Hong Kong Exchanges and Clearing Limited and The Stock Exchange of Hong Kong Limited take no responsibility for the contents of this announcement, make no representation as to its accuracy or completeness and expressly disclaim any liability whatsoever for any loss howsoever arising from or in reliance upon the whole or any part of the contents of this announcement.

Zengame Technology Holding Limited

禪遊科技控股有限公司

(incorporated in the Cayman Islands with limited liability)
(Stock Code: 2660)

SUPPLEMENTAL ANNOUNCEMET DISCLOSEABLE TRANSCTIONS IN RELATION TO WEALTH MANAGEMNET PRODUCT

Reference is made to the announcement of Zengame Technology Holding Limited (the "**Company**", together with its subsidiaries, the "**Group**") dated 20 May 2025 (the "**Announcement**") in relation to the subscription and redemption of wealth management products ("**WMP(s)**"). Unless otherwise defined, capitalized terms used herein shall have the same meanings as those defined in the Announcement.

The Company would like to provide the following supplemental and/or updated information in relation to the remedial measures disclosed in the Announcement:

a) In respect of the first remedial measure, it was disclosed in the Announcement that the head of the Group's financial department has been reminded to keep the Company informed of any transactions which may involve disclosure and/or Shareholder approval requirements under Chapter 14 of the Listing Rules. The Company would like to clarify that the head of the Group's financial department also serves as the Group's financial director (the "**Financial Director**"), and the Financial Director has duly undertaken such responsibility.

b) In respect of the second remedial measure, the Company committed to arranging internal training on Chapter 14 of the Listing Rules by the end of September 2025. The Company confirms that on 14 August 2025, its Hong Kong legal advisers conducted a targeted training session for the Directors, department heads, and finance personnel, covering aggregation principles and disclosure obligations under Chapter 14 of the Listing Rules. Refresher trainings will also be arranged on an ongoing basis through the company secretary, external legal counsel, or other professional institutions.

c) In respect of the monitoring arrangement for monthly transactions under

the third remedial measure, the Company has designated the internal audit department as the responsible unit and has implemented the following enhanced measures to strengthen the oversight of WMP transactions with financial institutions:

- where WMP transactions occur during a given month, a transaction ledger must be prepared on a weekly basis and submitted to the Group's internal audit department. The ledger must set out key information including transaction details, fund flows, expected returns, and applicable risk indicators;

- where no WMP transactions occur during a given month, a monthly ledger (indicating nil transactions) must still be submitted;

- the Group's internal audit department will review all submissions for completeness and compliance, and will promptly report any irregularities. Periodic verification of the ledger entries will also be conducted by the Group's internal audit department to ensure consistency and compliance with internal procedures.

In addition to the enhancements described above, the Company has adopted the following additional measures to further strengthen compliance oversight and internal controls in respect of WMP transactions:

a) **Enhanced External Consultation** - For any proposed transaction that may, whether on a standalone or aggregated basis, exceed any applicable 5% threshold under Chapter 14 of the Listing Rules, the Company will consult with its external legal advisers prior to execution. This requirement has been formally incorporated into Step III of the internal WMP approval procedures set out below.

b) **Independent Size Test Verification by Finance Director** – The Financial Director is now required to independently verify the following before approval: (i) the accuracy of the relevant percentage ratio calculations; (ii) the aggregation of outstanding transactions with the same counterparty over a 12-month period; and (iii) whether the transaction gives rise to any disclosure obligations under Chapter 14 of the Listing Rules.

c) **External Legal/Compliance Checklist** – The Company has engaged its legal advisers to perform thorough review on compliance with disclosure requirements using checklists for notifiable and connected transactions under the Listing Rules. These checklists will be adopted by the Company for ongoing internal monitoring and compliance assessment.

As part of the Company's ongoing efforts to strengthen internal controls and compliance in relation to its investments in WMPs, the Company has formally

adopted a set of internal approval procedures to ensure timely identification and reporting of notifiable transactions (if any) under Chapter 14 of the Listing Rules.

