ADAMA Ltd.

Information Disclosure Management Policy

(March, 2022)

Chapter I General Provisions

Article 1 The *Information Disclosure Management Policy* (hereinafter referred to as "this Management Policy") are enacted in accordance with *the Company Law*, *the Securities Law*, *the Administrative Measures for the Disclosure of Information of Listed Companies (2021)(Order of CSRC No.182),Stock Listing Rules of Shenzhen Stock Exchange (2022), the Self-regulatory Supervision Guidelines for Listed Companies of Shenzhen Stock Exchange No.1 – Standard Operation of Main Board Listed Companies*, *the Self-regulatory Supervision Guidelines for Listed Companies of Shenzhen Stock Exchange No.5 – Management of Information Disclosure* and other laws and administrative regulations, as well as the provisions of the *Articles of Associations* of the Company, for the purpose of regulating the information disclosure made by ADAMA Ltd. (hereinafter referred to as "the Company") and other information disclosure obligors, strengthening the management of information disclosure matters and protecting the legitimate rights and interests of investors.

Article 2 The "information disclosure obligors" relevant to this Management Policy refers to the Company, its directors of the board, supervisors, senior executives, shareholders, ultimate controllers, acquirers, as well as natural persons, entities and their related persons involved in major asset restructuring, refinancing and material transactions, bankruptcy administrators and their members as well as other subjects who have information disclosure obligations as stipulated by laws, administrative regulations and the CSRC.

Article 3 An information disclosure obligor shall comply with the provisions of this Management Policy when performing the information disclosure obligation. Where the CSRC provides otherwise on the information disclosure of initial public offerings and listing of stocks and the issuance of securities by listed companies, such provisions shall prevail.

Article 4 An information disclosure obligor shall perform its information disclosure obligation in a timely manner in accordance with the law. The information disclosed shall be authentic, accurate, complete, concise, clear and easy to understand, and shall not contain any false record, misleading statement or material omission.

Any information disclosed by an information disclosure obligor shall be disclosed to all investors at the same time and shall not be disclosed to any entity or individual in

advance. However, if it is otherwise provided for in any law or administrative regulation, such provisions shall prevail.

Prior to the disclosure of insider information in accordance with the law, any insider who has access to any insider information or any person who has illegally obtained any insider information may not publicize or divulge such information or conduct any insider trading by taking advantage of such information. No entity or individual may illegally require an information disclosure obligor to provide any undisclosed information which shall be disclosed in accordance with the law.

Where the securities as well as the derivatives of the Company are publicly offered and traded in China and overseas at the same time, the information disclosed in the overseas market by an information disclosure obligor shall be disclosed in the domestic market at the same time.

Article 5 The directors of the board, supervisors and senior executives of the Company shall perform their duties faithfully and diligently, and ensure that the information will be disclosed truthfully, accurately, completely, fairly and in time.

Article 6 Except for the information that shall be disclosed in accordance with the law, an information disclosure obligor may voluntarily disclose information related to the value judgment and investment decision made by the investors, which shall not conflict with the information disclosed in accordance with the law and may not mislead the investors.

The information voluntarily disclosed by the information disclosure obligor shall be authentic, accurate and complete. The voluntary information disclosure shall be subject to the principle of fairness, and the continuity and consistency of the information disclosure shall be kept. No selective disclosure shall be made.

An information disclosure obligor shall not improperly affect the trading prices of the company's securities as well as the derivatives thereof by taking advantage of the information voluntarily disclosed, or engage in any illegal or non-compliant actions such as market manipulation by taking advantage of the voluntary information disclosure.

Article 7 All public commitments made by the Company and its controlling shareholders, ultimate controllers, directors, supervisors and senior executives, if any, shall be disclosed.

