Shanghai Fosun Pharmaceutical (Group) Co., Ltd.

Regulations on Integrity Management for Construction Projects of Shanghai Fosun Pharmaceutical (Group) Co., Ltd. Trial

Chapter 1 General Principles

Article 1 To strengthen the integrity of construction projects of Shanghai Fosun Pharmaceutical (Group) Co., Ltd. (hereinafter referred to as "the Group"), regulate the professional behavior of project management personnel, effectively prevent and control fraud and corruption risks in construction projects, and ensure the compliance and orderly development of construction projects, these regulations are formulated in accordance with relevant national laws, regulations, and Group policies, combined with the practical situation of construction projects.

Article 2 Upholding integrity in professional conduct is a fundamental requirement of the Group's core value of integrity. Project management personnel should adhere to professional ethics, consciously comply with national laws, industry regulations, and the Group's codes of conduct, ethical norms, and anti-corruption rules. They must maintain integrity, fulfill their duties with loyalty, and avoid any form of misconduct.

Article 3 The construction party should strengthen and improve the integrity of construction projects, adhere to the principal of combing punishment with prevention, prioritize prevention, strengthen education, improve systems, and ensure strict supervision with clear rewards and penalties.

Article 4 Integrity management of construction projects will be implemented throughout the entire process, covering all stages, including project approval, bidding (surveying, design, construction, supervision, procurement of equipment, materials, etc.), business negotiations, signing and modification of contracts, design, construction, and acceptance.

Chapter 2 Integrity Norms

Article 5 Project management personnel shall diligently perform their duties and must not illegally seize or damage the interests of the construction party. The following actions are strictly prohibited during the construction process:

1. Taking advantage of position to embezzle, steal, fraudulently obtain, or misappropriate project funds, materials, or equipment;
2. Violation of regulations by privately distributing funds or establishing unauthorized private accounts;
3. Violation of regulations by u

public funds for private purposes;

4. Violating the laws and regulations on bidding and tendering, colluding with others to rig bids, falsifying documents, or engaging in corruption and malpractice during bidding processes;
5. Colluding with suppliers to use fraudulent methods to falsely report or inflate project quantities, and extracting project funds through fictitious project quantities or other means;
6. Violating confidentiality regulations or information security rules, infringing on trade secrets, leaking confidential bid information, or disclosing information that could harm the interests of the construction party;
7. Violating professional ethics, abusing of power or dereliction of duty in the course of performing professional responsibilities

Article 6 Project management personnel must perform their duties with integrity, and must not engage in bribery or corruption. The following actions are prohibited:

1. Offering money, goods, or other improper benefits to government officials or their associates to gain illegal advantages;
2. Using position to request or accept money or other improper benefits from bidders or bidding agencies during bidding;
3. Taking advantage of position during site verification, equipment and material procurement, quality inspection, measurement payments, project settlements, or fund allocation, to demand or illegally accept money or improper benefits from suppliers;
4. Violating national laws or Group policies by accepting various forms of kickbacks or commissions; any off-the-books kickbacks will be treated as bribery;
5. Demanding or accepting reimbursement from suppliers for personal expenses;
6. Requesting or accepting housing, motor vehicles for personal or specific related parties to reside or use, or facilitating housing renovations, employment arrangements for relatives and friends, as well as overseas or travel conveniences from suppliers free of charge or at an abnormally low price;
7. Accepting high-end banquets or other lavish entertainment from suppliers, which could affect the integrity of their duties;
8. Borrowing money or other properties from suppliers;
9. Any other actions that misuse power for personal gain or compromise the integrity of the position.

