

WHISTLEBLOWING POLICY

1. POLICY STATEMENT

- 1.1 SRE Group Limited (the “**Company**”) and its subsidiaries (collectively, “**the Group**”) are committed to achieving and maintaining the highest standards of openness, probity and accountability. Employees at all levels are expected to conduct themselves with integrity, impartiality and honesty. It is in all interest of the Group to ensure that any inappropriate behaviour or malpractice that compromise the interest of the shareholders, investors, customers and the wider public does not occur. It is also critical to maintain a good corporate image and raise the standard of corporate governance of the Group.
- 1.2 In this connection, the Company has adopted this Whistleblowing Policy (“**Policy**”) such that all employees (which for these purposes includes all directors, officers, employees and temporary or contract staff) (the “**Employees**”) as well as relevant third parties (“**Third Parties**”) can raise concerns, in confidence, about misconduct, malpractice or any irregularities with regard to any matters related to the Group and to ensure that proper arrangements are in place for the fair and independent investigation of any such matters and for appropriate follow-up actions.
- 1.3 The Company is committed to enhancing the awareness of corporate governance and this Policy constitutes an important part of the effective internal control and risk management system. It also provides employees and relevant Third Parties with reporting channels and guidance on whistleblowing.
- 1.4 In this Policy, “whistleblowing” refers to a situation where an employee or a relevant Third Party decides to report serious concerns about any malpractice, which he or she has become aware of or genuinely suspects that the Group has been or may become involved in. The Policy is also designed to encourage employees to raise concerns internally, without fear of repercussions or the risk of reprisals, in a responsible and effective manner.

2. SCOPE

2.1 This Policy is intended to assist Employees and relevant Third Parties to disclose information on suspected misconduct, malpractice or irregularity through a confidential reporting channel. It is not designed to further any personal disputes, question financial or business decisions taken by the Company nor should it be used to reconsider any staff matters which have been addressed under the grievance procedure already in place. Whistleblowing matters may include but are not confined to:

- (a) breach of legal or regulatory requirements;
- (b) criminal offences, breach of civil law, miscarriage of justice;
- (c) malpractice, impropriety or fraud relating to internal controls, accounting, auditing and financial matters;
- (d) endangerment of health and safety of an individual;
- (e) damages caused to the environment;
- (f) violation of rules or conducts applicable within the Company or those of the Group;
- (g) improper conduct or unethical behaviour likely to prejudice the standing of the Company;
- (h) bribery or corruption; and
- (i) deliberate concealment of any of the above.

2.2 Questions in relation to this Policy may be directed to the internal audit department of the Company.

3. PROTECTION

- 3.1 It is the Company's policy to make every effort to treat all disclosures in a confidential and sensitive manner after receipt of any relevant report from an Employee or a relevant Third Party. The identity of the individual Employee or relevant Third Party making genuine and appropriate allegation under this Policy is assured of fair treatment. In addition, Employees are also assured of protection against unfair dismissal, victimisation or unwarranted disciplinary action from raising concerns under this Policy, even if the legitimate concerns that are raised turned out to be unsubstantiated.
- 3.2 The Company reserves the right to take appropriate actions against anyone who initiates or threatens to initiate retaliation against those who have raised concerns under this Policy. In particular, Employees who initiate or threaten retaliation will be subject to disciplinary actions, which may include summary dismissal. The management of the Company support and encourage all Employees to raise legitimate concerns without fear of reprisals.

4. CONFIDENTIALITY

- 4.1 The Company will make every effort to keep all whistleblowing reports and identities of reporting Employees and/or Third Parties confidential.
- 4.2 Notwithstanding the foregoing, there may be circumstances, owing to the nature of the investigation or the nature of the concerns raised, in which it will be necessary to disclose the identity of the employees and/or Third Parties who have made the report as required by law or regulatory obligations.
- 4.3 In order not to jeopardise the investigation and any follow-up actions, Employees and/or Third Parties who have made reports are also required to keep confidential all information about and related to the report, including the fact that a report has been filed, the nature of the concerns, the identities of those involved and any other information that the Company has shared in the course of handling the report.

5. REPORTING CHANNELS

5.1 Employees of the Group or relevant Third Parties who have legitimate concerns can report to the internal audit department of the Company through the following channels:

(a) by mail to the internal audit department:

3rd Floor, Building 5, Oasis Central Ring Center, Lane 1628, Jinshajiang Road,
Putuo District, Shanghai, China

Attn: Head of internal audit department

in a sealed envelope clearly marked “Strictly Private and Confidential – To be
Opened by Addressee Only”;

(b) by email to jubao@sre.com.cn; or

(c) by the whistleblowing phone number: 021-33356960.

5.2 Any business units in receipt of a report alleging any of the misconducts, malpractices or irregularities mentioned herein shall redirect the report to the internal audit department, which shall handle such report in the manner stipulated in this Policy.

6. REPORTING METHODS

6.1 The methods for reporting can either by real name or by anonymity. The Group advocates reporting in real name, prioritizes to handle reporting in real name and keeps the confidentiality of the whistleblowers in real name. Whistleblowers in real name should provide their real name, contact details and identity card numbers. Anonymous reporting, in principle, will not be handled, however, it will be clues for the subsequent audit investigations.

