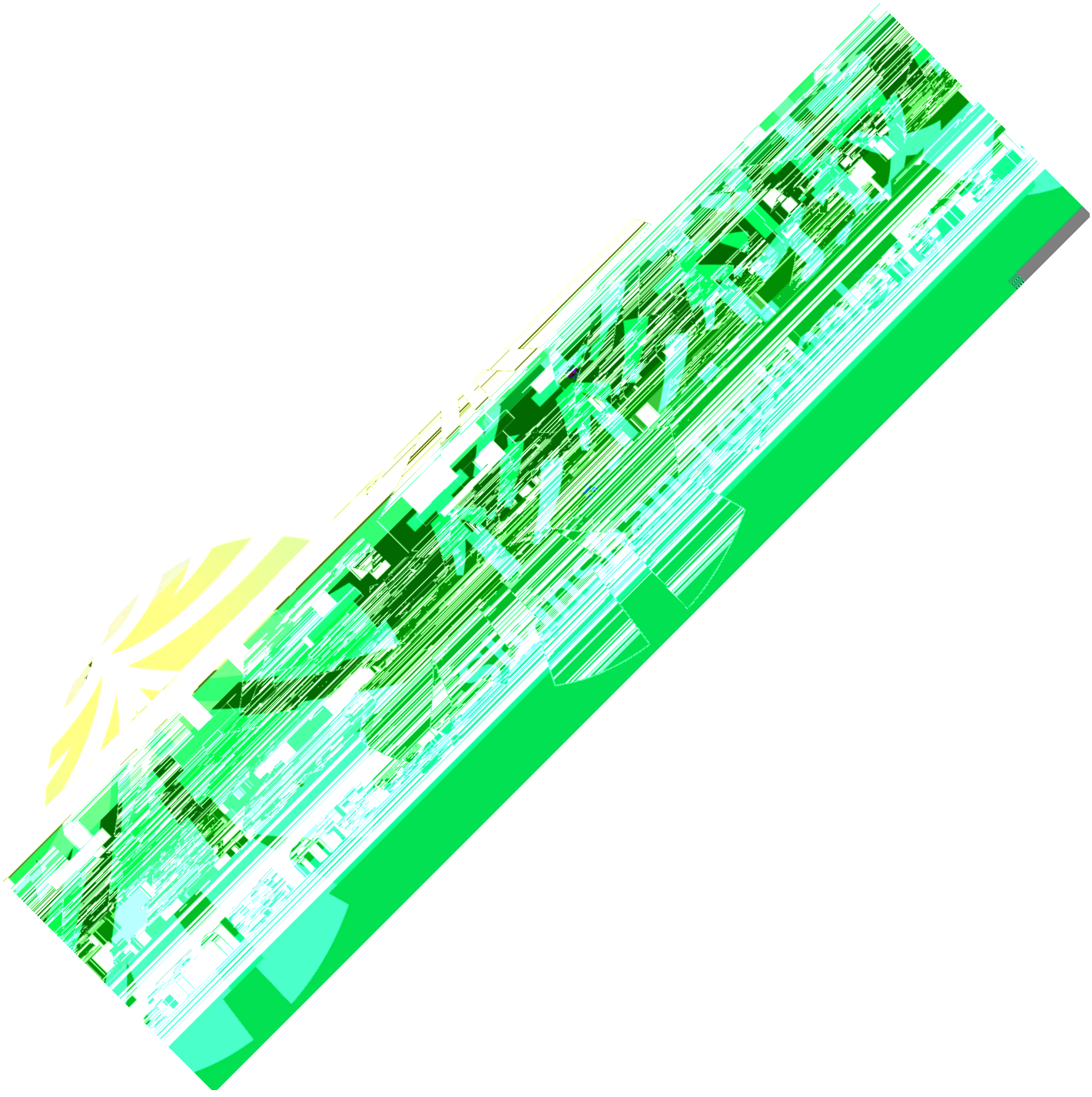

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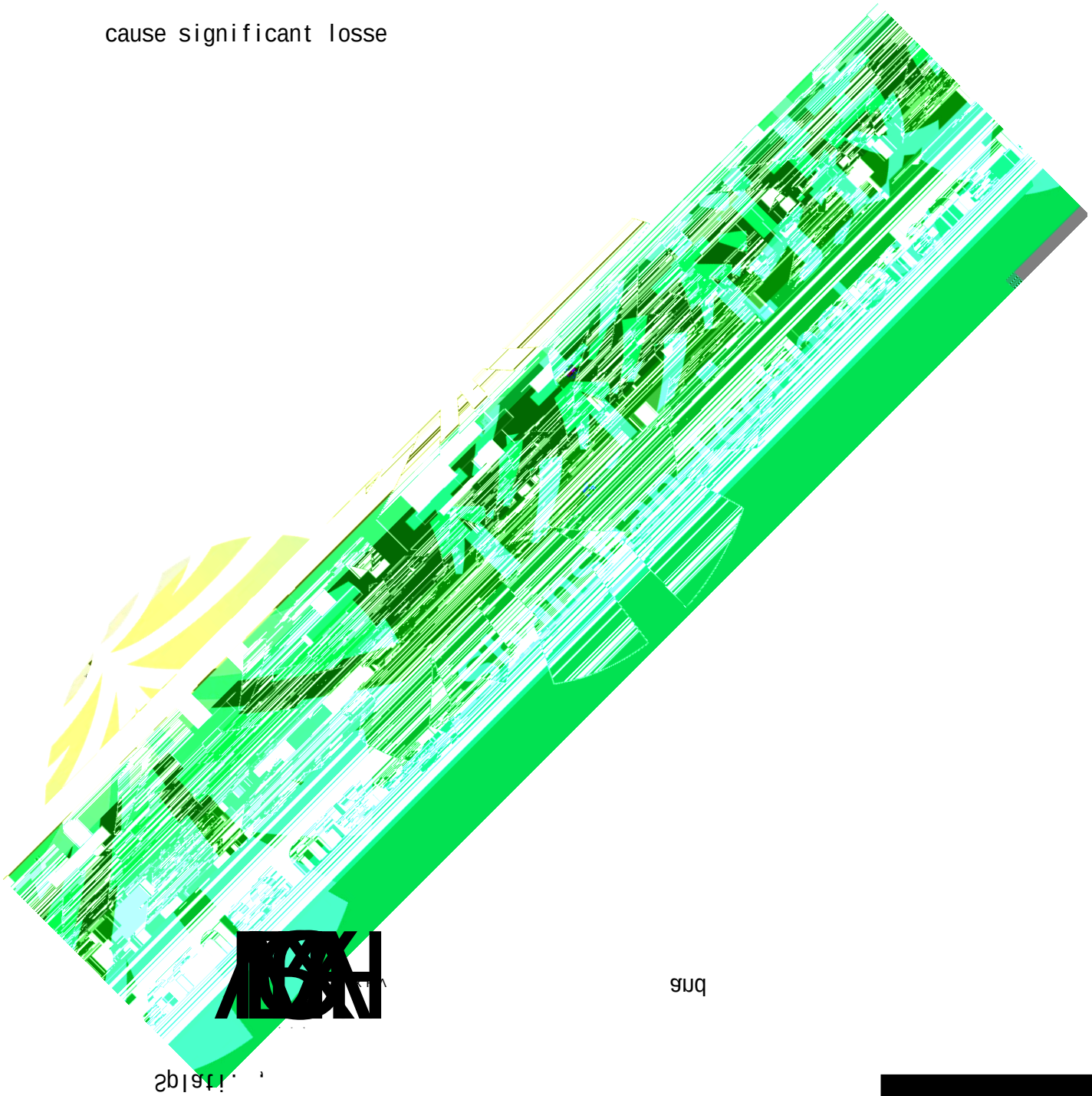
- Br[illegible] corruption, and fraud: The[illegible]y, corruption, and f[illegible]hat harm the [illegible]y's legitimate economic interests and seek improper financial benefits.

- Bribery, corruption, and fraud that harm the legitimate economic interests of the company: Improper acts by internal personnel of the company, in order to seek their own or others' interests, use concealment, deception, or other illegal or irregular means to harm the legitimate interests of the company or its shareholders. Including: accepting bribes or kickbacks, transferring transactions that would normally benefit the company to others; Illegal use of company assets, embezzlement, misappropriation, theft, or disclosure of company trade or technical secrets.

