



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)

ANTI-CORRUPTION AND BRIBERY POLICY

Purpose

Greenway Mining Group Limited (the “**Company**”) and its subsidiaries (collectively the “**Group**”) are committed to abiding by all laws and regulations or if necessary to exceeding them, to prevent corruption and bribery in all business dealings. This Policy provides information and guidance to our personnel on how to recognize and deal with bribery and corruption, and applies to all employees and contract workers of the Group.

Scope

Corruption and bribery include any illicit advantage offered or accepted as an inducement to or a reward for performing or abstaining from performing any duties. Items considered bribes include cash, cash equivalents, loans, commissions, benefits in kind or other advantages, but excluding traditional gifts of nominal value given during festive seasons. In this Policy, the following words shall have the meanings set out below:

- “**advantage**” shall mean paying or giving anything of value directly or indirectly, or any other action, such as any office, employment or contract; any payment or discharge of any loan or other liability; any other service or favour; the exercise or forbearance from the exercise of any right or any power or duty; and any offer, undertaking or promise;
- “**bribes**” shall mean anything of value given in an attempt to affect a person’s actions or decisions in order to gain or retain a business advantage;
- “**hospitality**” shall mean meals, receptions, tickets to entertainment, social or sports events; and
- “**kickback**” shall mean the return of a sum already paid or due as a reward for awarding further business.

Anti-Corruption and Bribery

Employees are expected to comply with all applicable laws, rules and regulations in relation to anti-corruption and bribery, and adhere to the following:

- no acceptance of improper payments, kickbacks and other forms of bribery;
- no payment, offer, solicitation, proposal of terms for, or acceptance of, bribes directly or with the assistance of any organization or individual;
- no attempt to circumvent any anti-corruption and bribery provisions through the use of agents, partners, contractors, family members or any others acting on someone’s behalf;

- no offer or acceptance of any gift, gratuity or hospitality that might be perceived to unfairly influence a business relationship; and
- no acceptance of lavish or frequent entertainment from persons with whom the Group has business dealings if, by doing so, it might be perceived that the employees are placing themselves in a position of obligation to the offeror.

This Policy should be read in conjunction with the Group's Business Ethics and Code of Business Conduct Policy and Gift Governance Statements which together set out the minimum standards to assist employees in recognizing circumstances which may lead to or give the appearance of involvement in corruption or bribery.

Reporting Method

Every employee has a duty to report any potential violations of this Policy and employee who receives an offer of bribery must immediately report to his/her supervisor, the audit department and/or the contact details as follows:

Greenway Mining Group Limited
 Room 102, Unit 1, Building 1,
 Ruiyuan, Jinjiang Community,
 Yanchang Line, Beijing Road,
 Panlong District, Kunming City, Yunnan Province,
 China
 Phone: +86 139 7717 0208
 Email: huanglijiang@greenwaymining.com
 Contact person: Mr. Huang Li Jiang

The whistleblower can disclose the relevant matters in person or in writing. If the disclosure is made in writing, the whistleblower must put his name on any disclosed information and put it in an envelope, seal the envelope, and clearly mark " Private and confidential - only for the recipient to read" to ensure confidentiality. Anonymous complaints are usually ignored.

Investigation process

- (i) The form of investigation and the time required vary according to the nature and special circumstances of the complaint. The complaint may be handled in the following ways:
 - Internal investigations;
 - Referral to relevant public or regulatory agencies;
 - Refer to an external auditor; and/or
 - Establish an independent investigation team.
- (ii) After receiving the report, the general manager of the audit department will reply to the reporter as soon as reasonably practicable:
 - Indicates that relevant concerns have been received;

- Will provide opinions on further investigation of the incident, if further investigation, explain the nature of the investigation; and/or
 - Estimate the time required for the survey.
- (iii) If there is evidence showing criminal activities, corrupt activities for receiving benefits, or violations of laws, regulations and regulatory requirements, the general manager of audit and risk management has the legal responsibility to notify the relevant public or regulatory agencies, such as the police, the Independent Commission Against Corruption, and the Hong Kong United Exchanges and Securities and Futures Commission, etc. (as appropriate).

Confidential

All issues will be treated as sensitive information and kept as strictly confidential as possible, although in some cases, the company may disclose information when required by law.

Review of this Policy

The Company will review this Policy from time to time as appropriate, regardless of any event, once every three years.