

# **Shanghai RAAS Blood Products Co., Ltd.**

## **Anti Corruption and Anti Commercial Bribery Policy(for Trial Implementation)**

### **1. Purpose**

1.1 With a view to standardizing the Company's business operations, enhancing employees' compliance awareness, improve the Company's anti corruption and anti bribery management level, and effectively maintaining the Company's good image and reputation, this System is hereby formulated.

### **2. Scope of Application**

2.1 This System is applicable to Shanghai RAAS Blood Products Co., Ltd. as well as its subsidiaries, and wholly-owned and controlled subsidiaries at all levels (hereinafter to as "Company"), including its full-time employees, part-time employees, temporary workers, contract workers, and outsourced personnel.

2.2 All suppliers, contractors, dealers, third parties acting on behalf of the Company, and other partners of the Company must also comply with the relevant provisions of this System.

### **3. Terminology**

3.1 “Commercial Bribery” refers to the act whereby a party uses property or other means to bribe the staff of the counterparty, entities or individuals entrusted by the counterparty to handle relevant affairs, or entities or individuals who can affect transactions with their power or influence, in order to seek trading opportunities or competitive advantages.

3.2 “Healthcare Professional” (HCP) refers to any professional in the healthcare, dental, pharmaceutical, or nursing field, or any other person who may prescribe, recommend, purchase, supply, or use drugs for patients in his/her professional activities.

3.3 “Healthcare Organizations” (HCO) refers to any organization composed of HCPs, or any organization that provides healthcare services and/or conduct healthcare research.

3.4 “Third Party” refers to any individual, legal person, or unincorporated organization who acts on behalf of the Company or provide goods or services to the Company, including but not limited to commissioned pharmaceutical product research institutions, commissioned pharmaceutical product production organizations, pharmaceutical product promotion service providers, relevant industrial associations and societies, dealers, suppliers, distributors, intermediaries, and agents.

#### **4. Responsibilities**

The Company has, under the supervision of the Audit Committee of the Company's Board of Directors, established a multi-departmental linkage management mechanism led by the General Manager and supported by the Legal Compliance Department, Audit Department, Human Resources Department, and Business Department, so as to ensure the implementation of the Company's anti corruption and anti commercial bribery related work.

#### **5. Anti Corruption**

5.1 The anti corruption laws and regulations of the People's Republic of China, as well as the applicable anti corruption laws and regulations in the countries and regions where the Company's business is conducted, shall be complied with.

5.2 The Company has zero tolerance for corrupt behavior, adheres to honest operation, and never obtains business through corrupt means.

5.3 All transactions shall be fully and accurately recorded in books and accounts, and no false or misleading records shall be made for any purpose.

#### **6. Anti Commercial Bribery**

6.1 No employee shall engage in any form of commercial bribery towards

government officials, or bribe or solicit bribes from suppliers, customers, or other third parties in any form.

6.2 All employees shall clearly refuse bribery or solicitation of bribery from suppliers, customers, or other third parties, and promptly report the relevant situation to the Company.

6.3 Discounts provided by suppliers to the Company, or discounts provided by the Company to customers, shall be accurately recorded in accordance with the requirements of the financial accounting standards.

6.4 All suppliers, customers, and other third parties shall also comply with the Company's regulations on anti commercial bribery, shall not bribe the Company's employees or their close relatives, and shall be obliged to give cooperation for the Company's investigation when requested.

## **7. Gifts**

7.1 The precondition for acceptance or giving of gifts is that, such acceptance or giving does not violate the applicable laws or professional ethics standards, does not violate the internal rules and regulations of the recipient or giver, and will not be considered as commercial bribery or improper benefits.

7.2 The expenses related to gifts must be accompanied by genuine consumption vouchers, including original invoices, and payment vouchers, and shall be subject to approval in accordance with the regulations of the Company.

