## Whistleblowing Management Regulations of

# Shanghai Fosun Pharmaceutical (Group) Co., Ltd.

## Chapter I General Provisions

**Article 1** These Whistleblowing Management Regulations (hereinafter referred to as the "Regulations") are established in accordance with related national laws and the rules and regulations of Shanghai Fosun Pharmaceutical (Group) Co., Ltd. (hereinafter referred to as the "Group"), while taking into account the Group's actual status, so as to standardize the complaint and whistleblowing work, enhance the internal governance and internal controls of the Group, ensure the order and compliance in the Group's operating activities, and facilitate the ethical performance of employees' duties.

**Article 2** Whistleblowing is a legitimate right and important method for the Group's employees or external individuals to report and uncover illegal activities, and protect their own interests and the Group's interests. The Group shall keep the identities of whistleblowers and the content of whistleblowing strictly confidential and protect the interests of the whistleblower.

**Article 3** Whistleblowing may be conducted with real names, concealed names, or anonymously. A real name whistleblowing refers to a whistleblowing in which the whistleblower provides his/her true name and contact methods. A concealed name whistleblowing refers to a whistleblowing in which the whistleblower does not provide his/her true name but provides other information that can be used for identification or effective contact methods. An anonymous whistleblowing refers to a whistleblowing in which the whistleblowing refers to a whistleblower does not provide his/her true name but provides other information that can be used for identification or effective contact methods. An anonymous of provide his/her true name or other information that can be used for identification or effective contact methods.

**Article 4** The Group welcomes employees or external individuals to actively report through any effective methods in related channels. The Group shall process all whistleblowings appropriately in accordance with requirements of the Regulations. The Group encourages real name whistleblowing and will give priority to handling and replying to such whistleblowing.

**Article 5** The whistleblower shall report truthfully based on good motives and shall not deliberately fabricate facts, forge evidence, or falsely accuse and frame others. Otherwise, the whistleblower shall bear corresponding legal liabilities.

## Chapter II Whistleblowing Scope and Management

**Article 6** According to relevant rules and regulations of the Group, the scope of whistleblowing includes but is not limited to the following acts:

- 1. Taking advantage of one's position to solicit or accept properties or improper benefits from others;
- 2. Offering bribes to others for the purpose of obtaining improper benefits;
- 3. Unlawful occupation or misappropriation of the Group's funds or assets;
- 4. Abuse of power or negligence of duty which leads to damage to the Group's interests;
- 5. Violating the duty of loyalty to the Group and harming the Group's interests;
- 6. Other unlawful or irregular acts that damage or may potentially damage the Group's interests.

**Article 7** The Anti-Corruption Supervision Department (hereinafter referred to as the "ACSD") is the department in charge of whistleblowing, and it is responsible for:

- 1. Accepting, managing, assessing, transferring and investigating whistleblowing clues;
- 2. Replying to, protecting, and rewarding the whistleblowers;
- 3. Publicizing whistleblowing.

**Article 8** The ACSD shall adopt diversified forms for whistleblowing, and make full use of various media and technologies, expand whistleblowing channels and carry out whistleblowing publicity.

**Article 9** The ACSD shall enhance the establishment and improvement of the whistleblowing information system, standardize whistleblowing procedures, and designate specific personnel to record key details, including the basic information of the whistleblowers and the accused, the main whistleblowing content, and the implementation status, etc., into the database, so as to improve work efficiency and management standards for whistleblowing.

#### Chapter III Acceptance of Whistleblowing

**Article 10** The ACSD accepts whistleblowing and the surrender of persons who have committed illegal or disciplinary violations.

Article 11 The ACSD shall publicize whistleblowing channels to employees

and external individuals and guarantee the availability of whistleblowing channels. Whistleblowers can report through the following channels:

- 1. Telephone whistleblowing: (86) 021-33987226
- 2. Email whistleblowing:lianzhengdc@fosunpharma.com
- 3. Website whistleblowing: www.fosunpharma.com
- 4. WeChat official account whistleblowing: FOSUN PHARMA
- Letter whistleblowing: Anti-Corruption Supervision Department, Building A, 1289 Yishan Road, Xuhui District, Shanghai, China, Postal Code:200233
- 6. On-site whistleblowing: Anti-Corruption Supervision Department, Building A, 1289 Yishan Road, Xuhui District, Shanghai, China

**Article 12** For whistleblowing by telephone, the staff at the ACSD shall accurately and completely record the name, address and telephone number of the whistleblower and the contents of whistleblowing. If conditions permit, the call content can be recorded. The staff shall respect the whistleblower's will if he/she does not wish to provide personal information such as his/her name or name of the entity. However, the staff shall recommend the whistleblower to provide contact methods for communication and feedback.

