



Inside Information Disclosure Policy

1. APPLICABLE SCOPE

- 1.1 This inside information disclosure policy (the **"Policy"**) is applicable to Bosideng International Holdings Limited (the **"Company"**) and its subsidiaries (collectively the **"Group"**).

2. PURPOSE

- 2.1 The Policy aims to provide inside information disclosure guidelines to the Company's directors (the **"Directors"**), senior officers, and all relevant employees of the Group to ensure that inside information (as defined below) is disclosed to the public in a fair and timely manner in accordance with applicable laws and regulations. "Relevant employees" refers to employees of the Group who, due to their position or nature of work, may have access to non-public inside information of the Group.

3. DEFINITION OF INSIDE INFORMATION

- 3.1 According to Section 307A(1) of Part XIVA of the Securities and Futures Ordinance (Cap. 571) (the **"SFO"**), in relation to the Company, "inside information" refers to specific information regarding the Company, a shareholder or a senior officer of the Company, or the listed securities of the Company or their derivatives. Such information is not generally known to the persons who are accustomed or would be likely to deal in the listed securities of the Company but would if generally known to such persons be likely to materially affect the price of the listed securities.
- 3.2 Examples of inside information as outlined in the "Guidelines on Disclosure of Inside Information" issued by the Securities and Futures Commission (the **"SFC"**) are set out in the appendix of the Policy.

4. OBLIGATIONS OF DISCLOSING INSIDE INFORMATION

- 4.1 The Company shall, as soon as reasonably practicable upon becoming aware of any inside information, disclose such information to the public, unless the relevant information falls within any of the "Safe Harbor" provisions as provided in the SFO (see Section 7.1 below).
- 4.2 The means of disclosure must enable the public to access to the disclosed information equally, timely, and effectively, such as via the e-Submission System of The Stock Exchange of Hong Kong Limited (the **"Stock Exchange"**).

- 4.3 The Company's board (the "**Board**") of directors (the "**Directors**") office (the "**Board Office**") is responsible for managing the Company's inside information, in particular, identifying inside information, providing advice to the Board, and organizing and coordinating the Company's disclosure of inside information.

5. CONFIDENTIALITY OF UNDISCLOSED INSIDE INFORMATION

- 5.1 All Directors or relevant employees who are aware of the Company's inside information is responsible for keeping such undisclosed inside information strictly confidential prior to the Company's full disclosure of such information to the public.
- 5.2 The Directors and relevant employees who are aware of the Company's undisclosed inside information must not buy or sell any of the Company's securities.
- 5.3 If the Company provides information to persons who require such information to perform their duties and functions (e.g., the Company's legal advisers), and such persons is under a duty of confidentiality to the Company, it shall not constitute a breach of the SFO.
- 5.4 If the Directors or relevant employees become aware that any undisclosed inside information is no longer confidential or has been leaked, they must notify the Board Office promptly, which will report to the Board accordingly and take reasonable measures to disclose such information fully to the public as soon as possible.

6. HANDLING OF RUMORS

- 6.1 The Company is not obliged to respond to any media speculation, market rumors, or analyst reports. If the media speculation, market rumors, or analyst reports are generally accurate and the information involved constitutes inside information, it is likely that the information is no longer confidential, rendering the "Safe Harbor" provisions inapplicable, and the Company shall make a full public disclosure accordingly.
- 6.2 If media reports or market rumors contain false or untrue information that is likely to affect the share price of the Company, and the Stock Exchange considers that it has resulted in or is likely to result in a false market or market disorder in the Company's securities, the Company shall, in accordance with the Rules Governing the Listing of Securities on the Stock Exchange, publish clarification announcements as soon as reasonably practicable under the circumstances.

