

**PharmaBlock Sciences (Nanjing), Inc.
Supplier Code of Conduct**



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General Provision

Purpose

This <Code of Conduct> is designed to standardize the conduct of suppliers, manufacturers, contractors, service providers, and other essential business partners (hereinafter referred to as "Suppliers") of PharmaBlock Sciences (Nanjing), Inc. (hereinafter referred to as "PharmaBlock," "the Company," "We"), and uphold high standards of business ethical practices to promote sustainable development throughout the supply chain.

Application

This <Supplier Code of Conduct> (hereinafter referred to as "this Code") applies to suppliers of PharmaBlock and its subsidiaries and affiliated companies worldwide, covering raw material production, contract manufacturing, marketing and distribution, as well as other general technical services.

Our Expectations

We expect our suppliers to conduct their business in compliance with all applicable national and regional laws and regulations, as well as internationally recognized ethical standards, including but not limited to business ethics, labor and human rights, occupational health and safety, and environmental protection.

We expect our suppliers to adhere to our <Supplier Code of Conduct> or adopt their own codes which include expectations similar to ours, and actively seek to collaborate with those who share and strive for the same commitments to high ethical standards.

PharmaBlock will assess suppliers' compliance with the Code through questionnaires, document reviews, or onsite audits. If it is determined that a supplier fails to meet our expectations, we will take appropriate actions, including necessary corrective measures or termination of the business relationship.

Business Ethics

Anti-Corruption and Anti-Bribery

Suppliers must not, directly or indirectly, offer, provide, or promise any valuable consideration to secure or maintain business benefits. Furthermore, they must not solicit or accept any bribes, kickbacks, or other improper forms of compensation.

Fair Competition and Antitrust

Suppliers shall adhere to applicable antitrust and competition laws, ensuring fair competition and conducting all business activities with integrity. They shall refrain from concealing information, making misleading statements, exaggerating claims, engaging in price fixing, allocating markets or customers, segmenting markets, or colluding with competitors in bidding processes or any other activities that compromise fair competition.

Conflict of Interest

Suppliers are obligated to avoid and promptly disclose any actions or information that may constitute a conflict of interest affecting business relations, including those involving PharmaBlock and its subsidiaries and affiliated companies worldwide. If there is any possible conflict of interest related to PharmaBlock, please report it to us immediately via PharmaBlock's open reporting channels.

Trade Compliance

Suppliers shall adhere to all applicable laws and regulations, international trade laws, and sanctions, including but not limited to export controls, import controls, economic sanctions, and anti-money laundering requirements.

Information Security and Intellectual Property Protection

The Supplier shall protect all business secrets and intellectual property, including those to PharmaBlock and its partners. Suppliers shall responsibly handle information and data and strictly adhere to laws and regulations related to information security and privacy protection. They shall take the necessary protective measures to ensure that all relevant stakeholders' privacy, intellectual property, and business secrets are effectively protected and used only for legitimate purposes.

In the event of any suspected loss, damage, or unauthorized access to business secrets or intellectual property, suppliers shall immediately report such incidents to PharmaBlock.

Anti-money Laundering and Counter-Financing of Terrorism

Suppliers shall strictly adhere to all applicable national and international anti-money laundering laws and regulations, and shall not engage, either directly or indirectly, in money laundering or the financing of terrorism.

Product Quality and Service

Suppliers shall ensure that the products or services they provide comply with all applicable laws and regulations, adhere to good practices, meet our quality standards, and are delivered on time.

Accuracy of Financial Records

Suppliers are required to maintain the accuracy, authenticity, and completeness of all financial records in compliance with legal and regulatory requirements, and to preserve these records properly to ensure that they consistently provide a clear, transparent, and timely reflection of the Company's operational status.

Responsible Procurement

Suppliers should take appropriate measures to avoid using raw materials sourced from conflict-affected and high-risk areas in their products, in order to avoid human rights violations, corruption, financing of armed organizations, or other similar negative impacts.

Labor and Human Rights

Non-discrimination and Fair Treatment

Suppliers shall adhere to applicable laws and regulations and ensure a work environment that is free from discrimination and harassment. Discrimination, harassment, or bullying based on race, religion, skin color, gender, sexual orientation and gender identity, marital status, pregnancy, medical condition, nationality, disability, age, or any other legally protected characteristics shall not occur in the workplace.

Suppliers shall provide fair and equal opportunities for all employees and job applicants in every aspect of their business, including recruitment, promotions, training, and salary allocation.

Freely Chosen Employment

Suppliers shall adhere to all applicable laws, regulations, and standards related to human rights, as well as uphold and support internationally recognized human rights. They shall not engage in or participate in any human rights abuses:

- No engagement or promotion of slavery, servitude, forced labor, or human trafficking is permitted.
- No forced, bonded, or indentured labor and involuntary prison labor shall be used.
- Physical abuse must not be used as a form of punishment.

