



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)

Anti-Fraud, Corruption and Bribery Policy

1. General

- 1.1 This policy applies to all employees, covering directors and employees at all levels, of ENN Energy Holdings Limited (hereinafter referred to as “**ENN Energy**”, together with its subsidiaries, collectively referred to as “**We**”, “the Company” or “the Group”). We also encourage all business partners (including, but not limited to, suppliers, contractors, subcontractors, agents, distributors, joint venture partners) and other stakeholders etc., to comply with the requirements of this Policy in carrying out their work with us.
- 1.2 The Group adheres the value of "being conscientious, self-driving, data-driven and sharing" as the standard and guideline for daily operation. This policy is aimed at the implementing corporate culture of “being conscientious”, requiring employees to be “honest and self-discipline”, and reinforcing the anti-fraud, corruption, bribery and conflicts of interest of the Group.
- 1.3 The Group is committed to preventing, investigating and affixing suspected fraud, corruption, bribery, and other violation to maintain a sound corporate management and ensure the sustainable and healthy development.

2. Interpretation

- 2.1 In this policy, fraud refers to the conduct of deceiving large amounts of public and private property for the purpose of illegal possession by fictitious facts or concealing the truth. Corruption refers to the conduct of employees taking advantage of their duties to embezzle, steal, defraud or otherwise illegally occupy the company property. Bribery refers to the conduct of giving the other party property or other benefits in order to seek improper benefits.
- 2.2 In this policy, fraud, corruption and bribery include but not limited to:
 - i. Participating into transactions involving interest conflicts or perusing personal gain without authorization;

- ii. Conspiring with customers, suppliers or competitors to harm the company's interests;
- iii. Illegally possessing company property;
- iv. Misappropriating corporate funds or lending corporate funds to others without authorization;
- v. Providing unauthorized external guarantee or commitment on behalf of the Company beyond the scope of personal authority;
- vi. Accepting bribery from employees, clients, suppliers and etc.; and
- vii. Involving in bribery during the tenure;
- viii. Obtaining improper benefits for the Company or any individual through Charitable donations and sponsorships;
- ix. Any other behavior that may have an improper impact on the Company, employees, and business partners, such as seeking undue benefits through actions like charitable donations or contributions, sponsorships, providing job opportunities, investment opportunities, confidential information, discounts, or personal loans, involving fraud, corruption, bribery, etc. Partners are not allowed to offer commercial bribes to the employees of the Company in any name or in any form, such as facilitation payments (referring to any illegal or unofficial payments made to relevant personnel to expedite or facilitate access to services to which the payer is lawfully entitled), presenting gifts (refer to the **Business Integrity and Compliance Code of Conduct** for specifications on the receipt of gifts), high-consumption dining and entertainment activities and other activities that provide personal interests or benefits.

3. Policy

- 3.1 The Group requires employees 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 any applicable anti-corruption laws. The Group maintains zero-tolerance towards fraud, corruption and bribery.
- 3.2 The Group formulates, promulgates and continuously amends the Employees' Penalty Measures for Violation of Rules and Regulations of ENN Energy to ensure that the above anti-fraud, corruption, and bribery laws are implemented.
- 3.3 The Group advocates the Anti-Fraud, Corruption and Bribery Policy through various channels to employees and conducts anti-fraud, corruption and bribery training regularly. The Group advocates the Anti-Fraud, Corruption and Bribery Policy through various channels to employees and conducts regular training on anti-fraud, corruption and bribery for all employees (full-time and part-time) and contractors. Employees and partners should strictly abide by the **Business Integrity and Compliance Code of Conduct** and restrain their behavior.
- 3.4 The Group formulates, promulgates and continuously amends the Supplier Corporate Social Responsibility Code of Conduct of ENN Energy, requiring the suppliers to strictly follow, and signs the Corruption Agreement along with

the contract with a supplier.

- 3.5 The Internal Control and Risk Management Department reviews the anti-fraud, corruption and bribery procedures and its implementation, and continuously improves internal control procedures and environment.
- 3.6 The Group's Internal Audit Department regularly conducts independent assessments of fraud, corruption and bribery that may be involved in various businesses and the internal control procedures.
- 3.7 The Group will only make charitable contributions that are legal and ethical under prevailing local laws and practices.
- 3.8 The Group does not make any direct or indirect contributions to political parties, political associations and political candidates.

4. Handling Procedures

- 4.1 Receipt of Reports and Case Assessment: Upon receipt of a report or risk indicator concerning fraud, corruption, bribery, or other misconduct, the Risk Management Department shall conduct a comprehensive assessment of the nature and severity of the suspected violation, the associated external legal risks, and the resources required for the investigation. Where the relevant criteria are met, a formal investigation shall be initiated, and the person under investigation shall be notified in writing of the grounds for the investigation.
- 4.2 Comprehensive Investigation, Evidence Collection, and Protection of Rights: Financial records, business records, communications, and other relevant evidence shall be collected objectively and comprehensively, and interviews and verification procedures shall be conducted; throughout the investigation, the lawful rights of the investigated person to issue statements, provide explanations, submit supporting evidence, and request the questioning of witnesses shall be protected, with an objective and comprehensive written investigation report prepared.
- 4.3 Determination of Facts and Risk Classification: The severity of the violation or misconduct shall be determined in accordance with the relevant policies of the Group, with a concurrent assessment conducted to determine whether the conduct violates applicable local laws and regulations or may constitute a criminal offence. Relevant factors shall include the seriousness of the violation, whether the individual cooperated voluntarily, and whether the individual has any prior record of misconduct.
- 4.4 Disciplinary and Remedial Decisions: Based on investigation findings, applicable laws and regulations, and internal policies, appropriate disciplinary action shall be taken, including warnings, financial penalties, suspension from duties, or termination of employment; where unlawful conduct is identified, a

proposal for referral to the relevant judicial authorities shall also be prepared, together with any claims for recovery of losses suffered by the Company.

- 4.5 Implementation, Appeals, and Follow-up: The disciplinary decision shall be formally delivered to the person concerned, together with information on the available appeal channels and applicable time limits, and the relevant disciplinary measures shall be implemented within the prescribed period; employee appeals shall then be accepted and reviewed; upon completion of the case, all records shall be archived, and related remedial actions shall be pursued, including recovery of losses and termination of relationships with third parties involved in the misconduct.

5. Reporting and investigating

- 5.1 The Group encourages employees and stakeholders to report the conduct of fraud, corruption and bribery according to the published **Whistleblowing and Whistleblower Protection Policy** and reporting channels (by email: risks@enn.cn or by mail). The Risk Management Department carries the investigation according to the procedures and keep the whistle-blower confidential. The Group implements accountability based on the investigation results, and those who violate the law will be held accountable.

6. Appendix

- 6.1 This policy was revised and published in May, 2026 and the Audit Committee with full authority to implement, supervise this policy.