

Whistleblower Rules of Procedure – China

Whistleblower channels

When there are reasonable grounds to suspect misconduct, you can make relevant report to us by sending email to wirelesscarchinareporting@fangdalaw.com.

当您有合理理由怀疑存在不当行为时，您可以通过发送电子邮件至 wirelesscarchinareporting@fangdalaw.com 向我们进行相关举报。

Scope of application

适用范围

The Policy applies to all the Company's employees, officers, directors, interns and temporary staff members who are working for the Company (“You”).

本政策适用于所有为公司工作的员工、管理人员、董事、实习生以及临时人员（“您”）。

You can report relevant misconduct of any of the Employees and/or relevant third parties that have dealing with the Company, including but not limited to any clients, consultants, agents, suppliers.

您可以举报任何员工或与公司有往来的相关第三方（包括但不限于任何客户、顾问、代理、供应商）的任何违规行为。

How will your report be processed?

我们将如何处理您的举报？

Please be aware that all the reports will be sent to VP, or Director Business & Operation APAC if the report does not concern them, otherwise VP HR or Compliance Manager in Sweden will be contact.

请悉知：所有举报内容都将发送至VP, Director Business & Operation APAC（如果举报内容与他们无关），否则举报内容将转送至瑞典总部的HR VP或Compliance Manager。

We have designed the following options of mechanism to handle each type of your report:

我们设计了以下选项机制来处理您的各类举报：

Type 类型	Description 描述	Action to be taken 应采取的行动
Type A 类型 A	Your report is specific, reliable and/or has corresponding supporting materials. 您的举报具体、可靠且/或有相应支持材料。	We will conduct internal investigation to obtain sufficient findings. 公司将开展内部调查以获得充分的发现。
Type B 类型 B	We are aware of the misconduct involved in your report and are ready to initiate or have initiated and completed an internal investigation, and your report does not provide additional useful information. 我们已意识到您的举报所涉及的不当行为并准备开展、已经开展或已经完成了内部调查，且您的举报并未提供额外的有用信息。	We will notify you of the information on our processing of the reported misconduct. 公司将通知您的举报所涉及的不当行为的处理情况。
Type C 类型 C	Your report is vague and there are no further supporting materials. 您的举报信息模糊且无进一步的支持材料。	We will invite you to provide further details and then decide the specific type of the report. 公司将请您提供进一步细节，进而决定您的举报具体属于哪种类型。
Type D 类型 D	Your report is completely fabricated or unsubstantiated. 您的举报完全是捏造的或者完全没有证据支持。	We will close the report and we may not provide a response to you. 公司将关闭该举报事项，且我们可能不会向您提供答复。

Confidentiality and anti-retaliation

保密及反报复

- Identity protection

- **身份保护**

We will adopt necessary measures to protect you as a whistleblower. We will keep your information (such as your identity and the contents of your report) confidential and process your information on a need-to-know basis. We will not share your information with the person(s) concerned in your report unless you provide consent, or we are permitted or otherwise required by law.

我们将采取必要措施保护您作为举报人的权益。我们将对您的信息（比如您的身份和举报内容）进行保密，并在需要知道的基础上处理您的信息。除非经您同意或根据法律的允许或要求，否则我们不会将您的信息与您举报的相关人员分享。

- **Zero tolerance to retaliation**

- **对报复行为零容忍**

We prohibit discrimination, retaliation or harassment of any kind against you as whistleblower who submits a complaint or report in good faith. If you believe that you are being subjected to discrimination, retaliation or harassment for having made a report under the Policy, please report those facts to us. Reporting should be done promptly to facilitate investigation and the steps to address the retaliation.

我们禁止对善意举报的举报人进行任何形式的歧视、报复或骚扰。如果您认为您因根据本政策进行举报而受到歧视、报复或骚扰，请向我们报告。请您及时报告，以便于我们开展调查和采取解决报复行为的步骤。

- **Report in good faith**

- **善意举报**

If you make a report in good faith, in particular when you have reasonable grounds to suspect the information you are reporting is true, you will not be subject to any penalty even though the information turns out to be incorrect.

如果您是善意举报，特别是当您有合理理由怀疑您举报的信息是真实的，即使信息被证实是错误的，您也不会受到任何处罚。

However, abusive use (such as malice, defamation, intent to harm, repeated clearly incorrect declarations) may be considered a serious matter that may result in the Company's disciplinary action to you, as well as relevant legal consequences according to the applicable Chinese laws and regulations.



但是，滥用（例如恶意、诽谤、意图伤害、多次明显错误的声明）的行为可能会被认为是严重问题。您可能会因为这些严重问题而受到公司纪律处分，甚至承担适用中国法律法规下的相关法律后果。