PharmaBlock is committed to actively working to eradicate any unethical labor practices that may arise within our supply chain.

Child and Young Workers Protection

Suppliers shall strictly adhere to national laws and regulations, and are strictly prohibited from employing child labor. Employment of young workers under the age of 18 is restricted to non-hazardous tasks and is only permissible if the workers are above the legal working age or have completed compulsory education as defined by national law.

Suppliers shall also conduct thorough due diligence on their subcontractors, suppliers, and other participants in the supply chain to prevent human rights abuses. In their supply chain. Should suppliers become aware of any actual or potential human rights violations within their operations, they must immediately inform PharmaBlock.

Employee Welfare

Suppliers shall adhere to all applicable laws, regulations, and standards related to wages, working hours, and benefits. They must ensure that employees are compensated according to these laws, which include provisions for minimum wages, overtime compensation, and other benefits, and must also ensure timely communication with employees regarding policies related to their welfare benefits.

Furthermore, suppliers shall provide employees with appropriate rest and recuperation periods, ensuring that working hours shall not exceed the legal maximum allowed.

Freedom of Association

Suppliers should respect and protect the rights of employees to freedom of association, supporting their ability to freely organize, join, or opt out of any association, union, or other organization by local laws and regulations, for the purpose of seeking representation and engaging in collective bargaining.

Employees shall be able to collectively bargain for improved working conditions, better compensation, and enhanced benefits without facing any form of retaliation or threat. Suppliers shall treat all employees and union members with equal regard.

Environmental, Health and Safety

Workplace Health and Safety

Suppliers shall adhere to all applicable occupational health and safety laws and regulations, and provide the necessary safety measures to prevent and mitigate accidents, ensuring the health and safety of all employees in the workplaces. Suppliers shall also establish a comprehensive occupational health and safety management system and provide necessary training to their employees.

Hazard Information

Suppliers shall gather safety information on hazardous substances (including APIs, intermediates, etc.) and promptly disseminate this information to their employees.

Environmental Protection

Suppliers shall comply with all applicable environmental laws and regulations to minimize the environmental impact of their daily operations and maintain the environmental health of the community. Suppliers shall follow the following principles:

- Comply with national and local applicable regulations related to environmental protection and operate in compliance.
- Establish a continuously improved environmental management system to constantly enhance performance.
- Encourage the implementation of waste reduction measures, aiming to minimize the generation of wastewater, exhaust gases, and solid waste during operations through the use of clean raw materials and improved process technologies while promoting the resourceful recycling of waste products.
- Strive to implement highly efficient operational practices, optimizing the utilization efficiency of both energy and water resources, with the objective of mitigating the environmental impact.

Emergency Response

Suppliers shall identify and assess potential emergencies that may arise in the workplace, establish appropriate emergency response mechanisms, and ensure they are equipped with the necessary emergency facilities and suppliers as mandated by regulations.

PharmaBlock

Suppliers shall also develop comprehensive emergency response plans and on-site disposal schemes, and enhance the company's emergency response capabilities through targeted training, education, and regular drills.

Management System

Supplier Commitment

Suppliers are required to demonstrate their commitment to this Code by appropriately allocating resources and taking necessary measures to ensure that their secondary suppliers also adhere to this Code.

Record

Suppliers shall comply with all applicable laws, regulations and the requirements of this Code, and shall retain relevant supporting documentation and records.

Training and Capacity

Suppliers are required to provide training and education to all their employees to enhance their skills and competencies, communicate the requirements of this Code, and ensure compliance with applicable laws, regulations, and PharmaBlock's Policies.

Continuous Improvement

Suppliers shall establish performance indicators, regularly conduct monitoring inspections and reviews, and develop and implement corrective action plans for any issues identified, in order to continuously improve.

Business Continuity

Suppliers shall develop and implement a business continuity plan tailored to PharmaBlock's operations. They shall immediately notify PharmaBlock of any situations that could potentially disrupt business or affect PharmaBlock's operations.

Reporting Channels

Suppliers shall establish an internal reporting process to encourage their employees to report any potentially illegal, unethical, non-compliant, or violations of this Code, and shall also set up a whistleblower protection mechanism to ensure employees are free from retaliation or harassment.

We expect and encourage suppliers to proactively report any potentially illegal, unethical, or non-compliant behavior involving PharmaBlock's employees or other suppliers. The reporting channels are as follows:

- Global Reporting Email: PB-IA@PharmaBlock.com
- Global Reporting Phone: +86 025 86918269 / +86 025 85930027

Supplemental Provisions

This Code s drafted and revised by the Company's ESG Executive Committee and released in January 2024.