



KLN LOGISTICS GROUP LIMITED

(Incorporated in the British Virgin Islands and continued into
Bermuda as an exempted company with limited liability)

Stock Code 636

Whistleblowing Policy

(Revised on 28 March 2025)

1. KLN Logistics Group Limited (the “Company”) and its subsidiaries (collectively, the “Group”) are committed to achieving and maintaining the highest standards of openness, probity and accountability. The Group has zero tolerance for unethical business practices or conduct. To achieve this, the board of directors of the Company (the “Board”) has approved a Whistleblowing Policy (the “Policy”) for employees and those (including business counterparts such as customers and suppliers) who deal with the Group (the “Whistleblower(s)”) to report any whistleblowing matters which they have become aware of or genuinely suspect that such matters have occurred or may occur. The Policy is subject to review by the Board or its committee(s) from time to time. Audit and Compliance Committee of the Company (“ACC”) and the Chief Executive Officer is responsible for the day-to-day implementation of this Policy.
2. Whistleblowing matters include the following matters in relation to the Group:-
 - (a) breach of legal or regulatory requirements;
 - (b) criminal offences, breach of civil law and miscarriage of justice;
 - (c) malpractice, impropriety or fraud in financial reporting, internal control or other financial matters of the Group;
 - (d) danger to the health and safety of any individual;
 - (e) damage to the environment;
 - (f) violation of rules of conduct applicable within the Group;
 - (g) improper conduct or unethical behavior likely to prejudice the reputation or standing of the Group;
 - (h) bribery or corruption; and/or
 - (i) deliberate concealment of any of the above.
3. The Company will treat all whistleblowing reports (“Report(s)”) in a confidential manner. The identity of the Whistleblower making the Report will not be divulged without the Whistleblower’s consent. However, there may be circumstances in which the Company may be legally obliged to reveal the Whistleblower’s identity. If a Report leads to an investigation by regulators or authorities, it may become necessary for the Whistleblower to provide evidence or be interviewed by the relevant regulators or authorities. In order not to jeopardise any investigation, the Whistleblower is also required to keep confidential the fact that he/she has filed a Report as well as the nature of concerns and the identity(ies) of those involved.
4. Any Whistleblower raising genuine and appropriate concerns under this Policy is assured of fair treatment including, where applicable, protection against unfair dismissal, victimisation or unwarranted disciplinary action. The Company reserves the right to take disciplinary or other action against anyone who victimises or retaliates (or threatens to do so) against a Whistleblower.
5. Genuine whistleblowing disclosures about relevant matters will be investigated promptly. If a Whistleblower makes a false Report maliciously, with an ulterior motive, without reasonable grounds that the information in the Report is accurate or reliable, or for personal gain, the Group reserves the right to take disciplinary action, including the possibility of dismissal, and other action to recover any cost, loss or damage resulting from a false Report.

6. Reports must be submitted in writing to the Chief Executive Officer of the Company at 16/F., Kerry Cargo Centre, 55 Wing Kei Road, Kwai Chung, New Territories, Hong Kong or by email to whistleblow-01@kln.com Chief Executive Officer shall copy to ACC upon receipt of the Reports. For any Report concerning the Chairman and/or the Chief Executive Officer, it must be submitted to the Chairman of ACC at the same address or email to whistleblow-02@kln.com. Records of all Reports and the corresponding follow up actions shall be centrally kept by the Director of Group Internal Audit.
7. When submitting a Report, Whistleblowers should provide sufficient case specific information including reason(s) for concern with full disclosure of relevant details and supporting documentation, so that investigations can be conducted effectively. While anonymous complaints are permitted, Whistleblowers are encouraged to disclose their identity and contact details so that they can be contacted for further information, if necessary, and feedback on the complaints can be provided. An anonymous Report which fails to provide clear and adequate information regarding a disclosure will not be processed.
8. The Chief Executive Officer and the Chairman of ACC shall have the power to decide whether or not a case will proceed to investigation. The format of an investigation will depend upon the nature of each case and the Reports may be:
 - (a) investigated internally;
 - (b) referred to the ACC; and/or
 - (c) referred to the external auditor of the Company and/or external regulators.

If there is sufficient evidence to suggest that a possible case of criminal offence or corruption exists, the matter will be reported to relevant regulators or authorities.
9. The Chief Executive Officer and the Chairman of ACC will authorise an officer to write to the Whistleblower:
 - (a) acknowledging that the Report has been received;
 - (b) advising whether or not the matter will be investigated, and if not, the reason(s) thereof; and
 - (c) if the matter is investigated, advising the results of the investigation wherever reasonably practicable.
10. This Policy will be published on the Company's website for public information.