



国际精密集团

标题： 举报制度 WHISTLEBLOWING POLICY	文件编号：	IPE-008
	版本：	1.0 版

第一章 总 则

Chapter I General rules

1.0 背景 [BACKGROUND]

1.1 国际精密集团（“本集团”）致力秉持公开、正直及问责的最高标准。举报制度（“本制度”）构成有效风险管理及内部监控的重要部分。

[1.1 IPE GROUP (the “Group”) is committed to high standard of openness, probity and accountability. This Whistleblowing Policy (the “Policy”) forms an important part of effective risk management and internal control policy.]

1.2 “举报”是指员工或第三方（“举报者”）因怀疑有严重诈骗、舞弊、违规或不当行为（“举报事项”）而作出汇报。

[1.2 Whistleblowing refers to a situation where an employee or a third party (a “Whistleblower”) decides to report a serious concern about any suspected fraud, malpractice, misconduct or irregularity (the “Concern”).]

1.3 举报行为有效于机构内揭发诈骗、舞弊、违规或重大风险。

[1.3 Whistleblowing serves as a useful way to uncover fraud, malpractice, misconduct, or significant risk within an organization.]

2.0 适用范围 [SCOPE OF APPLICATION]

本制度适用于国际精密集团所属各分公司及各部门。

[This Policy applies to the subsidiaries and departments of the IPE GROUP.]



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3.0 目的 [PURPOSE]

3.1 鼓励并协助本集团的员工或第三方（“如客户及供应商等”）提出举报事项并保密地透露其相关资料。

[3.1 To encourage and assist any employee(s) of the Group(the “Employee(s)”)or third parties(e. g. customers, suppliers etc.)to raise the Concern and disclose related information confidentially]

3.2 为员工或第三方举报的汇报渠道及指引，以便提出关注，而非忽视问题。

[3.2 To provide reporting channels and guidance on whistleblowing to Employees or third parties to raise the Concern rather than neglecting it.]

3.3 在集团受到影响或蒙受损失前，揭露怀疑诈骗、违规或不当行为。

[3.3 To reveal suspected fraud, malpractice or misconduct before these activities cause disruption or loss to the Group.

4.0 职责和权限 [RESPONSIBILITY AND AUTHORITY]

4.1 本集团的审核委员会是为本制度的最终负责人，至于监督和执行本制度的日常运作则委派集团内审部门负责。审核委员会会肩负监察和讨论本制度的有效性和举报调查后的行动。

[4.1 The Audit Committee of the Group (the “Audit Committee”)has the overall responsibility for the Policy, but has delegated the day-to-day responsibility for overseeing and implementing this Policy to the Group Internal Audit Department (“GIAD”). The Audit Committee is responsible for monitoring and reviewing the effectiveness of this Policy and the actions resulting from the investigation.]



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4.2 本制度已获审核委员会审批。如有任何修改或更新，必须由审核委员会审批方可实行。

[4.2 This Policy has been approved by the Audit Committee. Any amendments or updates to this Policy will be subject to the Audit Committee' s approval.]

第二章 细则

Chapter II Detailed rules

5.0 举报事项 [REPORTABLE CONCERN]

5.1 举报事项包括但不限于以下舞弊或违规事：

[5.1 Activities that constitute malpractice or misconduct may include, but not limited to the following:]

(1) 刑事罪行或审判不公；

[(1) Criminal offense or miscarriage of justice;]

(2) 违反法例及法规；

[(2) Non-compliance with laws and regulations;]

(3) 涉及会计、财务报告、内部监控及审核事宜的不当行为或欺诈；

[(3) Impropriety or fraud relating to accounting, financial reporting, internal controls and auditing matters;]

(4) 滥用或挪用公司资产或资源；

[(4) Misuse or misappropriation of the Group' s assets or resources;]

(5) 危害员工或其他持份者的健康及安全；

[(5) Any action which endangers the health and safety of Employees or other stakeholders;]



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(6) 违法本集团的制度或指引；

[(6) Violation of the policies or guidelines of the Group;]

(7) 不当使用或泄露机密或商业敏感资料；

[(7) Improper use or leakage of confidential or commercially sensitive information;]

(8) 蓄意隐瞒上述事项。

[(8) Deliberate concealment of any of the above.]

