SHENWAN HONGYUAN GROUP CO., LTD.
WORKING RULES OF THE RISK CONTROL COMMITTEE OF THE BOARD OF DIRECTORS

(Considered and amended at the twelfth meeting of the sixth session of the Board of Directors of the Company on November 28, 2025)

CHAPTER 1 GENERAL PROVISIONS

Article1 In order to improve and standardize the consideration and decision-making procedures of the Risk Control Committee of the Board of Directors (hereinafter referred to as the "Risk Control Committee") of Shenwan Hongyuan Group Co., Ltd. (hereinafter referred to as the "Company"), enhance the work efficiency and scientific decision-making level of the Risk Control Committee, and ensure the smooth progress of the work of the Risk Control Committee, the Working Rules of the Risk Control Committee of the Board of Directors of Shenwan Hongyuan Group Co., Ltd. (hereinafter referred to as the "Rules") are formulated pursuant to relevant national laws, administrative regulations and normative documents such as the Company Law of the People's Republic of China (《中華人民共和國公司法》) and the Code of Corporate Governance for Listed Companies (《上市公司治理準則》), the supervisory regulations of the places where the shares of the Company are listed, relevant provisions under the Articles of Association of Shenwan Hongyuan Group Co., Ltd. (hereinafter referred to as the "Articles of Association") and the Rules of Procedures of the Board of Directors of Shenwan Hongyuan Group Co., Ltd. (hereinafter referred to as the "Rules of Procedures of the Board of Directors") and in combination with the actual situation of the Company.

Article 2 The Risk Control Committee is a special working body of the board of directors (hereinafter referred to as the "Board" or "Board of Directors") established in accordance with the Articles of Association, which is accountable to and reports its work to the Board.

Article 3 The meetings of the Risk Control Committee include regular meetings and extraordinary meetings. Regular meetings shall be convened at least once every six (6) months. Extraordinary meetings of the Risk Control Committee may also be held pursuant to relevant provisions of relevant national laws, administrative regulations and normative documents, and the supervisory regulations of the places where the shares of the Company are listed, the Articles of Association, the Rules of Procedures of the Board of Directors and the Rules.

Article 4 The Board shall provide sufficient resources to the Risk Control Committee to enable the Risk Control Committee to perform its duties.

Article 5 As the administrative office of the Risk Control Committee, the office of the Board is responsible for receiving relevant proposals, organizing relevant meetings, taking meeting minutes maintaining documentaries and supervising the implementation of meeting resolutions and other administrative matters in relation to the performance of daily duties of the Risk Control Committee.

The risk management department of the Company assists in coordinating with the office of the Board, which is responsible for, among others, organizing the provision of proposals to be discussed and matters to be studied as well as tracking and giving feedback on the implementation of meeting resolutions of the Risk Control Committee.

CHAPTER 2 COMPOSITION

Article 6 The Risk Control Committee shall consist of three (3) to five (5) directors, and shall appoint one convener.

Article 7 The convener and other members of the Risk Control Committee shall be nominated, appointed and removed by the Chairman of the Company after soliciting the opinions of the majority of directors, which shall be approved by the Board.

Article 8 The term of office of members of the Risk Control Committee shall be consistent with that of the Board, and its members may serve consecutive terms if re-elected upon the expiry of the current term of office. If any member ceases to act as a director of the Company or any member who shall have the capacity as an independent non-executive director no longer has the independence stipulated in relevant national laws, administrative regulations and normative documents, and the supervisory regulations of the places where the shares of the Company are listed, the Articles of Association during his/her term of office, he/she shall automatically be disqualified as a member, and the vacancy shall be filled by the Board in accordance with the Rules.