Article 8 If the information to be disclosed by the Company is state secret or business secret, etc., and the disclosure or performance of relevant obligations in accordance with relevant regulations may lead to violation of relevant state laws and regulations on confidentiality, endanger national security or damage the interests of the Company and investors, then after prudent judgment, the disclosure can be suspended or exempted in accordance with relevant regulations of the Shenzhen Stock Exchange. Information to be withheld or exempt from disclosure shall meet the following conditions:

(1) Relevant information has not been leaked;

(2) The insiders of the relevant inside information have made written commitments to keep it confidential;

(3) There has been no abnormal fluctuation in the trading of the company's stocks and derivatives.

Article 9 If the Company decides to suspend or exempt the disclosure of any specific information, the secretary of the board of directors should keep a record, which shall be properly archived and kept after being signed and confirmed by the chairman of the board.

If the requirements of Article 8 are not met, or the period for the suspension of disclosure expires, the Company and relevant information disclosure obligors shall perform information disclosure and related obligations in a timely manner.

If the causes for the suspension or exemption from disclosure have been eliminated, the company and relevant information disclosure obligors shall disclose it in a timely manner with deliberation procedures that have been performed and the confidentiality measures that have been taken.

Article 10 The information disclosure documents include periodic and interim reports, IPO prospectuses, fundraising prospectuses, listing announcements, acquisition reports, etc.

Article 11 The information disclosed in accordance with the law shall be published on the website of the stock exchange and the media that meets the conditions prescribed by the CSRC, and shall also be simultaneously made available for public reference at both the Company’s domicile and the stock exchange.

The full text of the information disclosure documents shall be presented on the websites of the stock exchange and of the newspaper and magazines that meet the conditions prescribed by CSRC in accordance with the law. The abstract of periodic reports and acquisition reports, etc., shall also be disclosed on the website of the stock exchange and on the newspaper and magazines that meet the conditions prescribed by CSRC.

No information disclosure obligor may replace the due reporting or announcement obligations with any forms such as press conference or Q&A with journalists or replace the due ad hoc reporting obligations with the form of periodic reports.

Article 12 The information disclosure obligor shall submit the manuscript of the information disclosure announcements and relevant documents for future reference to the Provincial Bureau of CSRC in Hubei Province.

Article 13 The information disclosure documents shall be in Chinese. In case of a version in a foreign language at the same time, the information disclosure obligor shall ensure that the content of the two texts is consistent. In case of any discrepancy between the two versions, the Chinese version shall prevail.

Chapter II Disclosure of Periodic Reports

Article 14 The periodic reports that the Company shall disclose include annual, semi-annual reports and, based on the requirement of the Shenzhen Stock Exchange, quarterly reports. Any information that may significantly affect investors in making value judgments and investment decisions shall be disclosed.

The financial statements in the annual report shall be audited by an accounting firm that complies with the provisions of *the Securities Law*.

Article 15 The annual report shall be completed and disclosed within four (4) months from the end of each fiscal year, and the semi-annual report within two (2) months from the end of the first half of each fiscal year.

Article 16 The annual report shall contain the following information:

(I) Basic information of the Company

(II) Main accounting data and financial indicators

(III) Information on issuance of Company's shares and bonds and changes thereto; the total amount of shares and bonds and the total number of shareholders at the end of the reporting period; as well as information on the shareholding of the Company's top ten (10) shareholders.

(IV) Information on shareholders holding five percent (5%) or more of the shares, the controlling shareholders and the ultimate controllers

(V) Appointment of directors, supervisors and senior executives, their changes and annual remuneration

(VI) Reports of the board of directors

(VII) Management discussion and analysis

(VIII) Material events occurring within the reporting period and their impact on the Company

(IX) Full text of financial reports and audit reports; and

(X) Other matters as stipulated by the CSRC.

