



# 新奥天然气股份有限公司

## ENN Natural Gas Co., Ltd.

(Stock Code: 600803)

### **Anti-fraud Prevention, Anti-corruption and Anti-bribery Policy**

#### **1. Principle:**

- 1.1. This policy applies to all personnel of ENN Natural Gas Co., Ltd. and its member enterprises (including subsidiaries, associated companies, and joint ventures, hereinafter referred to as “The Company”), including the company’s directors and all levels of staff. The Company advocate that all business partners comply with the requirements of this policy.
- 1.2. The Company adheres to the values of “upholding conscience, advocating self-motivation, achieving through data, and enjoying sharing” as the daily code of conduct and guidelines. This policy aims to promote the implementation of the corporate culture of “upholding conscience”, requiring all business partners to be “honest and self-disciplined”, and strengthening the company’s ability to prevent fraud, corruption, bribery, and other misconduct.
- 1.3. The Company is committed to preventing, investigating, and holding accountable for suspected fraud, corruption, bribery, and other violations to maintain good corporate operating order and ensure the company’s continuous and healthy development.

#### **2. Definition**

- 2.1. In this policy, fraud refers to the act of illegally obtaining large amounts of public or private property by fabricating facts or concealing the truth for the purpose of illegal possession. Corruption refers to the act of embezzling, stealing, defrauding, or otherwise illegally possessing company property by taking advantage of one’s position. Bribery refers to the act of giving property or other benefits to others in order to seek improper benefits.

2.2. In this policy, fraud, corruption, bribery, and other misconduct are included, but are not limited to the following:

- (1) Engaging in transactions involving conflicts of interest or seeking personal benefits without authorization;
- (2) Colluding with customers, suppliers, or competitors to harm the company's interests;
- (3) Illegally possessing company property;
- (4) Misappropriating company funds or lending company funds to others without authorization;
- (5) Providing guarantees to others or making commitments on behalf of the company without authorization;
- (6) Accepting bribes from internal business partners, external customers, or suppliers;
- (7) Engaging in bribery while serving in the company.

### **3. Policy and Procedure**

3.1. The Company requires all business partners to strictly comply with the “Criminal Law of the People’s Republic of China”, the “Anti-Unfair Competition Law of the People’s Republic of China”, and other relevant laws and regulations, with zero tolerance for fraud, corruption, and bribery.

3.2. The Company has formulated, issued, and continuously revised the “Disciplinary Measures for Employees of ENN Natural Gas Co., Ltd. for Violations and Disciplinary Offenses” to ensure the implementation of the above anti-fraud, anti-corruption, and anti-bribery legal requirements.

3.3. The Company promotes the “Anti-Fraud Prevention, Anti-Corruption, and Anti-Bribery Policy” to all business partners through various channels and regularly conducts training on anti-fraud, anti-corruption, and anti-bribery.

3.4. The Company consistently signs the “Integrity Agreement” with external customers when signing contracts.

3.5. The Company is allowed to accept or provide small, memorable and appropriate gifts to business partners, as well as moderate reception, and is not allowed to provide or accept gifts and receptions that do not meet the company's regulations or may affect business decisions.

- 3.6. The internal control and risk management department of the company regularly assesses the procedures and execution of anti-fraud prevention, anti-corruption, and anti-bribery and continuously improves the internal control procedures and environment.
- 3.7. The internal audit department of the company regularly conducts an independent assessment of the potential fraud, corruption, and bribery in various businesses and internal control procedures.

#### **4. Reporting and Investigation**

- 4.1. The Company encourages all business partners and stakeholders to report fraud, corruption, and bribery related misconduct through the issued “Reporting Policy” and channels (email 803jvbao@enn.cn or letter).
- 4.2. The Company prioritizes the confidentiality of reports, with strict control systems and procedures for the acceptance and investigation of reports, strictly keeping confidential the personal information of the reporter and all data provided by the reporter. Those responsible for violating confidentiality regulations will be dealt with severely, and those who constitute crimes will be handed over to the judicial authorities for legal processing. The internal audit department will investigate according to the procedures, and the company will implement accountability according to the investigation results, and those who violate the law will be held legally responsible.
- 4.3. In the event of fraud, corruption, and bribery cases that cause significant impact or loss to the company, the management will promptly report to the board of directors.

#### **5. Supplementary Provision**

This policy was issued on December 31, 2021, and the company’s audit department supervises the implementation of this policy.