**ENN Natural Gas Co., Ltd.**

# System for the Registration and Administration of Persons with Knowledge of Inside Information

ENN Natural Gas Co., Ltd.

Board of Directors

May 16, 2025

# Chapter I General Provisions

**Article 1** To regulate the management of inside information of ENN Natural Gas Co., Ltd. (hereinafter referred to as the "Company"), strengthen the confidentiality of inside information, and uphold the principles of openness, fairness and impartiality in information disclosure, this System is formulated in accordance with the Company Law of the People's Republic of China, the Securities Law of the People's Republic of China, the Listing Rules of Shanghai Stock Exchange, the Measures for the Administration of Information Disclosure of Listed Companies, the Regulatory Guidelines for Listed Companies No. 5 — System for the Registration and Administration of Persons with Knowledge of Inside Information of Listed Companies and other relevant laws and regulations, as well as the Articles of Association of ENN Natural Gas Co., Ltd. and the Information Disclosure Management System of ENN Natural Gas Co., Ltd., and in light of the actual circumstances of the Company.

**Article 2** The Board of Directors shall be responsible for the Company's inside information management, and the Board of Directors shall ensure that the register of persons with knowledge of inside information is true, accurate and complete.

**Article 3** The Secretary of the Board of Directors shall be responsible for organizing and implementing the Company's internal information management. When the Secretary of the Board of Directors is unable to perform their duties, the securities affairs representative shall perform the duties of the Secretary of the Board of Directors on their behalf.

**Article 4** The Investor Relations Group, as the Company's department responsible for information disclosure, shall be uniformly responsible for the reception, consultation (inquiry) and service of securities regulatory authorities, stock exchanges, securities companies, law firms, accounting firms, asset appraisal institutions and other institutions, as well as shareholders.

**Article 5** The Investor Relations Group shall assist the Secretary of the Board of Directors and the securities affairs representative in specifically undertaking the daily work of supervision, management, registration, disclosure and filing of the Company's inside information.

**Article 6** Without the approval and consent of the Board of Directors, no department or individual of the Company may disclose, report or transmit to the outside world any inside information or information disclosure content involving the Company.

Documents, USB flash drives and other materials involving inside information or information disclosure content that are reported or transmitted externally may be reported or transmitted externally only after being reviewed and approved by the Secretary of the Board of Directors (and, depending on their importance, submitted to the Board of Directors for review); information involving financial matters shall also be signed and approved by the chief financial officer.

**Article 7** The directors and senior management of the Company, as well as all departments, branches, subsidiaries and relevant personnel of the Company, shall properly maintain the confidentiality of inside information and cooperate in the registration and filing of persons with knowledge of inside information.

# Chapter II Inside Information, Persons with Knowledge of Inside Information and Their Scope

**Article 8** Inside information referred to in this System means information known to persons with knowledge of inside information that concerns the Company's operations or finances, or that has a material impact on the trading price of the Company's securities and their derivative products, and that has not been made public. "Not made public" means that the Company has not formally disclosed the information through the information disclosure media designated by the China Securities Regulatory Commission (hereinafter referred to as the "CSRC") and selected by the Company.

**Article 9** The scope of inside information referred to in this System includes, without limitation:

(1) Material changes in the Company's business policies and business scope;

(2) The Company's material investment activities and major decisions on the purchase of property;

(3) The Company entering into an important contract that may have a material impact on the Company's assets, liabilities, equity or operating results;

(4) The Company incurring material debts and defaulting on material debts due, or incurring a large amount of liability for compensation;

(5) The Company suffering a material loss or material damage;

(6) Material changes in the external conditions of the Company's production and operations;

(7) A change in the Company's directors or managers, or the inability of the chairman or manager to perform their duties;

(8) A material change in the shareholding of a shareholder holding 5% or more of the Company's shares or of the actual controller, or in the circumstances in which such shareholder or actual controller holds shares or controls the Company;

(9) A decision by the Company to reduce its registered capital, merge, divide, dissolve or apply for bankruptcy, or the Company entering bankruptcy proceedings in accordance with the law or being ordered to close;

(10) Material litigation or arbitration involving the Company, or a resolution of the Shareholders' Meeting or the Board of Directors being revoked or declared invalid in accordance with the law;

(11) The Company being suspected of violating laws or regulations and being investigated by a competent authority, or being subject to criminal punishment or material administrative punishment; or the Company's directors or senior management being suspected of violating laws or disciplines and being investigated by a competent authority or subject to compulsory measures;

