

## PharmaBlock Sciences (Nanjing), Inc. Anti-Corruption and Anti-Bribery Policy

### Purpose

In order to strengthen the internal governance of PharmaBlock Sciences (Nanjing), Inc. (hereinafter referred to as “PharmaBlock”, “the Company” or “We”), effectively prevent and control the risks of corruption and bribery, promote the Company's integrity and clean operation, standardize the business ethics of employees, and ensure the Company's healthy, stable, and sustainable development.

### Applicable Scope

This Policy applies to PharmaBlock and its subsidiaries and affiliates worldwide, covering aspects such as production and operation, products and services, as well as new construction, renovation, and expansion projects.

### Definition

Corruption and bribery refer to the act of individuals, either internally or externally to the Company, engaging in improper competitive behavior by directly or indirectly providing, promising, paying, demanding, or accepting cash, valuables, or other benefits under the pretext of rebates, promotional fees, advertising fees, labor fees, reimbursement of various expenses, or provision of domestic and international travel, with the purpose of obtaining business opportunities. It also includes actions that involve concealment, deception, or other illegal and non-compliant means to seek personal improper benefits at the expense of the Company's legitimate economic interests. Additionally, it encompasses actions that seek improper corporate economic benefits, which may also result in improper benefits for oneself or others.

Bribery and corruption activities include actions that either damage the Company's legitimate economic interests or seek improper corporate economic benefits.

### Our Management Principle

Anti-corruption and anti-bribery are important guidelines for the Company to conduct business in an orderly and compliant manner. PharmaBlock is committed to building a relationship of integrity, fairness, and mutual respect with all stakeholders, promoting a value system of honesty and integrity, and strictly prohibiting any form of corruption and bribery.

In order to fulfill our commitment, PharmaBlock adheres to the following principles:

- Strictly comply with all applicable international conventions and the anti-corruption and anti-bribery laws and regulations of the countries and regions where we operate.
- Prohibit political donations and improper charitable donations in the global operations.
- Do not offer or promise any valuables to government officials to influence official actions or obtain improper benefits.

# PharmaBlock

- Zero tolerance for any acts of corruption and bribery that violate laws, regulations, and Company policies.
- Establish a comprehensive risk management and internal control system to assess the risks of bribery and corruption in business processes.
- Develop effective action plans to maintain the internal control system and prevent the occurrence of corruption and bribery.
- Actively carry out anti-corruption and anti-bribery training for employees, enhance the integrity awareness of all employees, and promote adherence to professional ethics among employees.
- Foster a culture of integrity, encourage employees and business partners to conduct business with integrity and transparency, and ensure that the Company's operations are fair and just.
- Establish a mechanism for integrity supervision and investigation, encourage employees to report acts of corruption and bribery, conduct integrity investigations, and formulate corrective and preventive measures.
- Supervise suppliers to ensure they adhere to the Company's high ethical standards, and conduct anti-corruption and anti-bribery due diligence on them if necessary to ensure compliance with the Supplier Code of Conduct.

## Employee Responsibilities

Employees shall maintain integrity and self-discipline in their business activities, strictly adhere to the principles of fairness and justice, and must not accept bribes from others, nor offer bribes to others for personal gain. The following behaviors are strictly prohibited:

- Soliciting or accepting any bribes, kickbacks, or improper compensation through one's position.
- Offering bribes to suppliers, clients, or other third parties in order to seek improper benefits.
- Engaging in commercial bribery by secretly giving or receiving bribes to or from the other party's organization or individuals in business activities such as bidding, procurement, or sales.
- Engaging in fraud in bidding or construction projects, and soliciting or illegally accepting property or property-related benefits from bidders, contractors, or other stakeholders.
- Violating Company policies by providing, soliciting, or accepting gifts and donations from business-related parties (such as suppliers, customers, or other third parties) that exceed normal business practices.
- Other behaviors that may affect the integrity of one's position.

Employees shall protect the Company's assets and safeguard its interests. It is strictly forbidden to engage in any actions that encroach upon or harm the Company's interests. The following actions are strictly prohibited:

- Illegally occupying, stealing, defrauding, or other means to use the Company's assets.
- Unauthorized misappropriation, sale, rental, or mortgaging of the Company's assets to others or individuals without the Company's permission.

