



新奥天然气股份有限公司

ENN Natural Gas Co., Ltd.

(Stock Code: 600803)

Integrity and Compliance Code

1. Preamble

The Integrity and Compliance Code (hereinafter referred to as the "Code") is the foundation for ENN to conduct business lawfully, with integrity and honesty, and is a guiding document within ENN's compliance management system. The Code applies to all ENN entities and all employees. Persons representing ENN, acting as ENN's agents or carrying out work in the name of ENN, as well as all of ENN's business partners, including but not limited to consultants, suppliers, contractors, subcontractors, agents, distributors and joint-venture or cooperation partners, and other stakeholders shall comply with the relevant provisions of the Code in connection with their work involving ENN.

As an ENN employee, you shall study the Code carefully, understand the basic requirements and specific provisions of integrity and compliance, and comply with the Code in your work. In addition, employees shall comply with applicable laws and regulations and ENN's other rules and systems.

As leaders at all levels of ENN, including persons in charge, first-in-command officers and conveners (hereinafter referred to as "business leaders"), you shall lead by example, promote compliance among all employees, integrate ENN's values and integrity into compliance management, and promote a culture of compliance throughout the organization. ENN's business leaders at all levels shall also assume the following responsibilities:

- (1) Ensure that your employees understand their responsibilities, can seek your guidance at the earliest opportunity when they encounter problems, and feel free to raise questions without fear of retaliation.

- (2) Never retaliate against, or allow others to retaliate against, an employee for reporting misconduct.
- (3) Ensure that your employees and business partners receive all training required under the Code.
- (4) As the first person responsible for compliance in your entity or department, report to your supervisor and handle conduct that you believe may violate laws, regulations or Company rules and systems.
- (5) If you are unsure how to respond to an employee's question or concern, contact the compliance management department responsible for compliance management in your entity (hereinafter referred to as the "Compliance Management Department") or the Group Legal and Compliance Enablement Team.

If you have any questions about the application of the Code, consult the Compliance Management Department or the Group Legal and Compliance Enablement Team for advice or assistance.

The telephone number and email address of the Group Legal and Compliance Enablement Team for consultations are 0316-2599721 and ennlegal@enn.cn, respectively.

2. Basic Requirements

All ENN entities and employees shall strictly comply with the laws and regulations of China, regulatory requirements, industry standards, the Articles of Association and rules and systems of the enterprise, as well as the laws and regulations, regulatory rules and international treaties of the countries and regions where business is conducted. ENN shall be governed according to law, managed compliantly and operated with integrity. Employees shall also strictly perform their compliance obligations, remain loyal to the Company, be dedicated to their work, protect Company secrets, safeguard the Company's reputation and firmly resist illegal and non-compliant conduct.

2.1. The Company and Employees

(1) Fair Treatment

ENN adheres to lawful employment practices. When entering into, performing, modifying, terminating or ending employment relationships with workers, ENN strictly follows the principles of legality, fairness, equality, voluntariness and good faith.

ENN advocates mutual respect and treating others with courtesy. We assess all applicants and employees based on their qualifications, professional skills and achievements. ENN will not discriminate against or treat employees differently on the grounds of race, color, belief, gender, nationality, ethnicity, age, disability, marital status or other similar factors.

(2) Avoid Conflicts of Interest and Prohibit Improper Benefits

All ENN employees shall avoid situations in which personal interests may conflict with the legitimate business interests of the Company. In conducting business, employees shall make correct decisions from the perspective of the team, their work and the Company.

Without Company authorization or approval, employees shall not use Company assets or information for personal purposes, nor seek any improper benefit for themselves or others.

Under no circumstances may an employee compete with the Company, assist a competitor or engage in any other conflict of interest. Employees may not invest in an unlisted enterprise that competes with the Company, hold a position in an entity that competes with the Company or provide assistance to a competitor.

Employees shall not use their authority to seek improper benefits for themselves or others. No employee may interfere with or intervene in the Company's tendering and bidding, contract execution or market access activities, designate or instruct the designation of a transaction counterparty, or disclose inside information to a person with a specific relationship.

Without the Company's consent, employees may not invest in unlisted enterprises or hold concurrent positions in other entities.

If you have any questions about whether a conflict of interest or improper benefit exists, consult the Compliance Management Department of your entity.

