



ANTA Sports Products Limited

安踏體育用品有限公司

Whistleblowing Policy

Effective date of this Policy:

Revised by the Board on 30 December 2022 and effective on 30 December 2022.

1 Introduction

1.1 The Group is committed to achieving and maintaining the high probity standards and ethical business practices and encouraging reporting of concerns of actual or suspected misconduct or malpractice by any employees and/or external parties in any matters related to the Group. To this end, the Company has adopted this Policy to create a system for its employees and other persons or entities who deal with the Group (e.g. customers and suppliers) to raise concerns, in confidence and anonymity, with the Risk Management Committee (designated by the Board with relevant authorities) about possible improprieties relating to the Group.

2 Purposes

2.1 The whistleblowing system established under this Policy is intended to:

- (1) cultivate a culture of openness and transparency across the Group;
- (2) maintain internal corporate justice;
- (3) encourage employees and other persons or entities dealing with the Group to raise concerns about possible improprieties relating to the Group and to provide them with reporting channels for such purposes; and
- (4) enable the Company to detect and deter or remedy a misconduct or malpractice in the Group before serious damage is caused.

3 Personnel to whom this Policy applies

- 3.1 This Policy is applicable to all employees of the Group at all levels and to other persons or entities who deal with the Group (e.g. customers and suppliers).
- 3.2 The system created hereunder is intended to provide reporting channels for the Group's employees and other persons or entities dealing with the Group to raise, in confidence, genuine concerns of any malpractice or improprieties relating to the Group. It should not be used to further any personal disputes, personal gains, grievances, malicious allegations or allegations without reasonable grounds.

4 Matters to be reported

- 4.1 Matters to be reported under this Policy include (but are not limited to):
- (1) failure to comply with any legal or regulatory requirements, including criminal offences, civil liabilities, negligence, breaches of contract, breaches of the Listing Rules and breaches of laws and regulations;
 - (2) malpractice, impropriety or fraud relating to internal controls, accounting, auditing and financial matters;
 - (3) action which endangers individual's health and safety;
 - (4) bribery, corruption and asset misappropriation;
 - (5) transaction and act involving conflict of interest not declared and approved in accordance with the internal procedures;
 - (6) sale, leakage and disclosure of important corporate decisions and commercial secrets;
 - (7) action which causes damage to the environment;
 - (8) action which appears likely to prejudice the interest or reputation of the Group;
 - (9) any other improprieties relating to the Group; and
 - (10) the deliberate concealment of information concerning any of the matters listed above.
- (each a "**Misconduct**" and collectively "**Misconducts**")

5 Reporting channels

5.1 The Group has set up a number of 24/7 independent reporting channels including email, WeChat, telephone hotline and mailbox. Whistleblowers may choose one of the following methods to report the Misconduct to the Ethics Officers or the Internal Audit Department:

(1) For reports to the Internal Audit Department, the contact information is as follows:

Email: jc@anta.com
WeChat: +86 180-3031-1272
Tel: +86 180-3031-1272
Mail address: Internal Audit Department, ANTA Sports Products Limited,
ANTA Operations Center, No. 99, Jiayi Road, Guanyinshan,
Xiamen, Fujian Province, China

(2) For reports to the chairman of the Board, the contact information is as follows:

Email: dingzhizhong@anta.com
Mail address: Mr. Ding Shizhong, ANTA Sports Products Limited, ANTA
Operations Center, No. 99, Jiayi Road, Guanyinshan, Xiamen,
Fujian Province, China

(3) For reports to the chairman of the Risk Management Committee, the contact information is as follows:

Email: stephen.yiu@anta.com
Mail address: Mr. Yiu Kin Wah Stephen, ANTA Sports Products Limited, 16/
F, Manhattan Place, 23 Wang Tai Road, Kowloon Bay, Kowloon,
Hong Kong

5.2 In general, the whistleblower should make their reports to the Internal Audit Department. If the report concerns any member of the Risk Management Committee or the Internal Audit Department, the whistleblower should raise his concerns to the chairman of the Board. If the report concerns the chairman of the Board, the whistleblower should raise his concerns to the chairman of the Risk Management Committee.

5.3 Any reporting by mail should be placed in a sealed envelope marked “Strictly Private and Confidential – to be opened by the addressee only”.

5.4 The Company takes reports of Misconducts seriously, and may conduct investigations if necessary. Although the whistleblower may be unable to provide conclusive proof or evidence, the reports of Misconduct made under this Policy shall include full disclosure of any relevant or material information to the extent possible, including the whistleblower's name, his relationship with the Group (e.g. employee, customer or supplier), contact address, telephone number, email address, date of report and details of Misconduct (such as names, event dates, places and reasons of concerns), together with any supporting evidence. Such information is important for facilitating an effective investigation and will be kept in confidence in accordance with this Policy. At the same time, the person providing the information should also keep the relevant information confidential.

6 Anonymous reports

6.1 The Group encourages whistleblowers to report with their real names and inform the Group of whistleblowers real names, contact information and address, so as to investigate and deal with the reported cases in a timely manner. If the whistleblower is unwilling to provide the above information, the Group respects the whistleblower's preferences, and the whistleblower may report anonymously or under a pseudonym. However, the whistleblower should provide case-specific information so that investigations can be conducted effectively. Failure to provide the above information may increase the difficulty of investigation.

