

CSPC Pharmaceutical Group Limited

Responsible Marketing Policy

Chapter 1: General Provisions

Article 1 To standardise the marketing activities of CSPC Pharmaceutical Group Limited and its subsidiaries (hereinafter collectively referred to as the "Group"), ensure that marketing behaviours comply with relevant laws, regulations, industry norms, and commercial ethics standards, and protect the legitimate rights and interests of the company, customers, employees, and all sectors of society, this policy is hereby formulated in accordance with the provisions of relevant laws and regulations, and in combination with the actual situation of the Group.

Article 2 Responsible marketing, as referred to in this policy, means that in product promotion, market advertising, academic promotion, customer communication, and other related marketing activities, the Group strictly abides by national laws and regulations, industry norms, and the Group's internal rules and regulations. It adheres to the principles of legal compliance, truthfulness and accuracy, fair competition, and prudent management, ensuring that the content, methods, and processes of marketing do not mislead, exaggerate, or conceal key information, do not infringe upon the legitimate rights and interests of customers, patients, and other relevant parties, prevent compliance and reputational risks, and safeguard the long-term stable development of the Group.

Article 3 This policy applies to all employees of the Group (including official employees, part-time employees, and outsourced employees) as well as various business partners. The Group encourages all business associates to comply with this policy and jointly maintain a fair, transparent, and responsible marketing environment.

Chapter 2: Management Organisation

Article 4 The execution and supervision of this policy shall be spearheaded by the Group's Compliance Department, which shall report the implementation status to the Compliance Committee, the Group's Chief Executive, and the Board of Directors.

Article 5 Each business department (such as the Central Marketing Department, Sales Operations Department, etc.) is the primary body responsible for marketing compliance. They are responsible for the daily compliance review and self-inspection of marketing activities within their respective areas to ensure all marketing activities meet the requirements of this policy. The Compliance Department independently exercises supervisory power, conducting regular or irregular compliance inspections and risk evaluations of marketing activities.

Chapter 3: Management and Control Contents

Article 6 In all operation and management activities of the Group, the following behaviours are strictly prohibited:

1. **Commercial bribery:** It is strictly prohibited to give or promise to give property (including but not limited to cash, kickbacks, cash gifts, marketable securities, payment vouchers, shopping cards, etc.) to medical institutions, doctors, pharmacists, public officials, or staff of other relevant parties under any name; it is strictly prohibited to induce doctors to issue prescriptions or induce medical institutions to purchase the Group's products by means of commissions, kickbacks, etc.
2. **Disguised transfer of interests:** It is strictly prohibited to transfer interests under the guise of sponsoring academic conferences, study tours, travel, or entertainment; it is strictly prohibited to reimburse commercial expenses related to medical institutions, doctors, pharmacists, public officials, or staff of other relevant parties;

it is strictly prohibited to give valuable items or gifts linked to drug sales volume during the promotion of drugs and medical devices; it is strictly prohibited to pay commercial bribes in disguised forms through third-party intermediaries, consulting firms, agents, etc., by "routing funds" or "laundering invoices".

3. **False advertising:** It is strictly prohibited to make any form of exaggeration, concealment, or false statement regarding drug information (such as the efficacy, safety, and indications of drugs); it is prohibited to publish false or exaggerated service and price information.
4. **Unfair and inequitable competition:** It is prohibited to compete for market share through unfair means (such as bribery, kickbacks, false comparisons, etc.); it is prohibited to disparage competitors, maliciously lower prices, or use other unfair means to strive for market share.
5. **Misleading consumers:** It is prohibited to mislead consumers through false advertising slogans or fabricated customer reviews.
6. **Concealing key information and falsifying data:** It is strictly prohibited to forge, tamper with, or conceal key information or data regarding the safety, health risks, and scope of application of products or services.
7. **Illegal collection and use of personal information:** It is prohibited to collect or disclose customers' personal information without their explicit consent.
8. **Violation of advertising regulations:** It is prohibited to violate the provisions of the *Advertising Law of the People's Republic of China*, the *Law on the Protection of Consumer Rights and Interests*, and other relevant regulations.
9. **Failure to avoid conflicts of interest:** It is strictly prohibited for marketing personnel to use their authority or the influence of their position to seek improper benefits for themselves or specific related persons; without approval, they must not hold shares or hold positions in external organisations that have business dealings with the Group, which may affect impartial marketing decisions.

Article 7 The Group requires that all marketing materials be reviewed and approved by the Marketing Department prior to publication. All materials, such as advertisements, brochures, electronic promotions, and social media content, must undergo strict compliance reviews to ensure the accuracy and compliance of the information.

Article 8 The Group conducts regular reviews and evaluations to ensure that all marketing behaviours comply with relevant laws and regulations, and are approved and recorded in accordance with Group policies.

Article 9 The Group encourages business associates to establish their own compliance systems and regularly audit their marketing behaviours to ensure that all marketing activities meet the standards of legality, fairness, and integrity.

Chapter 4: Reporting Mechanism and Protection

Article 10 The Group encourages personnel such as employees, customers, and suppliers to complain about and report any non-compliant behaviours of various units, departments, and employees of the Group.

- **Reporting telephone:** +86-18931872760
- **Reporting email:** cspcjb@cspc.cn
- **Reporting by post:** Supervisory and Security Department, CSPC Pharmaceutical Group, No. 896 Zhongshan East Road, High-tech Zone, Shijiazhuang City, Hebei Province
- **Postcode:** 050035

Article 11 The Group places the confidentiality of reporting as a top priority, accepts and handles non-compliant behaviours in accordance with relevant regulations, encourages real-name reporting, strictly keeps the personal information of the whistleblower and the content of the report confidential, sets access permissions for reporting information, and strictly prohibits any behaviour that leaks the whistleblower's information. Personnel responsible for violating confidentiality provisions will be dealt with severely and heavily; those whose actions constitute a crime will be handed over to judicial authorities for handling in accordance with the law.

Article 12 The Group prohibits any behaviour that threatens, intimidates, or retaliates against whistleblowers. Violators will be uniformly subjected to escalated processing, and when necessary, legal support and protection will be provided to the whistleblower.

Chapter 5: Accountability

Article 13 The Group maintains a "zero tolerance" policy towards any behaviour that violates this policy. Once discovered, based on the severity of the circumstances, the relevant responsible personnel will be held accountable in accordance with the Group's *Accountability Management System for Dereliction of Duty and Malfeasance* and the *Employee Reward and Punishment System*, and the management responsibility of their direct managers will be pursued simultaneously.

Article 14 If an employee's marketing behaviour is suspected of violating the law or committing a crime, the Group will report it to the relevant departments in accordance with legal procedures and assist the judicial authorities in handling the matter.

Chapter 6: Supplementary Provisions

Article 15 Matters not covered by this policy, or those in conflict with relevant laws and regulations, shall be executed in accordance with the relevant provisions of the respective laws and regulations.

Article 16 This policy shall be interpreted by the Compliance Department of the Group's Compliance Committee and shall come into effect on the date of review and approval by the Group's Board of Directors.