FOSUN PHARMA
复星医药

Shanghai Fosun Pharmaceutical (Group) Co., Ltd.

Anti-Corruption Regulations (2026 Revision)

Fosun Pharma
April 2, 2026

Shanghai Fosun Pharmaceutical (Group) Co., Ltd.

Anti-Corruption Regulations

Chapter I Purpose and Objectives

Article 1 These Regulations are formulated in accordance with relevant laws, regulations, requirements and provisions, and in light of the Company's actual circumstances, with a view to strengthening the management of business ethics, enhancing internal governance and control, preventing corruption risks, combating corrupt acts, and safeguarding the interests of the Company and its shareholders.

Article 2 The objectives of the Company's anti-corruption efforts are to promote integrity and ethical values, facilitate honest performance of duties and honest business operations, guide employees and stakeholders to strictly abide by national laws and regulations, regulate employees' official conduct, strengthen the management of the Company's business ethics, and ensure the healthy, stable and sustainable development of the Company.

Article 3 The Board of Directors and management of the Company shall be responsible for establishing and upholding an anti-corruption corporate culture, and for building and improving an anti-corruption compliance system encompassing both prevention and deterrence of corrupt acts.

Article 4 All employees shall strictly comply with national laws and regulations, industry norms, as well as the Company's Code of Conduct, Code of Ethics and anti-corruption rules.

Chapter II Scope of Application

Article 5 These Regulations shall apply to all departments, business divisions, and wholly-owned subsidiaries of the Company. Equity investees of the Company shall comply with These Regulations or implement them with reference hereto.

Chapter III Basic Principles

Article 6 Anti-corruption work shall adhere to the principles of *combining punishment with prevention, prioritizing prevention, addressing both symptoms and root causes, and pursuing comprehensive governance.* It shall employ a holistic approach integrating ex-ante prevention, in-process control, and ex-post investigation to establish robust mechanisms that make corruption *impossible, unaffordable, and unthinkable*, thereby effectively preventing and eliminating corruption risks.

Chapter IV Definition of Corrupt Acts

Article 7 For the purposes of These Regulations, "corrupt acts" refer to acts by Company employees in the course of daily business operations and management activities, including but not limited to: offering bribes to others to seek improper benefits; taking advantage of their positions to obtain or attempt to obtain improper personal gains; infringing upon the Company's lawful rights and interests; abusing power; dereliction of duty; causing damage to the Company's interests; and other serious violations of good faith.

Article 8 Company employees shall maintain integrity and self-discipline, and shall not accept bribes from others by taking advantage of their positions. They shall strictly observe fair competition rules, conduct business in good faith, and shall not offer bribes to others to seek improper benefits. The following acts are prohibited:

(1) Demanding or illegally accepting improper benefits from others by taking advantage of one's position;

(2) In the performance of duties, violating national laws and regulations or Company rules to accept rebates, handling fees, consulting fees or other benefits in any form;

(3) In business activities, providing improper benefits to counterparties or their specific related parties to seek improper benefits;

(4) Employees at medical institutions, in the procurement of pharmaceutical products such as medicines, medical devices, and medical hygiene materials, taking advantage of

their positions to demand or illegally accept improper benefits from suppliers;

(5) In tendering, bidding or infrastructure projects, practicing favoritism and malpractice, demanding or illegally accepting improper benefits from bidders, contractors or other interested third parties;

(6) In production, procurement, sales, infrastructure and other production and operation management activities, accepting invitations to high-end banquets or other high-consumption entertainment activities from customers, bidders, suppliers, or contractors that may affect the integrity of their duties;

(7) Other acts of taking advantage of one’s position to seek private gains or affecting the integrity of duties.

Article 9 Company employees shall perform their duties diligently and safeguard the Company’s interests. They shall not take advantage of their positions to illegally encroach upon or damage the Company’s interests. The following acts are prohibited:

(1) Illegally taking possession of Company property through misappropriation, theft, fraud or other means;

(2) Misappropriating Company funds for personal use or lending to others, or misappropriating Company assets;

(3) Violating regulations by using or exploiting business entertainment expenses or administrative expenses for personal gain, or misusing public funds for private purposes;

(4) Violating regulations by setting up or distributing “off-the-books” accounts or “slush funds”;

(5) Violating regulations by retaining for personal use gifts received in the course of business activities;

(6) Colluding with others to provide fabricated documents or false information to defraud Company funds;

(7) Abusing power or neglecting duties, thereby causing losses to the Company's interests;

(8) Other acts of illegally encroaching upon or damaging the Company's interests.

Article 10 Company employees shall remain honest and faithful, adhere to professional ethics, and fulfill their fiduciary duties to the Company. They shall not engage in business activities that damage the Company's interests. The following acts are prohibited:

(1) Without the Company's written consent, holding shares in one's own name or in the name of a specific related party in any enterprise (non-listed) engaged in the same or related business as the Company;

(2) Taking advantage of one's position to operate, for oneself or for others, a business identical to that of the Company, thereby obtaining illegal gains;

(3) Taking advantage of one's position to assign profitable business of the Company to one's relatives or friends for operation; purchasing commodities from entities managed by one's relatives or friends at prices significantly higher than market rates; selling commodities to entities managed by one's relatives or friends at prices significantly lower than market rates; or procuring substandard commodities from entities managed by one's relatives or friends;

(4) Engaging in any business activities that may cause a conflict of interest without prior written approval;

(5) Violating fiduciary duties to the Company by taking advantage of one's position to manipulate the Company into conducting improper or unfair connected transactions, thereby damaging the Company's interests;

(6) Using non-public information obtained through one's position to purchase or sell securities of the Company or other companies, or disclosing such non-public

information to others;

(7) Conducting private business during working hours, or using Company facilities, equipment or other assets/resources for private business purposes;

(8) Using the Company's business channels, operational information, trade secrets, intellectual property rights or other resources obtained through the performance of duties to engage in profit-seeking activities for personal gain;

(9) Intentionally providing false or forged personal information and relevant materials, causing serious consequences;

(10) Violating the Company's confidentiality regulations and information security management protocols, leaking Company secrets or internal information, causing severe adverse impact; or obtaining, disclosing, using, or permitting others to use the Company's trade secrets by improper means, thereby damaging or potentially damaging the Company's interests;

(11) Without the Company's written approval, engaging in outside part-time work or receiving remuneration therefrom in violation of regulations;

(12) Other acts that seriously violate good faith and professional ethics.

