STRONG PETROCHEMICAL HOLDINGS LIMITED

海峽石油化工控股有限公司*

(Incorporated in the Cayman Islands with limited liability)

(Stock Code: 852)

(1) KEY FINDINGS AND RESULTS OF THE INTERNAL CONTROL REVIEW AND FOLLOW-UP REVIEW; AND (2) CONTINUED SUSPENSION OF TRADING

This announcement is made by Strong Petrochemical Holdings Limited (the "**Company**", together with its subsidiaries, the "**Group**") pursuant to Rule 13.09 of the Rules (the "**Listing Rules**") Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the "**Stock Exchange**") and the Inside Information Provisions (as defined under the Listing Rules) under Part XIVA of the Securities and Futures Ordinance (Chapter 571 of the Laws of Hong Kong).

References are made to various announcements (the "**Announcements**") of the Company from 2 October 2024 to the date of this announcement in relation to, among others: (1) the suspension of trading (the "**Suspension**") of the shares of the Company (the "**Shares**") from 9:00 a.m. on 31 December 2024 and the Stock Exchange's guidance for the resumption of trading in the Shares issued to the Company on 4 March 2025 (the "**Resumption Guidance**"); (2) the various incidents involving the directors and former management of the Company (the "**Matters**"), the establishment of the independent board committee (the "**IBC**") by the board of directors of the Company (the "**Board**") to investigate the Matters and the engagements of a forensic auditor and a legal adviser by the IBC, and the Forensic Investigator has issued an investigation report ("**Independent Forensic Investigation Report**") to the IBC; and (3) the engagement of Acclime Consulting (Hong Kong) Limited ("**Acclime**") as internal control adviser to conduct an internal control review of the Group (the "**Internal Control Review**"). Unless otherwise defined, capitalized terms used in this announcement have the same meanings as those defined in the Announcements.

The Company hereby provides the shareholders of the Company ("**Shareholders**") with the key findings and results of the Internal Control Review and Follow-up Review.

Key Findings of the Internal Control Review and Follow-up Review

As disclosed in the Announcements, the Stock Exchange issued the Resumption Guidance to the Company, requiring the Company (among other things) to conduct an independent internal control review and to demonstrate that the Company has implemented adequate internal controls and procedures to ensure compliance with the Listing Rules.

To comply with the Resumption Guidance, the Company has engaged Acclime as its internal control adviser to review and examine the processes, systems, and controls (including accounting and management systems) adopted by the Group, with the aim of identifying and evaluating internal control weaknesses and providing a detailed report with appropriate improvement recommendations for internal control weaknesses based on the Group's current operations. This review was conducted based on the internal control model of the Committee of Sponsoring Organizations of the Treadway Commission (COSO), encompassing the control environment, risk assessment, control activities, information and communication, and monitoring. The review period was from 1 April 2024 to 31 March 2025. The scope of the review covered the Company's corporate-level controls (including the control environment, risk assessment and management, monitoring, information and communication, anti-fraud policies and procedures, and control measures) and the Group's financial reporting and disclosure controls and business process-level controls (including cash and fund management, revenue and receivables, purchasing and payables/prepayments, inventory management, personnel and payroll management, and general control of computer information systems).

The Company has adopted all the improvement recommendations proposed by Acclime, and has adopted, revised and/or strengthened (as applicable) the Company's relevant policies and procedures. Acclime is also engaged by the Company and has conducted a follow-up review covering the period from 1 April 2025 to 31 January 2026 after the implementation of the relevant remedial measures by the Group (the "**Follow-up Review**"). As of the date of this announcement, Acclime has completed the Internal Control Review as well as the Follow-up Review, and has issued the Internal Control Review and Follow-up Report. The Company has also submitted such report to the Stock Exchange for review.

The key findings of the Internal Control Review and Follow-up Review are set out below:

Issue Description	Recommendation	Follow-up Review Findings
A. CORPORATE-LEVEL CONTROLS		
A.1 Control Environment		
A.1.1 Compliance Manual and Code of Professional Ethics		
Prior to the issuance of the Company's annual report, signed Annual Compliance Confirmation Forms from some personnel were not fully collected or were missing. Some subsidiaries failed to establish a staff handbook or code of conduct, or did not require new employees to confirm the content of the staff handbook in writing upon onboarding.	Collect signed Annual Compliance Confirmation Forms from all employees before the issuance of the 2024 annual report. Require all subsidiaries to establish a staff handbook or code of conduct and to require new employees to confirm the content of the staff handbook in writing upon onboarding.	The Company has completed the rectification work as planned. Acclime has obtained and reviewed the Group's established Staff Handbook, which is listed in the Employee Policy Confirmation Form for staff to sign and confirm. Based on the samples obtained, employees of the Group and the relevant subsidiaries have signed the Employee Policy Confirmation Form and the Annual Compliance Confirmation Form.

Issue Description	Recommendation	Follow-up Review Findings
A.2 Risk Assessment and Management		
A.2.1 Risk Identification, Assessment, and Reporting Procedures		
The Group's Risk Management System does not fully meet the requirements for a risk management system as stipulated in the Corporate Governance Code, particularly lacking coverage for contingency plans and handling procedures, as well as procedures for the collection, identification, assessment, response, monitoring, evaluation, and reporting of various risk information. The Group commissions a third-party consulting firm annually to conduct ESG risk assessments, and the chief financial officer is responsible for collecting risk information identified by subsidiaries and considering risk response methods annually. However, the Group could not provide relevant written records.	Establish written policies regarding contingency plans and handling (including managing and responding to ongoing changes in the business environment) to standardize the relevant contingency plans and handling procedures. Responsibilities, authorities, and detailed operational guidance and procedures should be clearly defined within the plans. Enhance the existing Risk Management System to clarify the procedures for the identification, assessment, response, monitoring, evaluation, and reporting of various risks. The written management system shall be submitted to the management for approval with written approval records retained, and distributed to all relevant employees for compliance. The Group should prepare a risk register to record the impact of relevant risks and response plans. It should be regularly updated by each department before consolidated by the relevant department. Major risks should be reported regularly (at least annually) to the Board or the audit committee.	The Company has completed the rectification work as planned. Acclime has obtained and reviewed the Group's established Management System for Contingency Plan for Emergencies, which clearly specifies the categories of emergencies, the organisational structure and responsibilities, the early warning and prevention mechanisms, the emergency response procedures, and the emergency support. The Group has also established the Risk Management Guidelines, which clearly specify risk assessment, risk management strategies, risk management solutions, as well as the monitoring and improvement of risk management, while also retaining the management's approval records. In addition, the Group has prepared the Risk Register to record the relevant risks and their response measures, and has sent it to the directors for review via email.