5.2 举报者无需完全查证相关举报，即使最后未能证实举报事项，本集团一概感激所有善意的举报。

[5.2 Whistleblower is not required to make absolute proof the concern reported. The Concern would be appreciated if it is reported in good faith; even it is not confirmed by an investigation.]

6.0 对举报者的保护 [PROTECTION FOR WHISTLEBLOWER]

6.1 善意举报者应受到公平对待，即使指控未能成立，本集团致力保护举报者，以免其受到不公平解雇、伤害或不合理处分。“善意”是指举报者有合理依据相信举报事项乃真实并基于诚实而作出举报，而非为了个人利益或其他有恶意的动机。

[6.1 Persons reporting the Concern in good faith are assured of fair treatment. The Group will make every effort to protect the Employee against unfair dismissal, victimization or unwarranted disciplinary action, even if the Concern turn out to be unsubstantiated. Good faith means that the reporting person has held a reasonable belief that the Concern made is true and honest but not made for personal interest or any



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ulterior motive.]

6.2 管理层需确保举报者感到安心，不会受报复之忧虑所困惑。任何类型的报复行为均会被视为不当。

[6.2 Management must ensure that Whistleblowers feel easeful to raise Concern without fear of reprisals. Any kinds of retaliation against a Whistleblower will be considered as misdemeanors.]

6.3 相反，若举报者恶意提供错误报告，或涉及不可告人之动机或个人利益，本集团将保留对任何人（员工或第三方）的追索权，以弥补损失。

[6.3 However, if a Whistleblower makes false report maliciously ,with an ulterior motive ,or for personal advantage ,the Group reserves the right to take appropriate actions against anyone(Employees or third parties)to recover any loss or damage as a result of the false report.]

7.0 保密 [CONFIDENTIALITY]

7.1 本集团将竭力保密举报者的身份及其举报事项。

[7.1 The Group will make every effort to keep Whistleblower' s identity and the reported Concern strictly confidential.]

7.2 同样地，举报者亦应对举报事项的详情，如性质、相关人物等资料严格保密。

[7.2 Likewise, the Whistleblower should keep strictly confidential about the details of a reported Concern, such as its nature, related persons, etc.]



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7.3 在若干情况下，如需根据法律及法规来披露举报者的身份，本集团将采取所有合理的步骤确保举报者不会遭受伤害。

[7.3 Under certain circumstances where the Whistleblower's identity has to be revealed according to laws and regulations, the Group will endeavour to take reasonable steps to protect the Whistleblower from detriment.]

7.4 本集团体谅但不鼓励匿名举报，因为匿名举报只提供有限资料，妨碍调查及跟进工作。

[7.4 It is understood that a Whistleblower may wish to report anonymously. However, it is not encouraged as an anonymous allegation will hinder investigation and follow-up actions due to limited information.]

7.5 本集团鼓励举报者挺身而出，尽量提供详细资料协助评估及调查。

[7.5 Whistleblowers are encouraged to come forward and report as much specific information as possible for assessment and investigation.]

8.0 举报渠道及表格 [REPORTING CHANNELS AND FORM]

8.1 如任何员工或第三方欲提出举报，可用以下方法向集团内审部门提交举报表格（附件一）及补充资料（如有）：

[8.1 Any Employee or third party who wish to report a Concern should inform GIAD by sending the Whistleblowing Report Form(the "Form") as attached in Appendix 1, with supplementary information, if any, by the following ways:]

- (1) 电邮: whistle@ipehk.com.hk



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(集团举报专用)

[(1) Email: whistle@ipehk.com.hk]

(This email can only be reported by GIAD)

(2) 信函：

广州市增城区仙村镇岳湖村朱仙路 8 号

广州市新豪精密科技有限公司

内审部门 收

[(2) Mail:

Internal Audit Department

Guang Zhou Xinhao Precision Metal Products Co., Ltd.

