-1-
Grand Pharmaceutical Group Limited
Code of Business Ethics and Conduct

Chapter I General Provisions
Article 1 Grand Pharmaceutical Group Limited and its member companies
(hereinafter referred to as the “Company”, or “Grand Pharma”) are committed to
establishing and maintaining a highly ethical and honest business environment, and to
building a sound business ethics system and a clean corporate culture. We have
formulated this policy to join hands with various stakeholders to monitor our business
ethics and conduct, so as to ensure compliance and sustainable development of the
Company’s business.

Article 2 This policy applies to all employees of the Company and all of its member
companies, and we encourage other stakeholders, such as business partners and
suppliers, to comply with this policy.

Chapter II Anti-Corruption and Anti-Bribery Principles

-2-
form of misrepresentation or misleading behaviour.

Chapter III Anti-Monopoly, Anti-Unfair Competition Principles

Article 6 The Company adheres to the principle of fair competition and strictly
complies with all laws related to competition, anti-monopoly and collection of
competitive information. The Company requires all employees to refrain from
providing misleading or deceptive information in dealings with customers, suppliers,
competitors, government and other third parties, and to refrain from obtaining an
advantage by unfair means such as manipulation, concealment or abuse of privileged
information in support of and respect for open trade practices and open competition,
and to conscientiously maintain the fairness of the market order.

Chapter IV Conflict of Interest

Article 7 Employees shall avoid situations where their personal interests conflict with
the interests of the Company, and if a conflict of interest does exist, they shall promptly
report it to their superiors and take measures to resolve it.

Article 8 Employees shall be objective �刀尀䠀 䰀ðpeՠՠ̀尀&toӰఀҀr.
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-4-
Chapter VIII Reporting Channels

Article 18 The Company is committed to building a fair, just and transparent working
environment and cooperative ecosystem, which encourages stakeholders, including the

-5-
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Chapter IX Training

Article 22 The Company organises training on the Code of Business Ethics and
Conduct for all employees (including part-time employees and contract staff) at least
once a year to ensure that all employees are aware of, understand and comply with the
provisions of this policy.

Chapter X Oversight

Article 23 The Company’s Strategy and ESG (Promotion) Committee is responsible
for organising and directing the implementation of this code and ensuring its
effectiveness. The Board of Directors of the Company shall oversee the implementation
of the Group’s business ethics.

Article 24 The Company shall conduct a comprehensive audit of the implementation
of this code across all operations at least once every three years.

Article 25 Employees’ compliance with this code will be used as a basis for
assessment and included in the performance evaluation system of employees. The
Company attaches great importance to the compliance of its employees and takes it as
one of the important criteria for measuring the comprehensive quality and professional
conduct of its employees. This is intended to guide employees to consciously comply
with laws and regulations and this c

-6-
authorities for legal liability in accordance with laws.

Chapter XII Supplementary Provisions

Article 27 Any matters not mentioned in this code or in conflict with relevant laws,
regulations and normative documents shall be executed in accordance with such
relevant laws, regulations and normative documents.

Article 28 This code is formulated, revised and interpreted by the Company’s ESG
Working Group and shall take effect from the date of issuance.