Issue Description	Recommendation	Follow-up Review Findings
A.2.2 Policies and Procedures for Assessing the Impact of Management and Supervisory Personnel Departure		
Although the Group has established written internal control procedures for personnel and remuneration, standardizing workflows for employee onboarding, departure, salary adjustments and calculation, and payroll distribution, it has not yet established a written policy to standardize the procedure for assessing the impact of management and supervisory personnel departure.	The Group should establish a written policy to standardize the procedure for assessing the impact of management and supervisory personnel departure, so as to describe the workflow, responsibilities of relevant departments, assessment criteria, and procedures, etc., ensuring a comprehensive assessment is conducted before the departure of management and supervisory personnel.	The Company has completed the rectification work as planned. Acclime has obtained and reviewed the Policy on Assessing the Impact of the Departure of Management and Supervisory Staff established by the Group as recommended, which clearly specifies the triggering events for assessment, the assessment process, the responsibilities of various departments, the assessment criteria, and the follow-up actions, while also retaining the management's approval records.
A.3 Monitoring		
A.3.1 Related Party Declarations		
The Group has defined related transactions and specified the requirement for shareholder approval in its Compliance Manual and Code of Ethics, and has also established the Internal Controls for Related Transactions and the Guide on Notifiable Transactions in writing. However, there has been no requirement for directors to sign confirmation letters regarding connected party declarations or to make regular declarations or confirmations.	The company secretary should arrange for all directors to submit connected party declaration confirmation letters and regularly (at least semi-annually) require directors to make declarations or confirmations.	The Company has completed the rectification work as planned. Acclime has reviewed the Related Person Declaration.

Issue Description	Recommendation	Follow-up Review Findings
A.4 Information and Communication		
No major internal control findings were identified during the review period.		
A.5 Anti-Fraud Policies and Procedures		
A.5.1 Anti-Fraud, Anti-Deception, Anti-Money Laundering and Anti-Corruption Management		
Currently, each subsidiary provides business-related training to relevant employees, and finance staff are also required to undergo relevant training annually as required by the institute of certified public accountants. According to the chief financial officer, the Group routinely provides internal training for all employees every November on topics such as anti-fraud, anti-deception, anti-money laundering, anti-corruption, and the procedures and disciplinary actions for reporting misconduct. However, due to recent management changes, the Group failed to provide such training for all employees.	The Group should provide training for all employees as soon as possible on the topics of anti-fraud, anti-deception, anti-money laundering, anti-corruption, and the procedures and disciplinary actions for reporting misconduct. Relevant training materials and attendance records should be retained to ensure employees understand the latest laws, regulations, and company policies.	The Company has completed the rectification work as planned. The subsidiaries of the Group completed the anti-corruption training in August and September 2025, with relevant training materials and attendance records retained.

Issue Description	Recommendation	Follow-up Review Findings
A.6 Control Measures		
A.6.1 Monitoring of the Group's Subsidiaries		
The Company regularly monitors all its subsidiaries. Each subsidiary is required to report its funding status weekly to the chief financial officer and report financial data monthly to facilitate understanding of their financial and funding situations. Currently, all investment projects are initiated at the Company level, while subsidiaries' borrowing from banks may require guarantees from the holding company or intra-group enterprises, involving the signing of guarantee contracts. However, the Group has not yet established written management systems for regular transaction reporting and document submission from all subsidiaries, nor for their control measures, including matters related to the approval and reporting procedures for significant non-routine matters and significant contracts.	Management systems related to the approval and reporting procedures for significant non-routine matters and significant contracts should be established as soon as possible, to clearly define significant non-routine matters and significant contracts, outline handling processes for dealing with emergencies and important decisions, and standardize the approval process, including approval authorities and responsibilities at various levels, ensuring all significant contracts undergo appropriate review. The systems, after approval by the management, should have their written approval records retained and be distributed to all relevant employees for adherence. The Company should also establish relevant written systems governing all its subsidiaries, clearly explaining the reporting relationships and processes from the subsidiaries to the Group. To avoid omissions in the reporting of significant matters, a regular reporting system should be established. All subsidiaries must report monthly to the Group's directors on the status of signed significant contracts, significant mergers and acquisitions, establishment of business entities, setup of offices, etc. The system must also explicitly list the documents required to be submitted monthly by each subsidiary, with relevant written records retained.	The Company has completed the rectification work as planned. Acclime has obtained samples of the reporting procedures for significant non-routine matters and significant contracts established by the Group as recommended, and the reporting relationships from subsidiaries to the Group. In addition, the Group has also established a register to record significant non-routine matters, significant contracts, and other significant decisions. Acclime has confirmed with the management that, during the period from the confirmation of the rectification up to the date of this announcement, significant contracts and significant events occurring at the Group's subsidiaries have been reported to the directors via email in December 2025 and April 2026. At the same time, the management of each subsidiary would report the operational status to the directors in writing on a monthly basis.

Issue Description	Recommendation	Follow-up Review Findings
	All members of the senior management team shall report updates on their respective core functions to the Board in writing at least quarterly, with relevant records retained.	
A.7 Internal Control Findings and Recommendations from the Independent Forensic Investigation Report		
A.7.1 Management of Expense Reimbursements		
Employees and directors of the Company are required to submit original supporting documents, invoices, credit card statements and expense reimbursement forms to the deputy chief financial officer for processing. The deputy chief financial officer will review the completeness of the documents and confirm the accuracy of the reimbursement amount, and will prepare cheque/transfer application forms and accounting vouchers for management's approval.	If management needs to temporarily delegate its approval authority to other management personnel due to business trips, leave, or other reasons, it must explicitly authorize such delegation in a formal written form in advance, such as a formal authorization email or a letter of authorisation for the delegation of approval authority. The Group should also establish relevant written management systems and submit them to the management for approval with written approval records retained, and distributed to all employees for strict adherence. The written management systems shall clearly stipulate the following, including but not limited to: – Defining the nature of reimbursable expenses; – Setting specific limits for reimbursement amounts;	The Company has completed the rectification work as planned. Acclime has obtained and reviewed the Group's updated Staff Handbook. The handbook has set out the written management system governing the approval and monitoring of expense reimbursements, and such system has been approved by the management. Acclime has also selected samples to track the relevant expense reimbursement approval process, with written approval records retained.

