

# **ADAMA Ltd.**

## **Management Policy for Information Disclosure Suspension and Exemption**

### **Chapter I General Provisions**

Article 1 To regulate the suspension and exemption of information disclosure by ADAMA Ltd. (hereinafter referred to as the “Company”) and other information disclosure obligors, strengthen the management of information disclosure affairs, and protect the lawful rights and interests of investors, this Policy is formulated in accordance with *the Securities Law of the People's Republic of China, the Company Law of the People's Republic of China, the Administrative Provisions on the Suspension and Exemption of Information Disclosure by Listed Companies, the Listing Rules of the Shenzhen Stock Exchange, the Shenzhen Stock Exchange Self-Regulatory Guidance No.5 - Management of Information Disclosure Affairs*, and other relevant laws, regulations, regulatory rules, and the provisions of the *Articles of Association* of the Company.

Article 2 This Policy shall apply to the suspension or exemption of disclosure of interim reports by the Company and other information disclosure obligors, as well as the exemption of disclosing certain contents stipulated or required by the China Securities Regulatory Commission (hereinafter referred to as “CSRC”) and the Shenzhen Stock Exchange (hereinafter referred to as “SZSE”) in the periodic or interim reports.

Article 3 The Company and other information disclosure obligors shall disclose information in a truthful, accurate, complete, timely and fair manner. They shall not abuse the suspension or exemption of disclosure to evade information disclosure obligations or mislead investors, nor shall they engage in illegal activities such as insider trading or market manipulation.

The Company and other information disclosure obligors shall prudently determine matters for which disclosure may be suspended or exempted and shall implement such decisions after completing internal review procedures.

## **Chapter II Circumstances for the Application of Temporary**

### **Suspension and Exemption from Information Disclosure**

Article 4 Where the Company or other information disclosure obligor possesses conclusive and sufficient evidence demonstrating that the information to be disclosed involves national secrets or other matters whose disclosure may result in breaches of state confidentiality regulations or administrative requirements (hereinafter collectively referred to as “national secrets”), such disclosure shall be exempted in accordance with the law.

Article 5 The Company and other information disclosure obligors shall bear the duty to safeguard national secrets. They shall not disclose national secrets through any form of information disclosure, investor communications and Q&As, press releases, interviews, or similar means, nor shall they use the pretext of information being classified for business promotion.

The Company's Chairman and the Secretary of the Board shall enhance their legal awareness regarding the safeguarding of national secrets, ensuring that disclosed information does not contravene national confidentiality regulations.

Article 6 Where information to be disclosed by the Company or other information disclosure obligor involves commercial secrets or confidential business information (hereinafter collectively referred to as “commercial secrets”), and meets any of the following circumstances, and has not yet been made public or leaked, disclosure may be suspended or exempted:

(1) Information which pertains to core technologies and may give rise to unfair competition if disclosed.

(2) Information relating to the Company's own operations, or the operations of clients, suppliers or other parties, the disclosure of which may infringe upon the Company's or such parties' commercial secrets or seriously prejudice the interests of the Company or such parties.

(3) Other circumstances where disclosure may seriously prejudice the interests of the Company or other parties.

Article 7 Where information contained in the Company's periodic reports to be disclosed involves national secrets or commercial secrets, disclosure of such information may be exempted by employing methods such as using aliases, summarizing and generalizing, or omitting key information.

Where information in interim reports intended for disclosure by the Company or other information disclosure obligors involves national secrets or commercial secrets, disclosure of such information may be exempted by employing methods such as using aliases, summarizing in aggregate form, or omitting key details. Where disclosure after employing the aforementioned methods still carries a risk of disclosure of confidential information, disclosure of the interim reports may be exempted.

Article 8 Where the Company or other information disclosure obligor has suspended or been exempted from disclosing commercial secrets, they shall promptly disclose such information upon the occurrence of any of the following circumstances:

- (1) The reason for suspension or exemption has ceased to exist.
- (2) The relevant information is difficult to keep confidential.
- (3) The relevant information has been leaked, or rumors have emerged in the market.

### **Chapter III Management of Suspension and Exemption for Information Disclosure**

Article 9 The internal review procedures for suspending and exempting information

disclosure shall be as follows.

- (1) Where matters arise that fall within the information disclosure scope by laws and regulations, *the Listing Rules*, other relevant business rules of the Shenzhen Stock Exchange, or the Company's *Information Disclosure Management Policy*, the relevant departments, subsidiaries, and other information disclosure obligors of the Company shall promptly notify the Secretary of the Board of such information. If they think such information should be suspended or exempted from disclosure as outlined in this Policy, a written application shall be submitted to the Secretary of the Board at the same time. The application shall detail the reasons and basis for suspension or exemption, the potential impact of disclosure, and shall include supporting documentation and registration details of relevant insiders. The responsible personnel shall be accountable for the authenticity, accuracy, and completeness of the submitted materials.
- (2) The Secretary of the Board shall review the information and may organize relevant departments such as legal and finance to conduct deliberations as needed, and shall submit it to the Chairman for approval.

Article 10 Where the Company resolves to suspend or exempt disclosure of relevant information, the Secretary of the Board shall promptly register and file such resolution, with the Chairman signing to confirm. Relevant registration materials shall be retained by the Company's Securities and Legal Affairs Department for a period no less than ten years.

Article 11 The Company and other information disclosure obligors shall register the following matters when suspending or exempting disclosure of information:

- (1) The method of exemption, which includes exemption from disclosing interim reports, and exemption from disclosing certain content within periodic and interim reports, etc.
- (2) The type of documents subject to exemption, which includes annual reports, half-yearly reports, quarterly reports, and interim reports, etc.

- (3) The type of information subject to exemption, which includes material transactions, routine transactions, or related-party transactions in interim reports, or client and supplier names in annual reports, etc.
- (4) Internal review procedures.
- (5) Other matters deemed necessary for registration by the Company.

Where disclosure is suspended or exempted due to commercial confidentiality, in addition to promptly registering the matters specified in the preceding paragraph, the following information shall also be recorded: whether the relevant information has been made public through other manners, the principal grounds for classifying it as a commercial secret, the potential impact of disclosure on the Company or others, and the list of insiders.

Article 12 Where the Company or other information disclosure obligor suspends the disclosure of an interim report or certain contents therein, it shall promptly disclose such information once the grounds for suspension cease to exist. Concurrently, it shall explain the principal reasons for classifying the information as a commercial secret, the internal review procedures followed, and any securities transactions conducted by relevant insiders during the suspension period.

Article 13 The Company and other information disclosure obligors shall, within ten days of announcing the annual, semi-annual, or quarterly reports, submit the relevant registration materials pertaining to the suspension or exemption of disclosures during the reporting period to the Hubei Securities Regulatory Bureau and the Shenzhen Stock Exchange.

## **Chapter IV Accountability**

Article 14 Where a breach of information disclosure regulations occurs due to the negligence of parties involved in such disclosures under this Policy, resulting in serious impacts or losses for the Company, the responsible individuals shall be subject

to disciplinary action including reprimand, warning, or even removal from their posts.

## **Chapter V Supplementary Provisions**

Article 15 Where matters are not covered by this Policy, or where this Policy conflicts with relevant laws, administrative regulations, normative documents or other provisions, the relevant laws, administrative regulations, normative documents or other provisions shall prevail.

Article 16 This Policy shall be formulated, interpreted and amended by the Company's Board of Directors.

Article 17 This Policy shall take effect and come into force from the date of their approval by the Company's Board of Directors.

Board of Directors of ADAMA Ltd.

December 22<sup>nd</sup>, 2025