CSPC Pharmaceutical Group Limited
Anti-Corruption Policy

1. Purpose

CSPC Pharmaceutical Group Limited (hereinafter referred to as "CSPC" or the "Company") and its subsidiaries (hereinafter collectively referred to as the "Group") uphold the business philosophy of integrity and legal compliance. We are committed to working with relevant parties to pursue the highest standards of integrity and to maintain business ethics and probity. This policy is formulated to ensure that all business activities comply with the laws and regulations of China and other relevant countries and regions where the Group operates, to ensure that the Group's business is built on a fair, just, open, and transparent foundation, and to enhance the professional ethics and integrity compliance awareness of our employees and partners.

2. Scope of Application

This policy applies to the Company, its subsidiaries, and individuals acting on behalf of the Group, including but not limited to directors, supervisors, senior management, employees (including full-time, part-time, and temporary staff), as well as individuals acting as agents or trustees on behalf of the Group (such as agents, consultants, seconded workers, and contractors).

It also applies to business partners and their employees who have cooperated or intend to cooperate with the Group, including but not limited to suppliers, service providers, contractors, subcontractors, commercial companies, dealers, distributors, agents, clinical research organisations, promotional service providers, consultants, joint venture partners, intermediaries, middlemen, public relations agencies, and other entities and individuals with whom the Group has commercial dealings.

3. Anti-Corruption Governance

3.1 Board of Directors

The Board of Directors supervises, manages, and guides the anti-corruption and commercial bribery work, and makes final decisions on reported matters.

3.2 Supervision and Security Department & Compliance Department of the

Compliance Committee

The Group's Supervision and Security Department is responsible for drafting, revising, and providing training on the corruption-related contents of this policy. It receives reports of corrupt behaviour, organises investigations, and proposes handling opinions or recommendations based on the findings. It is responsible for coordinating and organising employees to sign the Integrity and Self-Discipline Commitment. It is also responsible for auditing, inspecting, and urging the rectification of the implementation of the corruption-related contents of this policy.

The Compliance Department of the Group's Compliance Committee is responsible for drafting, revising, and providing training on violations such as commercial bribery and false academic promotion within this policy. It is also responsible for auditing, inspecting, and urging the rectification of the implementation of the relevant contents. As the leading department for compliance work across the Group, the Compliance Department is responsible for organising, coordinating, and supervising compliance management. It receives reports regarding violations such as commercial bribery and false academic promotion, conducts investigations, and classifies and processes the incidents based on their nature and severity to form an investigation report for approval by the Compliance Management Committee.

3.3 Organisation and Talent Development Department

The Organisation and Talent Development Department is responsible for assisting in organising employees to sign the Integrity and Self-Discipline Commitment; executing rewards and punishments based on investigation results; and incorporating the implementation of the anti-corruption policy into the annual employee appraisal and evaluation system.

3.4 Supplier/Partner Management Departments

These departments are responsible for conducting pre-admission compliance due diligence on business partners in accordance with this policy; implementing anti-corruption requirements throughout the entire process of bidding, inquiry, bid evaluation, contract signing, and fulfilment; supervising partners' compliance with the *Sunshine Cooperation Agreement*; and implementing measures such as access prohibition, termination of cooperation, and blacklisting for non-compliant partners.

3.5 Business and Functional Departments

Each department is the primary responsible body for anti-corruption management within its purview. They must proactively identify corruption and bribery risks in their respective areas, conduct risk assessments, issue early warnings, implement responses, and promptly report to the corresponding competent departments.

4. Specific Provisions

Corruption and bribery in this policy refer to the act of any person, for the benefit of the Company or personal gain, directly or indirectly offering, promising, authorising, giving, soliciting, or receiving any improper property or other benefits to obtain or retain business opportunities, secure an improper competitive advantage, or influence normal business decisions.

The Group maintains a zero-tolerance attitude towards bribery. Regardless of whether such acts successfully obtain business or advantages, they are deemed a violation of this policy.

4.1 Anti-Commercial Bribery

4.1.1 Prohibition of Bribery to Any Entity

Employees of the Group and any personnel acting on behalf of the Group are prohibited from directly or indirectly offering, promising, or authorising the provision of any improper benefits to obtain or retain business, secure transaction opportunities, or gain an improper competitive advantage.

4.1.2 Prohibition of Accepting Bribes

Employees of the Group and any personnel acting on behalf of the Group are prohibited from using their positions to solicit or accept any improper benefits.

4.1.3 Prohibition of Bribery Through Third Parties

The Group prohibits any act of bribery conducted by assisting, abetting, facilitating, or conspiring with a third party.

4.2 Gifts and Hospitality

Under no circumstances shall Group employees directly or indirectly offer gifts or hospitality to public officials, client personnel, or partner personnel with corrupt intent; nor shall they solicit gifts or hospitality from any partner personnel.

4.3 Professional Integrity and Conflicts of Interest

4.3.1 Declaration of Conflicts of Interest

Employees must proactively avoid conflicts between personal interests (including the interests of relatives and other specified related persons) and the Company's interests. Employees should disclose information regarding related parties where they hold positions, invest, work part-time, or have business dealings within the Group's business scope upon joining the Company and during regular annual declarations. Without the Group's approval, employees may not hold shares, hold positions, or have private interest relationships that may affect the impartial performance of their duties in suppliers, dealers, medical institutions, or other partners that have business dealings with the Group.