Issue Description	Recommendation	Follow-up Review Findings
According to the Independent Forensic Investigation Report, certain expenses were approved only verbally, and no written records of such authorisations were retained. In addition, certain expense reimbursements did not obtain appropriate approvals in accordance with the Group's internal control requirements at that time, and there were instances of self-approval, cross-approval, or reimbursement being completed without approval. In addition, Acclime noted that the Group has not established a written management system governing the approval and monitoring of expense reimbursements for directors and employees, which clearly defines permissible expenses, business purposes, and the expense reimbursement process from application and approval to payment.	– Outlining the expense reimbursement process for directors and employees (including the method for submitting reimbursement applications, required supporting documents, and necessary information to be completed); – Prohibiting conflicts of interest in the expense reimbursement process for directors and employees, including self-approval and mutual approval between interested parties; – Specifying the approval process during the absence of an expense reimbursement approver while preventing conflicts of interest; – Stipulating the submission deadline for reimbursement applications; – Stipulating the archiving requirements and retention period for reimbursement documents The written management system shall be submitted to the management for approval with written approval records retained, and distributed to all employees for strict adherence. In addition, the Group should conduct independent internal audits on the expense reimbursement management process regularly (at least annually) and report the results to the Board to ensure that the system is being implemented properly and that records are being retained and archived in a timely manner.	

Issue Description	Recommendation	Follow-up Review Findings
A.7.2 Investment Management		
According to the Independent Forensic Investigation Report, during the tenure of the previous management, certain subsidiary was arranged to invest in individual investment funds. However, no Board minutes were noted to evidence that the Board of the Group had formally approved the execution of such fund investments at that time, nor were there any written records evidencing that the Board had assessed the relevant fund investments. When the Group has new investment projects, the project team will prepare feasibility studies for the investment projects. The feasibility studies are reviewed by the project team leader. Also, in accordance with the Group's general practice for managing major investment decisions, all major investments are subject to approval by the Board through Board resolutions. However, during the review process, Acclime noted that the Group has not yet established a formal written management system to govern its investment activities for evaluating, reviewing, and making recommendations on significant investments.	It is recommended that the Group retain written materials for all investment decision records and evaluation processes, including important documents such as investment proposals, due diligence working papers, risk assessments and feasibility analysis reports, and Board resolutions. The Group should also establish a comprehensive written management system that clearly defines the investment management processes for itself and its subsidiaries, including but not limited to the following: – Responsible departments, duties, and division of responsibilities – Investment decision-making and approval procedures – Workflows and required documents for due diligence, risk assessment, and feasibility analysis – Financial indicators and assessment criteria – Investment implementation and post-investment evaluation and monitoring mechanisms – Document archiving requirements and retention	The Company has completed the rectification work as planned. Acclime has obtained and reviewed the Group's established Investment Management Policy. The policy has set out the organisation, functions and responsibilities; the decision-making process and the documentation, records and retention, while also retaining the management's approval records.

Issue Description	Recommendation	Follow-up Review Findings
	The written management system shall be submitted to the management for approval with written approval records retained, and distributed to all employees for strict adherence. In addition, the Group should conduct independent internal audits on the investment management process regularly (at least annually) and report the results to the Board to ensure that the system is being implemented properly and that records are being retained and archived in a timely manner.	
A.7.3 Bank Signature Authorisation and Payment Approval		
The Group utilises online banking for payments, with two keys assigned for document preparation and authorisation, which are held in custody by the finance department personnel. Following approval of banking and expenses payment by the management, the finance department executes document preparation and authorisation in the online banking system using the keys.	The management should require bank key custodians to sign the Position Responsibility Letter for Custodian of Bank Keys under the supervision of an independent department (e.g., human resources and administration department). The responsibility letter shall clearly define the specific rights and responsibilities regarding the use of the online banking keys, custody obligations, specific clauses for violation accountability, and penalties, among other terms. A written document signed by all three parties shall be retained. It is recommended that bank key custodians be required to renew their responsibility letter at least once annually to enhance their sense of responsibility.	The Company has completed the rectification work as planned. Acclime has obtained and reviewed the following documents: • The Group has required the bank key custodians of all subsidiaries to sign the Position Responsibility Letter for Custodian of Bank Keys as recommended. Bank account information for the relevant Hong Kong and Macau bank accounts, which have been authorised to require two-person approval for bank payments, has been provided to evidence that the arrangement requiring two-person approval for payment has been completed.

Issue Description	Recommendation	Follow-up Review Findings
According to the Independent Forensic Investigation Report, the signing authorised persons for certain bank accounts of the Group were two directors, but the accounts were set up such that the signature of only one of them was required to be effective, and the Group also did not mandate that prior notice be given to the other signing authorised person before the relevant transfer operations. During the review process, Acclime noted the following internal control weakness: Regardless of the payment amount, only one authorised person is required to perform payment authorisation via online banking for enterprises within the Group. In certain subsidiaries, the authority to review fund usage and payments has been delegated by the general manager to the finance department due to operational requirements.	For the relevant subsidiaries, if the finance department is delegated with the authority to review fund usage and payments due to operational needs, the management should require the finance department to promptly seek approval from the general manager via email or WeChat for transactions exceeding a certain threshold before processing transfers, and to regularly report on fund usage. In addition, the management should require the finance department to assign the online banking document preparation and payment authorisation processes to two or more different personnel to ensure segregation of duties. Furthermore, the financial controller should be required to retain written records (such as written communication records or emails) of the Company leadership's approval for large fund usage applications, to demonstrate that formal approval was obtained prior to the execution of the relevant transactions. Additionally, it is recommended that the above processes be formalised into a written management system, submitted to the management for approval, with relevant written approval records retained, and distributed to all relevant staff for compliance.	The Company's subsidiaries have: • recompiled the "Financial Management System of Nantong Strong International Trading Company Limited", which sets out the following processes, and has confirmed through sample reviews that the processes have been followed: – Regular fund usage reporting process, requiring the finance department to submit bank transaction statements alongside financial and other management reports to line managers and head office during the first half of each month.

Issue Description	Recommendation	Follow-up Review Findings
	In addition, the Group should conduct independent internal audits on the bank signature authorisation and payment approval process regularly (at least annually) and report the results to the Board to ensure that the system is being implemented properly and that records are being retained and archived in a timely manner.	– Business payment process, which requires the originator to complete a payment application indicating the amount and purpose, submit it to the finance cashier for preliminary review and to note the finance department's contract number, and after review and signature by the department head and the finance responsible person, obtain approval from the general manager before payment. If the general manager is away, authorisation may be delegated to another person for operational needs. The completed business payment application form must be posted in the Company's management group chat to keep the leadership informed of the payment status and for review and approval before payment.

