

# Ruihe Data Technology Holdings Limited

## Reporting System

Current version information					
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Version number	Revision				Availability date
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examine and approve					
Authorized strength	Administration Department	Examine and verify	Functional departments	Approval	President

## catalogue

1. Purpose .....	3
2. Policy statements .....	3
3. Protection and Prevention of retaliation .....	3
4. All types of misconduct, fraud and irregularities .....	4
5. Confidentiality .....	4
7. Investigations .....	5
8. Reporting to the Audit Committee .....	6
9. False report .....	6
10. Supplementary Provisions .....	6

## 1. Purpose

- 1.1 Ruihe Data Technology Holdings Limited and its subsidiaries ("**the Group**") are committed to upholding and implementing high standards of business principles and ethics through an open, honest, law-abiding, and accountable approach. The Group expects all employees to act with integrity, impartiality, and honesty, and each employee is responsible for ensuring that any improper conduct that may harm the interests of shareholders, investors, customers, suppliers, or the public does not occur, which is also in the Group's best interests. To maintain sound corporate governance standards, the Group has established this Whistle blowing Policy (the "Policy"), which ensures that complaints are received, investigated, and archived in a confidential manner in compliance with all applicable laws and regulations.
- 1.2 This Policy primarily addresses suspected violations of laws, regulations, fraud, and breaches of business ethics. While routine HR disputes should be handled through HR channels, cases involving significant misconduct are also subject to this policy.

## 2. Policy statements

- 2.1 The Group provides a healthy environment that encourages employees, suppliers, customers, and other stakeholders ("Stakeholders") to express concerns about any improper conduct, fraud, or violations related to Group affairs in a confidential manner. This policy provides methods to enable employees and third-party whistle blowers (collectively referred to as "Whistle blowers") to: (i) report matters involving potential serious violations of Group policies or laws in good faith; and (ii) ensure that Whistle blowers are properly protected from retaliation for reporting such matters.
- 2.2 The Policy protects all whistle blowing activities based on reasonable belief (meaning the whistle blower reasonably believes the reported content may be true, based on the facts and information they had at the time)
- 2.3 For each report, the Group will diligently investigate the severity of the incident and the reliability of the provided data or statements in accordance with fair principles, and take appropriate action as circumstances warrant. The Group will not and must not allow any senior personnel or employees to retaliate against whistle blowers who report potential violations in good faith. "Good faith" means that the whistle blower reasonably believes the complaint is correct and that the complaint is not made for personal gain or other hidden motives.

## 3. Protection and Prevention of retaliation

- 3.1 The Group is committed to creating an open, fair and transparent environment in which individuals can report real problems and concerns.
- 3.2 To protect the whistle blower from retaliation for making a complaint (even if the complaint is ultimately unfounded), the complaint must:
- (i) Report in good faith, in particular by respecting others;
  - (ii) the informant has reasonable grounds to believe that the conduct or matter in question constitutes, or is likely to constitute, a violation; and
  - (iii) Reports must be submitted through the designated channels specified in the Policy.

3.3 In accordance with the Policy, the Group shall not retaliate against any whistleblower who meets the above criteria, nor tolerate any form of retaliation—including direct or indirect penalties, dismissal, demotion, suspension, intimidation, harassment, transfer to undesirable positions or locations, or discrimination (collectively termed "retaliation")—by directors, senior executives, employees, or agents against whistle blowers who raise complaints regarding suspected illegal or unethical conduct. The Group considers any retaliatory actions as serious violations of its policies and may impose disciplinary actions, including termination of employment. This protection extends to all individuals providing information for investigations (including internal investigations).

#### **4. All types of misconduct, fraud and irregularities**

Examples of misconduct or fraud may include, but are not limited to, the following:

- 4.1 Unfair or fraudulent acts relating to the group's accounting, internal control and audit affairs.
- 4.2 Disclosing confidential information or patent information to the external parties.
- 4.3 Misconduct, embezzlement, bribery, fraud, theft or misappropriation of the Group's property, assets or resources.
- 4.4 Other serious misconduct that may cause economic losses, non-economic losses or harm to the reputation of the Group.
- 4.5 Concealment of material conflict of interest.
- 4.6 Mislead, deceive, manipulate, coerce or fraudulently influence internal and external accounting or auditing personnel responsible for preparing, examining, auditing or reviewing the Group's financial reports or records.
- 4.7 Violation or potential violation of laws, rules or regulations.
- 4.8 Improper or unethical conduct.
- 4.9 Any form of sexual harassment.
- 4.10 Any form of discrimination on the basis of sex, age, race, religion, etc. in the employment process.
- 4.11 Attempts to conceal or disguise any of the above acts.