CHAPTER 3 TERMS OF REFERENCE

Article 9 According to relevant provisions of relevant laws, administrative regulations and normative documents, and the supervisory regulations of the places where the shares of the Company are listed and the Articles of Associations, the Risk Control Committee shall be accountable to and report to the Board. It has the following duties:

(I) to review and make suggestions on the overall goals and basic policies for risk management of the Company;

(II) to review and make suggestions on the organization design and duties of risk management;

(III) to evaluate and make suggestions on the risks of important decisions and solutions to significant risks which require review by the Board;

(IV) to formulate the significant risk limits centering on internal process controls, and to monitor, review and make suggestions to the Board on the internal control systems under the overall risk management;

(V) to be delegated by the Board to review the effectiveness of risk management and internal monitoring systems of the Company and its subsidiaries at least once a year, and to report to shareholders that it has completed the review in the Corporate Governance Report. The review shall cover all important monitoring aspects including the financial monitoring, operation monitoring and compliance monitoring, which shall specifically include the followings:

(a) the changes in the nature and extent of significant risks (including environmental, social, and governance risks), and the ability of the Company to respond to changes in its business and external environment since the review of last year;

(b) the scope and quality of management's ongoing monitoring of risks (including environmental, social, and governance risks) and of internal control system, and where applicable, the work of its internal audit function and other assurance providers;

(c) the extent and frequency of communication of monitoring results to the Board (or Board committees) which enables it to assess the monitoring of the Company and the effectiveness of risk management;

(d) significant monitoring failings or weaknesses that have been identified during the period. Also, the extent to which they have resulted in unforeseen outcomes or contingencies that have had, could have had, or may in the future have, a material impact on the Company's financial performance or condition; and

(e) the effectiveness of the Company's procedures for financial reporting and compliance with the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (《香港聯合交易所有限公司證券上市規則》);

(VI) to perform other duties as required by relevant laws, administrative regulations, and the supervisory regulations of the places where the shares of the Company are listed and the Articles of Associations and other matters as authorized by the Board.

Article 10 The convenor of the of the Risk Control Committee shall perform the following duties:

(I) to convene regular meetings of the Risk Control Committee;

(II) to convene extraordinary meetings of the Risk Control Committee in special occasions;

(III) to preside over the meetings of the Risk Control Committee;

(IV) to organize the compilation of topical research reports on risk management;

(V) to examine and approve research reports on routine risk management;

(VI) to perform other duties entrusted by the Board and the Risk Control Committee.

Article 11 The staff of the administrative office under the Risk Control Committee may attend meetings related to risk control of the Company as non-voting attendees and access to relevant information after obtaining permission, and shall issue relevant reports accordingly on a regular or irregular basis and submit them to the Risk Control Committee.

Article 12 Relevant senior management and departments of the Company shall, if necessary, assist in the work of the Risk Control Committee and provide relevant information, including but not limited to:

(I) basic information and relevant materials of risk management of the Company;

(II) basic information about major risk decision-making matters and advisory opinions given by any intermediaries or relevant experts;

(III) reports and relevant proposals submitted to the Risk Control Committee regarding major risk decision-making matters.

Article 13 In case of major risk matters, the Company shall report to all members of the Risk Control Committee in time.

CHAPTER 4 RULES OF PROCEDURES

Article 14 All meetings of the Risk Control Committee shall be convened by the convenor of the meeting. Where the convenor of the meeting is unable to or fails to fulfill the duty, another member shall be appointed by the chairman or jointly elected by a majority of the members to act on his/her behalf.

Article 15 In principle, a written notice shall be given to each member of the Risk Control Committee three (3) days before the meeting of the Risk Control Committee is convened (excluding the day of the meeting); however, under special circumstances, such notice period may be reduced to less than three (3) days upon consent of more than two-thirds (2/3) of the members of the Risk Control Committee, or by way of other means.

Article 16 Notice of the meeting of the Risk Control Committee shall include the followings:

(I) date and venue of the meeting;

(II) duration of the meeting;

(II) reasons and issues of the meeting;

(III) date of issue of the notice.

The issues and notices of the meeting shall be prepared by the convenor of the meeting and delivered to each member of the Risk Control Committee through the staff of the Board of the Company.

Article 17 Meetings of the Risk Control Committee may be convened by way of on-site meetings or telecommunications (including but not limited to telephone, video and fax).

Article 18 The meeting of the Risk Control Committee shall be held with more than two-thirds (2/3) of members present. Members of the Risk Control Committee shall attend the meeting in person and shall not be represented.