Issue Description	Recommendation	Follow-up Review Findings
		– The finance cashier reports the fund usage status and bank deposit balance for the week to the Company's management group chat before the end of work every Friday, enabling management to keep abreast of the Company's available funds in a timely manner. • the deputy general manager (finance) and financial controller has reported fund status to the general manager via WeChat.

Issue Description	Recommendation	Follow-up Review Findings
		• segregated online banking document preparation and payment authorisation as recommended, assigned to two different personnel in the finance department to ensure segregation of duties. During the follow-up review, Acclime selected relevant samples to confirm that actual operations followed the segregation requirement for online banking document preparation and payment authorisation. • updated Financial Management System, which explicitly requires that bank keys must be managed separately with segregated operations. The finance handling personnel makes payments based on the payment forms approved by the head of the unit, and the finance responsible person reviews and approves the payments. This system has been approved by the management and subsequently distributed to all relevant employees for adherence.

Issue Description	Recommendation	Follow-up Review Findings
A.7.4 Document and Archive Management		
During the review of documents, Acclime noted that, whilst the Company had established written archive management systems, several of these did not clearly specify requirements for division of duties, document archiving, document access rights, etc. The Group's written Compliance Manual and Code of Professional Ethics stipulates that the Company is required to keep accounting records for 7 years in accordance with the Hong Kong Companies Ordinance and the Inland Revenue Ordinance (counting from the end of the financial year to which the last entry made in such record or account and return, or the last matter recorded, relates), but it does not clearly specify the storage requirements and backup requirements. Most of the documents of certain subsidiaries of the Group were lost during the period when the incumbent management was not in place. After the incumbent management took over on 25 January 2025, it was also discovered that most of the key process documents relating to trading and procurement of those subsidiaries for the period between April and December 2024 had been lost.	The Group should take the following measures to strengthen document and archive management: • Establish a comprehensive archive management mechanism, detailing the relevant archive management processes, clarifying the managing departments for various types of documents, and the key documents and storage requirements for each business process, to ensure all relevant documents are archived and backed up promptly. The aforementioned written management system shall be reviewed and approved in writing by the management, with written approval records retained, and the approved version shall be distributed to all relevant employees for strict adherence. • Regular (at least semi-annually) document backup procedures shall be conducted by respective archive managers. The Group may also consider engaging third-party companies offering services such as document scanning and electronic document backup.	The Company has completed the rectification work as planned. Acclime has obtained and reviewed the Group's updated Compliance Manual and Code of Professional Ethics, which sets out the requirements for timely archiving and backup of relevant documents, while also retaining the management's approval records. Acclime has also examined on a sample basis the document backup forms of the Group's subsidiaries, which list the archived files.

Issue Description	Recommendation	Follow-up Review Findings
B. FINANCIAL REPORTING AND DISCLOSURE CONTROLS		
B.1 Accounting System Account Management		
Certain subsidiaries engage third-party accounting consulting firms to record transactions in the company's relevant system, prepare monthly financial statements, and bind hardcopy vouchers based on the original vouchers provided by the company. However, there is currently only one system administrator account for this system, which results in a discrepancy between the operator shown on the relevant vouchers and the actual operator.	The management shall introduce new users in the Yonyou System for the bookkeeping personnel of the third-party accounting consulting firm, which enables them to maintain independent accounts for handling the company's bookkeeping services, ensuring that the actual operator's identity matches the information displayed on the accounting vouchers.	The Company has completed the rectification work as planned. The Company has added new users in the relevant system for the bookkeeping personnel of the third-party accounting consulting firm. During the follow-up review, Acclime has obtained and reviewed two accounting vouchers prepared in April 2025 by the third-party accountants using the Company's relevant system, confirming that the information shown on the accounting vouchers is consistent with that of the actual operator.

Issue Description	Recommendation	Follow-up Review Findings
B.2 Financial Management System		
The Company's internal control procedures for the preparation of written financial reports do not include processes related to accounting archives management or the handover of finance personnel, nor are records of the management approval retained. Certain subsidiaries have not established written internal control procedures for financial reporting management, or have not maintained or are unable to provide records of management approval for relevant systems of the company's financial management.	The Company's management shall require the finance department to formally incorporate procedures for accounting archives management and the handover of finance personnel into the written internal control procedures for financial reporting preparation. These procedures shall be submitted to the management for approval, with relevant written approval records retained. The management of the relevant subsidiaries shall require the finance department to formalize existing internal control procedures for financial reporting management into written management systems. These systems shall be submitted to management for approval, with relevant written approval records retained. The approved version shall be distributed to relevant employees for compliance to ensure their work processes align with management directives.	The Company has completed the rectification work as planned. Acclime has obtained and reviewed the following documents: • The Group's internal control procedures for the preparation of written financial reports, which have set out the procedures for accounting archives management and the handover of finance personnel • The Financial Management System established by certain subsidiaries based on their existing internal control procedures for financial reporting management, as well as the management's written approval records for the Financial Management System The approved versions of the above written management systems have been distributed to the relevant management personnel for compliance. The Group has also provided relevant training to the relevant management and employees.

Issue Description	Recommendation	Follow-up Review Findings
B.3 Financial Budgeting and Variance Analysis		
With the exception of certain subsidiaries, the Group has not established internal control procedures for cash flow management, including the regular preparation of cash flow forecasts, significant variance analysis and approval processes. Although certain subsidiaries have established financial and funds management systems that standardise processes for the preparation, approval, execution, adjustment, and analysis of the company's financial budgets, regular financial analysis, budgeting, and variance analysis have not been conducted. This is due to the fact that the relevant companies have not yet resumed business operations, operate in a single business segment, or have limited business scope.	The Company shall require its subsidiaries to prepare annual financial budgets (including cash flow forecasts) based on their actual business nature to facilitate the rational allocation and management of existing resources. Furthermore, variance analysis between budgeted and actual figures shall be conducted regularly (at least quarterly), with significant variances analysed in writing and relevant documentation retained. Upon completion, the financial budgets and variance analysis reports shall be submitted to the management for approval, with written or electronic approval records maintained. Additionally, it is recommended that the above processes be formalised into written management systems, submitted to the management for approval, with its written approval records retained, and distributed to all relevant staff for compliance.	The Company has completed the rectification work as planned. The major subsidiaries of the Group have prepared financial budgets for the year 2026 and the financial analysis for the first quarter of 2026 (except for certain subsidiaries which, due to special circumstances, are not required to prepare the relevant financial budgets). Acclime has obtained and reviewed the aforesaid financial budgets and financial analysis.