(3) Regulate External Dealings

External conduct by employees on behalf of the Company must be approved or authorized by the Company. Such conduct includes, but is not limited to, inspections, negotiations, signing contracts, tendering and bidding, providing guarantees and issuing certificates in the name of the Company or an employee of the Company; expressing opinions or releasing information in the media on behalf of the Company; attending

public activities on behalf of the Company; or, when attending public activities or making statements in a non-Company capacity, citing or using any ENN cases.

(4) Maintain a Positive Working Environment

ENN does not tolerate any discrimination or harassment. Employees shall respect, trust and help one another and shall not use insulting or harassing language or engage in harassing conduct, or spread rumors or other defamatory or discriminatory information.

If you feel uncomfortable because a colleague discriminates against or harasses you in the workplace, or if you see someone else being harassed, report it to your direct supervisor or the Compliance Management Department of your entity. We attach great importance to protecting a positive working environment and will conduct a thorough investigation. Employees who harass, discriminate against or otherwise engage in improper conduct toward others will be subject to disciplinary action, including termination of employment or service.

2.2. Quality, Health, Safety and Environment

(1) Protect the Ecological Environment

Environmental protection is a fundamental national policy of China. All ENN organizations and business partners must fulfill their environmental responsibilities when conducting production and other business activities and contribute to environmental improvement and the protection of clear skies and clean waters.

(2) Continuously Improve Product and Service Quality

ENN has consistently pursued zero defects in product and service quality as an enterprise objective. The Company will continuously improve product and service quality through quality improvement and technological innovation. Employees must strictly follow all applicable standards, specifications and process technology requirements, pay attention to every aspect of product and service quality, and pursue customer satisfaction and loyalty.

(3) Focus on Employee Safety and Health

ENN organizations at all levels must provide business partners with safe working environments, occupational safety training, sanitary conditions and protective measures that comply with legal requirements when conducting production and other business activities. They shall enhance business partners' risk awareness and prevent accidents in the course of work.

(4) Ensure Safe Production

ENN complies with laws and regulations on work safety, strengthens work safety management, establishes and improves the work safety responsibility system and work safety rules, improves work safety conditions, promotes work safety standardization and continuously raises the level of work safety to ensure safe production.

Business partners shall comply with safe operating procedures for their roles, continuously improve safe working practices and perform their work safety obligations in accordance with the law.

(5) QHSE Management for Contractors and Suppliers

Rules shall be established for the prequalification of contractors and suppliers under QHSE requirements to accurately assess their ability to perform contracts, strengthen admission reviews, guide them to fully understand ENN's quality, health, safety and environmental requirements, and ensure that they comply with ENN's QHSE rules during contract performance. Requirements for products supplied by suppliers shall be specified to ensure that their products comply with relevant national, industry and enterprise standards and specifications. Contractors and suppliers shall be evaluated in accordance with service evaluation rules to ensure that their conduct meets ENN's ecological principles.

(6) Strengthen Emergency Management

Organizations at all levels of ENN shall regularly identify, assess and monitor hazards within their entities, formulate and implement emergency plans, establish emergency rescue organizations or designate part-time emergency rescue personnel, provide necessary emergency rescue equipment, facilities and supplies, inform business partners and relevant personnel of the emergency measures to be taken, and regularly organize emergency rescue drills.

Business partners shall acquire emergency response knowledge and continuously improve their emergency response skills. In an emergency, they shall follow unified command and take measures such as warning, evacuation, rescue and emergency repair in accordance with the emergency plan and site conditions.

2.3. Business Dealings

(1) Engagement with Business Partners

ENN seeks to cooperate with business partners that follow the same standards as we do. We treat business partners fairly in all business activities. Business decisions are

based on lawful business considerations and objective standards, rather than personal relationships or interests. When selecting business partners, we strictly review their qualifications, integrity and compliance performance and select those with good reputations and complete qualifications. In procurement activities of all sizes, we follow ENN's procurement procedures, weigh objective circumstances impartially and make fair selections.

In business cooperation, we consistently honor commitments and perform contracts strictly and avoid breaches arising from failure to honor contracts or lack of creditworthiness.

(2) Prohibition of Corruption and Commercial Bribery

We comply with all applicable anti-corruption laws and regulations in China and abroad. We will not, directly or indirectly, provide anything of value or any benefit to any person, including a government official, in order to influence the integrity of the official's conduct of duties or obtain an improper advantage as defined by applicable law.

