



Jiangsu Hengrui Pharmaceuticals Co., Ltd.

Responsible Marketing Policy

1. Purpose

This Policy aims to improve and strengthen the sustainable operation and development of Jiangsu Hengrui Pharmaceuticals Co., Ltd. (hereafter “the Company” or “We”) and ensure that the Company’s sales and marketing practices comply with applicable laws and regulations, social norms and moral standards.

2. Scope

This Policy applies to all the Company’s full-time, part-time, and outsourcing employees. Our business partners are encouraged to comply with this Policy.

3. Compliance with External Laws and Regulations

All forms of marketing activities including marketing content and method conducted by the Company should comply with the applicable laws, regulations and industry standards in the jurisdiction where the Company operates. The laws and regulations include but not limited to the *Advertisement Law of the People’s Republic of China*, the *Personal Information Protection Law of the People’s Republic of China*, the *Cybersecurity Law of the People’s Republic of China*, the *US Federal Trade Commission Act*, the *US Honest Ads Act*, the *US Health Insurance Portability and Accountability Act*, and the *EU General Data Protection Regulation*.

4. Compliance with Internal Rules and Regulations

The Company has established relevant rules and regulations on marketing, advertisement and privacy protection such as the *Regulations on Marketing*, *Ten Prohibitions for Ensuring Integrity of Sales Management*, *Guidelines on Basic Work Regulations of Sales Representative*, *Guidelines on the Work Regulations of Marketing Executives*, *Management System of Trade Secret Carriers (For Trial Implementation)*, and *Personal Data Privacy Protection Policy*. These stipulate that the marketing content and method should follow the Company’s relevant policy, the sales procedure should be strictly regulated, and the entire sales workstream should be guided and constrained. The Company prohibits the marketing activity from including exaggerated, deceptive and false content.

5. Ensuring Accurate Information Disclosure

The Company should accurately disclose information in accordance with the applicable laws, regulations, industry standards and guidelines of the jurisdiction where it operates, and provide customers with truthful, complete and legitimate information by adhering to the principle of



fair competition and refraining from slandering competitors, fabricating content, or misleading the audience. The Company should not make up the price of its products and services. It should not make false or misleading statements on the products, services, performance or track record of itself or its competitors. Nor should it use any form of comparative advertising unless proven necessary by a substantial amount of research. Before using comparative advertising, the Company should notify the Legal Affairs Department. The Company should keep all the marketing material for assessment or review when needed.

6. Establishing a Review and Supervision Mechanism

The Company has established a review and supervision mechanism for the responsible marketing material and constantly improved it. All the marketing material must get approval from the Company's authorized managers. The marketing and sales activities are reviewed regularly to avoid providing misleading information or holding back information. The Company requires 100% of targeted projects to be audited of their sales operations matters for approval at launch and conducts quarterly reviews.

7. Management of Product Labeling and Interactions with Healthcare Professionals

The Company has implemented a closed-loop labeling management system that spans the entire process — from R&D and regulatory registration, through design review, printing, and manufacturing, to post-marketing changes to ensure that labeling information is truthful, accurate, and complete, and to prevent any false or misleading statements. Furthermore, the Company actively advance the development of the drug traceability system and adopt a “one product, one code” approach to enable full traceability of product distribution.

Regarding the management of interactions with healthcare professionals, the Company has formulated and implemented dedicated policies such as the *Compliance Guidelines for Academic Activities* and the *Compliance Guidelines for Medical Research Projects*, clearly defining standards for activity organization and expenses, and strictly prohibiting promotion under the pretext of research, improper transfer of benefits, bribery, inappropriate inducement, and any interference with rational clinical medication use. Additionally, the Company implements multi-level review and version control of academic promotional materials by the Medical Affairs Department and the Compliance Department to ensure that all content remains strictly within the scope of approved indications, and we regularly review the compliance of related activities.

8. Protection of Personal Privacy and Data Security

The Company adheres to the principle of data protection when handling the personal data of customers, patients and suppliers, and refrains from collecting sensitive information of the relevant personnel without his/her individual consent. The Company abides by the *Management System of Trade Secret Carriers (For Trial Implementation)* when providing data for external



use, standardizes the application process for using information, and controls the flow of personnel information.

9. Responsible Marketing Training

The Company provides regular training in responsible marketing to all its employees. The Company also offers regular special training to its marketing and promotions staff to better regulate the behaviors of employees and protect the interests of customers.

10. Reporting Channel for Infractions

The Company encourages its employees, customers, suppliers and any other third-party organization to report any infractions of the Policy via the relevant channel. All the reports of misconduct will be investigated and dealt with in accordance with the Company's policy on business ethics and remedial measures will be taken if necessary.

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/>.