Article 19 Meetings of the Risk Control Committee shall be presided over by the convenor of the meeting. Where the convenor of the meeting is unable to or fails to fulfill the duty, another member shall be appointed by the chairman or jointly elected by a majority of the members to act on his/her behalf.

Article 20 Each member of the Risk Control Committee shall be entitled to one vote. Resolution of a meeting must be adopted by the affirmative votes of a majority of all members of the Risk Control Committee.

Article 21 The Risk Control Committee may discuss a certain risk matter, report or document of the Company. Matters considered at the meeting of the Risk Control Committee shall be formed as a meeting resolution, which shall be submitted to the Board of the Company together with relevant proposals.

Article 22 The voting at meetings of the Risk Control Committee shall be undertaken by way of poll, with signatures on resolutions. The voting at extraordinary meetings may also be undertaken by telecommunication.

Article 23 In principle, the meeting of Risk Control Committee will not consider issues or matters not listed in the notice of the meeting. When new issues or matters need to be added under special circumstances, the issues or matters may be considered and resolved upon consent of more than two-thirds (2/3) of the members.

Article 24 After voting at the meeting of the Risk Control Committee, the resolutions shall be formulated and the minutes shall be prepared. Each member of the Risk Control Committee attending the meeting shall sign the resolutions and minutes of the meeting.

Article 25 The resolution of the meeting of the Risk Control Committee shall include the followings:

(I) date and venue of the meeting and the name of the convenor;

(II) the supposed number of committee members who should attend the meeting and the actual number of members present;

(III) explanations of relevant procedures of the meeting and the legality and validity of the resolutions of the meeting;

(IV) explanations of the contents of the resolutions as considered and voted at the meeting and the voting results (including any concerns raised or objections expressed by members);

(V) other matters to be described and included in the resolutions.

Article 26 The written documents of resolutions of a meeting of the Risk Control Committee, along with the draft and final versions of the meeting minutes, shall be distributed to all members within a reasonable timeframe following the meeting. The draft version shall be provided for members to express their opinions, while the final version shall serve as the official record. The written documents and minutes of the meeting for the resolutions of meetings of Risk Control Committee shall be kept as company files by the secretary to the Board. During the existence of the Company, such documents and minutes shall be kept for a period of not less than fifteen (15) years.

Article 27 After the formulation of the resolutions at a meeting of the Risk Control Committee, if necessary, such resolutions shall be submitted to the Board for its consideration and approval in a timely manner.

Article 28 Members and the convenor of the Risk Control Committee attending the meeting are subject to confidentiality obligations on all discussed matters and shall not disclose relevant information without authorization.

Article 29 The general manager and the secretary to the Board of the Company shall attend meetings of the Risk Control Committee as non-voting attendees.

Based on the agenda and needs of the meetings, the Risk Control Committee may invite other persons relating to the issues of the meeting to brief relevant situation or listen to relevant opinions, and such persons shall not be absent from the meeting without proper reasons. Such persons shall not be involved in the discussion, or affect the progresses, voting or resolution of the meeting.

Article 30 If necessary, the Risk Control Committee may engage an intermediary agency to provide professional advice for its decision-making at the Company's expense.

CHAPTER 5 MISCELLANEOUS

Article 31 Save for otherwise specified, the terms used in the Rules shall have the same meaning as defined in the Articles of Association.

Article 32 In case of matters not covered in the Rules or if the Rules in contradiction with laws, administrative regulations, normative documents promulgated or revised after the Rules come into effect, the supervisory regulations of the places where the shares of the Company are listed or the

Articles of Association, the relevant laws, administrative regulations and normative documents, and relevant provisions under the supervisory regulations of the places where the shares of the Company are listed or the Articles of Association shall prevail.

Article 33 When the Rules need to be revised in accordance with the changes in actual situation, the revision draft shall be submitted by the Risk Control Committee to the Board for consideration and approval.

Article 34 After being considered and approved by the Board of the Company, the Rules shall come into effect. From the date on which the Rules come into effect, the Company's original Working Rules of the Risk Control Committee of the Board of Directors will automatically invalid.

Article 35 The Rules shall be interpreted by the Board of the Company.