We firmly oppose commercial bribery. We strictly prohibit directly or indirectly giving benefits to others to obtain business opportunities or interests, and prohibit employees from directly or indirectly accepting or soliciting benefits in business activities, including cash, gifts, negotiable securities, cash equivalents, goods, kickbacks, charitable contributions or donations, sponsorships and other benefits. All charitable donations and sponsorship activities must be approved in accordance with the Company's procedures and documents, including the application, authorization, drafting and management of donation and sponsorship agreements, to ensure compliance with national anti-corruption laws and regulations and internal systems such as the ENN Integrity and Compliance Code, the ENN Anti-fraud, Anti-corruption and Anti-bribery Policy and the ENN Charity and Public Welfare Activity Management Policy.

For business and social courtesy, we may accept or provide business partners with modest, commemorative and appropriate gifts and reasonable hospitality. Gifts and hospitality that do not comply with Company requirements or may affect business decisions are not permitted. Within the scope permitted by laws, regulations and Company rules, discounts may be offered to transaction parties or commissions may be paid to intermediaries in an explicit manner, but they must be truthfully recorded. Discounts and commissions accepted by the Company through normal procedures must also be truthfully recorded. Employees may not personally accept any kickback or commission.

If you have any questions about specific requirements and standards for gifts and hospitality, consult the Company's relevant systems or the relevant department.

(3) Prohibition of Unfair Competition

In business operations, it is prohibited to fabricate or disseminate false information or damage a competitor's reputation through misleading information.

It is prohibited to make false publicity about services, products, technologies or other offerings provided to customers, or to convey to customers information that has not been officially confirmed by ENN or has not been approved by the Company for external release. It is prohibited to deceive or mislead customers.

It is prohibited to infringe the brands and intellectual property rights of others, including but not limited to trademark rights, patent rights and copyrights.

(4) Antitrust

China's Anti-Monopoly Law is continually improving and antitrust enforcement is becoming increasingly stringent. Violations of antitrust law will result in severe sanctions. ENN consistently advocates fair competition and opposes monopolistic conduct.

The Company shall not enter into monopoly agreements with business operators that compete with it, including agreements to fix or change the prices of commodities, restrict the production or sales volume of commodities, divide sales markets or raw material procurement markets, restrict the purchase of new technologies or equipment, restrict the development of new technologies or products, or jointly boycott transactions. The Company shall not enter into monopoly agreements with trading counterparties to fix the price at which commodities are resold to third parties or set a minimum price for resale to third parties.

In areas where ENN holds a dominant market position, it shall not sell commodities or purchase services at unfairly high or low prices, sell below cost without a legitimate reason, restrict counterparties, conduct tie-in sales or refuse transactions, impose unreasonable trading conditions, or apply differential treatment to counterparties.

When merging with or acquiring another business operator, or obtaining control over another business operator by other means, the Company shall consult the Compliance Management Department of its entity in advance. Where the transaction meets the review criteria for concentrations of business operators, it shall be reported in strict accordance with statutory procedures.

(5) Protect Consumers' Legal Rights and Interests

We are committed to providing consumers with safe, reliable and high-quality products and services and meeting consumer needs. We take consumer feedback and suggestions seriously and continuously improve our products and services.

In transactions with consumers, we follow the principles of voluntariness, equality, fairness and good faith, focus on protecting consumers' legal rights and interests, seriously address conduct that harms consumer rights and interests, and broadly accept and encourage supervision by the public.

(6) Compliance with Import and Export Trade Controls

We comply with all import and export laws, regulations and restrictions applicable in the countries where trade is conducted. Such laws, regulations and restrictions apply to products, services, information, technology, goods or remuneration for services and the countries or third parties, including personnel, with which we conduct business, as well as technical data relating to the design, production and use of products or services. We should understand that violations of import and export trade controls or sanctions laws may cause serious losses to the Company and individuals.

When conducting business activities in other countries, we shall ensure that items carried with us comply with relevant import and export laws and regulations.

Employees are responsible for understanding relevant laws and may consult the Compliance Management Department of their entity if they have any questions.

(7) Anti-Money Laundering

Money laundering refers to concealing or disguising the source and nature of illegal proceeds and the income generated from them through various means so that they appear legal. ENN will not directly or indirectly participate in such conduct.

In business activities, we shall comply with all applicable anti-money laundering laws and regulations in China and abroad, conduct due diligence and fully understand business partners. When dealing with business partners or customers, we shall exercise sound judgment and promptly report any abnormal or suspicious activity. Abnormal or suspicious activities include, but are not limited to, large cash payments, arranging for a person who is not involved in a transaction to make a payment, payments from unusual sources and payments in a currency different from that specified in the contract. We shall strictly comply with the Company's financial systems and procedures, not accept non-compliant cash payments and not make payments to non-transaction accounts or unusual accounts.

