Stock Codes: 600801 Stock Abbreviation: HUAXIN BLDG MAT Ref: 2025-052

HUAXIN BUILDING MATERIALS GROUP CO., LTD.

Self-examination Report on the Trading of Company Shares by Insiders with Knowledge of Inside Information Regarding the 2025 A-share Restricted Share Incentive Scheme

Huaxin Building Materials Group Co., Ltd. (hereinafter referred to as the Company) held its eighteenth meeting of the eleventh Board of Directors on October 3, 2025, at which the Proposal on the Company's 2025 A-share Restricted Share Incentive Scheme (Draft) and its Summary (hereinafter referred to as the "Incentive Scheme" (Draft)) and other proposals were reviewed and approved. These proposals have been reviewed and approved by the Remuneration and Assessment Committee to the Board. The Company disclosed relevant announcements on the website of the Shanghai Stock Exchange (www.sse.com.cn) on October 9, 2025.

According to the Administrative Measures for Equity Incentives of Listed Companies (hereinafter referred to as the "Administrative Measures") and other relevant laws and regulations, the Company has taken sufficient and necessary confidentiality measures for the decision-making and implementation process of this incentive scheme, and registered the insiders who have knowledge of the inside information of this incentive scheme. According to the relevant provisions of the Administrative Measures, the Company has conducted a self-examination of the insider trading of the Company's shares during the six months before the public disclosure of this incentive scheme (from April 9 to October 9, 2025, hereinafter referred to as the "Self-examination Period"), and the specific circumstances are as follows:

I. Scope and Procedures of the Review

1. The review subjects are the insiders who have knowledge of the inside information of the Company's 2025 restricted share incentive scheme.

2. All insiders have filled out the Insider Information Registration Form.

3. The Company inquired with China Securities Registration and Settlement Co., Ltd. Shanghai Branch about the trading of the Company's shares by the review subjects during the Self-examination Period, and obtained a query certificate from China Securities Registration and Settlement Co., Ltd. Shanghai Branch.

II. Description of Insider Trading in the Company's Shares

According to the Information Disclosure Obligor Shareholding and Share Change Query Certificate and Detailed List of Shareholders Share Changes issued by China Securities Registration and Settlement Co., Ltd. Shanghai Branch, during the Self-examination Period of this incentive scheme, there were 7 review subjects that traded the Company's shares. After the Company's review and communication with the above-mentioned persons, it is confirmed that:

(1) Two review subjects traded the Company's shares during the Self-examination Period, and all transactions occurred before they knew about this restricted share incentive scheme. These transactions were independent investment decisions made based on their judgment of the Company's performance and future development, as well as secondary market trading conditions, publicly available information, and stock market trends. At the time of the stock transactions, they did not know about the Company's plan to implement a restricted share incentive scheme or the specific details of this incentive scheme, and there was no instance of using the inside information of this incentive scheme for stock trading or illegal profiteering.

(2) Three review subjects traded the Company's shares during the Self-examination Period, and most of the buying occurred before they knew about the restricted share incentive scheme. After review, it was found that these three review subjects continuously purchased the Company's shares before the Self-examination Period, and most of the transactions occurred before they knew about the equity incentive matters, with a small number of transactions occurring after they knew that the Company was preparing to launch a share incentive scheme. According to their written explanations and commitments, their purchase of the Company's A-shares was based on their personal judgment of the Company's performance and future development, and was independent of the inside information of this incentive scheme. They did not use the inside information of this incentive scheme for stock trading, and they did not disclose the specific information of this incentive scheme to any person or recommend others to buy or sell the Company's shares based on this information. These three review subjects have promised that if their purchase or sale of Huaxin Cement shares after knowing the inside information is deemed inappropriate by the regulatory authorities, they will voluntarily hand over all the profits (i.e., the difference between the selling price and the purchase price, minus the transaction costs) to Huaxin Building Materials Group Co., Ltd. and accept the supervision or punishment from the competent regulatory authorities.

(3) One review subject traded the Company's shares during the Self-examination Period, and this transaction occurred after he knew about the inside information of this restricted share incentive scheme. After review, it was found that this transaction was an independent investment decision made based on his personal judgment of the Company's performance and future development, and was independent of the inside information of this incentive scheme. He did not disclose the specific information of this incentive scheme to any person or recommend others to buy or sell the Company's shares based on this information. This review subject has promised that if his purchase or sale of Huaxin Cement shares after knowing the inside information is deemed inappropriate by the regulatory authorities, he will voluntarily hand over all the profits (i.e., the difference between the selling price and the purchase price, minus the transaction costs) to Huaxin Building Materials Group Co., Ltd. and accept the supervision or punishment from the competent regulatory authorities.

(4) One review subject was not an incentive subject of this incentive scheme, and he bought the Company's shares six months before the disclosure of the restricted share incentive scheme. He did not know about the Company's plan to implement a restricted share incentive scheme or the specific details of this incentive scheme at that time. When he sold the shares, the information about the Company's restricted share incentive scheme had not been announced yet. As a regular employee, he had limited knowledge of the restricted share incentive scheme at the time of the stock sale, and he did not know the specific implementation time, incentive scheme, and core contents of the restricted share incentive scheme. His stock trading was based

on his independent judgment of the secondary market conditions, publicly available information, and personal judgment, and there was no intention to use the inside information of this incentive scheme for stock trading. The stock trading did not involve the use of the specific scheme elements and other inside information of this incentive scheme for insider trading. This review subject has promised that if his purchase or sale of Huaxin Cement shares after knowing the inside information is deemed inappropriate by the regulatory authorities, he will voluntarily hand over all the profits (i.e., the difference between the selling price and the purchase price, minus the transaction costs) to Huaxin Building Materials Group Co., Ltd. and accept the supervision or punishment from the competent regulatory authorities.

Except for the above-mentioned circumstances, no other review subjects traded the Company's shares during the Self-examination Period.

III. Conclusion

To sum up, the Company has established relevant systems for information disclosure and management of inside information in accordance with relevant laws, regulations, and normative documents; during the six months before the first public disclosure of the draft of this incentive scheme, no insiders of this incentive scheme were found to have used the inside information of the Company's this incentive scheme for stock trading or disclosed the inside information of this incentive scheme.

It is herewith announced.

Board of Directors of Huaxin Building Materials Group Co., Ltd.
5 November 2025