

CIMC Enric Holdings Limited
(the “Company”)
Whistleblowing Policy
(the “Policy”)

1. General Principles:

This Policy applies to CIMC Enric Holdings Limited and its subsidiaries, associates and joint ventures (hereinafter referred to as the "**Group**"), which is committed to maintaining good corporate governance, integrity, compliance and a high level of transparency. Employees and business partners at all levels (including the Group's major shareholders, joint venture partners, agents, consultants, contractors, suppliers and other stakeholders who have dealings with the Group) are encouraged to report abuses, irregularities and misconduct within the Group.

The purpose of this Policy is to provide channels for reporting fraud, non-compliance and misconduct matters and to provide guidance on fair and independent investigation and appropriate action in such matters; The whistleblower will not be subject to unfair disciplinary action, dismissal, persecution or any other form of retaliation for making a true and sincere report.

“Whistleblowing” refers to a situation where employee or one who deals with the Group decides to report serious concern about any fraud, non-compliance and misconduct which he/she has become aware or genuinely suspects that the Group has been or become involved in.

2. Whistleblowing Matters:

This Policy is intended to enable whistleblower to provide information which the whistleblower has concern about any fraud, non-compliance and misconduct within the Group, as far as possible through confidential reporting channels. It is not designed to further any personal disputes, question business decisions taken by the Group companies nor should be used to reconsider any staff matters which have been addressed under the grievance procedures already in place.

Under this Policy, whistleblowing matters may include but are not limited to:

- Fraud, malpractice and impropriety in financial reporting, accounting, Internal Auditing and internal control

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- Endangerment of the interests of the group or violation of fair trading principle
- Acts of bribery, embezzlement or money laundering
- Breach of legal or regulatory requirements
- Criminal offences, breach of civil law and miscarriage of justice
- Endangerment of the health and safety of an individual
- Adverse impact to the environment and the society above and beyond the impact otherwise generated by a normal business in the industries that the Group companies engage in
- Improper conduct or unethical behaviour likely to prejudice the Group companies, and
- Deliberate concealment of any of the above

3. Reporting Channel:

A whistleblower can raise his/her concern to the Legal and Internal Audit Department of the Group, the contact details of whom are listed below:

CIMC Enric Holdings Limited

Legal and Internal Audit Department

CIMC R&D Center

No. 2 Gangwan Avenue Shekou Industrial Zone

Shenzhen, Guangdong, The PRC

Email: 5198@enricgroup.com

Tel: 0755-26802222

If the reporting matter involves the President of the Group, the whistleblower may choose to raise his/her concerns with the Audit Committee of the Board of Directors of the Company with the following contact details:

CIMC Enric Holdings Limited

Audit Committee of the Board

Suites 1902 – 3, 19th Floor

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Bank of America Tower, No.12 Harcourt Road, Central,

Hong Kong

Email: AC.Enric@cimc.com

Whistleblowers can make whistleblowings through the Group's special complaint reporting hotline, in writing or by email. Whistleblowers are encouraged to use Appendix 1 report form to raise relevant matters. As it is important that the Group takes reports of fraud, non-compliance and misconduct seriously and investigates potential and actual breaches, real-name reporting is strongly recommended and encouraged.

Disciplinary action may be taken by the Group against any person who seeks to prevent a communication of impropriety concern reaching the Legal and Internal Audit Department, or to impede any investigation.

4. Protection of whistleblowers:

The whistleblower should believe, in good faith, that the information is accurate, and will be protected from disciplinary action, dismissal, persecution or retaliation if the whistleblower raises a concern in good faith and reasonably, regardless of whether the concern is valid. In the event of retaliation against whistleblower, the Group will pursue administrative, economic and legal responsibilities.

Conversely, if a whistleblower is found to have knowingly provided false information or made malicious allegations, the Group reserves the right to take appropriate action to recover any loss or damage caused and may face disciplinary action by the Group if he/she is an internal employee.

5. Confidentiality:

After a whistleblower reports his/her concern, the Group will make every effort treating the disclosures in a confidential manner, including the identity of the whistleblower and the employees involved. In order to prevent leaks and retaliation against the whistleblower, it is strictly forbidden to

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directly forward the complaint report letters, evidence, complaint records and other elements to the reported entity or relevant personnel in accepting complaints and reports. The retaliation against the whistleblower will be held accountable for administrative, economic and legal responsibilities. In order not to jeopardise the investigation, the whistleblower should also keep the matters raised confidential.

However, there may be circumstances in which the Group may be legally obliged to reveal the whistleblower's identity, for example, where an investigation leads to legal proceedings being initiated. If the Group anticipates such circumstances exist, it will endeavour to inform the whistleblower as soon as practicable.

6. Investigation Procedures:

All concerns will be kept on record. The head of the Legal and Internal Audit Department of the Company will be notified of the details of concerns raised immediately before an investigation starts and will be made known regularly of the progress.

The Audit Committee specifically authorizes the head of the Legal and Internal Audit Department to review and evaluate the effectiveness and relevance of the reports and determine whether a comprehensive investigation is necessary, and it shall respond within 5 working days from the date of receipt of the reports as reasonably practicable and conduct a preliminary investigation into the reports.

In the case of conflict of interest, the subject matters will be reported to the Audit Committee by the Legal and Internal Audit Department, while the Audit Committee will report to the Board for decision making.

The form and length of an investigation will vary depending on the nature of each allegation made, which may be:

- referred to the Legal and Internal Audit Department of the Company to investigate;
- referred to the internal Internal Audit officer or/and the external Internal Auditor or professional parties; and/or
- referred to the relevant public or regulatory bodies, such as the Police Force, the Hong Kong Stock Exchange, the Securities and Futures Commission.

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The Legal and Internal Audit Department will write to a whistleblower within five working days after receiving the whistleblowing matters where reasonably practicable to:

- acknowledge that the concern has been received;
- advise whether or not the matter is to be investigated further and if so what the nature of the investigation will be; and/or
- subject to legal constraint, the outcome of the investigation.

Possible outcome of the investigation:

- The concern could not be substantiated;
- The concern is substantiated, and the Company will:
 - (i) take corrective action to ensure that the problem will not occur again; and/or
 - (ii) take disciplinary or appropriate action against the wrongdoer.

The whistleblowing matters (including but not limited to the outcome of the investigation and the follow-up actions) of all legitimate allegations will be reported to the Audit Committee by the Legal and Internal Audit Department, while the Audit Committee will report to the Board for subsequent actions. The summary of the whistleblowing matters will be updated to the Audit Committee semiannually by the Legal and Internal Audit Department, while the Audit Committee will report to the Board.

All reported cases will be filed and reasonably kept by the Group's Legal and Internal Audit Department.

7. Supplementary Provisions:

The Board shall have the ultimate right of amendments and interpretation of this Policy.

The Audit Committee of the Company is fully responsible for this Policy, and the daily implementation of the Policy will be delegated to the Legal and Internal Audit Department to follow up and deal with whistleblowing matters. This Policy will be reviewed by the Audit Committee of the Company, to ensure that proper arrangements are in place for fair and independent investigation of concerns raised by the whistleblowers and for appropriate follow-up action. Any modification or update of this Policy shall be subject to the approval of the Board of the Company.

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This Policy shall take effect upon approval by the board of directors of the Company, on 23 March 2023.

Board approval date: 1st Version on 19 March 2013

1st Revised Version on 24 August 2021

2nd Revised Version on 23 March 2023