Issue Description	Recommendation	Follow-up Review Findings
C. BUSINESS PROCESS LEVEL CONTROLS		
C.1 Cash and Funds Management		
C.1.1 Contract Approval and Seal Management		
Each domestic subsidiary has not required seal custodians to sign a Position Responsibility Letter for Seal Custodians to confirm their understanding and adherence to position responsibilities, and seal usage and custody requirements. The seal custody arrangements in certain companies have been affected by employee resignations or business trips. There are no complete written records of the processes for contract and seal usage approval and actual use.	All domestic subsidiaries shall require their seal custodians to sign the Position Responsibility Letter for Seal Custodians and retain the relevant written documentation to ensure compliance and security in seal usage. A comprehensive audit trail process should be considered by the management of the relevant companies for contract signing approval, seal usage approval, and actual usage. Responsible personnel would then be required to maintain complete records of approvals and usage history for reference. Additionally, seal custodians should be reasonably assigned to prevent excessive concentration of authority among certain employees. It is recommended that the above processes be formalised into written management systems, submitted to the management for approval, with its written approval records retained, and distributed to all relevant staff for compliance.	The Company has completed the rectification work as planned. Acclime has obtained and reviewed the following documents: • The Seal Management Responsibility Commitment Letter signed by all seal custodians of the relevant subsidiaries as recommended. • The revised contract management provisions in the trading business process policies of the relevant subsidiaries, which stipulate that all procurement and sales contracts of the companies are required to be reviewed by the deputy general manager of business and affixed with the contract seal. Before stamping a contract, the financial personnel must review the relevant terms including settlement and payment terms, and sign the contract usage registration form before the contract is handed over to the deputy general manager of business for stamping.

Issue Description	Recommendation	Follow-up Review Findings
Approval records for certain companies' seal applications in the OA system are incomplete. They have not recovered or destroyed former legal representative seals and have failed to retain relevant written handover records. In certain subsidiaries, both the company's legal representative seal and financial seal are custodied solely by the finance manager, without establishing proper segregation of duties.	The management of the relevant companies shall: (1) require seal management personnel to strictly implement the seal management regulations by submitting applications for using the legal representative seal via relevant system, with stamping permitted only after obtaining approval; (2) require relevant departments to amend related management procedures based on operational needs to specify the timeframe for destroying decommissioned seals, thereby mitigating the risk of seal misuse. The revised procedures shall be submitted to the management for approval, with corresponding written approval records retained, and distributed to all relevant employees for compliance; and (3) require relevant departments and seal management personnel to properly execute seal handover procedures, including signing confirmation on the handover form and retaining related written records. The management of the relevant companies shall authorise two different individuals to separately custody the financial seal and the legal person seal, implement proper handover procedures, and retain relevant written records to ensure proper segregation of duties.	• During the review period, Acclime also selected samples of contract signing approvals and the corresponding seal usage approval and usage records for certain subsidiaries, confirming that the finance department has reviewed the contracts and signed the contract seal usage registration form to evidence countersigning. • The seal handover documents of certain subsidiaries. • The Seal Management Regulations of certain subsidiaries, which have clearly specified the timeframe for destroying decommissioned seals. • Acclime has examined on a sample basis the applications and approval records for the use of the legal representative seal submitted through the relevant system of certain subsidiaries during the review period, confirming that stamping was only permitted after obtaining approval.

Issue Description	Recommendation	Follow-up Review Findings
		The approved versions of the above written management systems have been distributed to the relevant management personnel for compliance. The Group has also provided relevant training to the relevant management and employees.
C.1.2 Bank Balance Reconciliation		
Some companies require their finance staff to perform a daily check between the online bank balance and the financial ledger balance. However, a bank reconciliation statement is only prepared when discrepancies are identified, or no written records of the reconciliation or review are retained.	Management should require the finance department to prepare bank reconciliation statements periodically, even when there are no discrepancies between the accounting ledger balance and the bank statement balance. Upon completion, finance staff should submit the reconciliation statements to management for review and retain relevant written records (such as signatures, emails, etc.) to ensure the bank reconciliation process has been properly executed and the results are accurate. Furthermore, it is recommended to formalize the aforementioned process into a written management policy. This policy should be submitted to management for approval, with the written approval record retained, and distributed to all relevant staff for compliance.	The Company has completed the rectification work as planned. Acclime has obtained and reviewed the bank reconciliation statements of the relevant subsidiaries. The finance staff and management have signed the bank reconciliation statements to confirm that the reconciliation results are accurate. The revised financial or fund management policies of the Group and the relevant subsidiaries have clearly specified the requirements, preparation and review procedures for bank balance reconciliation, and have also required that bank reconciliation statements be prepared periodically even when there are no discrepancies between the accounting ledger balance and the bank statement balance.

Issue Description	Recommendation	Follow-up Review Findings
		The approved versions of the above written management systems have been distributed to the relevant management personnel for compliance. The Group has also provided relevant training to the relevant management and employees.
C.1.3 Cash and Fund Management Policies		
The written policies of some companies do not clearly define key internal control procedures related to fund management. In some cases, internal control processes are not adjusted following personnel changes in key positions, or relevant written policies and procedures have not been established.	The management of the relevant companies should establish or enhance existing written management policies. These policies should be submitted to management for approval, with the written approval record retained, and distributed to all relevant staff for compliance.	The Company has completed the rectification work as planned. Acclime has obtained and reviewed the following documents: • The revised or separately formulated policies of the Group and the relevant subsidiaries regarding fund management, financial accounting management, company bank account opening/closing procedures, and seal management, which include: confirming that the existing internal control procedures for cash and fund management have been formalised into written policies; confirming that adjustments have been made in response

Issue Description	Recommendation	Follow-up Review Findings
		to changes in key positions; and supplementing the work processes for cash flow management and monitoring, online banking management, cheque management, and loan handling procedures; confirming that the process descriptions for bank account management, expense reimbursement management, and wealth management products have been clearly specified; confirming that the procedures for bank reconciliation and adjustment, bank account opening, change and closing, online banking management, and the application conditions, approval processes and required documents for bank account opening and closing have been clearly specified, with the finance department making the application, the financial controller conducting the review, the chairman of the board of directors giving approval, and the cashier proceeding to

Issue Description	Recommendation	Follow-up Review Findings
		the bank for handling; confirming that the online banking receipt and payment processes, the approval procedures for the opening, usage inspection and clearing/closing of bank accounts, and the approval and usage rules for taking seals outside the premises have been clearly specified. • The above policies and procedures have been approved by the management and distributed to the relevant management personnel for their acknowledgement. The Group has also provided relevant training to the relevant management and employees.

