

## FINVOLUTION GROUP

### WHISTLE-BLOWER POLICY AND PROCEDURES

(AS ADOPTED BY THE BOARD OF DIRECTORS OF FINVOLUTION GROUP  
ON AUGUST 21, 2022)

This Whistle-Blower Policy and Procedure (the “**Policy**”) has been adopted by the audit committee and the board of directors (the “**Board**”) of FinVolution Group (the “**Company**”) to govern the receipt, retention and treatment of complaints regarding accounting, internal accounting controls, auditing matters or questionable financial practices (“**Complaints**”) with respect to the Company and its subsidiaries (collectively, the “**Group**”), and to protect the confidential, anonymous reporting of Complaints by employees. References herein to “employee” shall mean any employee of any entity in the Group.

#### **POLICY**

The Company believes in conducting its business fairly and transparently by adopting the highest standards of professionalism, honesty, integrity, ethical behavior and prudent commercial practices. The Company is committed to full and accurate financial disclosure and to maintaining the Group’s books and records in compliance with all applicable laws, rules and regulations.

This Policy establishes the standards and procedures to ensure complaints of accounting fraud and other misconduct matters can be reported anonymously through the whistle-blowing system, and all the allegations are treated or investigated in a timely, objective, fair and unbiased manner.

Employees are given the opportunity to submit confidential and anonymous Complaints for review by the Company. Complaints include, without limitation, grievances regarding the following:

- fraud against investors, securities fraud, mail or wire fraud, bank fraud, or fraudulent statements to the United States Securities and Exchange Commission (the “**SEC**”) or members of the investing public;
- violations of SEC rules and regulations applicable to the Company and related to accounting, internal accounting controls and auditing matters;
- intentional error or fraud in the preparation, review or audit of any financial statement of the Company;
- significant deficiencies in or intentional noncompliance with the Company’s internal accounting controls;
- misrepresentations or false statements regarding a matter contained in the financial records, financial reports or audit reports of the Group;
- deviation from the full and fair reporting of the Group’s financial condition;

- actions (actual or suspected) that are not in line with applicable Group policy and philosophy;
- actions that are unlawful;
- actions that amount to serious improper or unethical conduct;
- actions that constitute breaches of social and professional etiquette or constitute morally offensive behavior;
- actions that may constitute violations of law; and
- actions that damage the interests of the Company.

If requested by the employee, the Company will protect the confidentiality and anonymity of the employee to the fullest extent possible, consistent with the need to conduct an adequate review. Vendors, customers, suppliers, business partners and other parties external to the Company will also be given the opportunity to submit Complaints; however, the Company is not obligated to keep Complaints from non-employees confidential or to maintain the anonymity of non-employees.

The Board has appointed the Head of Internal Control Department as the internal control officer for the Company (the “**Internal Control Officer**”). Complaints will be reviewed under the direction and oversight of the Audit Committee or such other persons as the Audit Committee determines to be appropriate.

The Company will abide by all laws prohibiting retaliation against employees who lawfully submit complaints under these procedures. The Company shall not tolerate any retaliation by management or any other person or group, directly or indirectly, against anyone who, in good faith, makes a complaint about possible misconduct or unethical behavior, or provides assistance to the Audit Committee, Internal Control Department and Internal Control Officer during an audit or investigation. Retaliation includes, along with other things: a change in work hours or schedule, demotion, transfer, or termination of anyone raising a complaint or allegation. Acts of retaliation, including trying to find out the identity of an employee who confidentially reports a concern, can lead to disciplinary action, up to and including termination.

In the event that the Company contracts with a third party to handle complaints or any part of the complaint process, the third party shall also comply with these procedures.

## **PROCEDURES**

### **Receipt of Complaints**

Any person may submit a Complaint (i) by e-mail to the Internal Control Department at jubao@xinye.com; (ii) by mail to the Audit Committee or the Internal Control Officer at Building G1, No. 999 Dangui Road, Pudong New District, Shanghai 201203; (iii) by hotline at 021-80303391; or (iv) on-site to the Internal Control Department. Employees submitting a Complaint need not provide their name or other personal information and reasonable efforts will be used to conduct the investigation that follows from a Complaint from an employee in a manner that protects the confidentiality and anonymity of such employee.

