

# **Sino Biopharmaceutical Limited**

## **Policy for Whistleblowing and Whistleblower Protection**

### **1. Purpose**

The purpose of the policy is to clarify Sino Biopharmaceutical Limited together with its subsidiaries (hereinafter referred to as "Sino Biopharmaceutical", "the Group") 's management and commitment to whistleblowing and whistleblower protection, and to promote the Group to operate in accordance with high standards of business ethics to protect the legitimate rights and interests of customers, employees and business partners from various sectors.

### **2. Applicability**

This policy applies to the Group and to persons acting on behalf of the Group, including directors, executives, and other employees (including full-time, part-time, and outsourced personnel), shareholders, and persons acting on behalf of the Group in an agent or fiduciary capacity (such as agents, consultants, and contractors, etc.), as well as to business partners of the Group, including suppliers and other partners and their employees, etc.

### **3. Scope of Complaint and Reporting**

According to the relevant rules and regulations of the Group, the scope of complaint and reporting includes but is not limited to the following behaviors:

- Bribing, soliciting or accepting property or improper benefits from others;
- Abuse of power or neglect of duty thereby harming the benefits of employees or the Group;
- All forms of discrimination, harassment and unequal treatment;
- Any illegal actions, or violation of the Group's ESG Rules that damages, or is likely to damage, the benefits of employees or the Group;
- Any suggestions for the improvement of the Group's management and operation.

### **4. Whistleblowing Handling Process**

#### **(1) Initiation**

- All employees of the Group and external partners can initiate a report through the Group's unified reporting channel. Employees of the Group can report to their immediate supervisors within the Group, or contact the Group's responsible departments of the relevant matters, including but not limited to the human resources department and the compliance department;
- The Group accepts reports from whistleblowers using their real names or anonymity.
- Report contents should be as specific and clear as possible, with corresponding evidence materials and witness information.

- Report contents should be based on true and objective facts. Malicious complaints are strictly prohibited.

## **(2) Acceptance and Feedback**

- All departments accepting whistleblowing shall register the whistleblowing received synchronously;
- If the complaint contents are not specific and clear, the accepting department may contact and guide the complainant to supplement the complaint contents and reflect the real situation;
- The accepting department shall conduct the investigation according to the relevant investigation procedures such as anti-corruption, anti-commercial bribery, and employee complaints;
- After the investigation, special personnel shall be responsible for giving feedback to the whistleblowers.

## **5. Protection of Whistleblowers**

(1) The legitimate rights and interests of any individual or unit that reports illegal or unethical behavior or violation of business ethics to the Group shall be protected by the Group.

(2) In addition to the judicial authorities, regulatory bodies and other competent authorities and in accordance with laws, regulations and guidelines should be disclosed, the identity of the whistleblower, reporting matters and reporting information should be kept confidential by the Group's responsible departments:

- Whistle-blowing tips are accepted and recorded by specialized personnel, and are strictly managed in accordance with the level of secrecy, and may not be viewed by other personnel without the approval of the person in charge of the department accepting the report;
- Relevant departments should ensure the integrity of the material, security and confidentiality. Completion of the reporting case, should be filed;
- Contact with the whistleblower in an appropriate way. The understanding and verifying of the case must be carried out without revealing the identity of the whistleblower.

(3) Other protective measures:

- The Group has no tolerance for retaliation. It is strictly prohibited to take various forms of retaliation against whistleblowers and witnesses, and strictly prohibited to infringe on the legitimate rights and interests of whistleblowers and witnesses. Once the relevant behavior is verified, the Group will be in accordance with the relevant provisions to call to account, and if a crime is constituted, it will be transferred to the judicial organs to investigate criminal responsibility according to law.
- A whistleblower or witness who is retaliated against due to truthful reporting or testimony may appeal to the responsible department of the Group, and after

verification, the responsible department will follow up according to the specific situation and take effective measures to protect the legitimate rights and interests of the whistleblower and witness in accordance with the law and regulations.

## **6. Whistleblowing Channel**

Report mailbox: [Sbox@sino-biopharm.com](mailto:Sbox@sino-biopharm.com)

## **7. Supplementary Provisions**

Anything not covered in this policy, or contrary to the relevant laws, regulations, or normative documents of the People's Republic of China, should be implemented in accordance with the relevant laws, regulations, or normative documents of the People's Republic of China.