If you encounter any suspicious conduct or have concerns before proceeding with a transaction, consult the Compliance Management Department of your entity and retain relevant evidence.

(8) Political Contributions

A political contribution refers to movable or immovable property, a payment for inadequate consideration, debt forgiveness or other economic benefit provided without compensation by an external party to an individual or group engaged in election activities or other politically related activities. ENN Energy strictly prohibits political contributions in any form in accordance with national laws and regulations. If bribery of a state employee or government official occurs, the matter shall be handled in accordance with applicable local laws and regulations and ENN Energy's other relevant rules and systems.

2.4. Government and Community

(1) Comply with Local Laws and Regulations and Strengthen Government Communications

We shall comply with all applicable laws and regulations in the places where we conduct business. The Company advocates timely, effective, lawful and candid communication with government and actively seeks the government's understanding and support for ENN's legitimate needs.

(2) Support Community Public Welfare

ENN is committed to improving the quality of life and culture in the communities where it operates and promoting economic and social development. ENN encourages the integration of its public welfare facilities and services into communities to improve quality of life, and strongly encourages employees to support community public welfare through volunteering, participation in charitable and community activities and participation in industry development associations.

(3) Respect Local Customs and Religious Beliefs

ENN respects the religious beliefs and customs of different regions and ethnic groups in China and abroad, as well as the customs and religious beliefs of different employees. We rely on local customs and individual diversity to serve customers and consumers in different locations.

2.5. Assets

(1) Protect Company Assets

We are responsible for protecting all ENN assets from loss, damage or theft. Company assets include tangible and intangible assets. Tangible assets include funds, products, equipment including mobile devices and computers, facilities, installations and plants. Intangible assets include land-use rights, mineral rights, intellectual property including patents, trademarks, copyrights, domain names and trade secrets, franchise rights and other assets.

If Company assets are stolen, lost, damaged or misused, every employee is responsible for immediately reporting the matter to the relevant department of the Company. When an employee leaves the Company for any reason, the employee must return all Company assets in their custody, possession or control.

(2) Protect Intellectual Property

For new works, including computer software, patents, trademarks and domain names, created in the course of work, we shall promptly apply for registration in accordance with the law. Rights already obtained shall be renewed and maintained in a timely manner, and licenses and transfers shall be implemented in accordance with laws, regulations and ENN's systems. If we discover infringement of the Company's intellectual property, we shall stop it, preserve evidence of infringement and, where necessary, initiate legal proceedings to protect the Company's legitimate rights and interests in accordance with the law.

To the extent permitted by law, all intellectual property rights in work products created by employees in the course of their work belong to ENN. Inventions made by employees in performing Company tasks or primarily using Company resources are service inventions. The Company is the rights holder, and individual employees may not claim such inventions as their own.

While protecting the Company's intellectual property, we shall also respect the intellectual property rights of others. Before using another person's intellectual property, we shall obtain the rights holder's permission and prevent any infringement of the intellectual property rights of others.

2.6. Company Information

(1) Protect Data Security and Personal Information

ENN attaches great importance to protecting the privacy and data of business partners, customers, consumers and employees. We collect, store and use another person's personal information only for legitimate business purposes and with the person's

consent. When collecting, using and processing information relating to individuals, including employees, and market, financial, personnel and strategic planning information of business partners and other stakeholders, the Company follows the principles of legality, legitimacy and necessity, takes prudent measures to ensure information security, and does not unlawfully process, transfer, trade, provide or disclose the information collected. If you discover in the course of work that personal information or other data or information of a business partner, customer, consumer or employee has been misappropriated, promptly report it to the Compliance Management Department of your entity or the Group Legal and Compliance Enablement Team.

(2) Protect Confidential Information

ENN's confidential information includes, but is not limited to, non-public information about ENN and non-public information provided to us by business partners, customers and consumers. We must access such information only through secure devices and where there is a reasonable business need or a genuine need to know, and must fulfill our confidentiality obligations. Employees shall continue to fulfill confidentiality obligations after leaving the Company or completing their work. Regardless of the reason for departure, you may not take away paper or electronic documents containing confidential information or copy such documents. Before sharing any confidential information, confirm that the sharing complies with the Company's relevant information confidentiality requirements and sign a confidentiality agreement before sharing.