#### **5. Confidentiality**

- 5.1 The Group will treat all received information as top secret. While whistle blowers may choose to remain anonymous, we strongly encourage them to provide their name and contact details for direct access to report summaries or additional information when required.
- 5.2 In certain circumstances, the nature of the investigation may require the disclosure of the whistleblower's identity. If so, the Group will make every effort to inform the whistle blower of the potential disclosure of their identity.
- 5.3 The Group shall disclose an individual's identity only when required by official legal documents from judicial authorities or explicit statutory requirements from regulatory bodies. Where permitted by law, the Group shall make every effort to notify the whistle blower in advance. Such

circumstances include investigations initiated for legal proceedings, requests from relevant authorities or regulatory bodies, or requirements imposed by laws, regulations, or court orders.

## 6. Reporting channels

6.1 Any report under this system must be notified to the Internal Control Auditor (highly independent, not involved in business operations) through one of the following confidential methods:

➤ Written Submission:

Ruihe Data Technology Holdings Limited

19th Floor, West Block, Skyworth Semiconductor Design Building, South 4th Road, High-tech Zone, Nanshan District, Shenzhen

To: Internal Control Auditor of Ruihe Data Technology Holdings Limited (Confidential)

➤ Email: [rhszreport@datamargin.com](mailto:rhszreport@datamargin.com)

6.2 Any report must include sufficient, clear, and relevant information, along with dates, locations, individuals/witnesses, and figures to enable a reasonable investigation. Reporters may also discuss any matters with the Internal Control Auditor. Such requests should be clearly stated in submitted information or messages, accompanied by a phone number for contact when necessary. The Internal Control Auditor will confirm receipt of the report to the reporter where feasible.

6.3 Hotline: +86-755-83307622. Should it be inappropriate to report to the Internal Control Auditor, individuals may directly contact the Human Resources Management Department.

6.4 If the whistle blower has any reasonable reason not to wish to report any type of misconduct through the internal control auditor, the whistle blower may directly report to the Chairman of the Group, who will review the complaint and decide on the investigation method. The contact information of the Chairman of the Group is as follows:

Ruihe Data Technology Holdings Limited

19 / F, West Block, Skyworth Semiconductor Design Building, Gaoxin South 4th Road, Nanshan District, Shenzhen

To: Chairman of Ruihe Data Technology Holdings Limited (Confidential)

➤ Email: [rhszchairman@datamargin.com](mailto:rhszchairman@datamargin.com)

## 7. Investigations

7.1 The format and duration of the investigation vary according to the nature and complexity of the reports submitted.

7.2 Based on information provided by the whistle blower, an internal preliminary review will be conducted to understand the allegations. The investigation shall be carried out by an independent team formed by the internal control auditor, with team members required to recuse themselves from matters where they have a conflict of interest.

7.3 The Internal Control Auditor will assess the seriousness of the complaint and, if necessary, consult with managers who have no interest in the complaint to determine the manner in which the

complaint will be investigated, the extent of internal and/or external resources to be used and the person responsible for leading the investigation.

7.4 During investigations, the Internal Control Auditor shall appoint qualified internal or external legal, accounting, human resources, or other consultants. The Internal Control Auditor and its authorized representatives shall have access to all group ledgers and records during investigations. The Group's directors, senior management, and employees shall fully cooperate with investigations. When handling any investigation, the Internal Control Auditor shall reasonably and to the extent possible maintain the confidentiality of the whistle blower's identity.

7.5 Where any type of misconduct, fraud or irregularity is substantiated, the standard procedure is to refer the matter to management members who are not directly involved in the complaint to determine appropriate disciplinary action. Where sufficient evidence indicates that the reported incident may involve criminal conduct or corruption, the matter will be referred to the relevant authorities with the allegations and related information, and further action will be taken accordingly.

7.6 The results of the investigation may be notified to the informant when appropriate and necessary.

## **8. Reporting to the Audit Committee**

The Internal Control Auditor shall report quarterly to the Audit Committee of the Group's Board of Directors ("**the Committee**") on the total number, nature, and outcomes of complaints received and investigated under this policy. In addition to these periodic reports, the Auditor shall promptly notify the Committee of any complaints that have a material impact on the Group.

## **9. False report**

The Policy protects good-faith reporting. The Group reserves the right to take action only against reports that are substantiated as deliberate falsification of facts or malicious false accusations. Should the reporter be a Group employee, they may be subject to disciplinary measures, including dismissal where appropriate.

## **10. Supplementary Provisions**

10.1 Matters not covered herein shall be handled in accordance with relevant laws, regulations and rules (including listing rules).

10.2 This system shall be implemented after being approved by the board of directors of the Group.

10.3 The Board of Directors shall have the responsibility to implement, inspect and review this system on a regular basis.

10.4 In the event of any discrepancies between the English and Chinese versions, the Chinese version shall prevail.