## **Treatment of Complaints**

1. Unless otherwise directed by the Audit Committee, a Complaint made under these procedures shall be directed to the Internal Control Officer, who shall report directly to the Audit Committee on such matters.
2. The Internal Control Officer shall perform a preliminary inquiry into the Complaint within three working days of receipt of a Complaint to determine whether the Complaint is frivolous. Complaints that are frivolous or don't fall within the scope of this Policy shall be closed by the Internal Control Officer or referred to the appropriate person within the Company. The employee submitting the Complaint is entitled to know if the Complaint is accepted.
3. If the Complaint is accepted, the Internal Control Officer may investigate it himself or herself or assign it to another employee, outside counsel, advisor, expert (including internal auditing staff) or third-party service provider (including the external auditor) to investigate or assist in investigating the Complaint. In addition, the Internal Control Officer may direct any individual assigned to investigate the Complaint to act at the direction of or in conjunction with the Internal Control Officer or any attorney in the course of the investigation.
4. Unless otherwise directed by the Internal Control Officer, the person assigned to investigate will conduct an investigation of the Complaint and report his or her findings or recommendations to the Internal Control Officer. If the investigator is in a position to recommend appropriate disciplinary or corrective action, the investigator also may recommend disciplinary or corrective action.
5. If any of the persons assigned to the investigations is a relative or friend of the person submitting the Complaint or a person involved in the Complaint or if any relative or friend of the persons assigned to investigate has interests in the reported matters covered by the Complaint, or there are other circumstances that may affect the fair handling of the Complaint, the persons assigned to the investigations shall take the initiative to withdraw. The Internal Control Officer is entitled to request those related to or implicated in the reported matters to withdraw.
6. If determined to be necessary by the Internal Control Officer or the Audit Committee, the Company shall provide for appropriate funding, as determined by the Internal Control Officer or the Audit Committee, to obtain and pay for additional resources that may be necessary to conduct the investigation, with respect to the investigation of any Complaint must be approved by the Audit Committee.
7. Whenever the Internal Control Officer deems necessary but in no event less than once per quarter, Internal Control Officer shall submit to the Audit Committee, and to any other member of the Company's management designated by the Audit Committee, a report that summarizes each Complaint made within the last 12 months, if any, and shows specifically: (a) the complainant (unless anonymity applies, in which case the report will so indicate), (b) a description of the substance of the Complaint, (c) the status of the investigation, (d) any conclusions reached by the investigator, and (e) findings and recommendations. Major issues and issues involving the chief executive officer and the chief financial officer shall be reported to the Board.

8. At any time with regard to any Complaint, the Internal Control Officer, after obtaining approval from the Audit Committee, may adopt a different set of procedures for investigating and treating such Complaint, such as when the Complaint concerns pending litigation.

### **Misuse of Policy**

An employee who knowingly makes a false Complaint shall be subject to disciplinary action, up to and including termination of employment, in accordance with Company rules, policies and procedures.

An employee who makes a Complaint in good faith shall in no event be subject to discipline, even if the employee's concerns ultimately prove to be unfounded.

### **Access to Reports and Records and Disclosure of Investigation Results**

All reports and records associated with Complaints are considered confidential information and access will be restricted to members of the Audit Committee, the Company's legal department and the Internal Control Department, employees of the Company or outside counsel or other advisors involved in investigating the Complaints as contemplated by these procedures. Access to reports and records may be granted to other parties at the discretion of the Audit Committee.

Complaints and any investigations, reports or actions resulting therefrom will generally not be disclosed to the public except as required by any legal requirements or regulations or by any policy of the Company in place at the time.

### **Retention of Records**

All Complaints and documents relating to the Complaints made through these procedures shall be retained for at least five (5) years from the date of the Complaint, after which the Complaints and documents may be destroyed unless they may be relevant to any pending or potential litigation, inquiry, or investigation, in which case the Complaints and documents may not be destroyed and must be retained for the duration of that litigation, inquiry, or investigation and thereafter, if necessary.