

Zangge Mining Co., Ltd.

## Whistleblower Protection Policy



January 2024

# **Whistleblower Protection Policy of Zangge Mining Co., Ltd.**

## **Article 1 Preface**

Zangge Mining Co., Ltd. (the “Company”) works on maintaining good corporate governance and building efficient internal control and risk management systems. By upholding the business philosophy of good faith operation, following the highest standards of conduct and ethics, and continuously improving transparency, the Company has established a strict, uniform, and clear professional code of conduct for all employees. The Company believes that it is the responsibility of each employee to ensure that there is no misconduct or malfeasance that harms the interests of shareholders, investors, customers and the general public.

## **Article 2 Purpose**

The purpose of this policy is to specify the guiding principles of the Company to safeguard the legitimate rights and interests of whistleblowers and support the employees and related parties of the Company to report violations of rules and disciplines, illegal and criminal acts related to the Company and behaviors harmful to the interests and image of the Company in a lawful and orderly manner.

## **Article 3 Scope of Application**

This policy applies to all personnel within the Company and all its subsidiaries, and those engaging in salt lakes, exploration sites, production sites and other projects on which the Company has operational control, as well as third parties doing business with the Company, and all partners, suppliers and contractors are required to comply with the requirements of this policy.

## **Article 4 Commitments**

The Company undertakes that:

1. it shall support and encourage all employees as well as customers, contractors, suppliers and other related parties to report misconduct or malfeasance in order to help

such related parties disclose information about what they believe to be malfeasance or misconduct within the Company.

2. Whistleblowers referred to in this policy include, but are not limited to, the Company and all its subsidiaries, all current and former employees, directors and officers engaging in salt lakes, exploration sites, production sites and other projects on which the Company has operational control, as well as current and former temporary workers, business partners (including suppliers, customers, joint venture partners and their employees), and their relatives, dependents or spouses.

3. This policy is not intended to facilitate any personal dispute, challenge the Company's financial or business decisions, or be applied to reconsider any employee issue that has been resolved in the existing complaint procedure.

#### **Article 5      Policy Practice**

##### 1. Whistleblower protection:

(1) The Company encourages and supports employees and related parties to report any matter that they believe should be reported. Where a compliance report is made in accordance with this policy process, the whistleblower will be protected from unfair dismissal, persecution, or disciplinary action, even if it is later found that there is no conclusive evidence to substantiate the report.

(2) The Company encourages employees and related parties to report fraud, corruption, or matters that are detrimental to the interests of the Company in their real names. If the reported information is true after investigation and can improve corporate governance, certain honors or material rewards may be given to those who have made contributions to the report and investigation.

(3) In order to protect the legitimate rights and interests of whistleblowers, the Company will promptly investigate and seriously deal with acts of threatening, attacking and retaliating against whistleblowers. Retaliation falls within the scope of reporting covered by this policy, and those responsible may be subject to disciplinary

action up to dismissal. Persons who believe that they have suffered retaliation should immediately report the retaliation and provide relevant evidence.

(4) Retaliation includes, but is not limited to, any form of threat, intimidation, harassment or other acts that damage the legitimate rights and interests of the whistleblower.

## 2. Confidentiality:

(1) The Company undertakes to protect the identity of the whistleblower, and the data provided by the whistleblower will be kept strictly confidential and protected by law. The Company will make every effort to keep the identity information of the whistleblower confidential and will not disclose it without the written consent of the whistleblower.

(2) In certain circumstances, when it is necessary to disclose the identity of the whistleblower due to legal liability or regulatory obligation (e.g., investigation of circumstances leading to the commencement of legal proceedings), the Company will take all reasonable measures to protect the whistleblower.

(3) The Company encourages employees and related parties to, when making reports, provide their names and contact information for the purpose of clarification or requesting further information for follow-up and investigation if necessary. In certain circumstances when the whistleblower is not willing to disclose his or her identity, it may be possible to make an anonymous report, and the Company will consider such anonymous reporting where practicable.

## 3. Malicious and false reporting:

(1) The whistleblower shall be objective and truthful towards, and responsible for the authenticity of, the content of the materials provided; the whistleblower shall not fabricate or distort the facts, shall not falsely accuse or frame others, nor damage the interests of the Company and the legitimate rights and interests of other employees and related parties; the whistleblower shall consciously maintain the normal production and

operation order and the order of reporting of the Company.

(2) The whistleblower shall be responsible for his or her own reporting behavior, and it is strictly forbidden to maliciously report or falsify cases (clues) to defraud rewards. Once the above untrue act is discovered, the whistleblower will be dealt with in accordance with the relevant provisions of the Company; and those suspected of violating laws and crimes will be transferred to judicial organs for investigation of legal responsibility.

#### **Article 6      Monitoring and Review**

1. The Board of Directors of the Company shall be responsible for monitoring and ensuring the implementation of this Policy.

2. The Company shall review this Policy in due course to ensure that it is effective.

#### **Article 7      disclose**

The summary of this policy and the key programs and actions related to business ethics shall be disclosed in the Company's Environmental, Social and Corporate Governance Report and posted on the Company's website for public access.

#### **Article 8      Supplementary Provisions**

1. This Policy, together with its amendments, shall come into force after being reviewed and approved by the Board of Directors.

2. This Policy shall be interpreted and amended by the Board of Directors of the Company.

3. In the event of any conflict between the policies previously issued by the Company and this Policy, this Policy shall prevail.