



Jiangsu Hengrui Pharmaceuticals Co., Ltd.

Business Ethics Policy

1. Introduction

This Policy aims to ensure that Jiangsu Hengrui Pharmaceuticals Co., Ltd. (hereafter “the Company” or “We”) upholds the highest possible standard of business ethics, complies with all the applicable laws and regulations in the jurisdiction where it operates, and conducts business activities with integrity and fairness to prevent dishonest practices.

2. Scope

This Policy applies to the Company’s and its subsidiaries’ full-time, part-time, and temporary employees, as well as its business partners.

3. Governance Body

The Strategy Committee, under the Board of Directors, is in charge of examining, overseeing and taking responsibility for the relevant business ethics matters involved in this Policy.

4. Regular Audit

The Company conducts an internal business ethics audit every three years.

5. Anti-Bribery and Corruption

Ethics and Integrity

The Company refrains from any action that may bias its fair dealing or cause conflicts of interest, and bans everyone from taking advantage of their position to seek illegal gains. All the information related to the Company’s business operations, customers, suppliers, and employees must be kept confidential to ensure privacy.

Bribery, Engagement and Benefits

The Company adopts a zero-tolerance policy on bribery and bans all its employees from giving, requesting, or



accepting a bribe. This means employees should not give, request, or accept any gifts (excluding ceremonial business gifts), cash, or other benefits to/from customers, suppliers, legislative and/or law enforcement agencies, or any other personnel involved in the Company's business activities, nor should they act as a third-party intermediary to engage in the above-mentioned behaviors. Anyone who, with or without the permission of their superiors, uses their authority to request or accept any gifts (excluding ceremonial business gifts), cash, or other benefits is considered a violation of the *Business Ethics Policy*.

The Company prohibits its employees from accepting any benefits that are directly or indirectly related to the Company's business operations. Such benefits may hinder an employee's impartial judgment and handling of business activity, induce him/her to damage the Company's interests and consequently violate the relevant laws, regulations and listing requirements, resulting in complaints of favoritism or misdemeanor, and/or make him/her feel compelled to repay the giver in business dealings.

The Company's employees should report actual or foreseeable conflicts of interest at work in time. Any form of actual or foreseeable conflict of interest that employees are aware of exist should be immediately reported in writing to the Compliance Management Office or its department head truthfully. Common conflict of interest situations include but are not limited to the following:

- An employee has undeclared financial interests/transactions with any suppliers, service providers, or related personnel who have business dealings with the Company;
- An employee hires service providers who worked or are working for the Company to work or provide services, goods, etc. for him/herself and/or his/her immediate family members;
- An employee provides favorable treatment to certain suppliers, service providers, customers, job seekers, subordinates or superiors for personal reasons;
- An employee or his/her near relations (including relation by marriage) are engaged in or considering engaging in affairs, investments, or activities that conflict with the Company's interests or may lead to conflicts of interest;
- An employee uses working hours and corporate resources (including human resources), information or



status to do external work in the Company;

- An employee assists the Company's competitor and provides services/manufactures goods in private that compete with those of the Company;
- An employee works in a company or economic entity that has business dealings or competitive relationships with the Company.

The Company prohibits its employees from giving any gifts to customers or stakeholders in situations that may affect decision-making by the authorities or business partners or create such an impression on others. Unless approved by the Company, employees should not entertain customers or business partners. Regardless of the giver's intention to influence the Company's business decisions, the Company prohibits employees and their relatives from accepting gifts (excluding ceremonial business gifts), cash, entertainment or any things of value from customers or business partners.

The Company prohibits employees from providing loans or guarantees in the name of the Company without the Company's authorization to their superiors, subordinates, or any individuals or organizations that have business dealings with the Company. Nor should they accept loans from these individuals or organizations, or accept loans with their help.

The Company bans fraudulent activities in all forms. Fraud refers to the theft of company resources or the use of false statements, dishonest or deceptive means to obtain benefits from or cause losses to others. Fraud covers a broad range of areas, including unauthorized use and/or disposal of equipment and other materials (both tangible and intangible assets), false expense claims, falsification of financial or non-financial data and records, provision of false records and data for personal or resale purposes, and even theft of goods, money, services, etc. Intentionally fabricating profits, revenues, operating expenses, personal data, etc. is also considered fraud.

The Company's assets and materials, including such intangible assets as information, technical secrets, trade secrets, intellectual property, reputation and status, as well as its time, human resources, capital, vehicles, computers, supplies, equipment, facilities and consumables, should be used in support of the Company's business operations rather than for personal purposes. Employees should not use the Company's property and



materials for improper or illegal purposes. All the employees should use the Company's property and materials responsibly, and report the loss, damage, and improper or illegal use of them so that the Company can take corresponding measures.