Article 17 The semi-annual report shall contain the following information:

(I) Basic information of the Company

(II) Main accounting data and financial indicators

(III) Information on issuance of the Company's shares and bonds and changes thereto; the total number of shareholders as well as information on the shareholding of the Company's top ten (10) shareholders; changes of controlling shareholder and ultimate controller

(IV) Management discussion and analysis

(V) Material events occurring within the reporting period, such as material lawsuits and arbitrations and their impact on the Company

(VI) Financial reports; and

(VII) Other matters as stipulated by the CSRC.

Article 18 The quarterly report shall contain the information required by the Shenzhen Stock Exchange.

Article 19 All periodic reports shall be deliberated and approved by the board of directors of the Company. Any periodic report that has not been deliberated and adopted by the board of directors shall not be disclosed.

The directors and senior executives of the Company shall sign their confirmation opinions on the periodic report, indicating whether the preparation and deliberation procedures of the board of directors comply with the relevant laws, administrative regulations and provisions of the CSRC, and whether the contents of the report can truthfully, accurately and completely reflect the actual situation of the Company.

The board of supervisors shall examine the periodic reports prepared by the board of directors and put forward its examination opinions in written form signed by all members for confirmation. The examination opinions in writing shall indicate whether the preparation and deliberation procedures of the board of directors are in compliance with the laws, administrative regulations and provisions of the CSRC and whether the contents of the report can truthfully, accurately and completely reflect the actual situation of the Company.

In case any of the directors or supervisors are unable to ensure the truthfulness, accuracy or completeness of any periodic report or have any objections, they shall vote against or abstain from voting during the deliberation and examination of the board of directors or supervisors.

If any of the directors, supervisors and senior executives is unable to ensure the authenticity, accuracy or completeness of the content of any periodic report or has any objection against the content, they shall express their opinions and state their reasons in writing, and the Company shall disclose such opinions. If the Company refuses to do so, the directors, supervisors and senior executives may apply for disclosure directly.

The directors, supervisors and senior executives shall follow the principle of prudence in expressing their opinions in accordance with the preceding paragraph, and their responsibility to ensure the authenticity, accuracy and completeness of the contents of any periodic report shall not be exempted by that very act.

Article 20 If the Company foresees a loss or any substantial alteration of its performances, it shall make a timely pre-announcement.

Article 21 If there is a leak or any hearsay about the financial performance, or any

abnormal fluctuation in the trading of securities and derivatives of the Company before the disclosure of its periodic reports, the Company shall disclose the preliminary financial results in a timely manner.

Article 22 If a non-standard audit opinion is issued on the financial reports in the periodic report, the board of directors of the Company shall make a special report on the related items.

Chapter 3 Disclosure of Interim Reports

Article 23 Where the occurrence of any material event is likely to have a significant impact on the trading price of the Company's securities and its derivatives, and the investors have yet to be informed, the Company shall promptly disclose its occurrence and explain the cause, the current status and the likely effect.

A material event referred to in the preceding paragraph shall include:

(I) Material event as stipulated in Paragraph 2 of Article 80 of *the Securities Law*;

(II) Occurrence of liability for any significant sum of compensation;

(III) Provision for any significant amount of asset impairment;

(IV) Occurrence of negative value of shareholders' equity;

(V) The Company's main debtor becomes insolvent or enters bankruptcy, and the Company has not made full provision for bad debts for the corresponding credits;

(VI) Any newly promulgated law, regulation, rules, or industrial policy that may materially affect the Company;

(VII) The Company carries out any equity incentive program, repurchase of its shares, major asset restructuring, spin-off, or listing;

(VIII) The controlling shareholder is prohibited by the rule of any court from transferring its shares;

Shares of any shareholder accounting for five percent (5%) or more of the Company's total equity being pledged, frozen, judicially auctioned, held in

custody, placed in trust, or restricted in voting rights in accordance with the law, or forced transfer of ownership;

(IX) The Company's main assets are seized, impounded or frozen; or the main bank accounts are frozen;

(X) The Company anticipates a loss or substantial change in its business performance;

(XI) The main or all of its business comes to a halt;