Issue Description	Recommendation	Follow-up Review Findings
C.1.4 Imprest Advances Management		
During the review process, Acclime noted that for the sample imprest advance, the approval form for the payment of the advance could not be obtained. As a result, it could not be confirmed whether the approval of the chairman of the board of directors had been obtained prior to the disbursement of the advance. If employees on business trips face insufficient petty cash funds, they may request an additional temporary imprest advance from the finance department under urgent circumstances. The finance department disburses such temporary advance after obtaining verbal approval from the management. However, the temporary imprest advance only requires verbal approval from the chairman of the board of directors (e.g., via phone or face-to-face communication), and no relevant written records are retained.	The management should require that all imprest advances must first obtain written approval. The financial controller may only process the payment after the applicant has submitted the written instruction of the chairman of the board of directors. The management should also establish a stricter review process. Prior to reimbursing employee expenses, the financial controller should verify that all expense reimbursement requests are accompanied by complete supporting documents (including invoices and receipts) attached to the expense reimbursement approval form. Furthermore, the financial controller should only arrange payment after confirming that the supporting documents are complete and that the total amount matches the sum stated on the expense reimbursement approval form, and should sign the approval form to certify that the review of the expense reimbursement and its supporting documents has been duly performed. Additionally, it is recommended that the above processes be formalised into a written management system, submitted to the management for approval, with relevant written approval records retained, and distributed to all relevant staff for compliance.	The Company has completed the rectification work as planned. Acclime has obtained and reviewed the imprest advances ledger provided by the Company, and the relevant personnel have repaid the outstanding imprest advances.

Issue Description	Recommendation	Follow-up Review Findings
C.2 Revenue and Receivables		
C.2.1 Sales Contracts and Customer Information Management		
Some companies have violated sales management policies by failing to execute formal contracts with customers upon request, only providing quotations that outline project details and contract amounts. Key documents in the relevant sales processes were handled by a single individual, and incomplete records were discovered after the employee's departure. Certain companies have not prepared customer information summary sheets to consolidate customer qualifications and details. They have not assigned dedicated personnel to continuously monitor the validity periods of customer business qualifications, nor have they established an audit trail mechanism for the customer evaluation process. Additionally, the renewal of long-term customers lacks paper-based contract review forms.	Management of the relevant companies should require responsible personnel to execute formal contracts with customers in future projects. If necessary, legal terms within contracts should also be reviewed, and written approval records must be retained. Key documents in the sales process should be reasonably assigned to different employees for safekeeping, with electronic backups maintained. Management of the relevant companies should direct business departments to establish customer information summary sheets, assign dedicated staff to periodically monitor the expiration of customer business qualifications, and retain written reporting or approval records. If a license is nearing expiration, proactive follow-up with the customer regarding the renewal progress should be conducted. Furthermore, the above processes should be formalized into written management policies, submitted to management for approval, with corresponding written approval records retained, and distributed to all relevant staff for compliance. Management of the relevant companies should also require that all contracts, even those without significant changes in terms, undergo a contract review process. The seal custodian may only affix the company seal after confirming that the contract has completed the contract review and seal approval procedures.	The Company has completed the rectification work as planned. Acclime has obtained and reviewed the following documents: • The revised written internal control procedures for sales of the relevant company, which stipulate that formal contracts must be signed for all relevant business projects. The outsourced legal consultant will review the terms of the contract for accuracy, and the contract will be signed by the director of that company, with the project director acting as a witness to the signing. The procedures for the safekeeping of important documents in the sales process, such as customer information and contracts, have also been redefined, with documents including: customer master files, sales invoices, vouchers, contracts, etc. The directors periodically inspect the safekeeping of original paper documents and electronic backup files.

Issue Description	Recommendation	Follow-up Review Findings
		• The newly established Customer Information Summary Sheet of the relevant company, confirming that it includes all necessary information, and the business department has reported to the management on the expiration status of customers' hazardous chemical operation permits for the coming year. • Based on the customer contract information sheet provided by the relevant company, a total of eight contracts were signed during the review period, and it has been confirmed that they were properly completed after going through the contract review process and seal approval.

Issue Description	Recommendation	Follow-up Review Findings
		• Relevant system of trade business process recompiled by the relevant subsidiary, confirming that it has standardised the business support department's customer assessment process, qualification checks, etc., and stipulates that a Customer Information Summary Sheet will be established for all customers to provide an audit trail for the assessment process, to regularly check whether customer qualifications remain within the validity period, and to ensure the accuracy of invoicing information. • Acclime has reviewed the Customer Information Summary Sheet of the relevant company, which records whether customer qualifications are within the validity period and the invoicing information.

Issue Description	Recommendation	Follow-up Review Findings
		The approved versions of the above written management policies have been distributed to the relevant management personnel for their compliance. The Group has also provided relevant training to the relevant management and employees.
C.2.2 Sales and Receivables Management System		
Some companies have incomplete written internal control procedures or systems for revenue, or have failed to adjust internal control processes in response to personnel changes in key positions. Additionally, some have not documented the actual processes being implemented in their written sales management systems, or have yet to establish a formal written management system.	Management should require the relevant responsible personnel to develop, adjust, or improve the written management system for sales and receivables based on the current business processes. This system should be approved in writing by management, with written approval records retained, and distributed to all relevant employees for compliance. Any updated/newly established systems must be submitted to management for approval, with corresponding written review records retained, and distributed to all relevant employees for compliance.	The Company has completed the rectification work as planned. Acclime has obtained and reviewed the following documents: • The revised sales internal control procedures of the Group applicable to the relevant company, confirming that the Company has clearly specified in the policies the processes for customer information maintenance, sales contract management, credit control management, deposit and warranty management, accounts receivable management, and the archiving of important process documents.

Issue Description	Recommendation	Follow-up Review Findings
		• The revised written sales internal control procedures of the relevant company, confirming that the Company has, based on the current situation, specified in the written procedures the responsible personnel and bookkeeping personnel for the sales process. • The revised written "Comprehensive Sales Management System" of the relevant company, confirming that the Company has added a product price approval form template and a product pricing and quotation process chart, and has clearly specified the procedures for receiving and handling various types of customer complaints. The complaint handler understands the customer information and the details of the matter, records the complaint content in a "After-Sales Issue Registration Form", which is signed by the responsible person, sales director, chairman, and other management personnel, so as to organise and archive customer complaint information.