6.2 Whistleblowers can report by email, phone or in other ways, however, it is prohibited to report by the ways of messaging to the WeChat group, by SMS or emails which may lead to disorder of the Company.

6.3 The content of reporting should be true, clear, specified and realistic. No deliberate fabrication of facts, libel, false accusations or taking retaliatory actions shall be allowed. The content of reporting should consist of facts (in part or whole), including (but not limited to) the name, department and position of the reported person(s), matters of reporting (for example, time, location, process, main evidence, person(s) involved, amount involved, details and consequence).

7. DISCLOSURE

- 7.1 Disclosures can be made in writing or by using the standard form (Whistleblower Report Form) attached as Annex I to this Policy.
- 7.2 While the Company does not expect the whistleblower to have absolute proof or evidence of the misconducts, malpractices or irregularities reported, the report should show clear reasons for the concerns and full disclosure of any relevant/material information to the extent possible (including but not limited to names involved, event details, reasons of concerns) and supporting documentation (if any).
- 7.3 The whistleblower should make the report in good faith and exercise due care to ensure the accuracy of the information in making an allegation. If a whistleblower makes a false report maliciously, with an ulterior motive, or for personal gain, the Company reserves the right to decline or discontinue relevant investigation, and to take appropriate actions against the whistleblower to recover any loss or damage as a result of the false report.

8. INVESTIGATION

- 8.1 The internal audit department will evaluate the validity and relevance of the concerns raised in which report, and to decide if the reported matter falls under Section 2 above and whether an investigation is necessary. The format and the length of an investigation will vary depending upon the nature and particular circumstances of each report made. The matters raised may be:
 - (a) investigated internally;
 - (b) investigated by external professional party;
 - (c) reported and referred to the Audit Committee;
 - (d) referred to the external auditors of the Company;
 - (e) referred to the relevant public or regulatory/law enforcement authorities; and/or
 - (f) form the subject of any other actions as the Audit Committee may determine in the best interest of the Group.

- 8.2 The objective of an investigation is to evaluate whether concerns are substantiated by examining information relating to the allegation and to allow the Group to take proper subsequent actions as appropriate from an objective and impartial result. During the investigation, the internal audit department may seek advice and/or assistance from professionals (such as lawyers and external auditors) where appropriate.
- 8.3 It may be necessary for the internal audit department or other authorized professionals to contact the relevant Employees or Third Parties for further information during the course of investigations. As such, Employees and Third Parties are requested to cooperate with such investigations, including making themselves available for interviews as required. They are required to preserve the strict confidentiality of the fact of the investigation and the content of any interviews and/or communications in relation to the investigation (except as otherwise required by law or regulatory authority).
- 8.4 Breaching the Policy may lead to disciplinary actions, which may include termination of employment. In cases of suspected corruption or other criminal offences, a report will be made to the appropriate authorities, as considered appropriate.

9. RECORD KEEPING

- 9.1 Records shall be kept for all reported misconducts, malpractices, and irregularities by the relevant parties in the Group. In the event a reported irregularity leads to an investigation, the party responsible for leading and/or conducting the investigation shall ensure that all relevant information relating to the case is retained, including details of corrective action taken for at least seven (7) years (or other longer period which may be specified by any relevant legislation).

Notes

- A. This Policy will be reviewed and updated from time to time to ensure its relevance and effectiveness.
- B. In the event of any inconsistency or conflict between the English and Chinese version of this Policy, the English version shall prevail.

March 2024

ANNEX 1

WHISTLEBLOWER REPORT FORM

SRE Group Limited (the “**Company**”) and its subsidiaries (collectively the “**Group**”) are committed to maintaining a high standard of business ethics and principles. In line with that commitment, employees of the Group and relevant third parties (e.g. customers, suppliers, subcontractors, etc., who deal with the Group) are encouraged to raise concerns and report in confidence, any misconducts, malpractices or irregularities in any matters related to the Group.

The Whistleblowing Policy of the Company has been established to encourage and assist whistleblowers to disclose information relevant to the misconducts, malpractices or irregularities through a confidential reporting channel (to the extent possible). The Company will handle this report with care and will treat the whistleblower’s concerns fairly and properly.

You may use the report form below to make relevant written report. You may send the report, marked “Strictly Private and Confidential—to be Opened by Addressee Only” and addressed to Head of internal audit department, by post to the address below or by email to: jubao@sre.com.cn.

To: internal audit department

3rd Floor, Building 5, Oasis Central Ring Center, Lane 1628, Jinshajiang Road, Putuo District, Shanghai, China

Date of Report:

Contact details

Name:

Address:

Contact phone number:

Email address:

Details of relevant matter

Names of person(s) involved:

Details of concerns:

PERSONAL INFORMATION COLLECTION STATEMENT

The personal data submitted will be held and kept confidential by the Company and may be transferred to parties with whom we will contact during our handling of this case. The information provided may also be disclosed to law enforcement authorities or other concerned units. Where relevant, you shall have the right to request access to and correction of your personal data under the Personal Data (Privacy) Ordinance of Hong Kong.