Chapter V Division of Responsibilities

Article 11 To ensure fair and impartial handling of disciplinary violations, the Company establishes a Discipline Committee, composed of relevant Directors and senior management of the Company. The Discipline Committee is responsible for adjudicating on the determination of employee misconduct and imposing penalties, as well as pursuing the leadership and management responsibilities of relevant managers. The Discipline Committee shall have a secretariat to handle its daily affairs.

Article 12 The Company's Integrity Supervision Department (hereinafter referred to as the "Integrity Supervision Department") is the department responsible for the implementation, supervision and management of anti-corruption work. It reports to the Company's Board of Directors and operates under its leadership. Adhering to the working principle of "combining punishment with prevention, prioritizing prevention", it collaborates with the Company's Human Resources Department, Audit Department, Legal Department, Board Secretary Office and other relevant departments to jointly foster and maintain a clean corporate culture, promote the management of business ethics, and advance the Company's anti-corruption compliance framework.

Article 13 The duties of the Integrity Supervision Department include:

(1) Anti-corruption publicity, education and training;

(2) Providing anti-corruption consultations and compliance advice;

(3) Accepting and investigating complaints and whistleblowing leads;

(4) Supervision and inspection (daily supervision and special inspections).

Chapter VI Integrity Education

Article 14 The Company shall regularly conduct diverse forms of integrity and warning education, continuously carry out anti-corruption publicity and training, promote integrity values, strengthen integrity awareness, guide employees to perform their duties with integrity and engage in business with good faith, thereby fostering and maintaining a clean corporate culture.

Chapter VII Whistleblowing Mechanism and Protection of Whistleblowers and Witnesses

Article 15 The Company shall ensure the accessibility of whistleblowing channels including report mailboxes, hotlines, email addresses, official websites, and official WeChat public accounts, and encourages employees and stakeholders (entities or individuals) to submit real-name reports. The Integrity Supervision Department shall keep the identity of whistleblowers and the content of reports strictly confidential. Once the reported content is verified, the Company shall reward eligible real-name whistleblowers in accordance with relevant regulations.

Article 16 Retaliation against whistleblowers and witnesses is strictly prohibited. Any act of retaliating against whistleblowers or relevant witnesses shall be subject to corresponding disciplinary sanctions in accordance with relevant regulations; if the circumstances are serious and constitute a criminal offense, the case shall be transferred to judicial authorities for legal processing.

Chapter VIII Handling of Leads, Investigation and Disposition

Article 17 The Integrity Supervision Department shall, in accordance with the whistleblowing management regulations, accept, evaluate and review whistleblowing leads. For leads meeting the conditions for filing a case, it shall initiate investigations in accordance with relevant regulations.

Article 18 When the Integrity Supervision Department exercises its authority for case investigation, supervision and inspection, interviewed employees or relevant units/departments shall actively cooperate and are obliged to provide truthful and complete testimony and relevant information. Any person who intentionally conceals facts, gives false testimony, obstructs investigations or inspections, conceals or destroys evidence, colludes to confabulate, forms defensive alliances, threatens or retaliates against whistleblowers or relevant witnesses, falsely accuses or frames others, refuses to provide relevant information, or fails to cooperate with investigations or inspections, shall be subject to corresponding disciplinary sanctions by the Company in accordance with relevant regulations based on the circumstances.

Article 19 Upon conclusion of a review or investigation, the Integrity Supervision Department shall issue a review or investigation report and, depending on the circumstances, put forward penalty recommendations for violators. If the circumstances are serious and constitute a criminal offense, the case shall be transferred to judicial authorities for processing. Where necessary, the Integrity Supervision Department shall issue Integrity Supervision Recommendations to the unit or department where the incident occurred, assisting them in implementing rectifications and remedial measures. The Company's Human Resources Department shall, based on the investigation results and in accordance with relevant Company regulations, grant moral and material rewards to eligible whistleblowers, and impose corresponding disciplinary sanctions on violators (including but not limited to removal from office and termination of employment contracts).

Chapter IX Supplementary Provisions

Article 20 For the purposes of These Regulations, “improper benefits” include improper material benefits (money, physical goods or other property interests) and improper non-material benefits (non-property interests not calculable in monetary terms).

For the purposes of These Regulations, “specific related parties” refer to persons who have close kinship relations, illicit sexual relationships (e.g., mistresses/lovers), or other common interest relationships with the concerned party.

Article 21 The Board of Directors of the Company shall authorize the management to formulate detailed implementation rules and supporting systems for These Regulations as appropriate.

Article 22 These Regulations shall be interpreted by the Company’s Integrity Supervision Department.

Article 23 These Regulations shall become effective on the date of its approval by the Board of Directors. The same shall apply to revisions hereof. The original *Shanghai Fosun Pharmaceutical (Group) Co., Ltd. Anti-Corruption Policy*(Fosun Pharma [2016] No. 119) shall be repealed simultaneously.

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