



## **CHINA OUHUA WINERY HOLDINGS LIMITED WHISTLE-BLOWING POLICY**

### **INTRODUCTION**

China Ouhua Winery Holdings Limited (“China Ouhua Group”) is committed to high standards of openness, honesty and accountability. In line with that commitment we encourage employees and others with serious concerns about any aspect of China Ouhua Group’s operations to come forward and voice those concerns without fear of victimisation, subsequent discrimination or disadvantage.

This Whistle-blowing Policy is intended to encourage and enable staff and others to raise serious concerns within China Ouhua Group rather than overlooking a problem or blowing the whistle outside.

The policy applies to all employees, agents, contractors, suppliers and customers of China Ouhua Winery Holdings Limited and its subsidiary.

### **SCOPE**

There are existing procedures in place to enable you to lodge a grievance relating to your own employment. This Whistle-blowing Policy is intended to cover concerns that fall outside the scope of other procedures. Your concerns may be about something that:

- is unlawful; or
- is against China Ouhua Group; or
- falls below established standards or practice; or
- amounts to bribery, corruption or improper conduct.

### **SAFEGUARDS**

Harassment or Victimisation	China Ouhua Group recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. China Ouhua Group will not tolerate harassment or victimisation and will do what it lawfully can to protect you when you raise a concern in good faith.
Confidentiality	China Ouhua Group will do its best to protect your identity when you raise a concern and do not want your name to be disclosed. It must be appreciated that the investigation process may reveal the source of the information and a statement by you may be required as part of the evidence.



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**Anonymous Allegations** China Ouhua Group cannot act on anonymous allegations as by their nature they cannot be investigated fairly or credibly. The law gives protection to whistle-blowers acting in good faith, removing the need for anonymity.

**Untrue Allegations** If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make malicious or vexatious allegations, an investigation will take place to determine whether disciplinary or other action is taken against you.

### **HOW TO RAISE A CONCERN**

**Employees:**

You should normally raise concerns with your immediate manager or their superior. However, if you believe that this is inappropriate as a result of the seriousness and sensitivity of the issues involved, you should raise your concern with the Chairman's Secretary, Wang Yang.

**Others:**

You should raise concerns with the Chairman's Secretary, Wang Yang. (tel: 86 0535 6020999 or e-mail: [237815790@qq.com](mailto:237815790@qq.com) address: No. 3 North Wolong Road Yan Tai City Shan Dong Province The PRC)

The concern should be raised in writing, setting out the background and history of the concern, giving names, dates and places where possible, and the reasons why you are particularly concerned about the situation. If you are unable to put your concern in writing, you can telephone or meet the appropriate person as mentioned above.

### **HOW THE GROUP WILL RESPOND**

If you raise a concern with the Chairman's Secretary, the action taken by China Ouhua Group will depend on the nature of the concern and initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

Within ten working days of a concern being received by the Chairman's Secretary, he will write to you acknowledging that the concern has been received and setting out the proposed course of action to be taken.



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**THE RESPONSIBLE OFFICER**

The Chairman's Secretary maintains a record of concerns raised with him and the outcomes and will report as necessary to China Ouhua Group. If you request it, the Chairman's Secretary will do what he lawfully can to protect your identity but you should realise that he may be obliged to disclose it internally to the Board of Directors or Audit Committee or externally to the Police, the External Auditor or the Courts.