4.3.2 Obligation of Recusal

When employees become aware of an existing or potential conflict of interest, they must proactively report it to their department head and the supervisory department and apply for recusal. Without the approval of the supervisory department, they may not participate in business processes such as procurement, bidding, approval, acceptance, and payment involving the specified related person.

4.3.3 Prohibition of Concealing Related-Party Transactions

It is prohibited to use related-party relationships to harm the Group's interests, and it is prohibited to circumvent the obligation to declare conflicts of interest through methods such as anonymous holding or multi-layered nesting.

5. Third-Party Management

5.1 Principles of Cooperation

Cooperation between the Group and third parties must be genuine, lawful, and commercially reasonable. The Group requires all third parties to comply with the *Sunshine Cooperation Agreement*, integrity commitments, and this policy.

5.2 Contractual Control

Agreements signed between the Group and third parties must include anti-corruption clauses, or a separate *Sunshine Cooperation Agreement* must be signed.

5.3 Supervision and Disposal

5.3.1 The Group encourages third parties to formulate internal anti-corruption policies to systematically eliminate all types of bribery, embezzlement, fraud, and unfair competition.

5.3.2 Third-party management personnel must not approve, cover up, cooperate with, or acquiesce to commercial bribery.

5.3.3 If a third party violates this policy or the *Sunshine Cooperation Agreement*, the Group has the right to unilaterally terminate the cooperation, cancel bidding or winning qualifications, pursue liability for breach of contract, claim damages, and permanently add them to the *Dishonesty Blacklist*.

6. Assessment Mechanism

6.1 The Group systematically establishes an anti-corruption and commercial bribery assessment mechanism to review and evaluate the implementation, execution, and compliance with this policy, and takes effective measures for disposal. The review and assessment work is carried out every three years, covering all business activities and management links, and the frequency of audits may be increased according to specific business needs. At the same time, the Group regularly evaluates the effectiveness of the review and assessment procedures themselves and their results to ensure they continuously adapt to changes in the internal and external environment.

7. Whistleblowing and Acceptance

7.1 Whistleblowing Channels

The Group encourages internal employees, external suppliers, partners, and other relevant parties to report suspected violations of this policy in accordance with the law. The Group has established the following reporting channels:

※ Telephone reporting: 18931872760 (24 hours).

※ Email reporting: cspcjb@cspc.cn

※Letter reporting: To the Supervision and Security Department, CSPC Pharmaceutical Group, No. 896 Zhongshan East Road, High-tech Zone, Shijiazhuang City, Hebei Province. Postcode: 050035.

※ Reporting by appointment in person.

※ CSPC Integrity Education Platform - "I want to report".

※ CSPC Group Integrity WeChat Platform.

Account: cspclianjie

7.2 Whistleblower Protection and Rewards

7.2.1 The Group encourages real-name reporting. For whistleblowers who do not wish to use their real names, their wishes will be respected, and they may report anonymously or under a pseudonym.

7.2.2 The Group strictly keeps confidential the whistleblower's information, the content of the report, and the investigation process. Any act of leaking whistleblower information will be dealt with severely by the Group; those violating the law will be held legally responsible.

7.2.3 It is strictly forbidden for anyone to threaten, intimidate, retaliate against, or covertly marginalise a whistleblower. Once verified, severe punishment will be imposed on the person carrying out the retaliation.

7.2.4 For verified reports, the Group will provide corresponding rewards to the whistleblower in accordance with the *Whistleblower Protection and Reward System*.

7.3 Liability for Violations

7.3.1 Employee Liability

If a Group employee violates this policy, the Group reserves the right to take one or more of the following disciplinary actions depending on the severity of the circumstances:

- Circulated criticism, written warning;
- Recording of a demerit or major demerit;
- Demotion, dismissal from post, transfer from post;
- Probation within the company, termination of employment contract;
- If economic losses are caused to the Group, the responsible person shall bear the liability for compensation;
- If suspected of a criminal offence, the matter will be transferred to judicial authorities in accordance with the law.

7.3.2 Partner Liability

If a partner violates this policy and the *Sunshine Cooperation Agreement*, they will be subjected to measures such as access prohibition, cancellation of bidding or winning qualifications, termination of contract, and pursuit of liability for breach of contract, in accordance with the *Dishonesty Blacklist Management System* and the stipulations of the agreement.

8. Training and Communication

8.1 Relevant management departments of the Group shall cooperate with the Supervision and Security Department and the Compliance Department of the Compliance Committee to regularly organise integrity education and compliance training for all employees, including all directors, supervisors, and senior management. This is to enhance the awareness of integrity and self-discipline, improve the ability to resist corruption and prevent degeneration, and actively foster a clean, upright, healthy, and orderly working environment.

8.2 Employees are obliged to attend training to understand, master, and comply with all provisions of this policy.

8.3 This policy is published to all employees and serves as a compulsory component of the induction training for new employees. All employees must sign the *Employee Compliance Commitment* and strictly fulfil their compliance obligations. Business partners can access this policy through channels such as the Company's official website and supplier portals.

9. Supplementary Provisions

9.1 This policy has been reviewed and approved by the Board of Directors of the Group and shall come into effect on the date of promulgation.

9.2 The right to interpret this policy rests with the Supervision and Security Department and the Compliance Department of the Compliance Committee of CSPC Pharmaceutical Group.