- Bribery, corruption, and fraud seeking improper corporate economic benefits: Internal personnel who use concealment, deception, or other illegal means to harm the interests of the state, individuals, or shareholders in order to gain improper economic benefits. Including: spending for improper purposes, selling nonexistent or unreal assets, concealing or delenent

2.2. Content of Special Supervision

Special supervision items include: major faults, major disciplinary and legal violations, unethical behavior, bribery, corruption, fraud, serious economic, quality, and safety issues, which cause significant losse



2. Normal sources of information on bribery, corruption, fraud or unethical conduct

2.4 1 Information submitted through the reporting method

Whistleblowers should submit information and evidence of bribery, corruption, fraud, and unethical behavior to the joint-stock company through the following channels:

- Tip-off hotline 13777992677
- jubao-ssgf@shanshan.com
- Through the reporting page set up under the joint-stock company and the company's official website.
- Delivered by express or mail to 28th Floor, Shanshan Building, No. 777 Rili Middle Road, Yinzhou District, Ningbo City, Zhejiang Province (Audit and Supervision Officer).

2.4.2 Broaden the channels of discussion and expand the ways to obtain clues

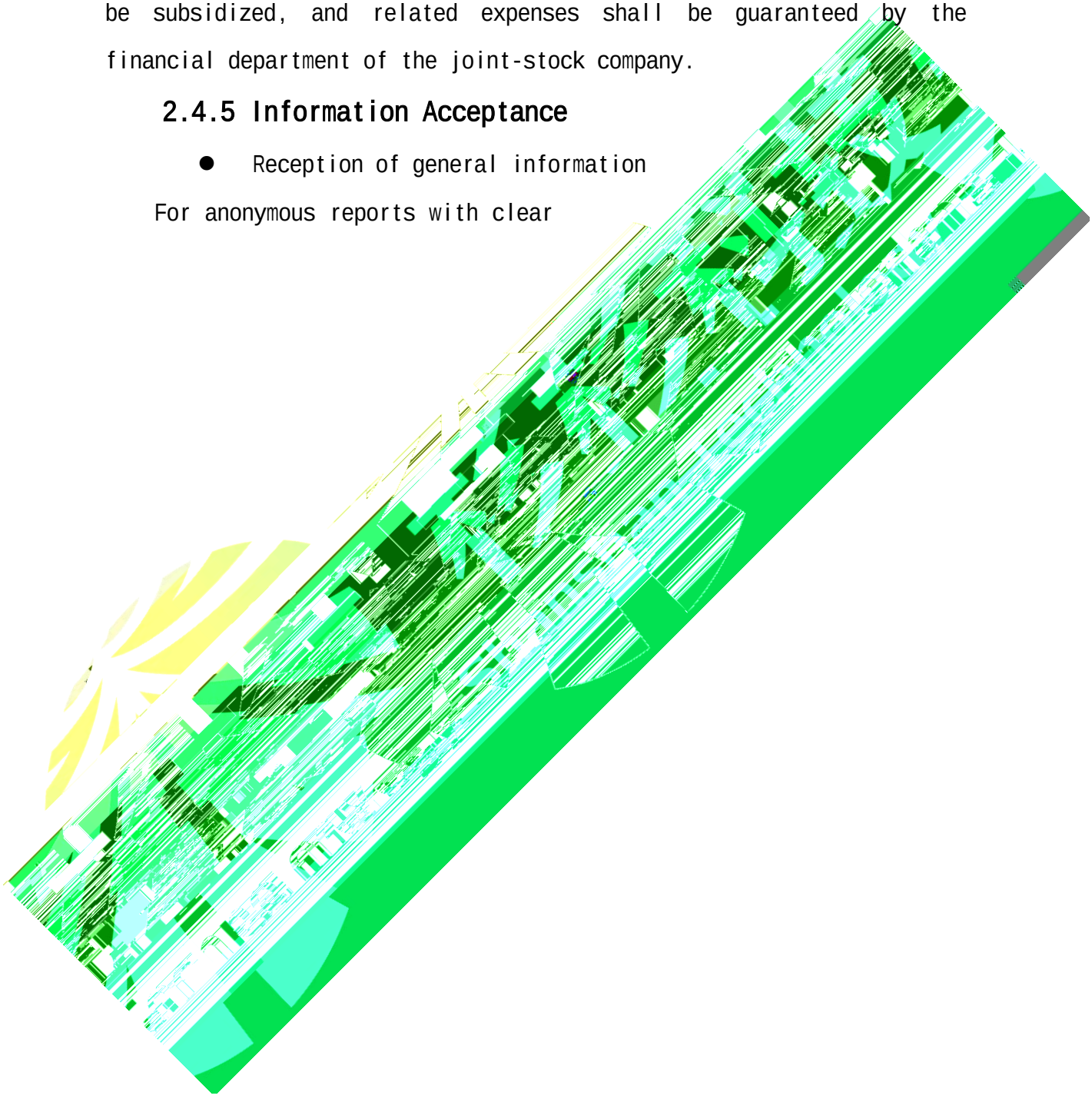
- The company portal website has a reporting page;
- Embedding reporting information in public transactions such as public engineering, procurement bidding information, and tender documents;
- All written contract texts for the company's purchases and sales, commissioned processing, engineering construction, investment