Issue Description	Recommendation	Follow-up Review Findings
		• Acclime has also obtained three product pricing approval forms countersigned by the sales director, head of the commerce department, head of the finance department, and the chairman; as well as "After-Sales Issue Registration Forms" prepared by the production department and logistics department and then signed for approval by the commerce department, sales director, and finance department, confirming that the Company has implemented the procedures in accordance with the management system. • The relevant company has updated its "Sales Management System" based on the latest actual operating procedures, retained written approval records, and subsequently distributed the system to all relevant employees for compliance.

Issue Description	Recommendation	Follow-up Review Findings
		• The newly established "Customer Management System" of the relevant company, which is based on current operations and internal control processes, clearly specifies the customer development and selection process, customer information management, pricing and discount management, customer order instruction confirmation, and customer complaint handling. • The relevant company has formulated written internal control procedures related to revenue management based on the latest actual operating procedures. The above policies and procedures have been approved by the management and distributed to the relevant management personnel for their acknowledgement. The Group has also provided relevant training to the relevant management and employees.

Issue Description	Recommendation	Follow-up Review Findings
C.3 Procurement and Prepayments/Payables		
C.3.1 Purchase and Acceptance Management		
Some companies do not retain written acceptance reports for their purchases, nor have they established a standardized acceptance report template for operating departments to use.	Management should establish acceptance report templates for relevant procurement activities for reference by operating departments (including details such as the accepting department and responsible personnel, acceptance results, acceptance date, and follow-up requirements). The relevant acceptance reports should also be attached to payment requests for management's confirmation that the acceptance process has been properly completed and that the payment amount is accurate.	The Company has completed the rectification work as planned. Acclime has obtained and reviewed the newly established "Purchase Acceptance Form" template of the Company, confirming that it includes all necessary columns.
C.3.2 Supplier Information and Periodic Assessment Management		
Some companies do not retain written supplier assessment records, nor have they established a supplier information summary or a process for periodically assessing suppliers.	Management should require the relevant responsible personnel to establish a supplier information summary to document the supplier assessment process. The summary should be regularly checked, and supplier documentation such as license validity periods and relevant invoicing information should be promptly updated to ensure that Nantong Strong International Trading (南通貿易) trades with suppliers possessing valid qualifications and meeting company requirements. In addition, it is recommended that the above processes be formalised into a written management system, which should be submitted to the management for approval, with the written approval records retained, and distributed to all relevant employees for reference.	The Company has completed the rectification work as planned. Acclime has obtained and reviewed the relevant system of trade business process revised by the relevant company, which standardises the business support department's supplier assessment process, qualification checks, etc., and stipulates that a supplier information summary sheet will be established for all suppliers to provide an audit trail for the assessment process, to regularly check whether supplier qualifications remain within the validity period, and to ensure the accuracy of invoicing information.

Issue Description	Recommendation	Follow-up Review Findings
		The approved version of the above written management policy has been distributed to the relevant management personnel for their compliance. The Group has also provided relevant training to the relevant management and employees. In addition, the Company has established a supplier information summary sheet to provide an audit trail for the supplier assessment process, and to regularly check and promptly update supplier licence validity periods, relevant invoicing information, etc. Acclime has also obtained, on a sample basis, the hazardous chemical operation licences of five suppliers and confirmed that such licences are valid.

Issue Description	Recommendation	Follow-up Review Findings
C.3.3 Procurement and Payables Management System		
The written internal control procedures or systems for procurement in some companies are not comprehensive, have not been adjusted following changes in key personnel, or there exist written procedures that have not been formally reviewed and approved.	Management should require the relevant responsible personnel to adjust or improve the procurement and payables management system based on the current business processes. This system should be submitted to management for approval, with written approval records retained, and distributed to all relevant staff for compliance.	The Company has completed the rectification work as planned. Acclime has obtained and reviewed the following documents: • The relevant company has adjusted or improved the written management system for procurement and payables management based on its current business processes. • The relevant company has revised its written internal control procedures for costs and expenses, confirming that the Company has, based on the current situation, re-specified the responsible personnel and bookkeeping personnel for the procurement and payment processes, and has also added procedures for the safekeeping of important documents in the procurement process.

Issue Description	Recommendation	Follow-up Review Findings
		• The relevant company has newly formulated the written "Raw Material Procurement Process and Management System", "Non-conforming Product Return System", "Supplier Access System" and "Procurement Order Exception Information Handling System and Process", which clearly specify the processes for new supplier onboarding, supplier performance management, procurement order receipt and payment monitoring, procurement returns, procurement inquiry process, and supplier contract management. • Acclime has also obtained, on a sample basis, five sets of new suppliers from the relevant company, confirming that the access and approval of new suppliers have been carried out in accordance with the system requirements, and that annual assessments have been conducted.

Issue Description	Recommendation	Follow-up Review Findings
		In addition, Acclime has also obtained, on a sample basis, five procurement price comparison confirmation forms, confirming that the Company has implemented the procurement inquiry process, and that such forms have been approved by the procurement department and the chairman. • The relevant company has updated its "Procurement Management System" based on the latest actual operating procedures, retained written approval records, and subsequently distributed the system to all relevant employees for compliance. • The relevant company has submitted the written "Procurement Work Procedures" to the management for approval, and has retained the written approval records. The approved versions of the above written management policies have been distributed to the relevant management personnel for their compliance. The Group has also provided relevant training to the relevant management and employees.