(12) The Company's plan to distribute dividends or increase capital;

(13) A material change in the Company's equity structure;

(14) A material change in the Company's debt guarantees;

(15) The mortgage, sale or retirement of the Company's principal assets used for business purposes in an amount exceeding 30% of the relevant asset in a single transaction;

(16) The conduct of the Company's directors or senior management potentially giving rise to material liability for damages in accordance with the law;

(17) Relevant plans for the Company's acquisition;

(18) Newly promulgated laws, regulations, rules or industry policies that may have a material impact on the Company;

(19) A resolution formed by the Board of Directors on the issuance of new shares or other refinancing plans, or an equity incentive plan;

(20) A court ruling prohibiting the controlling shareholder from transferring its shares held; or 5% or more of the Company's shares held by any shareholder being pledged, frozen, subject to judicial auction, placed in trust, subject to a trust arrangement or having its voting rights restricted in accordance with the law;

(21) The Company's principal assets being sealed up, distrained, frozen, mortgaged or pledged;

(22) The Company's principal or entire business operations coming to a halt;

(23) The Company providing a material external guarantee;

(24) Additional gains such as large government subsidies that may have a material impact on the Company's assets, liabilities, equity or operating results;

(25) A change in accounting policies or accounting estimates;

(26) The Company being ordered by a relevant authority to make corrections, or the Board of Directors resolving to make corrections, due to errors in previously disclosed information, failure to disclose information in accordance with regulations or false records;

(27) The content of the Company's periodic reports and earnings flash reports before disclosure;

(28) The Company's profit distribution plan;

(29) Material asset restructuring plans of the Company, its controlling shareholder or actual controller;

(30) Other important information recognized by the CSRC as having a significant impact on the trading price of securities.

Before the aforesaid inside information is formed, information formed during the Company's planning of the relevant material matters also constitutes inside information.

**Article 10** Persons with knowledge of inside information referred to in this System mean persons who can directly or indirectly obtain inside information before the Company's inside information is made public, including without limitation:

(1) The Company and its directors and senior management;

(2) Shareholders holding 5% or more of the Company's shares and their directors, supervisors and senior management, and the Company's actual controller and their directors, supervisors and senior management;

(3) Companies in which the Company holds a controlling stake or which are actually controlled by the Company and their directors, supervisors and senior management;

(4) Persons who can obtain relevant inside information of the Company by virtue of their positions in the Company or through business dealings with the Company;

(5) The acquirer of the Company or a party to a material asset transaction and its controlling shareholder, actual controller, directors, supervisors and senior management;

(6) Relevant personnel of securities trading venues, securities companies, securities registration and clearing institutions and securities service institutions who can obtain inside information by virtue of their positions or work;

(7) Staff members of securities regulatory authorities who can obtain inside information by virtue of their duties or work;

(8) Staff members of relevant competent departments or regulatory authorities who can obtain inside information because they manage the issuance or trading of securities, or the Company and its acquisition or material asset transactions, in accordance with their statutory duties;

(9) Other persons who can obtain inside information as stipulated by the CSRC.

## Chapter III Registration and Filing of Persons with Knowledge of Inside Information

**Article 11** Each department and subsidiary of the Company shall designate a dedicated person as an information disclosure liaison to coordinate and organize information disclosure matters of the department or subsidiary, promptly report material information to the Company, and provide relevant documents and materials and a list of persons with knowledge of inside information for registration and filing by the Company.

When the controlling shareholder, actual controller or other relevant party of the Company informs the Company, as required by regulations or the Company, of a material matter being planned, it shall simultaneously provide a list of persons with knowledge of inside information and relevant confidentiality agreements for registration and filing by the Company.

**Article 12** When inside information arises, the person with knowledge of inside information shall notify the Secretary of the Board of Directors at the first opportunity. The Investor Relations Group shall promptly inform relevant persons with knowledge of inside information of their confidentiality matters and responsibilities, and control the transmission of inside information and the scope of persons with knowledge thereof in accordance with applicable laws and regulations.

Before inside information is publicly disclosed in accordance with the law, the Company shall complete the register of persons with knowledge of inside information and promptly record the lists of persons with knowledge of inside information involved in the stages of discussion, planning, demonstration, consultation and contract execution, as well as the processes of reporting, transmission, preparation, resolution and disclosure, together with the time, place, basis, method and content of their knowledge of the inside information.

