

Sinochem HK Whistleblower Policy

As the offshore financing platform and a key overseas asset holding company of Sinochem Holdings, Sinochem Hong Kong (Group) Company Limited (“Sinochem HK” or the “Company”) firmly believes that good corporate governance is the basic guarantee to achieve sound operation and high-quality development. A sound and well-run reporting system helps to improve the corporate governance structure, continuously enhances Sinochem HK’s risk resilience and safeguards the sustainable development of Sinochem HK and its stakeholders.

Purpose

The Company has formulated and released this policy with an aim to continuously improve the level of corporate governance and safety prevention, clarify the Company’s policy and commitment on reporting and protection of whistleblowers, and provide reporting channels.

Scope of Application

This policy applies to all employees (including informal employees such as contractors, interns, and rehired retirees) of Sinochem Hong Kong (Group) Company Limited and its affiliates, and the Company encourages all business partners and stakeholders to comply with this policy to protect the interest of the Company and its own rights and interests. Affiliates of the Company may also formulate corresponding whistleblower policy based on their own conditions.

Policy

1. Misconduct Reporting

Matters of misconduct include, but are not limited to:

- 1.1 Violation of national laws, regulations, policies, regulatory provisions and various rules and regulations of the Company.
- 1.2 Leak of confidential information of the Company.
- 1.3 Infringement of the rights and interests of the Company, shareholders and employees.
- 1.4 Slander of the Company’s reputation.
- 1.5 Corruption or bribery.
- 1.6 Endangerment of the health and safety of employees.
- 1.7 Behaviors that have a negative impact on environmental protection.

2. Reporting Mechanism

Whistleblowers can report to the Legal and Compliance Department via telephone, e-mail, official website, and letters.

Email: WhistleblowerXGJT@sinochem.com

Telephone: +852 2829 9659

Post address: Room 4611, Office Tower, Convention Plaza, 1 Harbour Road, Wanchai, Hong Kong, To: Legal and Compliance Department. Please send to the above address in a sealed envelope marked “Confidential Document - intended for addressee ONLY”

The whistleblowers should clarify the basic background of the misconduct and the basic information of the whistleblowers. The whistleblowers should also provide evidence or relevant materials to prove the misconduct. All such reports will be investigated by the Legal and Compliance Department based on the contents of the reports, and will be reported to the company’s management or relevant compliance and discipline inspection agencies or departments at an appropriate time based on the actual situation of the case.

3. Whistleblower Protection

The Company encourages whistleblowers to identify themselves, strictly keeps confidential the personal information and reported content of the whistleblowers, sets restrictions on access to the reported information, and strictly prohibits disclosure of relevant information to the person against whom the concern is raised or unrelated persons. The Company prohibits all acts of threatening, attacking or retaliating against whistleblowers, and will provide legal support and protection to whistleblowers when necessary.

3.1 The Company shall follow the principle of protecting the legitimate rights and interests of whistleblowers from infringement.

3.2 The Company will strictly keep confidential all reported information and the identity of whistleblowers (unless otherwise stipulated by law).

3.3 If whistleblowers suffers from unequal treatment due to complaints, s/he has the right to report to the Legal and Compliance Department, and the Company will strictly protect the rights and interests of whistleblowers from infringement.

3.4 Whistleblowers with significant contributions shall be commended or rewarded upon approval of the Company. In the course of commendation publicity, any personal information of the whistleblower shall not be disclosed without the prior consent of the whistleblower.

4. Record Retention

Sinochem HK's Legal and Compliance Department shall keep records of all misconduct reported by whistleblowers. From the time the complaint enters the investigation stage, the person in charge of the investigation shall ensure that the relevant investigation data are kept for at least 5 years (or longer period as otherwise stipulated by law).

5. Others

5.1 The Legal and Compliance Department of Sinochem HK reserves the right of final interpretation of this policy.

5.2 This policy shall take effect from the date of the announcement.

5.3 If you have any questions about the content or application of this policy, please contact the Legal and Compliance Department through the above email address.

The Company will review and update this policy from time to time or at least every three years.

Should there be any discrepancy between Chinese and English versions, the Chinese version shall prevail.