



DNE

Whistleblowing Policy

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Chapter I General Provisions

1.1 Purpose and applicable scope

This DNE Whistleblowing Policy (this "Policy") is applicable to all companies under the asset line, management line and fund line of DNE (all domestic companies under each line are collectively referred to as "Domestic Companies", all overseas companies are collectively referred to as "Overseas Companies", and "Domestic Companies" and "Overseas Companies" are collectively referred to as the "Company").

This Policy is intended to inform directors, officers, employees, suppliers and partners of the Company of the procedures for reporting Misconduct and the Company's procedures for handling reports.

The Legal and Compliance Department is responsible for the implementation of this Policy. As the Compliance Officer of the Company, Senior Vice President of Legal Affairs¹ is responsible for overall management of compliance related work. A Compliance Committee is set up by the Company, which is composed of CEO, Senior Vice President of Legal Affairs, CFO, Senior Vice President of Human Resources, CIO, Senior Vice President of Asset Management and Senior Vice President of Capital and Funds², which is responsible for guiding and supervising compliance management of the Company, and making internal decision on the handling of compliance cases. The Compliance Officer shall have a Compliance Specialist³ to be responsible for the implementation of specific compliance related matters of the Company.

1.2 Definition

Laws and Regulations include both domestic laws and regulations (including but not limited to the current effective laws, administrative regulations, judicial interpretations, local regulations, local rules, departmental rules and other regulatory documents of the People's Republic of China, and the amendments and supplements thereto from time to time), as well as applicable foreign and/or international laws and regulations (including laws of relevant trading countries and international treaties, etc.).

Company's Policies include contracts, policies and guidelines of the Company (including but not limited to management regulations, technical standards, business manuals, etc.), management decision documents, resolutions of the board of directors and shareholders' meeting, etc.

Misconduct includes but is not limited to: 1) any violation of Company's Policies; 2) any behavior involving corruption or bribery; 3) any behavior that may constitute an administrative violation or criminal offense; 4) bribes (money, hospitality, convenience, future protection, repayment of debts or other guarantees, etc.) with Stakeholders; 5) trading with the Company in the name of the Interested Parties; 6) joint investment, acquisition of common property and/or loan of assets with Stakeholders; 7) illegally taking out Company's assets or using them; 8) taking advantage of his position and the Company's undisclosed information for personal gain; 9) falsifying documents and fabricating data; 10) neglect of duties, poor attendance, sexual harassment,

retaliation against whistleblowers, etc.; 11) all other behaviors that damage personal morality and reputation of the Company.

Money refers to cash, as well as securities, real estate, other items, accommodation vouchers, membership cards, admission tickets, discount coupons, complimentary pass, tickets, debt repayment, employment provision, empowerment, etc., and other tangible and/or intangible economic benefits.

Hospitality refers to providing and/or receiving meals, banquets, golf, performances, sightseeing, gambling entertainment, etc.

Convenience refers to support other than Money and Hospitality, such as transportation, accommodation, tourist guide, and activity support.

Stakeholders refer to individuals and/or groups including customers, shareholders, investors, consumers, partners, competitors, outsourcing companies, etc., whose rights and/or benefits are directly or indirectly affected by the business operators.

Interested Parties refer to people of the same interests, such as family members, relatives, fellow villagers, classmates, etc.

Chapter II Reporting

If the directors, officers, employees, suppliers and partners of the Company know or have reason to suspect that any directors, officers, employees, suppliers and partners of the Company have been, are or may be engaged in any violation of Laws and Regulations, Company's Policies and/or have any Misconduct, they shall report it in time through the following email and provide as much information as possible for the Company to conduct a thorough and complete investigation of this situation.

Email for reporting: compliance@dnegroup.com

2.1 Acceptance and handling of Reporting

The Legal and Compliance Department of the Company is the department that accepts reports and conducts follow-up investigation and handling. The Compliance Specialist will collect and integrate the reported information, and the Compliance Officer will review the case types and promote the case according to applicable internal investigation procedures in a DNE Compliance Investigation Policy. All departments of the Company shall provide full support to the relevant work of the Legal and Compliance Department in handling reports.

Under special circumstances, if the person being reported against is a Compliance Officer and/or a Compliance Specialist, the whistleblower should report to any member of the Compliance Committee. The Compliance Officer and the Compliance Specialist shall avoid, and the Compliance Committee (except for the Compliance Officer) should designate specific investigators and the person should accept the report and handle it.