The company provides transportation, dining, or subsidies for real-name whistleblowers and witnesses. Reasonable expenses incurred by whistleblowers and witnesses for transportation, accommodation, meals, lost work, and other expenses due to reporting activities shall be subsidized, and related expenses shall be guaranteed by the financial department of the joint-stock company.

2.4.5 Information Acceptance

- Reception of general information

For anonymous reports with clear

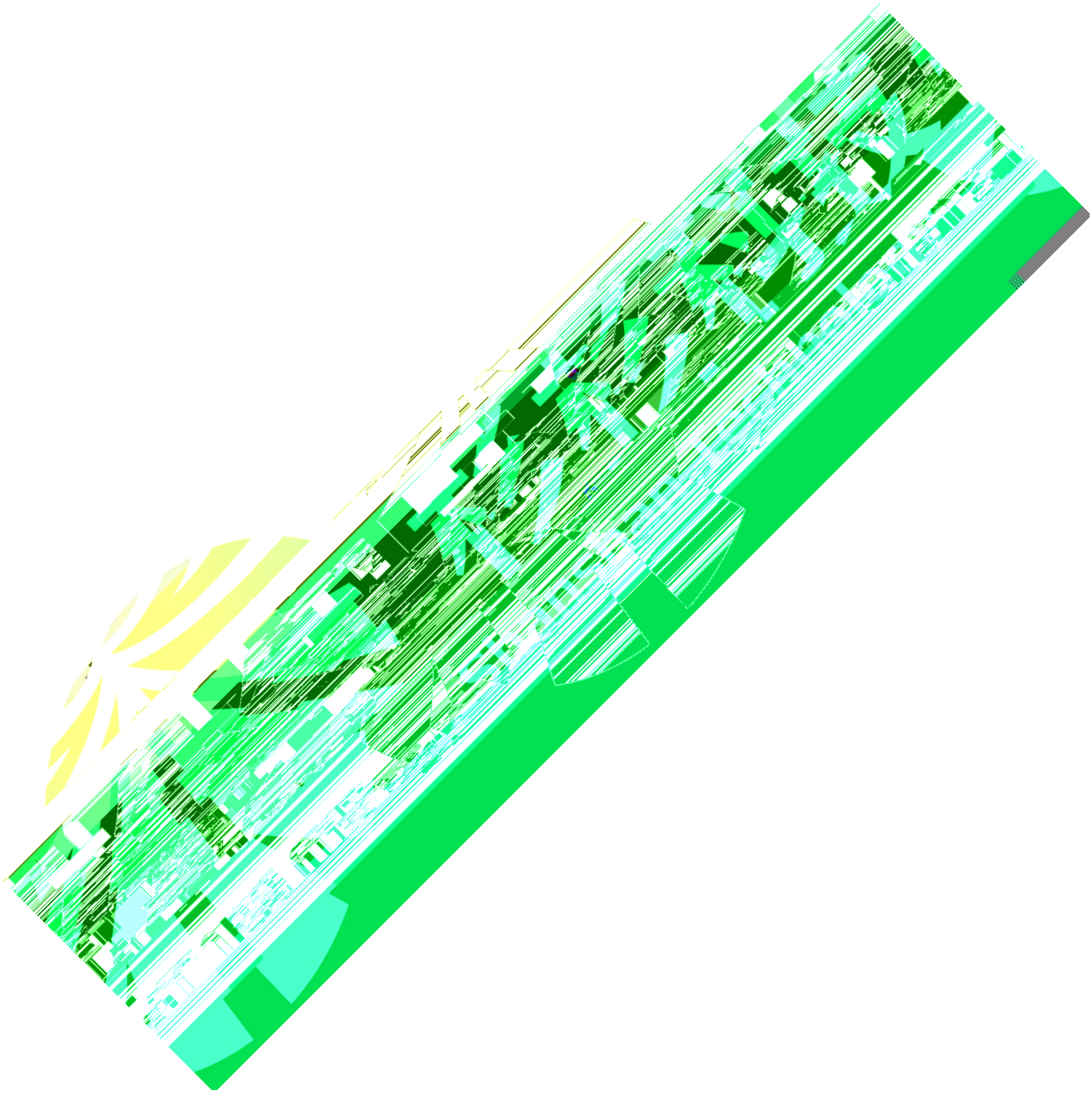


be made; After the incident, the reporter signs the relevant records for record-keeping.

Basic principle: All reported content and related materials will be handled according to the joint stock company's file management regulations - confidential requirements; Reported information must be reviewed internally by the Ministry of Supervision before being accepted for acceptance; In the event of major risks or emergencies, they shall be promptly reported to the Audit Committee and the Board of Directors.

2.5 Work Requirements

- When inspectors conduct company inspections, if they have any questions, they may inquire with the company in detail, consult relevant personnel to understand the situation, and review all materials, account books, ledgers, and related archives. Company personnel should cooperate as much as possible and must not obstruct, falsify, conceal, or evade reporting.
- Inspectors must adhere to seeking truth from facts, value evidence, facts, and research, avoid favoritism, and carry out supervision work with a strong sense of responsibility and a pragmatic attitude.
- Strictly follow the system, ensuring the effectiveness of supervision work through auditing procedures such as interviews, inspections, verifications, observations, calculations, and analysis, and promptly identify any issues that arise.
- For issues found during supervision, the company should be urged to carry out effective rectification within the prescribed time limit. Inspectors are responsible for promptly re-checking the rectification to ensure the resolution of the rectification