6.2 Generally, the following factors will be considered when deciding whether or not practical actions could be carried out for an anonymous report:

- (1) sufficiency and validity of the information provided;
- (2) credibility of the report by the whistleblower; and
- (3) possibility of the Misconduct being supported by other identifiable sources.

7 Handling of reports

7.1 Upon receiving a report, the Ethics Officers, the Internal Audit Department or such other person as designated by the Ethics Officers shall gather information and conduct preliminary verification of the report, and then discuss the report with the chairman of the Risk Management Committee (unless the report concerns any member of the Risk management Committee or the Internal Audit Department) to evaluate if an investigation shall be warranted. If an investigation is considered necessary, the Internal Audit Department or such other person as designated by the chairman of the Risk Management Committee shall conduct an investigation to establish whether any Misconduct has occurred. Investigation findings shall be reported to the Risk Management Committee by the designated person. On the basis of the findings, the Risk Management Committee shall make recommendations to the Board on actions to be taken.

- 7.2 If the report concerns any member of the Risk Management Committee or the Internal Audit Department, the chairman of the Board shall designate other person to gather information and conduct preliminary verification of the report, and then evaluate if an investigation shall be warranted. If an investigation is considered necessary, such other person as designated by the chairman of the Board shall conduct an investigation to establish whether any Misconduct has occurred. Investigation findings shall be reported to the Board directly by the designated person and the Board shall consider the actions to be taken.
- 7.3 A report should be made by the Company to the appropriate law enforcement agency once there is reasonable suspicion of a criminal offence. Internal inquiry should not jeopardise any future investigation by a law enforcement agency. Appropriate steps should be taken in handling any suspected criminal offences reported or revealed during the internal inquiry.
- 7.4 The outcome of the investigation will, to the extent permitted by law, be relayed to the person making a report under this Policy.
- 7.5 Documents related to the reporting, investigation and enforcement of this Policy will be kept in accordance with the Group's relevant internal policies and applicable laws and regulations. Internal Audit Department shall centrally record all reports made under this Policy and the corresponding follow-up actions to ensure accountability.

8 Confidentiality and protection against retaliation

- 8.1 The Company is committed to exerting its best effort to keep all reports by whistleblower confidential and privileged to the fullest extent permitted by law, and handle the reports in a timely manner. Any person making a genuine and appropriate report in good faith under this Policy will be assured of fair treatment, and should not be subject to any unwarranted disciplinary action or unfair dismissal as a result of making such report. The Company strictly prohibits any retaliation and will make the best effort to take reasonable measures in order to protect whistleblowers from retaliation. Persons who victimise or retaliate against those who have genuinely raised concerns in good faith under this Policy will be subject to disciplinary actions, and the identity of such person may be disclosed to internal or external investigators, or relevant law enforcement agencies or governmental, judicial or regulatory bodies for appropriate action without notifying such person to the extent permitted by law.
- 8.2 Should circumstances arise in which the Company is required to disclose the whistleblower's identity, the Company will, to the extent permitted by law, endeavour to inform the whistleblower that his identity is likely to be disclosed, and the Company will endeavour to protect the reasonable interest of the whistleblower.

9 False reports

- 9.1 All reports must be made in good faith. Persons making a report on any Misconduct under this Policy should exercise due care in ensuring accuracy of the information they report to the Ethics Officers or the Internal Audit Department.
- 9.2 The Group reserves the right to take appropriate actions against any person who knowingly or irresponsibly makes false allegations or malicious allegations, including but not limited to disclosing the identity of such person to internal or external investigators, or relevant law enforcement agencies or governmental, judicial or regulatory bodies for appropriate action without notifying such person to the extent permissible by law. The Group also reserves its right to take any actions against such person to recover any loss or damages resulted from the false report. Employees who make a false report may be subject to disciplinary actions, including dismissal, where appropriate.

10 Responsibility for this Policy

- 10.1 The Risk Management Committee assumes the overall responsibility for the implementation and oversight of this Policy, review and investigation of reports, and consideration and approval of changes to this Policy. The Risk Management Committee has delegated the day-to-day responsibility of administering this Policy to the Internal Audit Department and, where appropriate, the Ethics Officers.

11 Review of this Policy

- 11.1 The Risk Management Committee shall regularly review the implementation and effectiveness of this Policy to ensure that this Policy remains relevant to the Company's needs and reflects both current regulatory requirements and good corporate governance practice, and shall also discuss and consider any revisions that may be required.

12 Disclosure of this Policy

- 12.1 Full text of this Policy will be published on the Company's website. A summary of this Policy together with the Risk Management Committee's review of the implementation and effectiveness of this Policy will be disclosed in the corporate governance report as a part of the Company's annual report.

13 Definitions

13.1 In this Policy, the following expressions shall have the meanings set out below unless the context requires otherwise:

“ Board ”	means the board of directors of the Company
“ Company ”	means ANTA Sports Products Limited
“ Ethics Officers ”	means the chairman of the Risk Management Committee and the chairman of the Board collectively
“ Group ”	means the Company and its subsidiaries
“ Internal Audit Department ”	means the internal audit department of the Group, which reports directly to the Risk Management Committee
“ Listing Rules ”	means the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (as amended from time to time)
“ Misconduct ”	has the meaning ascribed to it in section 4.1 of this Policy
“ Policy ”	means this whistleblowing policy
“ Risk Management Committee ”	means the risk management committee of the Company

14 Language

14.1 If there is any inconsistency between the English and Chinese versions of this Policy, the English version shall prevail.