mutual respect while maintaining transparency.

2.0 OBJECTIVE

- 2.1 To encourage employees, suppliers and customers to disclose any wrongdoing, unethical business behaviour and/or professional behaviour relating to security concern, product safety, authenticity, legality and quality that may adversely impact the company and/or be detrimental to other employees, suppliers and customer of the company
- 2.2 To ensure that all employees, suppliers/ customer can confidently to raise concerns on malpractice and other wrongdoings without fear of retaliation, victimisation, harassment or discrimination at the earliest possible stage and in the right way.
- 2.3 To ensure that employees, suppliers/ customer are able to raise concerns regarding any illegal conduct or malpractice and to have such concerns properly investigated

3.0 SCOPE

This guideline is applicable to all level of employees of Heritage Food Group regardless of their position, working location, suppliers and customers.

4.0 PROCEDURES

4.1 Disclosure of Issue / concern

- 4.1.1 All disclosures of information can be raised to any of the following channels:

By e-mail : Compliance@heritagefoodsgroup.com

By post : Chief Financial Officer,
Heritage Foods Group
Suite 5805, 58th Floor,
Two International Finance Centre,
8 Finance Street, Central, Hong Kong

4.1.2 Please indicate your e-mail subject in the following format:-
Compliance - <State the Issue reported>

4.1.4 The report shall be made in good faith with a reasonable belief that the information and any allegations are substantially true, and the report is not made for personal gain. Malicious and false allegations will be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal or termination of contract, legal suit.

4.2 Action

4.2.1 All reports will be investigated promptly. Support from other resources e.g. Human Resource, Legal firms, Internal Audit may be required throughout the investigation process.

4.2.2 The findings of the investigation will be reported to Managing Director, Heritage Foods Group together with appropriate course of action for decision making.

4.2.3 The anonymity of the whistleblower will be maintained throughout the whistleblowing process to protect him/her from any retaliation for reporting violations or suspected violations.

4.2.4 Concerns will be treated seriously and investigated appropriately where possible you will be kept up to date with progress.

5.0 FREQUENTLY ASK QUESTION

5.1 What are the issues or concerns should I report?

- Theft, fraud, bribery, conspiracies, criminal acts, illegal or unethical activities, conflict of interest
- Inaccurate public disclosure, unauthorized transaction, falsification of accounting record, misappropriation of Company information or assets, management overriding of company internal control policy
- Violation of any law and regulations

5.2 How do I report it?

- Send your concern and provide all the relevant evidence to Managing Director, Heritage Foods Group via e-mail or post with Subject : Compliance- <State the Issue reported>

5.3 Can I choose not to disclose name?

- Yes, you can make the report anonymously.

5.4 Will I get harm from reporting the concern?

- The Company will not retaliate or take any adverse employment action against you as a result of your reporting any genuine concern or cooperating with an investigation under this guideline.