

Shanghai RAAS Blood Products Co., Ltd.

Responsible Marketing Policy

(for Trial Implementation)

1 Purpose

1.1 With a view to further regulating the marketing behaviors of Shanghai RAAS Blood Products Co., Ltd. (hereinafter referred to as "Shanghai RAAS") and its subsidiaries (hereinafter referred to as "Subsidiaries") ("Shanghai RAAS" and "Subsidiaries" collectively referred to as "Group" or "Shanghai RAAS and Its Subsidiaries"), complying with the relevant laws and regulations as well as the social ethical norms, preventing the compliance risks, enhancing the overall compliance management level of the Group, ensuring the sustainable operation and development of the Group, and fully reflecting the social responsibility and value of the Group, this System is hereby formulated.

2. Scope of Application

2.1 This System is applicable to all employees of the Group, including full-time employees, interns, and outsourced personnel. In addition, the Group encourages all of its business partners to comply with this System.

3. Responsibilities

3.1 Legal Compliance Department of the Group

3.1.1 Responsible for formulating, issuing, and mending this System.

3.1.2 Responsible for regularly or irregularly adjusting and improving this System in light of the changes in laws and regulations, the development of the industry, and the actual business management of the Company.

3.2 Others

3.2.1 Other departments and Subsidiaries of Shanghai RAAS shall, in strict

compliance with the provisions of this System, implement responsible marketing principles, norms, and requirements.

4. Complying with Laws and Regulations, Group's Systems, and Industrial Standards

All marketing activities carried out by the Group (including online and offline publicity and promotion activities) shall strictly comply with the relevant national laws and regulations, including but not limited to the *Drug Administration Law of the People's Republic of China*, the *Anti Unfair Competition Law of the People's Republic of China*, the *Personal Information Protection Law of the People's Republic of China*, the *Advertising Law of the People's Republic of China*, and the *Interim Measures for Examination and Administration on Advertisements for Drugs, Medical Devices, Dietary Supplements and Formula Food for Special Medical Purposes*, as well as the relevant norms and standards in the pharmaceutical and blood products industry, and shall comply with the *Code of Business Ethics and Conduct*, the *Anti Corruption and Anti Commercial Bribery System*, the *Compliance Manual* and other systems of the Group.

5. Ensuring the Authenticity and Accuracy of Information

The Group shall implement the concept of honest operation, accurately disclose product information in strict accordance with the applicable laws and regulations, and never make exaggerated, false, or misleading statements about its products, services, prices, performance, or business records; the Group shall adhere to the compliance and scientificity of marketing activities, ensure that all promotional materials are accurate, objective, and based on the latest scientific achievements or product information; the Group shall adhere to the principle of fair and just competition, and never maliciously defame competitors. The Group shall retain all marketing documents and materials for evaluation or review when needed.

6. Protecting Privacy and Data Security

The Group respects and protects the privacy and data of its customers and consumers, and shall not disclose customers' privacy information or consumers' personal information without their consent. Shanghai RAAS and its Subsidiaries shall establish information security management systems, and confidentiality management systems, so as to standardize the collection, transmission, and protection of personal information, and thus ensure the security of information and data.

7. Audit and Supervision Mechanism

7.1 Shanghai RAAS and its Subsidiaries shall conduct annual audit on all marketing materials, plans, and activities related to their business, so as to ensure the full compliance with this System and other regulations such as the *Code of Business Ethics and Conduct*, the *Anti Corruption and Anti Bribery System*, and the *Whistleblowing Management and Whistleblower Protection System*.

7.2 Shanghai RAAS shall establish a strict approval process for marketing and promotion activities, requiring all materials to be reviewed by the medical personnel of Shanghai RAAS for relevant markets, so as to ensure the compliance with the requirements of regulations such as the *Interim Measures for Examination and Administration on Advertisements for Drugs, Medical Devices, Dietary Supplements and Formula Food for Special Medical Purposes*, and to avoid false and misleading information. All Subsidiaries shall also establish an approval process for marketing and promotion activities, so as to ensure that all relevant materials comply with the relevant laws and regulations.

7.3 The Group regularly organizes employees and their close relatives to conduct self-inspection and declaration of conflict of interest, and timely records and reports the information on conflict of interest, so as to prevent marketing-related compliance risks.

8. Responsible Marketing Training

8.1 For different business areas, the Group organizes at least one responsible marketing training for all employees (including full-time employees, interns, and

outsourced personnel) every year, so as to ensure that all employees are timely informed of the national laws, regulations, and normative requirements as well as the consequences of violations, effectively enhance the compliance awareness of all employees, guide all employees to perform their duties in accordance with laws and regulations, and strengthen the compliance of the Group's operations.

8.2 The Group regularly conducts the training on conflict of interest for all employees and the declaration of conflict of interest for all employees. The declaration of conflict of interest covers employees at all levels, so as to effectively prevent and control the risk of conflict of interest between employees and the Group.

9. Whistleblowing and Handling Mechanism

9.1 The relevant systems and special agreements on good faith of the Group clearly set forth the whistleblowing and handling mechanism, and encourage any employees, customers, suppliers and other stakeholders to, in real name or anonymously, report any violation of laws, regulations, industrial norms or systems through oral, written, email and other means through the following channels:

9.1.1 Employee's superior leader

9.1.2 Competent leader or person in charge of employee's unit

9.1.3 Legal Compliance Department of the Company

9.1.4 Audit Department of the Company

9.1.5 Human Resources Department of the Company

9.1.6 Anti-fraud Whistleblowing Platform Specially Established by the Company: Fanwubijubao@raas-corp.com

9.2 After thorough investigation, and on the basis of the actual violations and the severity of the circumstances, the Group will, in accordance with the relevant systems such as the *Anti Corruption and Anti Commercial Bribery System*, the *Whistleblowing Management and Whistleblower Protection System*, and the *Compliance Manual*, classify violations, impose punishment, and take necessary corrective measures. The Group strictly keeps confidential all whistleblowing information, and protects the legitimate rights and interests of whistleblowers.

10. Miscellaneous

10.1 The latest version of this System is publicly available on the official website (<https://www.raas-corp.com>) of the Group.

10.2 All matters not covered by this System shall be dealt with in accordance with the relevant laws, regulations, and normative documents, as well as other systems of the Group.

10.3 This System shall come into effect as of the date on which it is approved by the Audit Committee of the Board of Directors of Shanghai RAAS, and shall be interpreted by the Audit Committee of the Board of Directors of Shanghai RAAS.

Shanghai RAAS Blood Products Co., Ltd.

April 2025