**Article 13** The contents of the registration and filing of persons with knowledge of inside information include, without limitation, their names, positions, ID numbers, employers, the inside information known to them, the channels and methods through which they obtained such information, and the time when they obtained such information.

**Article 14** Circumstances in which a register of persons with knowledge of inside information shall be established:

(1) Where the shareholders, actual controllers and related parties of the Company study or initiate a material matter involving the Company, or another matter having a material impact on the Company's stock price occurs, the relevant entity shall complete the register of persons with knowledge of inside information of such entity;

(2) Where an intermediary such as a securities company, securities service institution or law firm accepts an engagement to provide securities services and the entrusted matter has a material impact

on the stock price of the listed company, such institution shall complete the register of persons with knowledge of inside information of such institution;

(3) The acquirer, counterparty to a material asset restructuring transaction and other initiators involved in the Company and in a matter having a material impact on the Company's stock price shall complete the register of persons with knowledge of inside information of such entity.

The aforesaid entities shall, according to the progress of the matter, submit the register of persons with knowledge of inside information to the listed company in stages, but the complete register shall be submitted no later than the time when the inside information is publicly disclosed.

The Company shall properly register the persons with knowledge of inside information involved in the circulation of inside information of which it is aware, and compile the registers of persons with knowledge of inside information relating to the parties referred to in the first paragraph of this Article.

**Article 15** Where the Company conducts a material matter such as an acquisition, material asset restructuring, securities issuance, merger, division or share repurchase, in addition to completing the register of persons with knowledge of inside information of the listed company in accordance with this System, it shall also prepare a memorandum of the progress of the material matter, including without limitation the time of each key point in the planning and decision-making process, the list of persons participating in the planning and decision-making, and the method of planning and decision-making. The Company shall urge the relevant persons referred to in the memorandum to sign and confirm it.

Where the Company conducts a material matter listed in the first paragraph of this Article, it shall, after the inside information is publicly disclosed in accordance with the law, promptly submit the register of persons with knowledge of inside information and the memorandum of the progress of the material matter to the Shanghai Stock Exchange. The Shanghai Stock Exchange may, as appropriate, require the Company to disclose relevant contents of the memorandum of the progress of the material matter.

**Article 16** Before public disclosure, where the Company is required by relevant laws, regulations and policies to regularly submit information to relevant administrative authorities, and there is no material change in the submitting authority or content, the information may be treated as the same inside information matter, with the name of the administrative authority registered in the same form and the submission time continuously recorded. Except in the aforesaid circumstances, where the circulation of inside information involves an administrative authority, the name of the administrative authority, the reason for accessing the inside information and the time when the inside information was known shall be registered in the register of persons with knowledge of inside information on a one-matter-one-record basis.

**Article 17** For inside information involving mergers and acquisitions, restructuring, securities issuance, acquisition, merger, division, share repurchase or equity incentive, the relevant register of persons with knowledge of inside information shall be submitted to the Shanghai Stock Exchange for filing within five trading days after the inside information is publicly disclosed.

**Article 18** The directors and senior management of the Company and the principal heads of all departments and subsidiaries shall actively cooperate with the Company in registering and filing persons with knowledge of inside information, and promptly inform the Company of the circumstances of persons with knowledge of inside information and any changes in such persons.

**Article 19** The Company shall inform persons with knowledge of inside information outside the Company, including the Company's shareholders, actual controllers, acquirers, transaction parties and intermediary service institutions, of this System, remind and urge such persons with knowledge of inside information to actively cooperate with the Company in preparing the register of persons with knowledge of inside information, and promptly inform the Company of the circumstances of persons with knowledge of inside information in material events that have occurred or are proposed to occur and any changes in such persons.

**Article 20** Persons who obtain relevant inside information of the Company while providing intermediary services for the Company, and persons who participate in a material project and thereby become aware of inside information, shall be managed as persons with knowledge of inside information and sign confidentiality agreements from the date on which they access the inside information until the relevant inside information is disclosed.

**Article 21** The Secretary of the Board of Directors shall, based on the register of persons with knowledge of inside information and according to the specific work progress, inspect the trading of the Company's shares and their derivative products by persons with knowledge of inside information.

**Article 22** The Company shall promptly supplement and improve the information in the register of persons with knowledge of inside information. The register of persons with knowledge of inside information shall be retained for at least 10 years from the date of recording, including the date of any supplement or improvement.

## Chapter IV Confidentiality Management of Inside Information

**Article 23** Before the Company's inside information is made public, persons with knowledge of inside information shall not disclose, report or transmit the content of such inside information to the outside world.