(XII) The Company receives extraneous income that has a material impact on the current profit or loss, which may have a material effect on its assets, liabilities, equity, or its business performance;

(XIII) The appointment or dismissal of the accounting firm as an auditor of the Company;

(XIV) Significant autonomous changes in accounting policies and accounting estimation;

(XV) The Company is ordered by the relevant authorities or the board of directors decides to make corrections to previous disclosed information due to errors, failure to disclose information as required or false statements;

(XVI) The Company or its controlling shareholder, the ultimate controller, any director, supervisor or senior executive is subject to criminal penalties, under investigation or administrative penalties by the CSRC due to suspicion of violating the law, or subject to significant administrative penalties by other authorities entitled to do so;

(XVII) The controlling shareholder, the ultimate controller, directors, supervisors and senior executives of the Company are suspected of serious disciplinary offences or duty-related crimes, or are detained by the disciplinary inspection and supervision authorities, which consequentially affects their performance of duties;

(XVIII) Any of the directors, supervisors, senior executives other than the chairman of the board, or the CEO of the Company are unable to normally

perform their duties for more than three (3) months due to health issues, work arrangements and other reasons, or are subject to mandatory measures adopted by the competent authorities for alleged violation of the law, which consequentially affect the performance of their duties;

(XIX) Other matters as prescribed by the CSRC

If the controlling shareholder or the ultimate controller of the Company has a significant influence on the occurrence or progress of any major event, he or she shall promptly inform the Company in writing of the relevant circumstances to which he or she is aware and cooperate with the Company in fulfilling the information disclosure obligations.

Article 24 Any change to the Company's name, stock abbreviation, Articles of Associations, registered capital, registered address, main office address and contact number shall be disclosed immediately.

Article 25 The Company shall perform the information disclosure obligation of a material event in a timely manner at any of the following points of time when it first occurs:

(I) the board of directors or the supervisory board forms a resolution on the material event;

(II) the parties concerned sign a letter of intent or agreement in respect of the event;

(III) the directors, supervisors or senior executives become aware of the occurrence of the material event.

If any of the following circumstances occurs prior to the events mentioned in the preceding paragraph, the Company shall timely disclose the status of all relevant matters and the risk factors that may affect the development of the significant event:

(I) The material event is difficult to keep confidential

(II) The material event has been divulged or rumors emerge in the market;

(III) The securities of the Company and the derivatives thereof are abnormally traded

Article 26 If the disclosure of any material event by the Company leads to any development or change that may significantly affect the trading price of its securities and derivatives, it shall disclose the development or change and the likely impact in a

timely manner.

Article 27 In case a material event as stipulated in Article 23 of this Management Policy occurs in any of the Company's controlled subsidiaries, which may significantly affect the trading price of its securities and derivatives, it shall fulfill its obligation of information disclosure.

If an event occurs in a subsidiary in which the Company holds equity and may result in a significant impact on the trading price of the Company’s securities and derivatives, it shall fulfill its information disclosure obligations.

Article 28 Where any acquisition, merger, division, issuance of shares, repurchase of shares, etc. in which the Company is involved results in significant changes to its total equity, shareholders or the ultimate controller, the information disclosure obligor shall perform the obligation to report and announce the equity changes in accordance with the law.

Article 29 The Company shall keep track on any abnormal trading of its securities and derivatives as well as relevant media coverage.

If any abnormal trading or media report may materially affect the trading of the Company's securities and derivatives, it shall timely learn the truth from relevant parties and inquire in writing if necessary.

The Company's controlling shareholder, ultimate controller and parties acting in concert shall timely and accurately notify the Company whether there is any proposed share transfer, asset restructuring or other significant event and cooperate with the Company in the disclosure of information.

Article 30 If the trading of the Company's securities and derivatives is identified as abnormal trading by the CSRC or the stock exchange, it shall timely assess the actors triggering the abnormal fluctuations in trading and disclose them in a timely manner.

