

Whistleblowing Management and Whistleblower Protection System of Beijing Enterprises Urban Resources Group Limited

Chapter I General Provisions

Article 1 To regulate whistleblowing of Beijing Enterprises Urban Resources Group Limited (“BEUR”, and its subsidiaries hereinafter collectively referred to as the “Group”) and protect the lawful rights and interests of whistleblowers, safeguard whistleblowers’ legitimate rights and interests and promote healthy corporate development. This system has been formulated in accordance with the relevant laws and regulations of the Group’s place of registration, and in line with the actual situation of the Group.

Article 2 The term "whistleblowing" in these Regulations refers to citizens, legal persons, or other organizations reporting or complaining about violations of laws, regulations, and relevant rules and policies by the Group’s employees. Such reports or complaints shall be submitted via correspondence, fax, telephone, visits, the Internet, or other means and handled by the Group in accordance with the law.

A citizen, legal person, or other organization that provides information, makes suggestions, offers comments, or lodges complaints through the means specified in the preceding paragraph shall be defined as a "whistleblower".

Article 3 The acceptance and management of whistleblowing shall be conducted in a fact-based, people-centered, and categorized manner. It shall adhere to the principles of lawfully, promptly, and on-site resolving issues, combined with source prevention, multi-channel resolution, persuasion, and education.

Article 4 Whistleblowing that includes the whistleblower’s real name, affiliated work unit, and specific contact information shall be deemed as real-name whistleblowing.

Where anonymous whistleblowing falls within the scope of acceptance, the Group shall process it in accordance with prescribed procedures. For materials submitted under such circumstances, unauthorized verification of the whistleblower’s handwriting, Internet Protocol (IP) address, or other relevant information is prohibited.

Article 5 The legitimate rights and interests of any individual or unit that lawfully submits whistleblowing to the Group shall be protected by law. The Group shall strictly keep confidential the content of the whistleblowing and the whistleblower’s information.

Article 6 The System shall apply to all the domestic and overseas subsidiaries in the Group. Business partners, including suppliers and contractors, are also encouraged to comply with the System.

Chapter II Organization of Whistleblowing Work and the Scope of Responsibilities

Article 7 The Whistleblowing Management Department (WMD) is responsible for guiding, coordinating, and managing the daily whistleblowing work within its supervision scope. Relevant business divisions shall handle whistleblowing matters falling within their functions and duties in accordance with the provisions of these Regulations.

The Group's WMD shall allocate sufficient staff and provide necessary material and security support for the acceptance of whistleblowing reports.

Article 8 The WMD shall perform the following duties:

- (1) Accept whistleblowing reports submitted by whistleblowers, and transfer or assign such matters to relevant departments;
- (2) Handle whistleblowing reports assigned or transferred by higher-level authorities;
- (3) Respond to whistleblowers regarding the progress and outcomes of their reported matters;
- (4) Publicize whistleblowing-related regulations and guide whistleblowers to submit reports in compliance with laws and regulations;
- (5) Conduct investigations into reported matters and put forward improvement recommendations.

Article 9 Under the coordination of the WMD, the Group's relevant business divisions shall conscientiously handle whistleblowing reports, timely feed back the progress and results of handling, actively assist in receiving visitors, and provide professional advice and written responses related to the reported matters.

Article 10 The WMD shall clarify the responsibilities of the personnel handling whistleblowing matters and formulate standardized procedures. Those who delay handling or adopt obviously improper handling methods shall be subject to criticism; where serious consequences are caused, the responsible persons shall be held accountable in accordance with applicable regulations.

Chapter III Submission of the Whistleblowing Matters

Article 11 The Group accepts and handles the following whistleblowing matters:

- (1) Matters related to the Group's business operations;
- (2) Violations of disciplines, laws, and regulations by the Group's employees.

For whistleblowing matters that shall be handled through litigation, arbitration, or other statutory means in accordance with the law, whistleblowers shall submit them to the competent authorities in accordance with the procedures specified by relevant laws and regulations.

Article 12 The Group shall publicly disclose whistleblowing channels to facilitate understanding by whistleblowers.

Article 13 The reported matters raised by the whistleblowers shall be objective and truthful, while the whistleblowers shall be responsible for the authenticity of the content of the materials provided, and must not fabricate or distort the facts, and must not falsely accuse or frame others.

