



新奥能源控股有限公司 ENN Energy Holdings Limited

(Incorporated in the Cayman Islands with limited liability)

(Stock Code: 2688)

WHISTLEBLOWING AND WHISTLEBLOWER PROTECTION POLICY

1. Purpose

- 1.1 The Company is committed to improve transparency by maintaining a good corporate governance level and enhancing an effective internal control and risk management system. Whistleblowing is an important part of an effective internal control and risk management system. It is a useful means of uncovering fraud, corruption, misconduct or significant risks within ENN Energy Holdings Limited and its member companies (including subsidiaries, associates and joint ventures, collectively called the “Group”).
- 1.2 “Whistleblowing” refers to a situation where an employee conveys a concern, allegation or any information that fraud, corruption or any other misconduct is occurring or has occurred in the Group, with good faith that the concern, allegation or information is true.
- 1.3 The purpose of this policy is to provide the employees with guidance and reporting channels on whistleblowing. It is therefore designed to encourage employees to raise their concerns internally, rather than overlook a problem or blow the whistle outside.

2. Policy

2.1 Objectives

- 2.1.1 The Group has strictly implemented *ENN Group Employees Code of Conduct*, clarified that fraud, corruption or misconduct is absolutely prohibited (hereinafter referred to as “**Reportable Conduct**”).

Reportable Conduct may include but is not confined to:

- i. Fraud, malpractice and other possible improprieties relating to financial reporting, internal controls and accounting and auditing matters;
 - ii. Misuse of company resources or any other conduct that may cause financial loss to the Group;
 - iii. Breach or non-compliance of code of conduct and relevant internal control policy and procedures;
 - iv. Breach of legal and regulatory requirement;
 - v. Bribery internally or by external parties;
 - vi. Endangerment of the health and safety of an individual;
 - vii. Improper use of commercially sensitive data; and
 - viii. Miscarriage of justice.
- 2.1.2 To provide employees (permanent or temporary) of the Group with guidance and reporting channels to report any suspected Reportable Conduct.
- 2.1.3 To provide a comprehensive mechanism to ensure proper arrangements are in place for fair and independent investigation and for appropriate follow-up actions.
- 2.1.4 The objective of this Policy does not change existing reporting practices of the Group but to formalise such function. It is not designed for any staff members to question financial or business decisions taken by the Group or to be used to consider any staff matters which have been addressed under the grievance procedures of Human Resources Department.

2.2 Protection of Whistleblower

- 2.2.1 Full support should be given to the employees who are in good faith to report any genuinely suspected Reportable Conduct. The Group will make every effort to protect the employees against unfair dismissal, victimization or unwarranted disciplinary action, even if the concerns turn out to be unsubstantiated.
- 2.2.2 Employees are encouraged to report fraud, corruption and matters that damage the Group's interests in real-name. Once the reported information is confirmed to be true which help enhance the governance of the Group, spiritual or materials rewards might be given to the whistleblower and personnel who contributed in the investigation.

- 2.2.3 The Group will promptly investigate and seriously deal with threatening, combating and retaliating against the whistleblower to protect their legitimate rights and interests. Retaliation is within the reporting scope of this Policy. Disciplinary actions will be taken against the responsible person until dismissal. If you believe that you have suffered retaliation, please immediately provide relevant evidence and file a report.
- 2.2.4 Retaliation actions include but not limited to any form of threat, intimidation, harassment or other actions that damage the right and interest of the whistleblower.

2.3 Confidentiality

- 2.3.1 Anonymous allegations are discouraged. Employees providing information should, as far as possible, give their names and contact details so that clarification of the alleged matters or further appropriate information can be obtained, when required.
- 2.3.2 The Group will keep the name of the whistleblower, contact details, home address and other matters related to whistleblowing confidential, and reported materials will also be treated strictly confidential.
- 2.3.3 The Group handles the reporting matters with due care and will not disclose the identity of the whistleblower without the written consent of the whistle-blower. The Group will treat all allegations in a strictly confidential manner. Without the employee's written consent, his/ her identity will not be divulged.
- 2.3.4 However, there may be situations in which the Group is required or legally obliged to reveal the employee's identity, for example, where an investigation leads to legal proceedings being initiated. If this is the case, necessary steps will be taken to ensure that the employee suffers no detriment.

2.4 False or Malicious Accusations

- 2.4.1 Whistleblower shall report matters objectively and truthfully. He/she shall be responsible for the authenticity of the contents, and shall not fabricate or misrepresent the facts, make false claims or entrap others, damage the interests of the Group and the legitimate rights of others. He/she shall consciously maintain the operational stability and order of the Group.
- 2.4.2 Whistleblower shall take responsibility for their whistleblowing and are strictly prohibited from malicious reporting or forging cases (clues) to obtain rewards. Once discovered, it will be handled in accordance with the relevant regulations of the Group. Where a crime is suspected, it will be reported to the judicial authority for legal liability.

3. Reporting Channels

3.1 Email

risks@enn.cn

(This email address is only accessible by person-in-charge of Internal Audit & Risk Assurance)

3.2 Letter

Mr. Hao Lin Hong

Person-in-charge of Internal Audit & Risk Assurance

Room 418, Building A, ENN Industrial Park

Xinyuan DongDao Road

Economic and Technological Development Zone

Langfang City

Hebei Province

The PRC

Please mark “Strictly Private and Confidential – To be Opened by Addressee Only” in the sealed envelope.

4. Investigation and Reporting Procedures

4.1 Whistleblowing Register

All allegations will be recorded in the register.

4.2 Assessment and Case Initiation

The Internal Audit Department shall assess the matter based on its nature, complexity, and scope of involvement and determine whether to initiate an investigation, the investigation method, and the expected timeframe for completion.

4.3 Conduct of Investigation

The Internal Audit Department shall appoint designated personnel to conduct the investigation independently and in strict confidence. Where necessary, external lawyers, accountants, or other professional third-party organisations may be engaged

to participate in or conduct the investigation. During the investigation, the Internal Audit Department may contact the whistleblower to request supplementary supporting materials.

4.4 Investigation Report

Upon completion of the investigation, the Internal Audit Department shall prepare a formal investigation report and submit periodic summary reports to the Audit Committee. Investigation reports concerning material violations or systemic risks shall be submitted to the Audit Committee for review.

4.5 Communication of Investigation Results

Subject to confidentiality requirements and applicable laws and regulations, the Company shall communicate the investigation findings to the whistleblower, with the scope of such communication determined by the Internal Audit Department based on the confidentiality level of the case.

4.6 Referral to Judicial Authorities

An internal investigation conducted by the Company shall not replace an investigation by external law enforcement authorities. Matters involving suspected criminal offences shall be referred to the judicial authorities, which shall take the lead in handling the case.

4.7 Case Closure

Upon completion of the reporting of the investigation findings, communication of the results, and referral to judicial authorities, where applicable, the Internal Audit Department shall formally close the case, and the investigation procedure relating to the report shall be concluded.

5. Monitoring and Training

5.1 The Audit Committee will monitor the implementation of the policy.

5.2 Any future amendments to the policy shall be reviewed by the Audit Committee.

5.3 The Company shall provide employees with awareness and training on the use of whistleblowing channels to help them understand the relevant policies, reporting channels, and procedures.

6. Disclosure of the Policy

6.1 The Policy will be posted on the Company's website for stakeholder's reference.