



GOGOX HOLDINGS LIMITED

快狗打车控股有限公司

(incorporated in the Cayman Islands with limited liability)

Whistleblowing Policy

1. OBJECTIVES AND SCOPE

1.1. What is Whistleblowing Policy?

GOGOX Holdings Limited (the "**Company**") and its subsidiaries (together "**Group**", "**we**" or "**us**") is committed to principles of fair dealing, honesty and integrity. This is reflected in the manner in which the Company conducts its business, as well as the Company's strong commitment to build and maintain a culture of compliance.

We encourage employees and third parties to speak up should they have a concern relating to serious wrongdoing within the Group, including potential breaches of our Code of Ethics and Business Conduct. This is supported by our Whistleblowing Policy (this "**Policy**"), which provides guidance on how to raise concerns and the steps that will be followed when concerns are reported to us.

This Policy should be read in conjunction with our Code of Ethics and Business Conduct, which sets out our expectations in respect of the conduct of our Employees, as well as describing the Group's commitment to making ethical choices on business issues.

1.2. Who does the Whistleblowing Policy apply to?

This Policy applies to all employees (including part-time, temporary agency workers, interns and secondees), officers and directors of the Group (together, "**Employees**") and third parties who deal with the Group (for example, customers and suppliers) ("**Third Parties**").

1.3. Why do we have this Policy?

It is in the best interests of the Group, as well as our Employees and Third Parties, that concerns of suspected wrongdoing be reported. This enables us to conduct a thorough investigation and take prompt and necessary action.

This Policy sets out a reporting mechanism which is designed to help us mitigate legal, financial, operational and reputational risk to the Group. The primary objectives of this Policy are:

- to encourage Employees, Third Parties, as well as individuals and entities acting for or on behalf of the Group, to report suspected wrongdoing with the confidence that their concerns will be given serious, prompt and appropriate attention;
- to provide guidance on how to report suspected wrongdoing; and
- to provide assurance to anyone who makes a report in good faith that they will not be subjected to retaliation of any kind.

Any reporting under the Whistleblowing Policy can be done confidentially, further information can be found below.

1.4. **What kinds of concerns should be reported through the Whistleblowing Policy reporting channels?**

This Policy encourages Employees and Third Parties (each, a "**Whistleblower**") to report any concerns of suspected or actual serious wrongdoing relating to the Group, which includes but is not limited to the following areas:

- **Improprieties in financial reporting or internal controls** – examples include: falsification or destruction of business or financial records; misrepresentation or suppression of financial information; breaches of internal financial reporting policies/controls, and auditor independence concerns.
- **Criminal offences or breaches of other legal or regulatory requirements** – examples include: fraud or theft.
- **Harassment or discrimination in any form**
- **Serious breaches of the Group's policies, guidelines and procedures**— examples include: corrupt practices (including giving or receiving bribes or other improper benefits); and anti-competitive behaviour under antitrust/competition laws (e.g. cartel activities).
- **Unethical behaviour that has the potential to bring the Group into disrepute** – examples include: conflict of interest concerns.
- **Retaliation or retribution against any individual who reports a concern** – examples include: statements, conduct or actions involving discharging, demoting, suspending, harassing or discriminating against an individual for reporting a concern in good faith.
- **Any perceived risk to the Group's business, reputation or operations**
- **Deliberate concealment of any of the above** – examples include: destroying/deleting documents in an effort to impact an investigation of

suspected wrongdoing.

Note: The reporting channels that are provided through this Policy are not intended to be used to question the Group's business or commercial decisions. They should also not be used to air personal disputes or grievances, or address matters that would be more appropriately dealt with through the disciplinary or grievance procedures, or other internal procedures provided by the Group.

2. HOW WILL I BE PROTECTED IF I MAKE A REPORT?

2.1. Protection against retaliation

We will protect any individual who raises an issue or reports a concern in good faith from retaliation. Retaliation against any individual who raises a concern in good faith will not be tolerated and will be dealt with in an appropriate manner, which may include disciplinary action for Employees.

