

Whistleblowing Policy of CITIC Limited

1. Purpose

The Company is committed to achieving and maintaining high standards of integrity and ethical business practices. The whistleblowing mechanism is an important part of the Company's internal control and risk management system, and an effective way to detect misconducts or significant risks within the Company. The Policy aims to safeguard the interests and reputation of the Company, to strengthen the corporate governance and internal control, and to prevent acts that harm the interests of the Company and its shareholders.

The internal whistleblowing mechanism sets out a series of principles and procedures to (i) encourage the reporting of actual or suspected inappropriate behavior, misconducts or violations occurring within the Company or involving the Company itself or its employees; (ii) guide the Company's senior management and employees in handling reports in a fair and appropriate manner; and (iii) prevent malicious allegations and protect whistleblowers from retaliation.

2. Definition of a Whistleblower

A person who makes a report, makes an allegation or provides relevant evidence of any actual or suspected inappropriate behavior, misconducts or violation within the Company. A whistleblower must certify that his/her report, allegation or evidence is accurate and reflects the fact to the best of his/her knowledge.

3. Reporting Coverage

Any employee of the Company (including directors, contractors, consultants, and any contract, temporary or seconded personnel) or any person dealing with the Company (including business partners, such as

customers or suppliers) may act as a whistleblower with respect to any of the following inappropriate behavior, misconducts or violations that have occurred (or are likely to occur) within the Company or involving the Company itself or its employees:

- (I) Any violation of or breach of any applicable laws or regulations;
- (II) Any violation of the Company's management rules, professional ethics and code of conduct;
- (III) Any act of promoting illegal interests or involving corruption, or accepting or offering commercial bribes;
- (IV) Misconducts, dishonesty or fraud related to internal control, accounting, auditing and financial matters;
- (V) Any act detrimental to ESG;
- (VI) Other acts that damage the Company's social reputation; and
- (VII) Deliberately concealing any of the above.

The whistleblower's report shall include (i) details of the matter reported (including the name of the person involved, and the relevant time, date and place where the matter occurred); (ii) the reason for the concern; and (iii) any documents and other evidence relating to the whistleblowing.

While the Company does not require the whistleblower to provide absolute evidence of all aspects of the report, the report shall be made in good faith and out of genuine concern.

4. Anonymous Disclosure

The Company strongly encourages whistleblowers to provide their names and contact information when making a report under this Policy so that clarification or further information can be obtained from them. The identity and information of the whistleblowers shall be kept strictly confidential, and any threats, attacks or retaliation against the whistleblowers shall be prohibited.

For whistleblowers who do not wish to be identified for any reason, the

Company accepts anonymous reports made by mail or electronically. Nevertheless, the report shall include sufficient information for the Company to conduct an effective investigation. It shall be noted, however, that anonymous reports without sufficient information may delay or seriously limit the investigation process.

5. Consequences of False or Malicious Reporting

Abuse of this internal whistleblowing system will be dealt with severely. Employees who use whistleblowing to intentionally fabricate false facts, maliciously accuse others, and cause troubles in the name of whistleblowing to interfere with normal business operations, or making a malicious report in other ways may be subject to disciplinary punishment, including but not limited to dismissal without notice.

6. Whistleblowing Channels and Procedures

The General Department shall be responsible for the daily implementation and supervision of this Policy.

- (I) Whistleblowers can submit reports through the following ways:
 - i. By letter to: 31st Floor, CITIC Tower, 1 Tim Mei Avenue, Central, Hong Kong.
 - ii. By e-mail to: zxgfjb@citic.com.
- (II) Letters can be written directly to the Chairman, the President of the Company or the chairman of the Audit and Risk Management Committee.
- (III) After receiving the report, the General Department shall handle it in accordance with the procedures, conduct preliminarily analysis and assessment of the report content, and refer it to the relevant department or subsidiary in accordance with the *Guidelines of CITIC Limited on Handling Whistleblowing* for investigation and handling. Relevant departments or subsidiaries shall provide feedback to the General Department on the handling situation within a certain period

of time. If necessary, the General Department will report the evaluation results to the person-in-charge of the Company or the chairman of the Audit and Risk Management Committee. If the issue reflected is specific and clear, internal investigation, investigation by external independent agencies, or sending to the law enforcement or regulatory authorities will be taken according to the nature and specific circumstances of the report. The whistleblowers may be invited to attend the meeting to provide further information about the allegations.

Where appropriate and legally permissible, the relevant units will notify the whistleblower (if the identity can be identified) of the investigation results as soon as possible after the reported issue has been internally investigated. The whistleblower must keep the feedback confidential.

If after considering the available facts, the Company has justification for suspecting that a criminal offence may have been committed, the Company reserves the right to seek legal advice to determine whether it is necessary to refer the matter to relevant authorities for further action. For the avoidance of doubt, our internal investigation must not in any way jeopardize the future investigations by law enforcement agencies.

The Company will endeavor to resolve most issues within 30 working days upon receipt of the report; where appropriate, notify the whistleblower of the progress of the investigation if an extension is required due to the complexity of the situation.

7. Complaint of Retaliation

Whistleblowers shall immediately notify the Company if he/she believes that he/she has been retaliated against for making a report.

If a complaint is received regarding retaliation against the whistleblower, the Company will investigate and provide the whistleblower with such protective measures as it deems appropriate.

The above-mentioned actions and measures to protect of the whistleblower's rights and interests shall be conducted separately from the investigation of the reported issues.

8. Retention of Records

The Company shall keep core records of all reports made by whistleblowers and the countermeasures taken. Such records shall include the name of the whistleblower (if any), the subject of the report, preliminary analysis and evaluation results, investigation results (if any) and the corresponding follow-up actions taken (if any).

All records of whistleblower reports, including the results of any investigation, shall be retained for no more than seven (7) years after the completion of the investigation or the conclusion of the incident, as the case may be.

9. Policy Management and Review

The Audit and Risk Management Committee of CITIC Limited will review this Policy from time to time, recommend changes and evaluate its effectiveness.

The Company may amend this Policy at any time at its sole discretion. The latest version of this Policy will be posted on the Company's intranet and website.