



Greenway Mining Group Limited

信盛礦業集團有限公司*

(Incorporated in the Cayman Islands with limited liability)

(Stock Code: 2133)

WHISTLEBLOWING POLICY

1. GENERAL POLICY

“Whistleblowing” refers to a situation where an employee of the group including Greenway Mining Group Limited (the “**Company**”), its subsidiaries, and joint ventures or companies in which the Group holds a management and controlling interest (collectively the “**Group**”) or related third parties (e.g. customers, suppliers, etc., who deal with the Group) (the “**Third Parties**”) decides to report serious concerns about any suspected misconduct, malpractice or irregularity.

This policy is intended to encourage and assist whistleblowers (the “**Whistleblowers**”) to disclose information relevant to suspected misconduct, malpractice or irregularity through a confidential reporting channel. The Company will handle the report with care and will treat the Whistleblower’s concerns fairly and properly.

2. RESPONSIBILITY TO REPORT

The Group requires the employees to promptly alert their supervisor or higher management of business and work-related situations that could be damaging to the Group or cause harm to others such as emergencies, crimes, accidents, irregularities or other unexpected events; and to take reasonable action to prevent damage or harm. Employees could be regarded as committing misconducts if they assist or authorise others in activities, or conceal or fail to report any known or suspected breaches by others. Employees and Third Parties may also have a duty to report corruption to the authorities if required to do so by local laws or regulations.

3. PROTECTION TO WHISTLEBLOWER

Persons making genuine and appropriate reports under this policy are assured of fair treatment. In addition, the Group’s employees are also assured of protection against unfair dismissal, victimisation or unwarranted disciplinary action, even if the concerns raised turned out to be unsubstantiated. The Group reserves the right to take appropriate actions against anyone (employees or Third Parties) who initiates or threatens to initiate retaliation against those who have raised concerns under this policy. In particular, employees who initiate or threaten retaliation will be subject to disciplinary actions, which may include summary dismissal. Management will support all employees and encourage them to raise concerns without fear of reprisals.

4. CONFIDENTIALITY

The Group will make every effort, within its capacity to do so, to keep a Whistleblower's identity confidential. Should an investigation lead to a criminal prosecution or as the relevant laws and regulations require, it may become necessary for a Whistleblower to provide evidence or be interviewed by the relevant authorities.

In order not to jeopardise the investigation, the Whistleblower is also required to keep confidential the fact that he or she has filed a report as well as the nature of concerns and the identities of those involved.

5. MISCONDUCT, MALPRACTICE AND IRREGULARITY

The Group is not possible to give an exhaustive list of the activities that constitute misconduct, malpractice or irregularity covered by this policy. If an employee or Third Party suspects any misconduct, malpractice or irregularity, such employee or Third Parties is recommended to make reports in accordance with this policy.

6. REPORTING AND INVESTIGATIONS

(i) Complaint Officer

The Group appoints the legal counsel as complaint officer (the "**Complaint Officer**"), to handle the complaint matter and be responsible to the Audit Committee of the Company (the "**Audit Committee**").

(ii) Reporting Channels

In general, the Whistleblowers should make their reports to the Complaint Officer for review. For employees, they may prefer to have an initial discussion with his/her manager or local human resources (the "**HR**") representatives. However, the manager or HR must in turn report any potential or actual misconducts, malpractices or irregularities to the Complaint Officer. If employees feel uncomfortable doing this (e.g., the line manager has declined to handle your case or it is the line manager who is the subject of the report), then the employee should contact the Complaint Officer directly. Business partners, suppliers and Third Parties are encouraged to report to the Complaint Officer.

Any business units in receipt of a letter or a verbal report alleging any of the misconducts, malpractices or irregularities shall redirect the letter or the report to the Complaint Officer.

You can make a report as follows:

- (a) Verbally through our Whistleblower Hotline No.: +86 139 7717 0208
- (b) In writing (by post or by email) to the Complaint Officer using the standard form (Report Form) attached as Annex of this policy.

(iii) Reports and Supporting Documentation

While the Group does not expect the Whistleblower to have absolute proof or evidence of the misconducts, malpractices or irregularities reported, the report should show the reasons for the concerns and full disclosure of any relevant details and supporting documentation. If you make a report in good faith then, even if it is not confirmed by any subsequent investigation, the Whistleblower's concerns would be valued and appreciated.