Article 7 Project management personnel must faithfully perform their duties and must not engage in interest transfer. The following actions are prohibited:

1. Engaging in business activities that impair the interests of the construction party, or investing in non-listed companies that have business relationships with the construction party;
2. Privately recommending family or friends to suppliers for materials, equipment supply, equipment leasing, subcontracting, or labor-related business activities; if recommending companies of close relatives or companies where they are employed, shall proactively declare and avoid participation in related evaluation activities;
3. Requiring suppliers to purchase materials, equipment, or other goods outside the scope of

Article 21 The term "property" refers to money, tangible assets, and other property-related benefits. Money includes cash and securities (such as bonds, stocks, etc.); tangible assets include various high-end products, luxury items, and large-value assets such as real estate and motor vehicles. Other property-related benefits refer to those that can be measured in monetary terms, including but not limited to membership cards with monetary value, vouchers (cards), gift cards (coupons), free travel, free entertainment, debt relief, and the provision of home renovation services. Other improper benefits refer to non-property-related benefits that violate national laws, regulations, or public order and good morals and are difficult to calculate in monetary terms.

Chapter 6 Supplementary Provisions

Article 22 These regulations apply to the Group's headquarters, all departments, subsidiaries, and wholly-owned or controlling companies; invested companies shall comply with or refer to these regulations for implementation.

Article 23 The ACSD and the Construction Management Department are responsible for the interpretation of these regulations.

Article 24 These regulations will take effect from the date of issuance.

Article 25 Attachment: "Integrity Commitment for Construction Projects"

Complaint and Reporting Channels:

Group's Anti-Corruption Supervision Department

Complaint Hotline: 021-33987226

Complaint Email: lianzhengdc@fosunpharma.com

WeChat Official Account: Fosun Pharma

Mailing Address: Anti-Corruption Supervision Department, Building A, No. 1289 Yishan Road, Xuhui District, Shanghai, China

Postal Code: 200233

Integrity Commitment for Construction Projects

I have thoroughly studied the "Regulations on Integrity Management for Construction Projects" of Shanghai Fosun Pharmaceutical (Group) Co., Ltd. I fully aware of and understand the contents of these regulations, including the disciplines to be adhered to and the responsibilities to be undertaken. I will consciously abide by the laws and regulations, maintain integrity in professional conduct, perform my duties with loyalty, oppose any illicit exchange of power for money, and safeguard the interests of the Construction Party.

I solemnly make the following commitment, agree to accept supervision from the Construction Party and its employees, and will not engage in the following actions:

1. Taking advantage of one's position to embezzle, steal, defraud, or misappropriate construction funds, materials, or equipment;
2. Illegally setting up or distributing private funds in violation of regulations;
3. Misusing or exploiting business entertainment and misuse of funds for personal benefit;
4. Violating relevant laws, regulations, and management systems regarding bidding and tendering, colluding with others to rig bids, falsifying documents, or engaging in corruption and malpractice during bidding processes;
5. Colluding with suppliers to use fraudulent methods to falsely report or inflate project quantities, and extracting project funds through fictitious project quantities or other means;
6. Violating confidentiality and information security regulations, infringing on business secrets, disclosing confidential bidding information that causes losses or impacts to the construction party;
7. Violating professional ethics, abusing of power or dereliction of duty in the course of performing professional responsibilities;
8. Offering money, goods, or other improper benefits to government officials or their associates to gain illegal advantages;
9. Taking advantage of position to request or accept money or other improper benefits from bidders or bidding agencies during bidding;
10. Taking advantage of position during site verification, equipment and material procurement, quality inspection, measurement payments, project settlements, or fund allocation, to demand or illegally accept money or improper benefits from suppliers;
11. Violating national laws or Group policies by accepting various forms of kickbacks or commissions; any off-the-books kickbacks will be treated as bribery;
12. Demanding or accepting reimbursement from suppliers for personal expenses;
13. Requesting or accepting housing, motor vehicles for personal or specific related parties to reside or use, or facilitating housing renovations, employment arrangements for relatives and friends, as well as overseas or travel conveniences from suppliers free of charge or at an abnormally low price;
14. Accepting high-end banquets or other lavish entertainment from suppliers, which could affect the integrity of their duties;
15. Borrowing money or other properties from suppliers;
16. Engaging in business activities that impair the interests of the construction party, or investing in non-listed companies that have business relationships with the construction

party;

17. Privatelyrecommending family or friends to suppliers for materials, equipment supply,