2.2 Transfer of Report

Except for the report received by the Legal and Compliance Department through the email for reporting, if other department personnel receive a report, they shall immediately (within 12 hours) transfer the report to the Legal and Compliance Department through the email for reporting after receiving the report.

When other departments find violations or other suspicious circumstances in the process of internal audit and external investigation, they shall report to the Compliance Officer, apply for further verification and start internal investigation when necessary.

2.3 Reporting acceptance procedures

The Compliance Specialist is responsible for the preliminary verification of the reported matters received and reporting to the Compliance Officer. The Compliance Officer may decide to handle the corresponding report according to the following procedures as appropriate:

Type	Description	Action
Type A	The report is specific, reliable and/or with supporting materials	An internal investigation should be conducted to obtain sufficient findings

Type B	The Company has already been aware of the Misconduct involved in the report and is ready to carry out or has carried out and completed the investigation. The report does not provide additional useful information	Whistleblowers should be invited to provide further details (if preparing for investigation), or informed of relevant information (if investigation is completed)
Type C	The report provides certain information, but evidence is insufficient	Whistleblowers should be invited to provide further details, and preliminary investigation and verification should be carried out based on the information provided by the whistleblowers
Type D	The reported information is vague and there is no supporting evidence	The whistleblower should be invited to provide further details. If the whistleblower is unable to provide further information, the Compliance Officer will decide whether to close the report after verification.

The Compliance Officer will confirm receipt of the report to the whistleblower within 5 working days after receiving the report, and if necessary, ask the whistleblower to provide further details or evidence. Within 20 working days after receiving the report, if the Legal and Compliance Department accepts the report after preliminary verification, the Compliance Officer shall feedback the report acceptance and preliminary verification to the whistleblower, and ask the whistleblower to keep it confidential. The Compliance Officer shall properly record the acceptance process and results of the report, inform the whistleblower of the relevant results in a timely manner, and keep the record properly for reference.

2.4 Report content and requirements

Directors, officers, employees, suppliers and partners can choose to submit reports in real name or anonymously. The Company encourages real name reporting, and will keep the information of the whistleblower strictly confidential. When submitting the reported information, the whistleblower should follow the principle of objectivity and truthfulness, describe the person being reported against and the reported facts, and provide as much supporting material and evidence as possible.

The Company opposes malicious reporting. If the report is found to be intentional fiction, frame-up or malicious slander after investigation, the Company will take measures to protect the legitimate rights and interests of relevant employees, and reserve the right to seek the corresponding legal liabilities of malicious whistleblowers.

When directors, officers, employees, suppliers and partners make self-reports, the penalty or punishment for the person making self-report may be reduced or exempted as appropriate.

2.5 Confidentiality

All reports of potential Misconduct will be kept confidential, and the reported information will only be received by the Compliance Specialist and Compliance Officer and provided, to a minimum extent, to those who need to know it and will conduct investigation based on the information. All employees who have access to the report and follow-up investigation shall have the confidentiality obligation, and shall keep the identity information of the whistleblower strictly confidential. As for

the case information, it shall not be disclosed without authorization, except for that published as appropriate after the investigation is completed. Violators will be subject to disciplinary action, and up to termination of employment in serious situations.

2.6 No retaliation

The Company prohibits any retaliation against whistleblowers. Retaliation against whistleblowers will be regarded as a serious violation of this Policy, and the Company will punish those responsible for retaliation in accordance with relevant disciplinary regulations of the Company, and reserve the right to hold them liable.

The Company will take all measures within its ability to prevent the whistleblower from being retaliated against, including but not limited to regularly confirming whether the whistleblower is retaliated against or adversely affected.

If the whistleblower is afraid of being retaliated and/or has been retaliated against, and requests the Company to provide protection, the Company will take all measures within its ability to protect the whistleblower, including but not limited to prohibiting relevant personnel from access to the Company's premises.

Chapter III Supplementary Provisions

3.1 Matters not covered

Matters not covered in this Policy shall be implemented in accordance with the relevant provisions of the articles of association and general rules and regulations of the Company; in case of any inconsistency between this Policy and the articles of association and general rules and regulations, the articles of association and general rules and regulations shall prevail.

3.2 Entry into force and interpretation

In case of any objection to the understanding of this Policy, the interpretation of the Legal and Compliance Department shall govern.

If the content of this Policy conflicts with other provisions of the Company concerning reporting, the Legal and Compliance Department shall decide the content that prevails according to the specific situation.

This Policy comes into force as of the date of issuance.