**Article 13** For whistleblowing through online channels such as email, the Group's official website or the Group's WeChat official account, the staff at the ACSD shall promptly download or take screenshots of the whistleblowing content and complete the acceptance registration. The whistleblowing contents shall remain in their original state without any processing on wording.

**Article 14** For whistleblowing by letter, the staff at the ACSD shall complete the acceptance registration and maintain appropriate records, and ensure the integrity of the material in the envelops while keeping the information such as postage stamps, postmarks, post codes and addresses clear and complete.

**Article 15** For on-site whistleblowing and the surrender of persons who have committed illegal or disciplinary violations, the ACSD shall assign over two staff members for reception, make detailed inquiries, and make written records. After verification, the whistleblower or the surrendering person shall sign the records. Where necessary and with the consent of the whistleblower, the inquiry process may be recorded or videotaped. The related evidence, materials, and objects provided by the whistleblower or the surrendering person shall be registered. An acceptance list shall be formulated and signed by the whistleblower or the surrendering person. If necessary, they shall be photographed and properly kept.

Under special circumstances where the whistleblower requests an interview at a place outside the ACSD, upon the approval of the person in charge of the

ACSD, the ACSD may assign over two staff members to the place proposed by the whistleblower to accept the whistleblowing.

**Article 16** When whistleblowing illegal and irregular facts, the whistleblower shall provide supporting evidence materials (including but not limited to documentary evidence, physical evidence, witness testimonies, audio-visual materials etc.) or other clues that can prove the illegal and irregular facts.

For a whistleblowing conducted by over three individuals, the whistleblowers should be advised to elect a representative.

**Article 17** If the whistleblowing with real name or concealed name lacks of enough or detailed information, the whistleblower should be advised to supplement information or related materials.

#### Chapter IV Assessment of Whistleblowing

**Article 18** After receiving whistleblowing clues, the ACSD shall conduct a prompt assessment and process the whistleblowing in a timely manner in accordance with the specific conditions of the whistleblowing and jurisdiction regulations.

**Article 19** Multiple whistleblowing clues reporting the same illegal or irregular act or the same target can be handled together in a combined case.

**Article 20** Whistleblowing clues that do not fall under the jurisdiction of the ACSD may be transferred to or jointly handled with the relevant departments of the Group. If the board of directors or the management of the Group deems it more appropriate for the ACSD to take jurisdiction, the ACSD can be authorized to process the whistleblowing.

**Article 21** Whistleblowing clues that fall under the scope of jurisdiction of the ACSD shall be promptly and preliminarily verified and assessed based on the content of the whistleblowing and related evidence. The following procedures shall be promptly carried out in accordance with the results of the preliminary verification and assessment:

- 1. If the conditions for filing an investigation are met, an investigation shall be filed;
- 2. If the conditions for filing an investigation are not temporarily met, the investigation can be postponed;
- 3. Unclear or ambiguous anonymous whistleblowing may be filed for future reference and followed up when necessary. When new clues or evidence is discovered later, they can be reassessed for further

processing;

- 4. If the content of the whistleblowing is seriously inconsistent with the facts or there is no need for further investigation, the assessment shall be terminated;
- 5. For whistleblowing involving subordinate member enterprises, if it is considered more appropriate for the member enterprises to handle after evaluation, it can be transferred to the ACSD of the member enterprises for processing. Where necessary, the transfer can be conducted with supervision pattern, and the subordinate member enterprise shall promptly feedback to the Group's ACSD on the processing status and results.

**Article 22** The staff at the ACSD shall keep the content of whistleblowing and related information of the whistleblowers strictly confidential. Related investigations shall be conducted without exposing the identity of the whistleblower. Unless the whistleblower agrees, his/her name, unit, contact methods and other information shall not be disclosed. For the staff of ACSD who violate provisions on confidentiality, corresponding disciplinary actions shall be taken in accordance with related regulations of the Group.