Chapter 4 Management over Information Disclosure Affairs

Section 1 Procedures for Information Disclosure

Article 31 Procedures for the preparation, deliberation and disclosure of periodic reports are as follows:

(I) The divisions of the headquarter of the Company and each subsidiary shall provide basic information carefully. The CEO, the CFO, the General Legal Counsel and the secretary of the board of directors shall organize and lead the relevant teams to draft periodic reports in a timely manner and submit them to the board of directors and supervisory board for review and deliberation.

(II) The chairman of the board shall be responsible for convening and chairing the meeting of the board of directors to review and deliberate the periodic reports.

(III) The directors and senior executives of the Company shall sign a written confirmation regarding the periodic reports.

(IV) The board of supervisors shall review the periodic reports prepared by the board of directors and offer opinions in writing along with signed written confirmation.

(V) After the board meeting approves the periodic reports, the secretary of the board shall be responsible for arranging the relevant departments to disclose the periodic reports.

Article 32 Procedures for the preparation, deliberation and disclosure of interim reports are as follows:

(I) When the directors, supervisors and senior executives become aware of a material event, they shall immediately report to the chairman of the board and inform the General Legal Counsel and the secretary of the board who will arrange and coordinate the relevant parties of the Company to draft the disclosure of the interim reports;

(II) For events that require resolution of the board of directors, supervisors and the general meeting of shareholders, the General Legal Counsel along with the secretary of the board shall make sure the relevant parties of the Company prepare an interim report based on the instructions and resolutions of the board of directors and supervisors as well as the general meeting of shareholders.

For information disclosure of any material event prescribed in Article 23

of this Management Policy and not subject to the approval of the board of directors, supervisors and the general meeting of shareholders, the General Legal Counsel along with the secretary of the board shall make sure the relevant parties of the Company prepare the corresponding interim reports.

(III) The interim report shall be reviewed successively by the secretary of the board and the General Legal Counsel and shall be approved by the CEO, and if deemed necessary, by the chairman of the board.

(IV) The secretary of the board shall submit the approved interim reports to the Shenzhen Stock Exchange in a timely manner.

Article 33 Except for announcements of the board of supervisors, the information disclosed by the Company shall be published in the form of the announcement of the board of directors. Directors, supervisors and other senior executives other than the secretary of the board shall not release undisclosed information to the public without authorization in writing by the board of directors.

Article 34 The Company shall not provide insider information when it communicates with any entity or individual regarding its operation, financial status and other issues through performance presentation, analysts' meeting, road shows or investors' inquiries.

Section 2 Responsibilities of Information Disclosure

Article 35 The board of directors shall lead the information disclosure of the Company and implement the rules stipulated in this Management Policy.

(I) The chairman of the board shall be the primary person responsible for the management over information disclosure affairs of the Company.

(II) The secretary of the board shall be responsible for the arrangement and coordination of information disclosure affairs and take direct responsibility accordingly.

(III) As the standing institution for information disclosure, the department of securities and legal affairs shall specifically handle relevant affairs, contacts with investors and shareholders, receiving visitors, answering

inquiries, providing investors with information publicly disclosed by the Company and other daily functioning affairs. Other relevant functional departments of the Company and its subsidiaries shall closely cooperate with the department of securities and legal affairs and the secretary of the board of directors to ensure that the disclosure of information in all the periodic and interim reports can be carried out in a timely manner.

Article 36 The information disclosure obligor holds the responsibility to provide the material and information required for the relevant information disclosure to the secretary of the board in a timely manner.

Article 37 The directors, supervisors and senior executives of the Company shall diligently fulfill their duties, pay careful attention to the preparation and drafting of information disclosure documents and ensure that periodic and interim reports are disclosed within the prescribed period.

Article 38 Directors of the board shall be aware of and pay continuous attention to the business operation and financial status of the Company and any significant event of the Company that has occurred or may occur as well as the impacts, and take the initiative to investigate and obtain the information required for decision-making.