When communicating with others in public places or at meetings, seminars and industry events, you must also take care to avoid unintentionally disclosing confidential information.

If you have any questions about the use of information, promptly consult the relevant information security management department of your entity.

(3) Lawful External Disclosure of Information

In external information disclosure, ENN shall comply with applicable laws, regulations and regulatory requirements and disclose information required by law in a true, accurate, complete and timely manner. External information shall be disclosed by professional personnel authorized by the Company in accordance with Company requirements. No employee may disclose information externally without authorization or approval.

Each listed company shall, in accordance with the securities laws and securities exchange laws of the country or region where it is located, timely fulfill its information

disclosure obligations to shareholders and the market. Disclosed information must be timely, true, accurate and complete, and relevant documents shall be registered and filed as required. Listed companies shall also actively accept and cooperate with on-site inspections by regulatory authorities, proactively provide complete data and materials, and assist regulatory authorities in carrying out supervision.

When an authorized authority investigates or inspects the Company, we shall, under the guidance of the compliance department of our entity, actively and properly cooperate with the investigation or inspection, including accepting inquiries and providing relevant documents, materials and information.

(4) Strengthen Information Systems and Network Management

ENN's information and communications systems, including telephone and network connections, are critical to ENN's business and shall only be used for reasonable business-related purposes. The Company regularly conducts information security risk assessments at the system and network levels, promptly patches system vulnerabilities, deploys necessary security measures at the data, endpoint, application and network levels, and continuously monitors the information security posture to ensure rapid response to and handling of security incidents.

Employees shall study relevant network knowledge, comply with the Company's information security management requirements, not browse illegal websites, not receive suspicious emails, not download malicious software, and not publish, download or receive illegal or non-compliant information.

2.7. Applicable Compliance Standards in Different Countries, Regions and Business Areas

In addition to complying with the Code and ENN's other rules and systems, when conducting business in other countries or regions, if local laws, regulations or customs differ from the Code, we shall follow the stricter standard. Similarly, when conducting business in different parts of China, we shall comply with local laws, regulations, policies and customs and implement the highest applicable standard.

When conducting business in a specific field, we shall also comply with the requirements and standards of the relevant industry.

If you have any questions about the application of laws or compliance requirements in the place where you conduct business, consult the Compliance Management

Department of your entity. Where necessary, consult a local professional institution for advice and assistance.

2.8. Comply with Compliance Management Systems

The Code is a guiding document within ENN's compliance management system and sets out only basic and principled requirements for the compliance obligations of the Company and its employees. While complying with the Code, employees shall also comply with other specific compliance management systems issued and updated by ENN from time to time, including but not limited to the ENN compliance management system and supporting implementation rules on compliance training, reporting of violation incidents, compliance management evaluation and conflict of interest management; ENN prohibited and mandatory standards and guidelines; guidelines on the registration of gifts and hospitality, anti-corruption and anti-commercial bribery, antitrust compliance, fair competition compliance management, standardized advertising language and compliance due diligence on business partners; and compliance management systems, rules and requirements issued and updated by the relevant entity. All employees shall carefully read the Code and other compliance management systems, participate in relevant training, understand and strictly implement the Company's compliance management requirements.

2.9. Reporting and Whistleblowing

ENN expects and encourages employees and individuals who have a working relationship with ENN to promptly report or whistleblow on any conduct that may violate laws and regulations, Company systems or the Code, protect ENN's reputation and prevent harm to ENN.

If any ENN employee, business partner, customer, government authority or other stakeholder suffers retaliation for reporting misconduct, expressing a view they believe to be correct or refusing to participate in conduct that violates laws and regulations, Company systems or the Code, promptly report it to the Group Legal and Compliance Enablement Team. The Group has a unified whistleblowing telephone number and email address: 0316-6081111 and jvbao@enn.cn, respectively.

2.10. Disciplinary Action for Violations

For conduct that seriously violates the requirements of the Code, ENN will treat it as serious misconduct and impose disciplinary action in accordance with the Company's employee violation and disciplinary action management rules and other relevant requirements.

In addition to internal Company disciplinary action, violations may cause organizations and individuals to bear corresponding civil and administrative liabilities. Where a violation is suspected of constituting a crime, it shall be transferred to the judicial authorities for criminal liability in accordance with the law.

If you are unsure whether your conduct violates the rules, promptly contact the Compliance Management Department of your entity or the Group Legal and Compliance Enablement Team for advice and assistance.