# PharmaBlock

- Exploiting loopholes and defects in e-commerce technology to harm the Company's interests.
- Violating the Company's regulations by using public funds for private purposes, or using Company assets (such as issued electronic devices, transportation vehicles, etc.) for personal use.
- Deliberately misleading or inducing, falsely reporting transactions, or providing false information to defraud the Company's funds or cause the Company to incur debts.
- Violating Company regulations by appropriating gifts from business and foreign affairs activities as one's own.
- Negligence or abuse of authority, causing damage to the Company's interests.
- Other illegal acts of encroachment or damage to the Company's interests.

Employees shall adhere to professional ethics, maintain honesty and trustworthiness, and must not seek personal benefit for any illegal or improper purposes. The following actions are strictly prohibited:

- Engaging in business activities that harm the Company's interests, giving or receiving shares or dividends related to or in the same type business as the Company.
- Using one's position for the benefit of immediate relatives or others, thereby damaging the Company's interests.  
Without pre-consent, using the Company's resources to participate in the operation of affiliated enterprises or competitive enterprises, or engaging in profit-making activities related to the Company's business and paid intermediary activities privately.
- Colluding with external partners to use one's position for transferring benefits, engaging in improper and unfair related transactions, and harming the Company's interests.
- Trading in the Company's or other companies' stocks, securities, or derivative financial products using inside information obtained through one's position, or leaking such information to others.
- Exploiting one's position to use the Company's resources (such as intellectual property, trade secrets, business channels, etc.) for personal benefit.
- Intentionally concealing or altering financial records and contract documents to conceal corrupt activities.
- Violating the Company's confidentiality requirements, infringing upon or disclosing the Company's business or technical secrets, resulting in significant losses to the Company.  
Other acts that violate integrity or professional ethics.

## Stakeholder Responsibilities

Suppliers, clients, or other third parties shall adhere to the following principles when conducting business with PharmaBlock:

- Comply with all applicable laws, regulations, and the Company's policy requirements.
- Refrain from offering bribes to our employees or their immediate family members in any form.
- Do not engage in bribery with any government officials or personnel from other relevant entities.
- Encourage business stakeholders to report promptly any acts of bribery, solicitation, or acceptance of bribes by our Company's employees.

## Reporting and Investigation

Company employees are obliged to report any violations of this Policy, and encourage third parties with business relations to actively report. We strictly keep confidential the whistleblower's identity and the report content, and strictly prohibits any form of retaliation against the reporter. Individuals who retaliate against whistleblowers will be subject to demotion and may even have their employment contracts terminated. If such actions violate the law, they will be handed over to judicial authorities for legal action.

The Company ensures the availability of reporting channels such as the whistleblower hotline and email address. Employees or stakeholders can report through the following published channels:

- Global Reporting Email: [PB-IA@PharmaBlock.com](mailto:PB-IA@PharmaBlock.com)
- Global Reporting Phone: +86 025 86918269/+86 025 85930027

The supervisory department shall promptly accept reported leads and initiate an investigation. The departments and individuals involved should actively cooperate and must not provide false information, conceal or destroy evidence, or any other actions that would obstruct the investigation. If the reported misconduct is confirmed, the Company will take timely corrective actions to resolve the issue. These measures include, but are not limited to, clarifying Company policies, providing additional training, disciplinary action, and may extend to termination of employment. If the misconduct violates the law and the circumstances are severe, legal responsibility will also be pursued.

## Our Governance

PharmaBlock has established a robust ESG (Environmental, Social, and Governance) management framework. Within this framework, the ESG Executive Committee serves as the leading body for anti-corruption and anti-bribery efforts, providing guidance and oversight on the Company's anti-corruption and anti-bribery initiatives, the Internal Audit Department is responsible for the development, promotion, and supervision of this Policy.

The Company's management team is committed to leading by example and adhering to the Company's various systems and procedures through concrete actions. In daily operations, the head of each department is the primary person responsible for the management of corruption and bribery risks, tasked with identifying potential corruption issues in business activities.

This Policy is reviewed and approved by the Company's ESG Executive Committee to ensure consistency with our anti-corruption and anti-bribery strategy. Additionally, our Company has established an internal anti-corruption and anti-bribery management system to ensure the implementation of this Policy.

## Supplementary Provisions

This Policy is formulated and revised by the Company's ESG Executive Committee. It takes effect from December 2023.