The key steps of the internal procedures are summarized below:

Step I - Initiation by Financial Officer

The Group's finance officer initiates each proposed WMP subscription by obtaining product quotations and draft terms from financial institutions. The finance officer is responsible for:

a) conducting preliminary due diligence on the financial institution and assessing the return, liquidity, and risk profile of the proposed product; and

b) performing a preliminary size test with reference to the applicable percentage ratios under Chapter 14 of the Listing Rules, including: (i) reviewing the Group's WMP transaction history with the same financial institution over the past 12 months; (ii) identifying any affiliated or related-party relationships through online checks; and (iii) flagging any transaction that may exceed the 5% threshold under the applicable percentage ratios.

The findings and size test results are then submitted to the Group's financial manager for review.

Step II - Review by the Financial Manager

The Group's financial manager reviews and recalculates the size test, verifies the nature and amount of the proposed transaction, and assesses any potential compliance risks. The reviewed materials are then submitted to the Financial Director for further assessment.

Step III - Reviewed by the Financial Director and External Legal Consultation

The Financial Director, who is responsible for overseeing the Group's overall financial operations, will: (i) verify the credentials of the relevant financial institution, (ii) assess the product's risk classification and compare its expected return with similar products; (iii) evaluate whether the transaction aligns with the Group's financial strategy and risk tolerance; and (iv) review the size test results, subscription terms, historical dealings with the financial institution, current liquidity position, and prevailing market conditions.

Where the proposed transaction involves complex product features (such as embedded derivatives, open-ended terms, or foreign exchange exposure), or

where any applicable percentage ratio may equal or exceed 5%, the Financial Director will consult with the Company's external legal advisers prior to execution.

Step IV - Involvement of the Group's Securities Department, Executive Director and the Board

Where any applicable percentage ratio equals or exceeds 5%, the following approval process will apply:

- The Group's financial department will submit the relevant materials to the Group's securities department for review of the size test methodology and assessment of any disclosure obligations under Chapter 14 of the Listing Rules;

- Upon receiving the review report of the Group's securities department, the Financial Director will report the matter up to the executive Director (the "**ED**"), who also serves as the chief technology officer of the Company and is responsible for overseeing the Group's investment activities and financial risk management;

- The ED will evaluate the transaction from a strategic and capital allocation perspective, including consideration of the risk-return balance and compliance with applicable regulatory requirements; and

- The Group's securities department will also report the matter up to the Board for consideration. The Board will conduct a comprehensive review of the proposed transaction, taking into account its potential impact on the Group's financial position, operating performance, and compliance with the Listing Rules. The Board will collectively decide whether to approve the transaction and proceed with the necessary disclosure.

Where any applicable percentage ratio below 5%, the following approval procedures will apply:

- Transactions of RMB2 million or below require final approval from the Financial Director; and

- Transactions exceeding RMB2 million require final approval from the ED.

Step V - Execution by Accounting Department

Upon obtaining the necessary approvals, the Group's accounting department will execute the payment. The Group's finance officer will promptly record the transaction details in the transaction ledger, including the transaction date, counterparty, transaction amount, and product description.

Step VI - Ongoing Monitoring by Financial Director

The Financial Director will continuously monitor the performance of all subscribed WMPs, taking into account prevailing market conditions and the Group's liquidity needs. In respect of open-ended WMPs, the Financial Director evaluates redemption opportunities. Upon identifying a favorable redemption window, the Financial Director instructs the finance officer to initiate the redemption process, which is subject to the same size test and internal approval procedures applicable to subscriptions. Upon completion, the redemption details are promptly recorded in the transaction ledger.

The above information does not affect any other information contained in the Announcement. Save as disclosed herein, all other information in the Announcement remains unchanged.

By Order of the Board
Zengame Technology Holding Limited
Ye Sheng
Chairman

Hong Kong, 15 August 2025

As at the date of this announcement, the executive Directors are Mr. Ye Sheng, Mr. Yang Min and Ms. Xiong Mi, and the independent non-executive Directors are Mr. Jin Shuhui, Mr. Mao Zhonghua and Mr. Yang Yi.