2.2. Identity protection

We will treat all allegations in a sensitive and confidential manner. The Whistleblower's identity will not be divulged without his/her consent wherever possible.

However, there may be circumstances in which the Group is required or legally obliged to disclose the Whistleblower's identity. For example, should an investigation lead to a criminal prosecution, it may become necessary for a Whistleblower to provide evidence or be interviewed by relevant authorities. If this is the case, necessary steps will be taken to ensure that the Whistleblower suffers no detriment.

Whistleblowers are required to maintain confidentiality at all times and must not disclose to any other individual that they have filed a report. They must also not disclose the nature of the report and the identities of any other individuals involved.

2.3. Making false reports

If a knowingly false report is made, for personal gain or any other ulterior motive, the person making the report will be investigated. This may result in disciplinary action for Employees, including termination of employment.

3. HOW DO I REPORT A CONCERN UNDER THE WHISTLEBLOWING POLICY

Employees and Third Parties may report their concerns under this Policy to the senior management team at speakup@gogox.com.

Important Note:

- 1) We will investigate all credible concerns that are reported under this Policy. When submitting a report, as much detail as possible should be provided, including names and dates, etc., in order to help facilitate the fact-finding/investigation process.
- 2) Whistleblowers are encouraged to provide their names and contact details, so that clarification of the reports made or further applicable information can be obtained directly from them where required. However, we recognize that in some cases Whistleblowers may not feel comfortable identifying themselves. In these cases, reports may be submitted anonymously. Please note, however, that anonymous reports could limit our ability to thoroughly investigate a concern.
- 3) If a report relates to the Human Resources Department, such report should be submitted to the Legal Department, and the Legal Department will conduct an investigation according to this Policy and notify the Legal Director.

4. INVESTIGATIONS

All reports will be referred to the Human Resources Department except those relating to their department.

Depending on the nature of the report received, the Legal Department or the Human Resources Department will carry out a preliminary review to understand the circumstances surrounding the allegation based on any information provided by the Whistleblower. All preliminary assessments will be reported to the Legal Director or the Human Resources Director (as the case may be) prior to the commencement of any investigative work. The Human Resources Director or the Legal Director will report all claims reviewed by it to the Board of Directors of the Company.

Subsequent to the preliminary review, the Legal Director or the Human Resources Director (as the case may be) will discuss the case (together with the proposed detailed investigative work to be conducted or other proposed action (e.g. report to law enforcement authorities where necessary)) with senior management of the relevant Group company, including the Head of Finance Department.

If the Legal Director or Human Resources Director determines that detailed investigation for the case should be carried out, the Legal Director or Human Resources Director (as the case may be) will carry out a detailed review which may include, but is not limited to, inspection of relevant documents and interviewing of relevant parties.

Relevant advice from in-house or external legal counsel and/or the Human Resources Department will be obtained where appropriate.

The result of the Legal Department or Human Resources Department investigation, together with corrective action plans, will be documented and provided to senior management, and where appropriate, the Board of Directors.

The result of any investigation may be communicated to the Whistleblower, where it is deemed appropriate by the Group.

If, having considered the facts available, the Group is of the opinion that a criminal offence may have been committed, we will seek legal advice to determine if it is necessary to, and if so, we will, refer the matter to the appropriate authorities for their further action.

Employees who are found to have perpetrated or participated in an impropriety will be subject to disciplinary action, which may include termination of employment. In the case of any suspected corruption or other criminal offences, a report will be made to the appropriate authorities in the relevant countries, as we may consider appropriate.

5. RETENTION

All records of reports or complaints made, including results of any investigation, shall be retained for a period of not more than seven years following completion of the investigation (if any) or closure of the matter.

6. POLICY GOVERNANCE AND REVIEW

This Policy has been approved by the Board of Directors of the Company. The Board of Directors have overall responsibility for the implementation of this Policy, and has delegated the day-to-day responsibility for the administration of this Policy to the Human Resources Department.

The Audit Committee is responsible for reviewing this Policy, recommending changes, and addressing issues of concern.

Changes to this Policy may be made from time to time. This Policy is posted on the website of the Group. The version on the website shall be deemed as the most current version of this Policy.