Failure to comply with the requirements above may result in severe punishments, such as demotion, duty removal, and dismissal.

6. Anti-Money Laundering

The Company prohibits its employees from participating in money laundering, falsely reporting the amount of money, intentionally and illegally evading tax payment obligations, and financing terrorism or other illegal and criminal activities. Employees should make every effort to understand customers through legitimate background checks to reduce the risk of becoming a tool for money laundering.

7. Insider Trading

The Company prohibits its employees from revealing "material insider information" at work, including financial performance, potential mergers, acquisitions, divestitures, capital increases, capital market transactions, important licensing agreements and other partnerships, gains and losses of major contracts, clinical trial results, current litigation, and important information of customers. Employees should not disclose such nonpublic information to those who may conduct transactions based on the information, such as coworkers, relatives and friends. Employees should also remain vigilant about chain emails, which require recipients to forward them to multiple individuals, and conversations in trains, airplanes, restaurants, meetings, and public open spaces.

The Company prohibits employees in possession of "material insider information" from buying or selling the stock of the Company or other companies. Violation of insider trading laws means that both the Company and its employees will face civil and criminal penalties, including substantial fines and imprisonment.

8. Anti-Corruption by Business Partners

Business Integrity



The Company prohibits its business partners from engaging in or tolerating any form of corruption, extortion, corruption or money laundering. Specifically, they should not give or accept a bribe or other illegal benefits, such as kickbacks to/from their business partners or government officials in any circumstances, or provide any type of gift or benefit that can be considered a bribe to the Company's employees. Nor should they exert undue influence on business relationships through the provision of gifts or entertainment.

Conflict of Interest

The Company prohibits its business partners from concealing any conditions that may present a conflict of interest to the Company. For example, if an employee and his/her immediate family members have a position, personal and/or economic benefits or interests in any business activity of the Company's business partners, the situation will constitute a conflict of interest.

Problem Identification

The Company encourages its business partners to communicate work-related issues, file complaints, or report potential illegal activities through our compliance email and compliance hotline. The Company should keep confidential any reports from its business partners and provide them with reporting channels free from retaliation, intimidation, harassment or threat.

The Company's business partners should proactively facilitate corporate compliance audits and develop policies to ensure that upstream and downstream suppliers and service providers in the Company's projects also participate in such audits.

Policy Consistency

The Company's business partners should develop, implement and maintain management systems and policies related to this Policy, and maintain necessary documents to demonstrate compliance with the principles established in this Policy. After mutual agreement, the document will be reviewed by the Company.

9. Whistleblower Protection

Reporting Channels

The Company encourages its employees to report existing or potential violations.



The Company encourages its employees to raise concerns or complaints by reporting directly to the leadership or using the following channels:

- Compliance Management Office
- The top leadership of an employee's organization, department or business segment
- Email: compliance.report@hengrui.com
- Tel: 0518—85108796

Protection Mechanism

The Company will protect the identity and privacy of each whistleblower in accordance with the law. Without the consent of the whistleblower, his/her identity will not be revealed unless required by applicable laws and regulations or by an order or directive issued by any court with a jurisdiction right over the Company.

The Company should not discriminate or retaliate against whistleblowers. Harassment, discrimination, retaliation and harm by other employees towards a whistleblower will be considered serious misconduct, which, if proven, can lead to dismissal.

If a whistleblower deliberately makes a false report due to ulterior motives or for personal gains, the Company reserves the right to take appropriate actions against the whistleblower and other relevant personnel. Disciplinary will be taken against internal employees in accordance with relevant internal regulations.

Investigation Mechanism

Once a report is received, the Company's Compliance Management Office will create a team to conduct a fair and effective investigation. The investigation is aimed at assessing whether the reported matter has violated internal rules, regulations and/or codes of conduct. After completing the necessary procedures, the team will release an investigative report based on the facts checked.

10. Business Ethics Training and Signing/Verification of Responsibility Letter

All the Company's employees and business partners are responsible for understanding and complying with this Policy. The Company provides relevant training to all its employees and business partners to ensure



consistent understanding. Training includes but is not limited to onboarding new employees and online and in-person compliance training. All the employees and business partners are also required to verify compliance with this *Business Ethics Policy*.

11. Availability and Revision

This Policy is available to all the Company's employees. The Company reserves the right to revise, alter or repeal the Policy at any time for any reason. The Company will review this Policy regularly and revise it when necessary. When this Policy is updated, the Company will notify its employees in time. The latest version of the Policy will be available on the official website of the Company: <https://www.hengrui.com/>.