Article 14 The whistleblowers shall withdraw the reported matters through written reports, phone calls or other means. The Whistleblowing Management Department shall terminate the whistleblowing process after verifying the information.

Article 15 The Whistleblowing Management Department shall designate responsible persons to open, read, number, register and archive reported matters presented through letters, fax and Internet.

Other departments shall promptly transfer the whistleblowing materials submitted to them to the Whistleblowing Management Department.

Article 16 If the whistleblower makes a report by telephone, the interviewers should keep an accurate record of the name (title), contact information, requests of the whistleblowers and the facts, reasons, and other claims they stated. If necessary, the phone call shall be recorded after informing the relevant whistleblowers.

Article 17 When whistleblowers visit the reception venue, interviewers shall first verify their identity. If necessary, the whistleblowing interview may be video-recorded or audio-recorded after notifying the whistleblower.

Article 18 For whistleblowing matters involving strong professional or regulatory nature, the WMD shall consult with the Group's relevant departments to conduct joint interviews.

Article 19 When the whistleblowers fall under any of the following circumstances, interviewers shall suspend the meeting, persuade and educate the whistleblower, and notify the security personnel to strengthen security. If the persuasion and education are ineffective, interviewers shall notify the relevant government departments:

- (1) Refusing to submit reported matters at the designated reception venue or entering offices without authorization;
- (2) Illegally gathering around offices, besieging or attacking office premises, damaging the Group's property, intercepting the Group's vehicles, or blocking and obstructing traffic;
- (3) Carrying dangerous articles or controlled instruments;
- (4) Insulting, assaulting, threatening, or extorting Group staff, or illegally restricting others' personal freedom;
- (5) Loitering and causing disturbances at the reception venue, or leaving persons unable to care for themselves at such venues;
- (6) Inciting, colluding with, coercing, or enticing others with property interests, or manipulating others behind the scenes to blow the whistle, or exploiting whistleblowing for personal gain;
- (7) Attempting or threatening to commit suicide, self-mutilation, or other aggressive acts;
- (8) Committing other acts that disrupt public order or endanger national or public security.

Chapter IV Acceptance of the Whistleblowing Matters

Article 20 Upon receiving a whistleblowing report, if the WMD can make an on-the-spot decision on whether to accept it, the WMD shall do so immediately. If an on-the-spot decision cannot be made, the WMD shall register the report and notify the whistleblower in writing or by telephone, unless the whistleblower's name (title), contact information is unclear or false, or the whistleblower explicitly states that no reply is required. If the whistleblower submits a new complaint before the original report is accepted, the WMD shall handle the original and new matters collectively.

Where the materials provided by the whistleblower are incomplete and prevent a decision on acceptance, the WMD shall request the whistleblower to supplement the relevant evidence or information.

Article 21 Whistleblowing reports shall not be accepted if they fall under any of the following circumstances:

- (1) Beyond the Group's supervision scope;
- (2) Have already been resolved, or should be addressed through litigation, arbitration, or other legal means;
- (3) Have already been accepted or are under processing, and the whistleblower submits the same complaint without new factual grounds;
- (4) Have already been replied to or are under processing by the Group, and the whistleblower lodges repetitive complaints based on the same facts and reasons.

Article 22 The WMD shall transfer whistleblowing reports to the relevant departments based on the nature, type of the matter, and the authority scope of the relevant departments.

Article 23 Staff members of the WMD shall not disclose or transfer the whistleblower's personal information, submitted materials, or leaders' handling instructions to the subjects of the report. They shall also not conceal, destroy, or forge whistleblowing materials.

Chapter V Handling of the Whistleblowing Matters

Article 24 The WMD shall register all whistleblowing reports individually and handle them through the following categorized approaches:

- (1) For comments or suggestions put forward by whistleblowers regarding the Group, the WMD shall conduct careful research and analysis. Those that are conducive to the Group's work improvement and healthy development shall be adopted;
- (2) For complaints and requests supported by clear facts, the WMD shall conduct investigations and verification in accordance with relevant laws and regulations, the Group's internal policies, and actual circumstances;
- (3) For complaints lacking factual basis or failing to comply with laws, regulations, the Group's internal policies, or other relevant provisions, the WMD shall reject them;
- (4) For whistleblowing reports involving suspected violations of national laws, regulations, or the Group's internal policies, the WMD shall transfer them to the relevant internal departments or competent government authorities.