No. 8, Zhuxian Road, Yuehu village, Xiancun Town

Zengcheng District, Guangzhou]

8.2 为确保邮递过程中保密，请使用密封信封邮递表格，并注明“私人及密件-只供收件人拆阅”。

[8.2 To ensure confidentiality in the mailing process, the Form should be sent in a sealed envelope marked “Strictly Private and Confidential-To be Opened by Addressee Only” .]

9.0 调查程序 [INVESTIGATION PROCESS]

9.1 集团内审部门将收到的举报个案记录于举报登记表，并跟进所有有正确联络方法的个案。内审部门将评估所收到个案的真实和相关性，并决定个案的类别，以向下列的相关方汇报：



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[9.1 GIAD will record all whistleblowing cases raised in the Whistleblowing Register. All reported cases with valid contacts will be followed up. GIAD will evaluate the validity and relevance of the cases received, and to decide the categorization of whistleblowing cases for reporting to appropriate parties. The whistleblowing matters raised should be:]

(1) 如举报人物或个案不涉及任何集团执行董事，向集团执行董事汇报；

[(1) referred to the Executive Directors if the person or matter concerned does not relate to any members of the executive directors;]

(2) 如举报人物涉及集团个别执行董事，直接向集团审核委员会汇报。

[(2) referred to the Audit Committee if the person or matter concerned relates to any members of the Executive Directors;]

9.2 集团内审部门将评估每一个案及将调查结果向集团执行董事汇报，集团执行董事会检核调查结果，以决定适当行动。

[9.2 GIAD will evaluate each reported case and report the findings to the Executive Directors, then the Executive Directors will respectively review each investigation to determine the courses of actions.]

9.3 如集团执行董事或审核委员会认为其个案情节严重，举报个案或会送交相关政府监管机构。

[9.3 Should the Executive Directors or the Audit Committee considers that the circumstances of the case are serious, the case may be referred to relevant government regulators.]

IPE GROUP LIMITED
(国际精密集团有限公司)

举报表格
[WHISTLEBLOWING REPORT FORM]
(严格保密)
[STRICTLY CONFIDENTIAL]

如欲报告举报事项, 请填写下列表格, 所有资料均受到严格保密。

[If you wish to report a whistleblowing concern, please fill in this form. All information will be kept in a strictly confidential manner.]

举报者资料
[Reporter's Information]

姓名及职位:
[Name and Title]

公司及部门:
[Department and Company Name]

联络电话:
[Tel No.]

电邮:
[Email]

举报详情
[Details of Concern]

请提供所有举报事项的详细资料, 例如相关人士的姓名、日期、地点、原因, 以及其他证据等。(可于新一页续写)

[Please provide full details of your concern: names of the persons involved, dates, places, reasons, etc. and any other supporting evidence. (Continue on separate sheet if necessary)]

签署:
[Signature]

日期:
[Date]

*注： 请依据举报制度的第8条提交举报表格：

[Note: Please deliver your form by the following ways according to the section 8 of the Whistleblowing Policy:]

(1) **电邮：** whistle@ipehk.com.hk
(集团举报专用)

[(1)**Email:** whistle@ipehk.com.hk]
(This email can only be reported by GIAD)

(2) **信函：**
广州市增城区仙村镇岳湖村朱仙路8号
广州市新豪精密科技有限公司
内审部门 收

[(2)**Mail:**
Internal Audit Department
Guang Zhou Xinhao Precision Metal Products Co., Ltd.
No. 8, Zhuxian Road, Yuehu village, Xiancun Town
Zengcheng District, Guangzhou]