(iv) Investigations

The Complaint Officer will assess every report received through the reporting channel described in section 6(ii) above to decide if and/or whether a full investigation is necessary.

If there is sufficient evidence to suggest that a case of possible criminal offence or corruption exists, the matter will be reported by the Complaint Officer to the relevant local authorities (for instance, Independent Commission Against Corruption ("ICAC") in Hong Kong).

In some situations (e.g. in case of possible criminal offence), the Complaint Officer may have to refer the matter together with the relevant information to the authorities. Please note that once the matter is referred to the authorities, the Group may not be able to take further action on the matter.

The Complaint Officer will prepare a full report on the investigations without revealing the identity of the Whistleblower. For confirmed cases of misconduct, malpractice or irregularity, the normal process is for the responsible line management (with the assistance of HR representative) to determine what disciplinary action is appropriate and if necessary after review by the Complaint Officer, make a recommendation to Audit Committee for final decision.

7. FALSE REPORTS

If a Whistleblower makes a false report maliciously, with an ulterior motive, or for personal gain, the Group reserves the right to take appropriate actions against such person to recover any loss or damage as a result of the false report. In particular, employees may face disciplinary action, including dismissal where appropriate.

8. ANONYMOUS REPORTS

As the Group will take reporting of misconducts, malpractices, and irregularities seriously and in a timely and properly manner, it is preferred that these reports are not made anonymously. However, it is recognised that for some reasons, the Whistleblower may not feel comfortable reporting potential violations directly to the Complaint Officer. In these cases, anonymous reports may be submitted to the Audit Committee of the Company.

9. RECORD RETENTION

Records shall be kept for all reported misconducts, malpractices, and irregularities by the relevant parties in the Group under section 6 above. In the event a reported irregularity leads to an investigation, the party responsible for leading / conducting the investigation shall ensure that all relevant information relating to the case is retained, including details of corrective action taken for a period not exceeding six years (or whatever other period may be specified by any relevant legislation).

10. RESPONSIBILITY FOR IMPLEMENTATION AND REVIEW OF POLICY

This policy has been approved and adopted by the Board. The Audit Committee has overall responsibility for implementation, monitoring and periodic review of this policy. In addition, the Audit Committee has delegated the day-to-day responsibility for implementation of the policy to the Complaint Officer. If there are any questions about the contents or application of this policy, please contact the Complaint Officer.

11. REVIEW OF THIS POLICY

The Board has delegated the authority to the Audit Committee to review or make any revisions to this policy, as appropriate, to ensure the effectiveness of this policy.

12. LANGUAGE VERSION

The text of this policy appears in both English and Chinese languages. In case of discrepancy, the English version shall prevail.

(Effective Date: 2 March 2022)

**ANNEX
REPORT FORM
(CONFIDENTIAL)**

The Group is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, encourages employees of the Group and related third parties (e.g. customers, suppliers, etc., who deal with the Group) to raise concerns and report in confidence, about misconducts, malpractices or irregularities in any matters related to the Group.

The Whistleblowing Policy has been established to encourage and assist Whistleblowers to disclose information relevant to the misconducts, malpractices or irregularities through a confidential reporting channel (to the extent possible). The Group will handle this report with care and will treat the Whistleblower's concerns fairly and properly.

If you wish to make a written report, please use the report form below. Once completed, this report becomes confidential. You may send the report, marked confidential and addressed to the Complaint Officer (Mr. Huang Li Jiang), by post to the relevant addresses below or by email to huanglijiang@greenwaymining.com

To: The Complaint Officer
Greenway Mining Group Limited Room 102, Unit 1, Building 1, Ruiyuan, Jinjiang Community, Yanchang Line, Beijing Road, Panlong District, Kunming City, Yunnan Province, China
Information of the Whistleblower: Name: _____ Tel No: _____ Address: _____ Email: _____ Date: _____
The names and department of those involved (if known): _____
Details of concerns: Please provide full details of your concerns: names, dates and places and the reasons for the concerns (continue on separate sheet if necessary) together with any supporting evidence / documents. Remarks: The Company encourages the complainant to provide the names with this report. Anonymous reports are much less persuasive but Complaint Officer will try our best endeavors to consider them.