**Article 24** Before the Company's information is publicly disclosed, all directors and other persons with knowledge of inside information shall limit the scope of persons with knowledge of the information to the minimum. Persons who have the opportunity to obtain inside information shall not disclose the content of inside information to others or use inside information to seek benefits for themselves, their relatives or others.

**Article 25** The Company shall truthfully and completely record the lists of all persons with knowledge of inside information involved in each stage of the reporting, transmission, preparation, review and disclosure of inside information before public disclosure, as well as the time when the persons with knowledge of inside information became aware of the inside information and other relevant information, and register such information for future reference.

**Article 26** The Company may provide undisclosed information to external information users, major shareholders and actual controllers only with the consent of the Chairman of the Board of Directors (or a senior management member of the Company authorized by the Chairman of the Board of Directors).

**Article 27** Where the Company submits relevant information to specific external information users in accordance with laws and regulations, it shall comply with the relevant provisions of Chapter VII of the Company's Information Disclosure Management System.

**Article 28** The Company shall notify its controlling shareholder and actual controller, relevant departments and other persons with knowledge of inside information in writing of the relevant laws and regulations governing persons with knowledge of inside information, and urge them to maintain the confidentiality of information.

**Article 29** The Investor Relations Group shall, in accordance with the requirements of the CSRC, the Shanghai Stock Exchange, the Hebei Bureau of the CSRC and other regulatory authorities, properly perform the filing of inside information.

## Chapter V Trading Rules for Persons with Knowledge of Inside Information

**Article 30** The Company prohibits persons with knowledge of inside information relating to securities trading from using inside information to engage in securities trading activities.

**Article 31** Persons with knowledge of inside information shall not trade in the Company's shares during sensitive periods, including the 15 days before the announcement of the Company's annual report or semi-annual report, the five days before the announcement of a quarterly report, earnings forecast or earnings flash report, or the period from the date on which a material event that may have a relatively significant impact on the trading price of the Company's shares and their derivative products occurs or enters the decision-making process until the date of disclosure in accordance with the law.

**Article 32** The management of the shares of the Company held by the Company's directors and senior management and changes therein shall be governed by the Rules for the Management of Shares of the Listed Company Held by Directors and Senior Management and Changes Therein.

**Article 33** Where a person with knowledge of inside information engages in insider trading, leaks inside information or advises another person to use inside information for trading, the Company shall verify the matter and pursue the liability of the relevant person in accordance with this System.

## Chapter VI Accountability

**Article 34** Where a person with knowledge of inside information discloses known inside information to the outside world, engages in insider trading using inside information or advises another person to engage in trading using inside information, the Board of Directors of the Company shall, depending on the severity of the circumstances and the losses and impact caused to the Company, impose penalties on the relevant responsible person. Disciplinary measures imposed by the local offices of the CSRC, the Shanghai Stock Exchange and other regulatory authorities shall not affect the Company's imposition of penalties on such person.

**Article 35** Where a person with knowledge of inside information violates this System, discloses inside information without authorization or causes a violation due to negligence, the Company shall, depending on the severity of the circumstances and the losses and impact caused to the Company, impose penalties on the responsible person and reserve the right to claim compensation from such person.

**Article 36** Where a person with knowledge of inside information violates this System and is suspected of committing a crime, the Company shall transfer the matter to the relevant state authorities in accordance with the law and pursue their legal liability.

**Article 37** Where any of the following discloses the Company's information without authorization and causes losses to the Company, the Company reserves the right to pursue their liability:

(1) a securities service institution and its personnel issuing special documents for the Company to perform its information disclosure obligations;

(2) relevant entities and persons participating in all stages of consultation, planning and demonstration of a material project of the Company;

(3) a shareholder or potential shareholder holding 5% or more of the Company's shares, the Company's actual controller, or a controlled subsidiary and its directors or senior management.

## Chapter VII Supplementary Provisions

**Article 38** Matters not covered in this System shall be governed by the relevant provisions of national laws, regulations and the Articles of Association. If this System conflicts with laws or regulations promulgated by the state in the future or with the Articles of Association amended through lawful procedures, the relevant national laws, regulations and the Articles of Association shall prevail, and this System shall be amended promptly and submitted to the Board of Directors for deliberation and approval.

**Article 39** This System shall become effective upon approval by the Board of Directors and shall be interpreted and amended by the Board of Directors.

ENN Natural Gas Co., Ltd.

Board of Directors

May 16, 2025