Issue Description	Recommendation	Follow-up Review Findings
C.4 Inventory Management		
No significant internal control findings were identified during the review period.		
C.5 Personnel and Remuneration Management		
C.5.1 Personnel and Remuneration Management		
Regarding employee departures, some companies failed to adjust internal control procedures (including personnel responsible and procedures for relevant tasks) following personnel changes in key positions during the review period. Furthermore, the joint chief financial officer and executive director, after review, failed to countersign the final salary calculation form of the departing employee. In the written internal control procedures for personnel and remuneration of certain companies, there is a failure to specify the procedures for employee leave applications, approvals, and required documentation, as well as the employee departure handover process. Alternatively, some companies have not established written management systems to standardize key internal control procedures for salary calculation and disbursement, and employee social security and housing provident fund contributions.	The management of the relevant companies should instruct the responsible personnel to improve the existing written internal control procedures for personnel and remuneration. These procedures should clearly standardize the procedures for employee leave applications, approvals, required documentation, and the employee departure handover process. Written management systems should be established to regulate the key internal control procedures for employee salary calculation and disbursement, and social security and housing provident fund contributions. These written internal control procedures and management systems should be submitted to management for review, with written review records retained, and distributed to all relevant employees for compliance. The management of the relevant companies should enhance the review process by requiring the reviewer to sign the final salary calculation form of departing employees after review, ensuring an audit trail.	The Company has completed the rectification work as planned. Acclime has obtained and reviewed the following documents: • The Group and certain companies have supplemented their policies with key contents including employee leave application, approval and required documentation, as well as the employee departure handover process. The approved versions of the above written management systems have been distributed to the relevant management personnel for compliance.

Issue Description	Recommendation	Follow-up Review Findings
Regarding employee onboarding and remuneration, some companies have not signed labor contracts with employees or made social security and housing provident fund contributions for them. In other cases, labor contracts signed with new employees lack the signing date, the contract template does not specify employee compensation and the employee has not signed other wage confirmation documents, or labor contracts have expired without being renewed with the employee.	The relevant companies should promptly execute formal labor contracts with the concerned employees and make social security and housing provident fund contributions for them. Management should require signatories to always fill in the date when signing labor contracts, ensure that labor contracts contain the necessary compensation clauses as required by regulations, and promptly renew labor contracts with existing employees.	The Group has also provided relevant training to the relevant management and employees. • Certain companies have revised the template of their labour contracts. For future new employees, such revised contracts will be signed upon onboarding, while existing employees will sign a remuneration grade notification letter, which clearly sets out the remuneration structure and amount. Samples of remuneration grade notification letters signed by three existing employees were selected to confirm that the recommendation has been followed.

Issue Description	Recommendation	Follow-up Review Findings
		• Acclime selected one out of six existing employees of certain companies on a sample basis and confirmed that the company has renewed the contract with the employee. • The labour contract signed between certain companies and the relevant employee, the documents evidencing the company's payment of social security and medical insurance for the employee, the salary breakdown, bank receipts and relevant vouchers, confirmed that the company has signed a labour contract with the employee and has paid social security contributions.

Issue Description	Recommendation	Follow-up Review Findings
C.6 General Computer Information System Control		
C.6.1 Financial System Access Rights Management		
Some subsidiaries have issues with the allocation of financial system access rights, failing to effectively achieve segregation of duties in areas such as financial bookkeeping. For instance, some subsidiaries use advanced financial software and have assigned two finance personnel completely identical financial account permissions. However, due to insufficient staffing, the person responsible for review is frequently on business trips, resulting essentially in the same individual performing both bookkeeping and review. Additionally, certain subsidiaries use the same financial system for bookkeeping but have not allocated a separate review account.	Management should require the relevant finance personnel to reasonably allocate financial system access rights based on employee roles and responsibilities, ensuring that the same account cannot perform both bookkeeping and approval functions. If reasonable allocation of permissions cannot be achieved within the system due to practical constraints, written approval records for vouchers shall be maintained to ensure that bookkeeping and authorisation are performed by separate individuals.	The Company has completed the rectification work as planned. Acclime has selected on a sample basis 5 sets of vouchers from each subsidiary for review and confirmed that approval records have been retained, with one person handling bookkeeping and another handling approval.

Results of the Internal Control Review and the Follow-up Review

Acclime has completed the Internal Control Review (including the Follow-up Review of the Group's internal controls after rectification) and did not identify any material deficiencies or weaknesses in the Group's internal control system within the scope of review. Accordingly, Acclime is of the view that: the Group has implemented detailed internal control procedures, and the internal control weaknesses (including the various internal control weaknesses identified in the Independent Forensic Investigation Report) have been rectified and adequately remediated; the policies and procedures implemented by the Group have effectively addressed its deficiencies and prevented recurrence of similar incidents; the Group has established adequate internal controls and procedures and implemented them effectively to comply with the Listing Rules; the Group has provided training to all employees (including directors and senior management) on the newly established/revised policies and procedures; and the Group has established procedures and mechanisms to ensure adequate checks and balances as well as to monitor compliance, prevent and detect deviations from the Listing Rules.

Views of the Audit Committee and the Board

The Board (including the Audit Committee) has reviewed the key findings of the Internal Control Review as well as the Follow-up Review and, subject to the Stock Exchange's satisfaction, is of the view that: (a) all internal control weaknesses identified in the Internal Control Review (including the various internal control weaknesses identified in the Independent Forensic Investigation Report) have been adequately addressed through appropriate recommended rectifications; (b) the remedial measures taken by the Company are adequate and appropriate; and (c) the Company has put in place sufficient internal controls and procedures to fulfil its obligations under the Listing Rules.

The Board (including the Audit Committee) will, as required by the Listing Rules, continue to monitor the effectiveness of the Company's internal control systems and procedures in order to fulfil its responsibilities under the Listing Rules and to ensure that the internal control policies and procedures are reasonable and adequate, and fully embedded in its daily operations.

CONTINUED SUSPENSION OF TRADING

At the request of the Company, trading in its shares on the Stock Exchange has been suspended with effect from 9:00 a.m. on Tuesday, 31 December 2024 and will remain suspended until further notice.

The Company will continue to keep the Shareholders and potential investors abreast of any relevant material developments by making further announcement(s) as and when appropriate in accordance with the requirements under the Listing Rules and the SFO, as well as announce quarterly updates pursuant to Rule 13.24A of the Listing Rules. The Company will continue to work closely with its professional advisers and proactively take all necessary and appropriate steps to comply with the Resumption Guidance, with the aim of resuming trading in its shares on the Stock Exchange as soon as practicable.

Shareholders and potential investors of the Company are advised to exercise caution when dealing in the Shares.

By order of the Board
STRONG PETROCHEMICAL HOLDINGS LIMITED
Wang Qihong
Chairman

Hong Kong, 12 June 2026

As at the date of this announcement, the Board comprises two executive directors, one non-executive director and three independent non-executive directors. The executive directors of the Company are Dr. Wang Pang Paul and Mr. Cao Xinzhong. The non-executive director of the Company is Mr. Wang Jian Sheng. The independent non-executive directors of the Company are Mr. Wang Qihong, Dr. Lu Guoyang and Ms. Tam Yuk Yu.

* *For identification purpose only*