Article 39 Supervisors shall monitor the Company's directors and senior executives in the performance of their information disclosure duties; pay attention to the information disclosure, and if identifying any violation of information disclosure investigate and suggest proper handling.

Article 40 Senior executives shall report to the board of directors in a timely manner on significant issues related to the business operation or financial status of the Company, any development of or changes in a disclosed event and other relevant information.

Article 41 The secretary of the board shall be responsible for collecting the information to be disclosed by the Company, analyzing and judging information significance.

If it is necessary to fulfill the obligation of information disclosure in accordance with relevant laws and regulations as well as provisions of this Management Policy, the secretary of the board shall report to the board of directors in a timely manner and request to go through the corresponding procedures and disclose to the public.

The secretary of the board shall also continuously pay attention to the media coverage on the Company and take the initiative to seek verification.

The secretary of the board has the right to attend the general meeting of shareholders, the meeting of the board, the meeting of the supervisory board and relevant meetings of the senior executives to understand the financial and operational situation of the Company and consult all documents related to information disclosure matters.

The secretary of the board is responsible for handling matters related to the announcement of the Company's information to the public.

The Company shall facilitate the secretary of the board to perform one's duties, and the CFO shall cooperate with the secretary of the board in the work related to financial information disclosure.

Article 42 When the following events occur, the shareholders or the ultimate controller of the Company shall take the initiative to inform the board of directors and cooperate with the Company in fulfilling its information disclosure obligations:

(I) A substantial change in the shareholding of a shareholder who holds five percent (5%) or more of the total equity, or to the shareholding proportion or control over the Company of the person in effective control, or a substantial change to the ultimate controller and other enterprises under one's control which are engaged in the same or similar business as the Company.

(II) A court rules to prohibit the transfer of shares held by the controlling shareholder; or five percent (5%) or more of the total shares of the Company held by any shareholder are pledged, frozen, judicially auctioned, entrusted, set up in trust or restricted in voting rights in accordance with the law; or there is a risk of forced transfer of ownership.

(III) Proposed major asset or business restructuring of the Company.

(IV) Other circumstances as prescribed by the CSRC.

Where, prior to the information disclosure in accordance with the law, relevant information has been circulating in the media, or if there are abnormal trade fluctuations in the securities and derivatives of the Company, the shareholder or the ultimate controllers shall submit a timely and accurate written report to the Company

and cooperate to make timely and accurate announcement accordingly.

The shareholders or ultimate controllers of the Company shall neither abuse their rights or dominant position nor request to provide them with insider information.

Article 43 When the Company issues shares to qualified investors, its controlling shareholders, ultimate controllers and the recipient shall provide relevant information to the Company in a timely manner and cooperate in fulfilling its information disclosure obligations.

Article 44 The directors, supervisors, senior executives, shareholders holding five percent (5%) or more of the shares, parties acting in concert and the ultimate controller shall submit to the board of directors a list of related parties and indicate the associated relationships concerned in a timely manner.

The Company shall fulfill the deliberation procedures for related-party transactions and strictly implement the voting abstention rules in related party transactions. The parties to the transaction shall not circumvent the Company's procedures to review the related-party transactions and information disclosure obligations by concealing the connected relationship or adopting other means.

Article 45 A shareholder who holds five percent (5%) or more of the total equity of the Company or a person in effective control by accepting a commission or trust shall promptly inform the Company of information about the principal and cooperate with the Company in fulfilling the information disclosure obligations.

Section 3 Management on Information Disclosure Files

Article 46 The documents and information related to the disclosure according to provisions of this Management Policy shall be filed by the department of securities and legal affairs and managed in accordance with the Company's file management policy. The performance of duties by directors, supervisors and senior executives of the Company shall be recorded by the department of securities and legal affairs and managed in accordance with the Company's archive management system.

