

Whistleblower Protection System of Beijing Enterprises Holdings Limited

Chapter I General Provisions

Article 1 Beijing Enterprises Holdings Limited (hereinafter referred to as BEHL or the Company) has formulated this system in accordance with the *Constitution of the People's Republic of China*, the *Supervision Law of the People's Republic of China*, the *Criminal Procedure Law of the People's Republic of China* and other relevant provisions and in line with the actual situations of the Company, in order to protect the exercise of the right of whistleblowers in accordance with law, safeguard whistleblowers' legitimate rights and interests and promote healthy corporate development.

Article 2 Whistleblowing complaints that include the real name of the whistleblower or his or her work unit and specific contact information are deemed as real-name whistleblowing.

Article 3 If anonymous whistleblowing falls within the scope of acceptance, the Company shall accept it according to the procedures. For materials filed in such cases, it is not allowed to check the whistleblower's handwriting, Internet Protocol address (IP address) and other information without authorization.

Article 4 The legitimate rights and interests of any individual or unit who files whistleblowing complaints with the Company according to law

shall be protected by law. The Company must keep strictly confidential the content of complaints and the information of whistleblowers.

Article 5 The System is applicable to the Company and its wholly-owned subsidiaries and holding companies.

Chapter II Rights and Obligations of Whistleblowers

Article 6 Whistleblowers shall have the following rights:

- (1) File whistleblowing complaints of suspected violations of laws, regulations and disciplinary procedures;
- (2) Request the excusal of the staff involved in the reported matter;
- (3) File complaints concerning dereliction of duty or other acts to the unit accepting the whistleblowing complaint and the staff handling it;
- (4) Other rights stipulated by national laws and regulations.

Article 7 Whistleblowers shall perform the following obligations:

- (1) Provide all the evidences and information truthfully, be responsible for the authenticity of the reported content, and not to distort the facts and not to make false accusations against others;;
- (2) Conscientiously safeguard the public order and the order of filing complaints via letters and visits, and refrain from undermining national interests and legitimate rights of individual citizens;
- (3) Keep the feedback on the processing outcomes and any other relevant information confidential;

(4) Other obligations stipulated by national laws and regulations.

Chapter III Acts of Retaliation against Whistleblowers

Article 8 Any of the following circumstances shall constitute an act of retaliation against whistleblowers:

(1) Infringe the right of personal safety of the whistleblower or his or her close relatives by violence, threat or unlawful restriction of personal freedom;

(2) Unlawfully take into possession or damage property of the whistleblower or his or her close relatives;

(3) Make false accusations against the whistleblower or his or her close relatives on them;

(4) Insult or slander the whistleblower or his or her close relatives;

(5) Dismiss, lay off or terminate the whistleblower or his or her close relatives in violation of regulations;

(6) Withhold, whether in disguised form or not, the salaries, bonuses or other benefits of the whistleblower or his or her close relatives;

(7) Not approve or delay the approval of reasonable applications submitted by the whistleblower or his or her close relatives that should have been approved;

(8) Other acts that infringe upon the legitimate rights and interests of the whistleblower and his or her close relatives.

Chapter IV Protection Measures and Commitments for Whistleblowers

Article 9 Whistleblowers shall have their legitimate rights and interests stipulated by the national laws and regulations. The relevant departments in the Company shall implement strict confidentiality provisions, strict excusal mechanisms and effective measures against retaliation to protect the legitimate rights and interests of whistleblowers and accept their requests concerning protection of their legitimate rights and interests.

Article 10 The departments and staff that handle whistleblowing complaints should proactively excuse themselves when they have a conflict of interests or other relationships with the whistleblower or the target(s) of the whistleblowing complaint that may affect fair handling of the complaint. The whistleblower has the right to request excusing himself or herself.

Article 11 No unit or individual in the Company shall retaliate against a whistleblower under any excuse or by any means, and shall trace the information about the whistleblower without authorization.

Article 12 The Company advocates and encourages real-name whistleblowing, which will be prioritized for processing, handling and giving reply by the Company.

Article 13 For those who breach confidentiality, interfere with, and obstruct the whistleblowing process or retaliate against a whistleblower,

the Company will hold them accountable and deal with their cases seriously according to laws, regulations, and disciplinary procedures. Those who are suspected of violating the law and committing crimes shall be transferred to the relevant unit to be held liable according to law.

Chapter V Confidentiality Measures

Article 14 The Company shall take the following measures for keeping the whistleblowing process confidential:

(1) The acceptance of whistleblowing complaints shall be handled by specially designated personnel at a specially designated venue or via a specially designated website or phone number without the presence of personnel who are not involved in handling whistleblowing complaints.

(2) Materials related to whistleblowing shall be kept in a place that complies with the confidentiality provisions which personnel who are not involved in handling whistleblowing complaints are not allowed to enter.

(3) It is strictly prohibited to disclose the content of whistleblowing complaints and whistleblowers' personal information such as their name, work unit's name, address and telephone number. It is also strictly prohibited to transfer whistleblowing materials to the individual(s) or unit(s) that are the target of the complaint.

(4) Other confidentiality measures that are deemed necessary.

Chapter VI Supplementary Provisions

Article 15 Matters not covered by this System shall be handled in accordance with relevant national laws and regulations and relevant rules and regulations of the Company.

Article 16 This System shall come into force as of the date of printing and distribution.