## **8. Banquets and Business Entertainment**

8.1 Whether providing or accepting banquets and business entertainment, the following principles shall be followed:

8.1.1 Such banquets and business entertainment are non-recurring and appropriate

8.1.2 Such banquets and business entertainment serve legal and legitimate business purposes

8.1.3 Such banquets and business entertainment are not luxurious, with

reasonable cost and frequency

8.1.4 Such banquets and business entertainment do not violate public order and good customs

8.1.5 Such banquets and business entertainment do not involve commercial bribery and improper interests

8.1.6 Such banquets and business entertainment comply with business practices, laws and regulations, and the Company's policies

8.1.7 The expenses related to such banquets and business entertainment must be accompanied by genuine consumption vouchers, including original invoices, and payment vouchers, and shall be subject to approval in accordance with the regulations of the Company.

## **8.2 Payment**

8.2.1 In principle, every payment shall be supported by a written contract, have legitimate and reasonable commercial purpose, and be based on genuine transactions.

8.2.2 Payment of remuneration to third parties such as HCP and HCO shall comply with the following requirements:

8.2.2.1 Such payment shall comply with this System and relevant financial regulations, and shall be consistent with fair market price.

8.2.2.2 The payment of lecture fees shall be based on real lecture services, with reasonable amount and frequency.

8.2.2.3 Any payment or reimbursement shall not be used as an inducement or reward for HCPs or HCOs to designate, purchase, or recommend any of the Company's products.

8.2.2.4 Payment shall be made by check or bank wire transfer, and cash payment shall be avoided.

8.2.3 No payment shall be made in return or as a prerequisite for seeking any trading opportunity or competitive advantage.

## **9. Training**

9.1 The Company conducts anti corruption and anti commercial bribery

training in various forms, such as induction training, annual training, specialized training, and other irregular training.

9.2 It is the obligation of all employees (including part-time) and contractors to participate in relevant training and to master and comply with various provisions of this System. The relevant departments shall properly record the training and keep such records.

## **10. Whistleblowing**

10.1 Each employee is obliged to promptly report any behavior known to him/her which does not comply with this System, and the reporting channels include:

10.1.1 His/her' superior leader

10.1.2 Competent leader or person in charge of his/her unit

10.1.3 Legal Compliance Department of the Company

10.1.4 Audit Department of the Company

10.1.5 Human Resources Department of the Company

10.1.6 Anti-fraud Whistleblowing Platform Specially Established by the Company: [Fanwubijubao@raas-corp.com](mailto:Fanwubijubao@raas-corp.com)

10.2 The Company encourages all suppliers, customers, and other third parties to promptly inform the Company of any violation of this Policy through the above-mentioned channels.

10.3 For specific information and matters not covered, please refer to the *Whistleblowing Management and Whistleblower Protection System* of the Company.

10.4 For each report received, whether in real name or anonymous, the Company will evaluate it, and decide whether it is necessary and how to conduct an investigation. The Company will, based on the investigation results, improve and perfect the relevant systems and processes.

## **11. Audit**

11.1 The Audit Department shall inspect the implementation of this System training and the recording of training on a regular basis every year.

11.2 The Audit Department shall identify the areas involving high risk of corruption or commercial bribery through regular and specialized audits, and shall generate the relevant reports.

## **12. Miscellaneous**

12.1 In principle, for each contract signed with a third party, the "special clause on good faith" shall be attached or the *Special Agreement on Good Faith* shall be signed.

12.2 This System is drafted by the Company's Legal Compliance Department, shall come into effect as of the date on which it is approval by the Audit Committee of the Company's Board of Directors, and shall be interpreted by the Audit Committee of the Company's Board of Directors. The Audit Committee of the Company's Board of Directors reserves the right to amend, modify or abolish this System at any time, and will adjust and improve this System regularly or irregularly in light of the changes in laws and regulations, the development of the industry, and the actual situations of the Company. The latest version of this System is publicly available on the Company's official website (<https://www.raas-corp.com>).

12.3 All matters not covered by this System shall be dealt with in accordance with the relevant laws, regulations, and normative documents, as well as the Company's articles of association.

Shanghai RAAS Blood Products Co., Ltd.

April 2025