
Anti-Fraud Management Regulations

Chapter 1 Purpose

This document has been formulated in accordance with the relevant national laws and regulations and company policies to prevent fraud. It strengthens the internal governance and control of Inspur Electronic Information Industry Co., Ltd. and all of its subsidiaries and affiliates (hereinafter referred to as the "Company"). The regulations described in this document can be applied to reduce the Company's business risk, manage employees' professional conduct, and safeguard the Company's legal rights and interests.

Chapter 2 Terminology Explanation

The term "fraud" in this document refers to the use of deception or any other unlawful means by Company personnel or persons from outside the Company to obtain improper benefits for themselves or to harm the legitimate economic interests of the Company.

Chapter 3 Management Regulations

3.1 Types of Fraud

The following practices can be considered fraud:

- (1) Taking bribes or kickbacks.
- (2) Establishing a company or becoming a shareholder in another company in your own name or that of a relative to conduct business with the Company without the Company's permission.
- (3) Shifting a transaction that would benefit the organization under normal circumstances to another organization or other people.
- (4) Embezzling, misappropriating, stealing or seizing company assets by other illegal means.
- (5) Misrepresenting or falsely reporting transactions or other matters, causing the Company to pay for fraudulent transactions or matters.
- (6) Deliberately misreporting transactions and recording fraudulent transactions, including inflating revenues and underestimating liabilities, issuing inaccurate financial reports or financial statements that cause users to make inappropriate investment decisions, performance evaluations, employee promotion decisions, material rewards, etc., damaging the Company's legitimate economic interests.
- (7) Leaking the Company's commercial or technical secrets.
- (8) Other acts that damage the Company's economic interests.

3.2 Division of Fraud Management Responsibilities

3.2.1 Company management is responsible for establishing an anti-fraud culture and environment. Management must establish a robust internal control system that includes fraud prevention and implement controls to minimize fraud. Management must supervise relevant departments to ensure that appropriate and effective measures against fraud are implemented.

3.2.2 The Audit Department is responsible for the specific implementation of anti-fraud work, including setting up fraud reporting channels, receiving fraud reports, organizing and conducting investigations, and issuing investigation reports. The Audit Department will also brief Company management on fraud investigations, supervise relevant departments with regards to the implementation of their anti-fraud measures, and conduct anti-fraud campaigns and training.

3.2.3 The HR Department is responsible for holding all persons who have committed fraud accountable based on the fraud investigation conducted and facts identified by the Audit Department and in compliance with relevant Company policies.

3.2.4 Company departments are responsible for maintaining their anti-fraud environment and ensuring that their employees strictly comply with the requirements of the anti-fraud policy and related company policies. If fraudulent actions are suspected or confirmed and leads are discovered, departments shall promptly report them, cooperate in all investigations, and actively take remedial action.

3.3 Fraud Prevention and Control

3.3.1 By enhancing its corporate culture, the Company guides its employees to establish the right values and maintain an honest and upstanding work ethic to create an anti-fraud corporate culture and environment.

3.3.2 The Company requires all employees to comply with all rules, laws, and ethical requirements in their daily work and business relationships. Employees must be able to correctly address conflicts of interest at work and resist the temptation to gain illegitimate benefits.

3.3.3 The Company must identify and assess business-level fraud risks, establish and implement internal controls to minimize fraud in areas where there is a high incidence of fraud.

3.3.4 The Company should conduct background checks on employee candidates (with the scope determined by the HR Department). The background check process must be formally documented and archived.

3.3.5 The Audit Department regularly conducts company-wide campaigns on corporate anti-fraud systems, procedures, and related measures. It also organizes regular anti-fraud training for employees to enhance their awareness of compliance with the law and working with integrity.

3.4 Fraud Reporting Channels, Report Acceptance, Fraud Investigation, and Report Issuance

3.4.1 The Company provides the following fraud reporting channels: **Email: jubao@inspur.com**

3.4.2 The Company encourages whistleblowers to make real-name reports so that fraud management staff can obtain detailed and accurate information to more efficiently investigate and follow up on fraud matters. Whistleblowers should provide detailed information, including their personal information and their evidence on the reported matter (such as contracts, documents, invoices, etc.).

The Company will not accept reports that only list allegations of disciplinary or work-related offenses but lack essential information.

3.4.3 Fraud management staff must maintain confidentiality, have the highest integrity, and uphold honesty and diligence. They shall recuse themselves from cases in which they or their close relatives have an interest.

3.4.4 Fraud management staff have the right to retrieve both hard and soft copies of all documents and data required for case investigation. Relevant departments and employees must actively support the investigation and shall not obstruct it or deliberately conceal or distort the facts. The Audit Department has

the right to hold departments or employees accountable for obstructing fraud investigations in accordance with relevant company policy.

3.4.5 The Audit Department must provide a written report and brief Company management promptly after the investigation of the fraud case.

3.4.6 For all proven fraudulent actions, the Audit Department shall submit all evidence to the Legal Affairs Department for processing. At the same time, the Audit Department must provide the HR Department with their assessment of who is accountable for their actions. Should processes be identified as deficient or containing loopholes, the Audit Department must propose recommendations for improvement and supervise their implementation.

3.5 Protection for Whistleblowers

3.5.1 Fraud management staff shall keep the personal information of whistleblowers strictly confidential. When publicizing and rewarding whistleblowers, information such as their names and departments shall not be disclosed except with the consent of the whistleblower.

3.5.2 The Company prohibits any discrimination or retaliation against whistleblowers, or any adverse behavior toward investigation participants. The Company will discipline those who disclose whistleblower information or take retaliatory action against whistleblowers in accordance with relevant company policy. The Company will hand over those who violate the law to the judicial authorities for prosecution in accordance with the law.

3.6 Whistle-blowing Requirements

The Company prohibits malicious reporting and false accusations. Once malicious reports and false accusations are confirmed, the Company will discipline those who have committed these acts in accordance with relevant company policy. The Company will hand over those who violate the law to the judicial authorities for prosecution in accordance with the law.