#### Chapter V Whistleblower Rights and Whistleblowing Reply

Article 23 The whistleblowers enjoy the following rights:

- 1. The right to be informed. Whistleblowers with real name or concealed names shall have the right to inquire the ACSD on the processing status of the whistleblowing and the ACSD shall promptly respond.
- 2. Protection of legitimate rights and interests. In the event that the legitimate rights and interests of a Group's employee or external individual are infringed upon, retaliated against, or treated unfairly after whistleblowing, he/she shall have the right to request the ACSD to take corresponding protective measures in accordance with the Group's whistleblower protection system and related regulations.
- 3. The right to receive rewards. After the ACSD conducts investigations on the clues provided in the whistleblowing and verifies them to be true, qualified whistleblowers may receive appropriate spiritual and material rewards in accordance with the Group's regulations on rewarding whistleblowers.

**Article 24** For real name or concealed name whistleblowing, the processing status and results shall be promptly replied to the whistleblower. The response may be conducted verbally, in writing, or through other appropriate methods (including but not limited to face interviews, emails, letters, telephone calls, social media applications etc.). If the reply is made orally, a work record shall

be made for filing.

## Chapter VI Whistleblowing File Management

**Article 25** The ACSD shall properly keep all information regarding the acceptance, registration, investigation, and reports of whistleblowing clues, including but not limited to text documents, audio-visual materials, electronic files, and all other forms of information in safe storage.

**Article 26** After the assessment or investigation of whistleblowing clues is completed, the person in charge of the whistleblowing investigation project shall sort out and file the relevant whistleblowing materials. All whistleblowing files shall be managed as confidential documents.

## Chapter VII Liabilities

**Article 27** The staff of ACSD shall remain diligent and ethical in performing their duties over the management of whistleblowing; the following actions are strictly forbidden:

- 1. Using whistleblowing clues for extortion, soliciting bribes, or accepting bribes;
- 2. Abusing powers and arbitrarily processing the whistleblowing clues without authorization;
- 3. Conducting fraudulent acts or negligence that cause material damages;
- 4. Privately storing, withholding, concealing, or losing whistleblowing clues;
- 5. Facilitating reprisals on or unfair treatment towards the whistleblower;
- 6. Violating the whistleblower protection regulations and deliberately leaking the name, address, telephone number of the whistleblower or the contents of the whistleblowing, or illegally transferring the whistleblowing materials to the accused or the accused member enterprise;
- 7. Violating the whistleblower protection regulations, passively treating or not responding to reasonable requests for protection from reprisal or unfair treatment filed by the whistleblower.

**Article 28** If the staff of the ACSD violate the provisions in the preceding Article, whistleblowers can directly report to the Board of Directors or the Board of Supervisors of the Group. The Group shall impose appropriate disciplinary actions on the violators based on the severity of violations; if the violation is severe or suspected to be criminalized, the violator shall be transferred to the judicial organs.

#### Chapter VIII Supplementary Provisions

**Article 29** In the operation of business, the Group guarantees the legitimate rights and interests of stakeholders (including but not limited to customers, suppliers, business partners etc.) and undertakes to properly handle complaints from stakeholders. A stakeholder who believes that its legitimate rights and interests have been infringed shall be entitled to file complaints and report the situation to relavant departments of the Group, and request solutions. The jurisdiction, acceptance, management, assessment, transfer, investigation, and reply of the complaints shall be processed in accordance with related regulations on whistleblowing.

**Article 30** The ACSD referred in the Regulations means the Anti-Corruption Supervision Department of the Group or departments who carry out the functions of anti-corruption supervision in its surbodinate member enterprises.

**Article 31** The term "over" before a certain number specified in the Regulations shall include the number.

**Article 32** The Regulations shall apply to all departments and platforms. Wholly-owned subsidiaries, controlling member enterprises and equity participation enterprises shall follow or refer to the Regulations.

**Article 33** The Regulations shall be interpreted and revised by the Group's ASCD.

**Article 34** The Regulations shall become effective upon the date of promulgation.