

## **Notice: Ambow Education Group Internal Control Communication, Whistle-blower Channels and Anti-fraud Reward Program**

**Send to:** All staffs of Ambow Education Group

### **Text:**

Dear Colleagues,

The Internal Control Department of Ambow Education Group (or the Company) hereby advises all colleagues to understand and be familiarized with the internal control communication, whistle-blower channels and anti-fraud reward program, the purpose of which is to strengthen the Company's internal control mechanism, maintaining an honest and law-abiding company culture, creating a clean workplace environment and ensuring the healthy development of the Company. We encourage all colleagues to timely report their concerns to the relevant Company Officer when becoming aware of questionable practices or violations of any laws, rules, regulations, or the Company's Code of Conduct and relevant Company policies.

### **Internal Control Communication and Whistle-blower Channels**

If an employee has a concern regarding questionable practices or violations of any laws, rules, regulations or the Company's Code of Conduct and policies, such employee may report the concern or finding by sending an email or letter to the Internal Control Department [[IA@ambow.com](mailto:IA@ambow.com)], or the Chief Executive Officer or the Chief Financial Officer of the Company.

Employees who are uncomfortable reporting their concerns to the management of the Company may report these concerns directly to the Audit Committee of the Board of Directors of the Company by sending an email to [[AuditCommittee@ambow.com](mailto:AuditCommittee@ambow.com)] or a letter to the Chairman of the Audit Committee at the following address:

Audit Committee Chairman  
c/o Corporate Secretary  
Ambow Education Group  
12th floor, No. 1 Financial Street Chang'an Center, Shijingshan District,  
Beijing, 100043 China.

Employees are welcomed to provide your contact information (including phone number and email address) to the above-mentioned recipients, so that the Company can follow up with the employee regarding the concern and to reward the relevant employee according to the anti-fraud reward program. The identity

of the employee reporting such concern will be kept strictly confidential to the maximum extent permitted by applicable law, rule or regulation.

### **Anti-fraud Reward Program**

Except that the employees reporting the concern remains anonymous, authorized by the Company, or fulfilling his/her ordinary job responsibilities, the reward will be granted according to the following standards:

1. Reward of up to RMB 500 may be given to the employee who reports a fraud, if the fraud is reported and substantiated, but without providing concrete and valid evidences.
2. Reward of up to RMB 10,000 may be given to the employee who reports a fraud and provides direct and valid evidences or clues to substantiate the fraud.
3. Reward of 10% of the recovered economic losses (capped at RMB 100,000) may be given to the employee who reports a fraud that is substantiated and helps recover the economic loss of a total amount of no less than RMB 200,000.
4. The reward can only be granted to one person/group. The first employee or the one who contributes most to the investigation will be rewarded based on above-mentioned amounts if there are more than one employee. Reward will be shared equally among a group of employees who reports their concerns together.

Human Resource Department will submit the reward application to the management of the Company within seven days after the closure of a fraud investigation. Once the reward application is approved, the reward will be transferred electronically to the employees directly.

### **Right of Interpretation**

The Internal Control Department of the Company reserves the right of interpretation of this notice.

# 通知：安博教育集团内部控制沟通、投诉渠道及舞弊举报奖励政策

**发送范围：** 安博教育集团全体人员

## 邮件正文：

亲爱的全体同仁们，

你们好！

为了强化内部监督机制，持守诚信守法的企业文化，营造良好工作环境，保障安博教育集团健康发展，公司内控部再次提请全体同仁了解并熟悉内部控制沟通、投诉渠道，以及舞弊举报奖励政策。我们鼓励您对可疑的违反法律、公司行为准则和制度等违法违规事项及时进行举报。

## 内部控制沟通和投诉渠道

若员工发现任何可疑的违反法律法规，或公司行为准则和制度等违法违规事项，该名员工可以发送电子邮件或寄信给公司内控部 [IA@ambow.com]或公司首席执行官、首席财务官。

若员工认为将该问题上报至公司管理层不妥，可以直接发送电子邮件至董事会审计委员会[AuditCommittee@ambow.com]，或寄信给审计委员会主席到以下的地址：

审计委员会主席（公司秘书代收）  
安博教育集团  
北京市石景山区金融街（长安）中心 1 号楼 12 层，邮编 100043.

您可主动提供联络方式（电话号码和电子邮件），以便我们在必要时，就后续信息与您取得联系，并对举报有功者进行奖励。在相应的法律、规章以及制度下，员工个人信息将得到最大程度的保密。

## 舞弊举报奖励政策标准

对于任何经查证属实、挽回经济损失的反舞弊举报（匿名举报、个人职责范围内或受单位委托的举报除外），集团将给予奖励，标准如下：

1. 举报并配合调查，但未提供有效证据，经查证属实，奖金最高不超过 500 元。
2. 举报并提供直接线索、证据，经查证属实，奖金最高不超过 1 万元。
3. 举报重大舞弊行为，经查证属实并挽回经济损失20 万元（含）以上，按挽回经济损失的 10%奖励，奖金最高不超过 10 万元。
4. 举报同一案件的，不重复奖励。对举报同一案件中有数个举报有功人员的奖励金，根据个人在其中所起作用进行确定。原则上奖励最先举报者或贡献大的举报者。对联名举报的，奖励金发给参与举报的全体人员，奖金总额按本办法奖励标准执行。

奖金由人力资源部在结案后 7 个工作日内提议，经管理层核准后发放。集团给予举报人的奖励将采取电子划账的方式支付。

#### **解释权**

本通知的解释权归公司内控部所有。