

Shanghai Fosun Pharmaceutical (Group) Co., Ltd. Regulations on Anti-Corruption

Article 1: The Regulations, based on the actual status of Shanghai Fosun Pharmaceutical (Group) Co., Ltd. (hereinafter referred to as the "Company"), are established to enhance the internal governance and control of the Company, effectively prevent and control the Company's corruption risks, crack down on corruption, and prevent the occurrences of actions that damage the interest of the Company and shareholders in accordance with the related laws and regulations.

Article 2: The purpose of the Company's anti-corruption tasks is to promote the value of integrity and ethical conducts, facilitate work and business with honesty, guide employees and stakeholders to strictly comply with the laws and regulations of the nation, regulate the performance of duties of employees, and ensure the healthy, stable, and sustainable development of the Company.

Article 3: The Board of Directors and management of the Company are responsible for establishing an anti-corruption culture in the Company as well as an internal control system that includes corruption prevention.

Article 4: All employees shall strictly comply with the laws and regulations of the nation, regulatory systems of the industry, and the Company's code of conduct, code of ethics, and anti-corruption regulations.

Article 5: The Regulations shall apply to the management of the Company's departments, platforms, and branches, as well as production, business, and management activities such as manufacturing, procurement, sales, and infrastructure. The Company's subsidiary companies shall comply with the Code or follow instructions contained herein.

Article 6: The acts of corruption referred to in the Regulations mean the Company's employees take the advantage of their positions to obtain or attempt to obtain unlawful interest for personal use, infringe the legal rights of the Company, abuse of powers, negligence, damage the interest of the Company, and other gross violations of honesty and good faith.

Article 7: The Company's employees shall be honest and disciplined, and they may not accept bribes from other by using their positions. They shall also strictly adhere to fair competition regulations, conduct businesses in good faith, and they may not bribe others for the purpose of obtaining unlawful interests. The following acts are prohibited:

(1) Requesting or illegally accepting others' properties or financial interests by means of official duties;

(2) Accepting others' properties or financial interests, or violating national laws or company regulations in accepting various kickbacks and facilitation fees in the performance of their duties;

(3) Providing counterparties with properties or financial interests in operating activities for the purpose of obtaining unlawful interests;

(4) Practicing bribery by using money, valuables or other means to sell or buy goods, or secretly paying or accepting kickbacks from the other party, be it an entity or individual, off the book;

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(5) Employees at medical institutions may not use their powers to request or illegally accept properties or financial interests from suppliers in the procurement activities of medical products such as medical equipment or medical sanitation materials;

(6) Requesting or illegally accepting properties or financial interest provided by bidders, contractors, or other related third parties in tendering or infrastructure engineering projects;

(7) Accepting invitations to meals or high-cost entertainment activities from customers, bidders, suppliers, or contractors in production, business, and management activities such as manufacturing, procurement, sales, and infrastructure that may affect the integrity of the duties;

(8) Other actions that affect the integrity of duties.

Article 8: The Company's employees shall perform their duties diligently and may not use their powers to illegally encroach or damage company interests. The following acts are prohibited:

(1) Taking possession of company properties illegally through misappropriation, theft, fraud, or other means;

(2) Misappropriating company funds for personal use or loans to others, or misappropriating company assets;

(3) using or making use of business entertainment expenses and administrative expenses for personal use against the regulations;

(4) Violating regulations by establishing hidden reserves and using them for personal profit;

(5) obtaining gifts used in business activities and public relations for personal use against related regulations .

(6) Colluding with others in providing fabricated documents or false information to obtain company funds.

(8) Abusing power or neglecting duties and causing damage to company interest;

(9) Other actions of misappropriation or causing damage to company interests.

Article 9: Employees shall remain honest and faithful and adhere to professional moral principles to carry out their duties to the Company faithfully. The following acts are prohibited:

(1) Conducting business activities that damage the Company's interest or investing or accepting dry shares in enterprises in the same business as the Company or related businesses;

(2) Obtaining interests for close relatives or specific related parties and damaging the Company's interest by making use of their powers;

(3) Employees may not conduct any business activities that may be in conflict with company interests without prior authorization;

(4) Violating loyal obligations to the Company and using powers to manipulate the Company into conducting illegitimate and unfair transactions with related parties and damaging company interests.

(5) Using official powers to obtain non-public information for purchasing or selling securities of the Company or other companies, or providing such non-public information to others;

(6) Conducting personal businesses during office hours or making use of the Company's facilities, equipment, or other assets in personal businesses; use of company resources such as business channels,

business information, trade secrets, and intellectual property rights obtained through the exercise of duties to conduct personal profit-seeking activities.

(7) Deliberately providing false or fabricated personal information that leads to severe consequences;

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(8) Violating the Company's confidential regulations and information security management protocols, obtaining trade secrets illegally or leaking trade secrets and causing material damage or impact on the Company's interest;

(9) Other actions that severely violate the principle of good faith and work ethics.

Article 10: The Company's Anti-Corruption Supervision Department (ACSD) is responsible for the implementation, supervision, and management of anti-corruption. It answers to the Company's Board of Directors and operates under its leadership. The ACSD adopts a policy for taking punitive and preventive measures with an emphasis on prevention, and collaborates with the Company's Audit Department and Human Resources Department to create and maintain an ethical corporate culture and promote the Company's compliance system.

Article 11: Duties of the Anti-Corruption Supervision Department:

- (1) Anti-corruption education;
- (2) Providing anti-corruption consultation and compliance recommendations;
- (3) Accepting and investigating complaints and reports;
- (4) Supervision and inspections (daily supervision and special inspections);

Article 12: The Company guarantees the availability of the report mailbox, telephone hot line, and email. The Anti-Corruption Supervision Department shall keep the informant and the contents of reports strictly confidential. The Company encourages employees and companies or individuals who conduct business with the Company to include their names in reports. Once the content of the report has been verified, the Company shall reward the informant appropriately in accordance with related regulations.

Article 13: Reprisals against informants and witnesses are strictly forbidden. Reprisals against informants or related witnesses shall be punished in accordance with related regulations (including but not limited to dismissal and termination of the employment contract). Serious violations with legal ramifications shall be transferred to judicial units for processing according to various laws.

Article 14: After accepting a report, the ACSD shall evaluate the evidence provided in the report and conduct investigations on evidence that meet investigation requirements in accordance with related regulations.

Article 15: The Company's employees, related units and departments shall actively cooperate with the ACSD in interviews for its investigation and supervision duties and they shall be obligated to provide truthful and complete testimonies as well as related information. Individuals who provide false evidence, obstruct investigations, inspections, conceal or destroy evidence, refuse to provide related information or do not comply with investigations or inspections shall be punished by the Company in accordance with the circumstances.



Article 16: Upon the termination of investigations or inspections, the ACSD shall formulate an investigation report and provide recommendations for punishing the violator in accordance with conditions. The ACSD shall provide recommendations to the unit or department where the incident occurred or assist it in making improvements and adopting remedial measures. The Company's Human Resources Department shall provide the informant with moral and material rewards in accordance with related regulations of the Company; Appropriate punishment shall be imposed on violators (including but not limited to dismissal and termination of the employment contract). Serious violations involving criminal offenses shall be transferred to judicial units for processing.

Article 17: The Board of Directors of the Company shall authorize the Company's management to establish implementation procedures and related institutions.

Article 18: The Regulations shall be interpreted by the Company's Anti-Corruption - Supervision Department.

Article 19: The Policy shall be effective from the date of its approval by the Board of Director