7. EXEMPTION TO THE DISCLOSURE OF INSIDE INFORMATION

- 7.1 The "Safe Harbor" provisions under the SFO allow the non-disclosure of inside information in any of the following circumstances:
- (a) the disclosure is prohibited under, or would constitute a contravention of a restriction imposed by, an enactment or an order of a court;

- (b) the information concerns an incomplete proposal or negotiation;
- (c) the information is a trade secret;
- (d) the information concerns the provision of liquidity support from the Exchange Fund of the Hong Kong Government or from an institution which performs the functions of a central bank to the Company; or
- (e) the disclosure is waived by the SFC.

7.2 With the exception of item (a) above under the Safe Harbor provisions, all other Safe Harbor provisions will only be applicable if the Company has taken reasonable precautions for preserving the confidentiality of the information and that the information has in fact remained confidential.

8. REPORTING AND EVALUATION OF INSIDE INFORMATION

8.1 The Directors and relevant employees must promptly notify the Board Office of any inside information. The Board Office will then evaluate and report to the Board, so that appropriate action will be taken without delay.

9. REVIEW OF THE POLICY

9.1 The Policy will be reviewed, assessed and/or evaluated from time to time, and, if necessary, updated to ensure its continued effectiveness. Any proposed changes to the Policy will be submitted to the Board for approval.

10. DISCLOSURE OF THE POLICY

10.1 The Policy is posted on the Company's website.

10.2 An extract of the Policy is disclosed in the Company's annual report.

(Adopted by the resolution of the Board on June 26, 2025)

Appendix

The following examples of inside information are listed in accordance with the “Examples of possible inside information concerning the corporation” under the SFC’s “Guidelines on Disclosure of Inside Information”. The list of events or circumstances below does not imply that once disclosed, the information will necessarily have a significant impact on the share price. This list of events or circumstances that may constitute inside information is not exhaustive and is provided for illustrative purposes only. The absence of a particular event or circumstance from the list does not mean it is not inside information; conversely, those in the list are not automatically deemed inside information. The determination of whether specific information or data constitutes inside information depends on its importance. Any news or data that is reasonably likely to have a significant impact on share prices must be disclosed.

- Changes in performance, or the expectation of the performance, of the business;
- Changes in financial condition, e.g. cashflow crisis, credit crunch;
- Changes in control and control agreements;
- Changes in directors and (if applicable) supervisors;
- Changes in directors’ service contracts;
- Changes in auditors or any other information related to the auditors’ activity;
- Changes in the share capital, e.g. new share placing, bonus issue, rights issue, share split, share consolidation and capital reduction;
- Issue of debt securities, convertible instruments, options or warrants to acquire or subscribe for securities;
- Takeovers and mergers (corporations will also need to comply with the Takeovers Codes that include specific disclosure obligations);
- Purchase or disposal of equity interests or other major assets or business operations;
- Formation of a joint venture;
- Restructurings, reorganizations and spin-offs that have an effect on the corporation’s assets, liabilities, financial position or profits and losses;
- Decisions concerning buy-back programs or transactions in other listed financial instruments;
- Changes to the memorandum and articles (or equivalent constitutional documents);
- Filing of winding up petitions, the issuing of winding up orders or the appointment of provisional receivers or liquidators;
- Legal disputes and proceedings;
- Revocation or cancellation of credit lines by one or more banks;
- Changes in value of assets (including advances, loans, debts or other forms of financial assistance);
- Insolvency of relevant debtors;
- Reduction of real properties’ values;
- Physical destruction of uninsured goods;
- New licenses, patents, registered trademarks;
- Decrease or increase in value of financial instruments in portfolio which include financial assets or liabilities arising from futures contracts, derivatives, warrants, swaps protective hedges, credit default swaps;
- Decrease in value of patents or rights or intangible assets due to market innovation;
- Receiving acquisition bids for relevant assets;
- Innovative products or processes;

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- Changes in expected earnings or losses;
- Orders received from customers, their cancellation or important changes;
- Withdrawal from or entry into new core business areas;
- Changes in the investment policy;
- Changes in the accounting policy;
- Ex-dividend date, changes in dividend payment date and amount of dividend, changes in dividend policy;
- Pledge of the corporation's shares by controlling shareholders; or
- Changes in a matter which was the subject of a previous announcement.