Section 4 Confidentiality Measures

Article 47 A person who gets to know any material information of the Company before it is disclosed shall be responsible for keeping it confidential.

Article 48 The board of directors shall take necessary measures to minimize the number of insiders before the disclosure of any material information.

Article 49 The Company shall implement a registration management system for those who hold insider information. Before the disclosure of any insider information in accordance with the law, the Company shall prepare files about relevant insiders and report to the Shenzhen Stock Exchange within five (5) trading days after the first public announcement of the insider information in accordance with the law as may be changed from time to time.

Article 50 In carrying out business activities, if various departments of the Company are in actual need to provide non-public material information to counterparties, agents, other institutions and relevant personnel who are under confidentiality obligations to the Company due to special circumstances while promoting business activities, they shall require the relevant institutions and personnel to sign confidentiality agreements, otherwise they shall not provide the relevant information.

Article 51 The relevant departments of the Company shall carefully review the contents of reports at large and important internal meetings as well as speeches and written materials prepared for meetings held by the controlling shareholders. Regarding any relevant public information that has not yet been disclosed in the designated media and for which any avoidance is impossible, the scope of communication shall be limited, and confidentiality requirements shall be made to the report drafters and participants of those meetings. The participants of normal working meetings of the Company have the responsibility of confidentiality of the relevant important information stipulated in this Management Policy.

Section 5 Management on Information Disclosure Affairs of Subsidiaries

Article 52 The head of any subsidiary of the Company shall be the primary person responsible for the management and reporting of information disclosure relating to its affairs.

The heads of relevant departments of the subsidiaries are responsible for the management of relevant information disclosure documents and materials and reporting to the secretary of the board of the Company through the reporting chain in a timely manner any information related to the Company, which includes but is not

limited to the full set of documents for the shareholders' meeting, the board of directors' meeting and meetings of supervisors.

Article 53 The Company's subsidiaries shall refer to material events prescribed by this Management Policy and report in writing to the secretary of the board of the Company through the reporting chain in a timely manner the corresponding events occurring in their companies, and the secretary shall be responsible for the disclosure of information in accordance with the provisions of this Management Policy.

Section 6 Standing Institution and Contacts for Information Disclosure

Article 54 The department of securities and legal affairs of the Company is its standing institution for information disclosure and investor reception with the following contact details.

Tel：010-56718110

E-mail：IRChina@adama.com

Chapter 5 Legal Liabilities

Article 55 The directors, supervisors and senior executives of the Company shall be responsible for the truthfulness, accuracy, completeness, timeliness and fairness of information disclosure, except cases with sufficient evidence for their diligence to have performed their duties.

The chairman, the CEO, and secretary of the board shall be primarily responsible for the truthfulness, accuracy, completeness, timeliness and fairness of the information disclosed in any interim report of the Company.

The chairman, the CEO and the CFO of the Company shall be primarily responsible for the truthfulness, accuracy, completeness, timeliness and fairness of the financial statements of the Company.

Article 56 If any negligence of the parties related to the information disclosure covered by this Management Policy causes violation of laws of information disclosure and consequentially triggers serious impact or loss to the Company, the person responsible shall be criticized, warned, or even dismissed from his or her position.

Article 57 The Company reserves the right to pursue the responsibility of consultants, staff of agents and associates hired by the Company if any of these discloses the Company's information without authorization and cause losses.

Chapter 6 Supplementary Provisions

Article 58 This Management Policy shall be interpreted and amended by the board of directors of the Company.

Article 59 In case of any matters not covered by this Management Policy or any conflict between this Management Policy and relevant laws, administrative regulations, regulatory documents and other relevant provisions, the latter shall prevail.

Article 60 This Management Policy shall take effect from the date of approval by the board of directors of the Company, replacing the "*Information Disclosure Management Policy*" (revised in August 2007) adopted at the Ninth Meeting of the Fifth Session of the Board of Directors.

Board of Directors of ADAMA Ltd.

March 29th, 2022