

CIMC Enric Holdings Limited

Anti-Corruption and Fraud Policy

1. General Principles

- 1.1 This Policy applies to all employees, covering directors and employees at all levels, of CIMC Enric Holdings Limited and its subsidiaries, associates and joint ventures (hereinafter referred to as the "Group"). We also encourage all business partners, including major shareholders, joint venture partners, agents, consultants, contractors, suppliers and other stakeholders of the Group who are involved in our work, shall follow the principles of this policy.
- 1.2 The Group is committed to preventing, investigating, reporting and affixing suspected corruption, fraud, bribery, and other improper, illegal or fraudulent practices to maintain sound corporate management and healthy development.
- 1.3 Integrity is the core value of the Group. This policy is aimed to implement corporate culture of integrity, honesty and self-discipline, promote the maintenance of good ethics and conduct by employees, and reinforce anti-corruption, fraud, malpractice and other misconduct in the Group. We encourage employees to proactively enhance their awareness and sensitivity to anti-corruption and fraud, maintain vigilant and take necessary action against any behaviour that is outside the relevant rules and policies of the Group or that has suddenly become frequent compared with the Group's previous practices, or that is inconsistent with the Group's common business practices.

2. Interpretation

- 2.1 In this policy, **corruption** refers to illegal or immoral conduct such as embezzlement, bribery, extortion, theft and duty encroachment in order to seek improper benefits. **Fraud** refers to conduct such as illegally occupying the company assets, forgery, collusion, false statement or

concealment of important facts, and deliberate deception to seek improper benefits or evade responsibilities and obligations.

2.2 In this policy, corruption, fraud, malpractice and other misconduct include but are not limited to:

- Soliciting, accepting or offering bribes;
- Misusing positions and authorities for personal gains;
- Embezzling payment received, and/or transferring it to a personal bank account;
- Embezzling, misappropriating or stealing the physical or intangible assets or funds of the company;
- Providing unauthorised external guarantee or commitment on behalf of the company;
- Manipulation or falsification of accounting records or supporting documents to prepare false financial statements, or intentionally providing misleading information;
- Procrastinating in registering, late entry, misrepresentation or deliberate omission of financial records;
- Leaking business or technological secrets of the company;
- Participating into transactions involving interest conflicts or pursuing personal gain without authorisation;
- Conspiring with customers, suppliers or competitors to harm the company's interests; and
- Other conduct prohibited by laws and regulations.

3. Policy

3.1 The Group requires employees and business partners to strictly comply with the Criminal Law of the People's Republic of China, Anti-Unfair Competition Law of the People's Republic of China, Prevention of Bribery Ordinance (Cap. 201 of the Laws of Hong Kong) and other relevant anti-corruption laws and regulations applicable in the countries and regions where the Group has business operations. The Group maintains zero tolerance toward corruption, fraud and malpractices.

3.2 The Group strictly follows the CIMC Clean Practices for Cadres and Sensitive Position Personnel. The Group's management and personnel in sensitive positions at all levels shall sign

the clean practices declaration every year, and accept audit and supervision in accordance with the policies of CIMC Supervision System for Cadres and Sensitive Position Personnel and Measures for the Administration of Supervision, Complaint and Reporting of CIMC.

- 3.3 The Group formulates and promulgates the Code of Conduct for Employees setting out guidelines and requirements on integrity, honest and clean practices, requiring all employees to strictly follow and maintain good ethics.
- 3.4 The Group formulates, promulgates and implements the Sunshine Cooperation Commitment Letter for suppliers, covering the requirements on anti-commercial bribery, conflict of interest and integrity, requiring all suppliers to strictly follow, and sign the Sunshine Cooperation Commitment Letter along with the contract with the Group.
- 3.5 The Group develops and implements anti-corruption and fraud management and monitoring systems, monitors and continuously reviews relevant risk control and monitoring measures and their implementation effects through risk assessment procedures and constantly improves its internal control procedures and environment.
- 3.6 The Group advocates the Anti-Corruption and Fraud Policy to employees at all levels through various channels, and conducts anti-corruption and fraud training for employees to enhance their anti-corruption ability and awareness, to promote the corporate culture of integrity, anti-corruption and compliance.

4. Reporting and investigating

- 4.1 The Group encourages employees, business partners and other stakeholders to report any corruption, fraud, malpractice, violation and other misconduct within the Group and in business activities according to the published Whistleblowing Policy and reporting channels.
- 4.2 The Legal Compliance Department of the Group carries out investigations according to the procedures and keeps the whistle-blower confidential. The Group implements accountability based on the investigation results, and those who constitute crimes will be handed over to the judicial institutions for investigation and treatment according to the law.
- 4.3 The Legal Compliance Department of the Group reports to the audit committee in relation to whistleblowing cases including corruption, fraud and malpractice cases verified by

investigation every six months or in the event of circumstances that cause significant impact or loss to the Group, and the audit committee will report to the Board of Directors promptly.

5. Appendix

- 5.1 This policy shall be effective as of the date of approval by the Board of Directors, i.e., 11 October 2022.
- 5.2 The audit committee with full authority to monitor and review this policy's implementation and amend it as necessary.