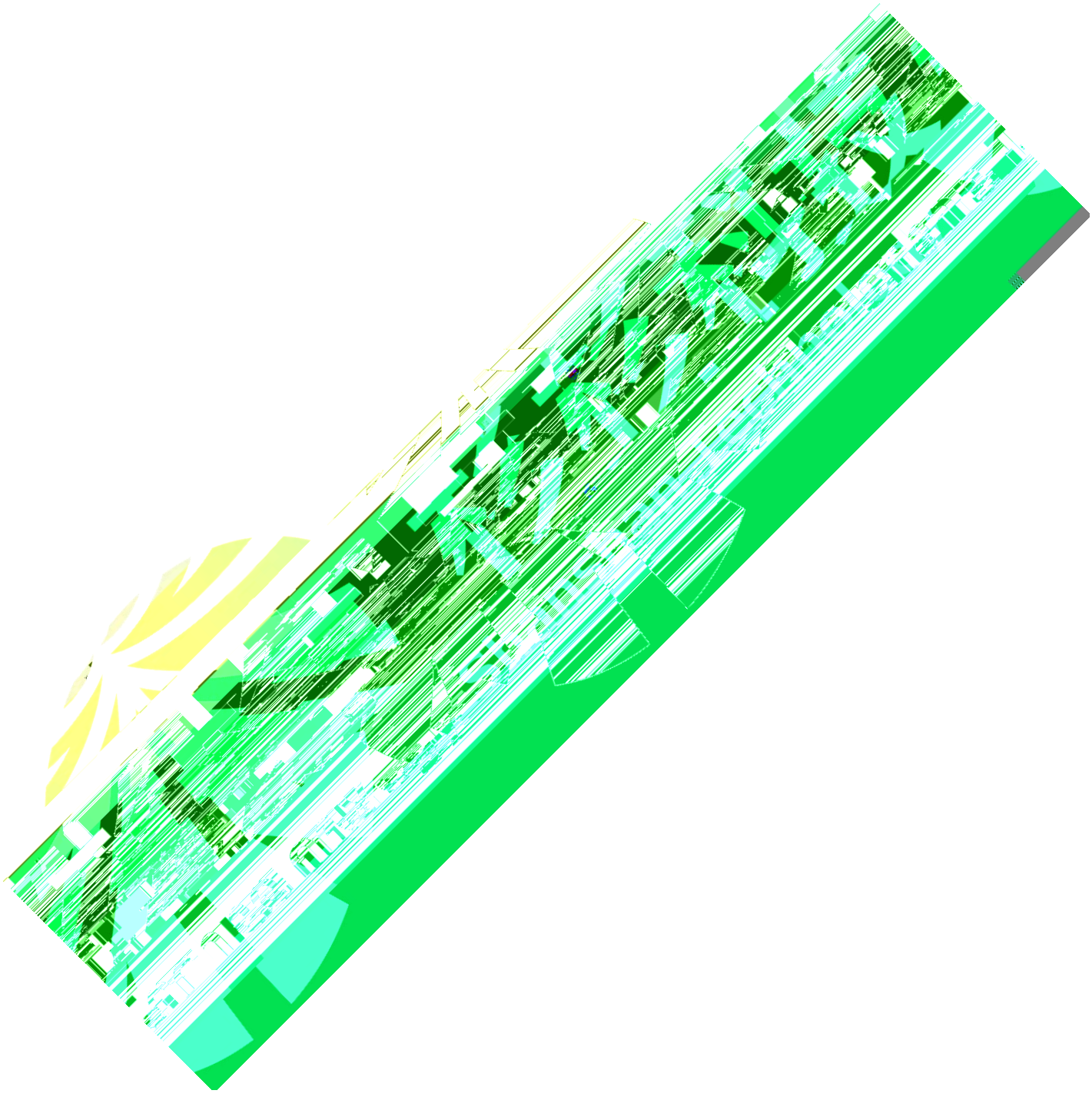


whistleblowers. As long as the report is made in good faith, even if the investigation finds that the report does not match the facts, the whistleblower will not face the risk of losing their job or suffering other adverse effects. If the whistleblower believes they have suffered retaliation or discovers that other relevant employees or third parties have been retaliated against, they should immediately contact the first recipient. Anyone who retaliates against a well-intentioned whistleblower or related witnesses will face severe disciplinary action. In serious cases, their employment relationship will be terminated, and if a crime is constituted, the case will be transferred to judicial authorities for handling according to law.

2.7 Rewards for whistleblowers

2.7.1 Principles for Rewarding Reporting

- The maximum reward for reporting is generally limited to real-name reporting. For anonymous whistleblowers, if the true identity of the whistleblower can be confirmed during the investigation or handling stage, the whistleblower will be treated as a real-name whistleblower, and the company may reward them.
- If multiple whistleblowers report the same case in succession, in principle, the first to report or the one who plays a major role in breaking through the case shall be rewarded.
- If two or more people jointly report the same case, the same reward shall be applied, and the reward shall be distributed through negotiation among the reporters.
- If the same whistleblower reports the same matter multiple times, or reports two or more related matters, the same content



conditions, the informant may be rewarded according to the nature of the case. The specific details are as follows:

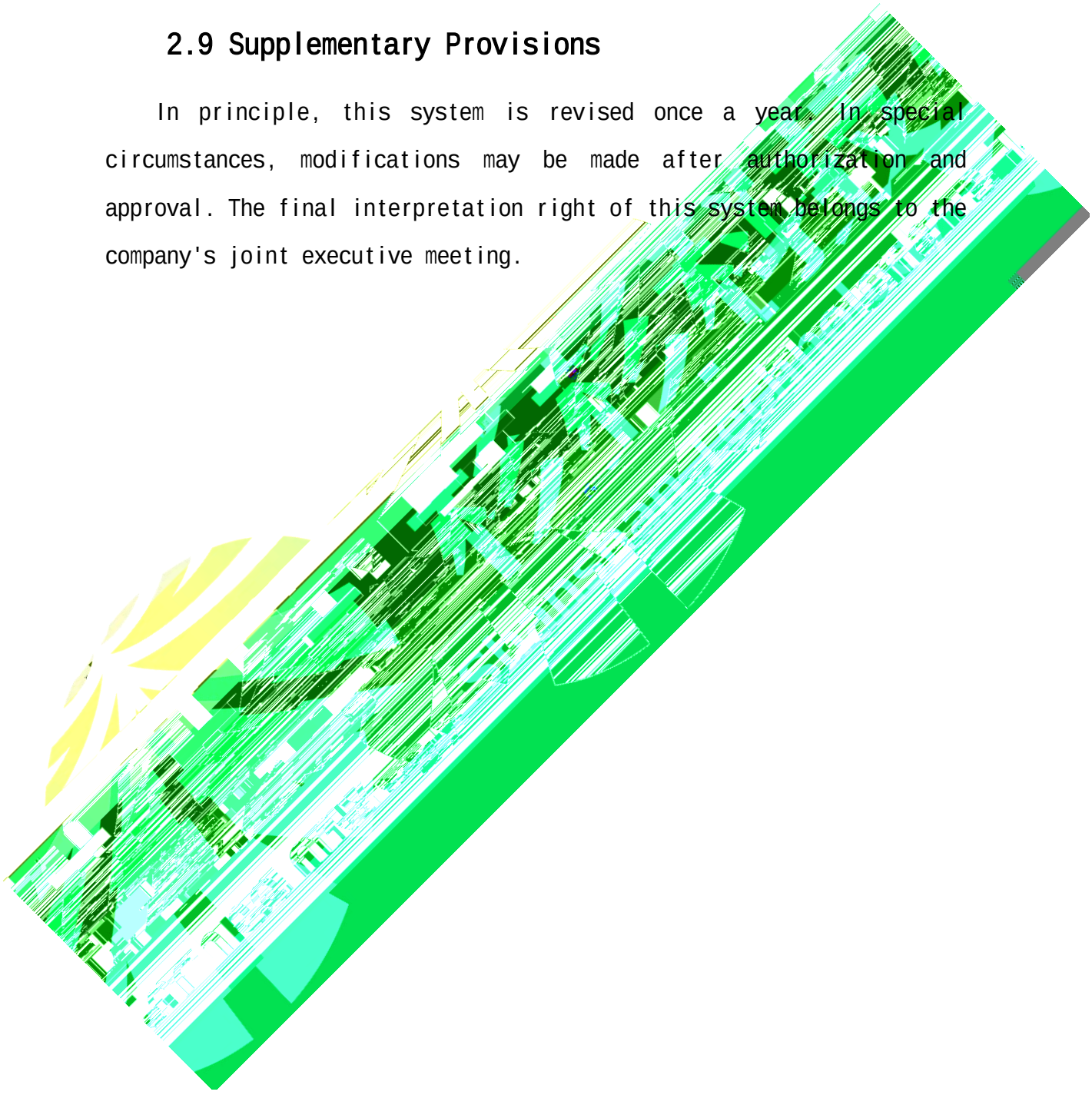
- There must be a clear and specific subject being reported;
- The clue materials provided by the whistleblower are first-hand and have not been previously obtained by relevant departments or individuals;
- The reported information and materials have been verified to be true;
- Other necessary conditions.

- If the whistleblower is an internal employee of the company, in addition to rewards as stipulated, priority will be given in their selection and promotion.
- If a report from an external partner is verified to be true, the company will award the whistleblower an honor and reward, and will prioritize them as a partner in future business. If there is already business cooperation, ensure stable business development.
- The company shall determine the reward method and amount based on the nature of the reported illegal or irregular act, the amount involved, the loss recovery situation, and the value of the reported clues. Witnesses who make significant contributions to case characterization or breakthroughs, and those who assist in investigations, should also be rewarded by the company.

2.8 Good faith reporting

Whistleblowers should ensure that their reporting acts are in good faith. The joint-stock company reserves the right to penalize and hold any whistleblower who intentionally falsely accuses or makes false statements. If necessary, those responsible for violating the

principle of good faith reporting will be subject to severe disciplinary action; in serious cases, their employment relationship will be terminated; if a crime is constituted, the case will be transferred to judicial authorities for handling according to law.

2.9 Supplementary Provisions

In principle, this system is revised once a year. In special circumstances, modifications may be made after authorization and approval. The final interpretation right of this system belongs to the company's joint executive meeting.