

Hikvision Whistleblowing Policy

1. Foreword

Hikvision adheres to the business philosophy of honesty and trustworthiness and is committed to creating an enterprise culture and working environment of honesty, respect, justice and kindness. We require all employees to abide by the “Hikvision Code of Ethics and Business Conduct” and applicable laws, regulations and ethics when conducting business transactions, and does not tolerate any illegal or unethical conduct.

The company encourages and supports all employees, customers, suppliers, users and other stakeholders to report any potential legal, regulatory or ethical risks, including any potential misconduct. The purpose of this Policy is to ensure that the above-mentioned reports can be handled properly, objectively, efficiently, openly and transparently, and at the same time, protect a whistle blower’s personal information and other legitimate rights and interests.

2. Scope

This Policy applies to Hangzhou Hikvision Digital Technology Co., Ltd, and its subsidiaries and branches (hereinafter referred to as “we” or “Company”).

Whistle blowers referred to in this Policy include employees, former employees, employment candidates, and parties with whom Hikvision has a business relationship (such as contractors, subcontractors and suppliers). Meanwhile, we welcome input from people from all walks of life.

3. Protection and Support for Whistle-blowers

We will act in good faith to protect any whistle blower and take all necessary information security measures to ensure that the whistle blower’s personal information and his/her report are not leaked, accessed by unauthorized individuals, changed or destroyed.

The company has zero tolerance for any form of retaliation. No one may retaliate against any good faith whistle blower or against anyone who investigates the matter. Any retaliation is considered a serious violation of the company’s compliance policy and may result in disciplinary action, including termination of employment, and may be subject to civil or even criminal prosecution.

4. Content of the Report

We encourage whistle blowers to provide reasonable and objective input on matters of concern. When submitting a complaint, the whistle blower should leave detailed information about suspected unethical or illegal or suspicious behavior. We will carefully and fairly analyse the information and take appropriate action, as appropriate. Whistle blowers do not need to provide or confirm all information before submitting a complaint.

We will not accept unsubstantiated allegations which are purposely designed to maliciously disseminate untrue statements, intentional fabrication of facts, mass release of offensive statements or violations of the principle of equality and non-discrimination. If necessary, the company reserves the right to resort to the law.

Reportable concerns include but are not limited to the following topics:

- Internal corrupt practices, such as bribery, insider trading, embezzlement;
- Anti-competitive practices, such as behaviours likely to damage the reputation of the company or its partners, competitors, or its employees;
- Intellectual property disputes, such as leakage of personal data or infringement of trade secrets;

- Breaches relating to the protection of privacy and personal data, or security of network and information security, such as lack of technical security measures;
- Information disclosure irregularities, such as non-compliance with accounting standards, financial misrepresentation;
- Human rights violations, such as the infringement of the individual rights of company employees or stakeholders, including discrimination, harassment, threats of violence, retaliation, unsafe working conditions, or infringement of individual rights of third parties due to abuse of company products;
- Violation of trade compliance requirements, such as violation of export control requirements of the United Nations, China, the United States, the European Union and other countries or regions;
- Breaches of product safety and compliance, such as when defective products could cause injury or illness;
- Breaches relating to the protection of the environment, such as improper waste disposal, improper handling of toxic chemicals, etc.;
- Other misconduct or compliance issues that might involve suspected violations of laws, regulations or ethics.

5. Reporting Approach

Whistle blowers may report any alleged violations of laws, regulations, ethical standards or potential compliance risks related to the company by any means, including telephone, e-mail, letter and face-to-face communication. Whistle blowers can leave their names and contact information so that we can contact them directly, when appropriate or necessary. However, whistle blowers can also choose to report anonymously.

For convenience and efficiency, the company has set up special reporting channels. In addition, whistle blowers can also report to their managers, Human Resources Department, Financial Department or other responsible departments at any time. If the whistle blower cannot determine the responsible department, he/she can also report to the Legal and Compliance Department. After receiving the report, the Legal and Compliance Department will identify the responsible department on the basis of the content of the report and hand over the report materials. The responsible department will set up an investigation team to investigate and verify the report.

For internal corrupt practices (such as bribery, insider trading, embezzlement, etc.), please use the following contact information:

- Email: jubao@hikvision.com
- Tel: 86-571-86611816

For intellectual property disputes, please use the following contact information:

- Email: weiquan315@hikvision.com
- Tel: 86-571-86474468
- Website: www.hikvision.com/weiquan315
- Address: No. 518, Internet of Things Street, Binjiang District, Hangzhou

For all other matters, please use the following contact information of the Legal and Compliance Department:

- Email: compliance@hikvision.com
- Tel: 86-571-86474468
- Address: Legal and Compliance Department, No. 518, Internet of Things Street, Binjiang District, Hangzhou

6. Operation Principles of the Report

After receiving the report, the company will confirm to the whistle blower and carry out an inquiry into the matter. The company will contact the whistle blower, as appropriate, to inform him/her of the conclusion of

the investigation. The company and all members of the investigation team will maintain strict confidentiality of all reports and follow-up investigation process and conclusions, respect the privacy of the whistle blower, and strictly limit the scope of access based on the principle of reasonable necessity.

7. Implementation guidelines

This Policy shall come into force as of the date of release. If there is any conflict between this Policy and other complaint reporting policies, the more stringent requirements shall apply in the basic spirit of “respecting the facts and protecting the whistle blowers”.

The company reserves the right to amend, modify and interpret this Policy. If you have any questions or need further explanation about the content of this Policy, please contact the Legal and Compliance Department (compliance@hikvision.com).