Chapter VI Rights and Obligations of Whistleblowers

Article 25 Whistleblowers shall have the following rights:

- (1) File whistleblowing reports regarding suspected violations of laws, regulations, and disciplinary rules;
- (2) Request the recusal of the staff members involved in the reported matter;
- (3) Lodge complaints against the accepting unit or handling staff for dereliction of duty or other improper acts;
- (4) Other rights stipulated by national laws and regulations.

Article 26 Whistleblowers shall fulfill the following obligations:

- (1) Truthfully provide all relevant evidence and information, be responsible for the authenticity of the reported content, and shall not distort facts or falsely accuse others;
- (2) Conscientiously safeguard public order and the order of complaint submission (including letters and visits), and shall not undermine national interests or the legitimate rights and interests of citizens;
- (3) Keep confidential the handling outcomes and other relevant feedback information;
- (4) Other obligations stipulated by national laws and regulations.

Chapter VII Retaliation against Whistleblowers

Article 27 Any of the following circumstances shall constitute an act of retaliation against whistleblowers:

- (1) Infringe upon the personal safety rights of the whistleblower or their close relatives through violence, threats, or illegal restriction of personal freedom;
- (2) Illegally seize or damage the property of the whistleblower or their close relatives;
- (3) Falsely accuse the whistleblower or their close relatives;
- (4) Insult or slander the whistleblower or their close relatives;
- (5) Illegally dismiss, lay off, or terminate the employment of the whistleblower or their close relatives in violation of relevant provisions;
- (6) Withhold, whether in disguised form or not, the salaries, bonuses or other benefits of the whistleblower or their close relatives;
- (7) Refuse to approve or delay the approval of reasonable applications submitted by the whistleblower or their close relatives that are otherwise eligible for approval;
- (8) Other acts that infringe upon the legitimate rights and interests of the whistleblower and their close relatives.

Chapter VIII Protection Measures and Commitments for Whistleblowers

Article 28 Whistleblowers' legitimate rights and interests as stipulated by national laws and regulations shall be protected. Relevant departments of the Group shall implement strict confidentiality provisions, a robust recusal mechanism, and effective anti-retaliation measures to safeguard the legitimate rights and interests of whistleblowers. They shall also accept and respond to whistleblowers' requests related to the protection of their legitimate rights and interests.

Article 29 Departments and staff handling whistleblowing reports shall voluntarily recuse themselves if they have a conflict of interest or other relationships with the whistleblower or the subject(s) of the report that may affect the fair handling of the matter. Whistleblowers have the right to request the recusal of such personnel.

Article 30 No unit or individual of the Group may retaliate against a whistleblower by any means or on any pretext, nor shall they improperly access or disclose the whistleblower's information without authorization.

Article 31 The Group advocates and encourages real-name whistleblowing, which shall be given priority in processing, handling, and feedback by the Group.

Article 32 For those who violate confidentiality provisions, interfere with, and obstruct the whistleblowing process or retaliate against a whistleblower, the Group shall hold them accountable and deal with their cases seriously according to laws, regulations, and disciplinary procedures. Where the act is suspected of violating the law or constituting a crime, the relevant personnel shall be transferred to the competent authorities for legal liability.

Chapter IX Confidentiality Measures

Article 33 The Group shall implement the following confidentiality measures throughout the whistleblowing process:

- (1) Whistleblower complaints shall be received and handled by designated personnel. The process shall take place at a dedicated venue, or via a designated website or telephone number, with no presence of personnel unrelated to whistleblowing handling;
- (2) All materials concerning whistleblowing shall be stored in a location that meets confidentiality requirements. Unauthorized personnel (not involved in whistleblowing handling) are prohibited from accessing this location.
- (3) Disclosure of whistleblowing content and whistleblowers' personal information—including name, employer, address, and telephone number—is strictly prohibited. Transfer of whistleblowing materials to the complained individual(s) or unit(s) is also strictly forbidden.
- (4) Other necessary confidentiality measures that as deemed necessary.

Chapter X Supplementary Provisions

Article 34 The Group shall review the System at least once a year, and revise it in accordance with the changes in national laws and regulations of the jurisdictions where it operates, as well as relevant international conventions.

(The English translation of the System is for reference only; in case of any inconsistency between the Chinese version and the English translation, the Chinese version shall prevail.)