

Whistleblowing Policy

Topcast is committed to achieving and maintaining the highest levels of professional behaviour, standards and conduct at work, as described in our Code of Conduct. We expect the same from our customers, clients, suppliers or vendors (together, our “Stakeholders”). Topcast encourages all our Stakeholders to report genuine concerns over malpractice, illegal acts, or failures to comply with recognised standards of ethical behaviour that they observe.

Purpose

The Company operates a confidential reporting process which allows whistleblowers to raise concerns to independent senior management.

Policy

A whistleblowing report can be made through the any of the following channels: via (1) via Email: whistleblowing@topcast.com or (2) Phone: +852 2305 4111. The Company will not tolerate any retaliation in any form against people who, in good faith, report suspected ethical or legal misconduct or policy violations.

Procedure

1.1.1. Escalation to Whistleblowing Email

If you feel that the concerns have not been adequately addressed through the aforementioned channels or believe that the guidance provided is not appropriate, you are encouraged to submit the concerns directly to the whistleblowing email at whistleblowing@topcast.com. This ensures that all concerns are taken seriously and handled appropriately by a team of senior management.

1.1.2. An investigation or interview will be conducted and recorded for every whistleblowing case. Topcast will facilitate the process.

1.1.3. The following procedures are followed for each reported incident:

- All incidents are reviewed. In some cases, further follow-up is made with the reporter of the incident (if not anonymous) to ensure that full information is obtained on the reported incident.
- A summary of the reported incident is forwarded to the senior management team responsible for further investigation.
- Regular updates are obtained on the actions that are being taken to investigate the incident, the findings of the investigation and the actions being taken, if any.
- Regular reports are made to the Chief Executive and the Group Compliance Committee.