

GENVON GROUP LIMITED
(Incorporated in the Cayman Islands with limited liability)
(Stock Code: 2389)

**POLICY OF EMPLOYEES FOR
RAISING POSSIBLE IMPROPRIETIES**

1. Constitution

- 1.1 Genvon Group Limited (the “Company”) and its Audit Committee committed to ensure fair treatment of all employees when dealing with their concerns about possible improprieties with a view to addressing problems in the best possible manner.

2. Objective

- 2.1 To establish a proper channel for employees to voice out their concerns about possible improprieties in financial reporting, internal control or other matters and to settle these concerns.

3. Principle

- 3.1 All cases should be handled independently and treated in strictest confidentiality.
- 3.2 A fair treatment and the right to channel and appeal should be provided to the employees on their concerns by the management of the Company.
- 3.3 A fair hearing should be given to each of the reported concerns.
- 3.4 Concerns raised anonymously shall not be handled.
- 3.5 No one (the concerns informers, information providers or accused employees) shall suffer from any retaliation for involvement in the concerns about possible improprieties.

4. Procedure

- 4.1 An employee shall report any of his concerns about, include but not limited to, possible improprieties in financial reporting or internal control to his supervisor, the Head of Division / Department or the Human Resources Department.

- 4.2 If an employee considers that his concerns are unlikely to be resolved through discussions with his supervisor, the Head of Division / Department or the Human Resources Department or is of a very sensitive or serious nature which requires the attention of the management, he can raise his concerns direct with the chairman of the board of directors of the Company (the “Board”) (the “Chairman”) in the form of a signed letter.
- 4.3 The Chairman, shall acknowledge receipt of the concerns in the first instance.
- 4.4 The Chairman, or his designate shall review and examine the case and decide whether any meeting with the concerns informer and the accused employee and / or other relevant parties is required so as to obtain further information or better understanding of the case.
- 4.5 The Chairman shall come to a conclusion after reviewing and evaluating all the facts relating to the concerns.
- 4.6 The accused employee shall duly be advised of the views / decisions of the Chairman as well as any follow up actions, if warranted.
- 4.7 A written report of the conclusion shall be issued by the Chairman and forward to the concerns informer and the accused employee.
- 4.8 In the case of a concerns raised against the Chairman, the employee can lodge it to the independent non-executive directors of the Company (the “INEDs”).
- 4.9 If the accused employee is not satisfied with the decision made by the Chairman, he may appeal to the INEDs.
- 4.10 Regarding 4.8 and 4.9 above, the INEDs should repeat the handling procedure as stated in 4.3 to 4.7 being done by the Chairman.
- 4.11 The INEDs shall render the final resolution to the accused employee. This represents the final decision of the Company.

5. Reporting

- 5.1 The written report of the conclusion of all cases shall be filed as an official record by the company secretary of the Company.
- 5.2 The written report of the conclusion of all cases shall be made available upon request of the Board members only.

6. Review

- 6.1 The Audit Committee of the Company shall review and reassess this policy and its effectiveness on a regular basis or as required.

Adopted on: 27 March 2012