

WuXi Biologics

Anti-Corruption Policy

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1 PRINCIPLES AND DIVISION OF RESPONSIBILITIES

1.1 Purpose and Scope

1.1.1 Purpose

WuXi Biologics (Cayman) Inc. is committed to conducting its business with honesty and integrity. The objective of this policy is to provide guidance for anti-corruption management and enable applicable entities and individuals (please refer to Section 1.1.2, 1.1.3, 1.1.4 below) to identify and address corruption.

1.1.2 Applicable Entities

This policy applies to all worldwide-held subsidiaries of WuXi Biologics (Cayman) Inc. (collectively referred to herein as “WuXi Biologics”).

1.1.3 Applicable Individuals

This policy applies to all members of the Board of Directors and all personnel of WuXi Biologics, including but not limited to full-time employees, part-time employees, interns, and contingent workers (collectively referred to herein as “WuXi Biologics Personnel”).

1.1.4 Other Applicable Parties

This policy also applies to WuXi Biologics’ business partners and their employees or personnel, including but not limited to organizations or individuals (non-WuXi Biologics Personnel) providing services, raw materials, or other products to WuXi Biologics, such as suppliers and distributors.

1.2 Definitions of Corruption and Bribery

1.2.1 Corruption

Corruption refers to the act of abuse of power (e.g., a government official’s power or an individual’s power within an enterprise) for unethical and improper personal gain. Corruption includes but is not limited to soliciting and accepting bribes, misuse of official authority.

1.2.2 Bribery

Bribery refers to the act of providing, offering or promising – or authorizing others to provide, offer or promise – anything of value directly or indirectly for the purpose of unduly influencing the actions or decisions of the parties involved in order to gain or maintain an unfair business advantage. Bribery can take various forms, including but not limited to providing cash, cash equivalents, gifts, hospitality, favors (e.g., providing exceptional assistance in obtaining employment opportunities, introducing investment opportunities, and offering other benefits such as home renovations or debt waivers) or other items of value.

1.3 Anti-Corruption Principles

The anti-corruption principles outlined below should be followed with respect to all business activities and business decisions of WuXi Biologics.

- **Legitimacy of Intent:** Ensure that all business activities have a legitimate intent and are in line with the Company's values.
- **Transparency:** Conduct all business activities in an open and transparent manner.
- **Appropriateness:** Ensure that arrangements and considerations for all business activities are appropriate (e.g., ensure donations are reasonable, ensure the Company's payments and considerations are in line with fair market values).
- **No Undue Influence:** Conduct all business activities in accordance with applicable laws and regulations, as well as local business practices, to avoid exerting undue influence on the decisions of others.
- **Documentation:** Maintain sufficient written records for all business activities.
- **Internal Controls:** Establish effective internal controls from the anti-corruption perspective and ensure compliance in all business activities.

1.4 Tone from the Top

WuXi Biologics upholds integrity in all business activities and adopts a policy of zero tolerance toward corruption and bribery.

1.5 Roles and Responsibilities

1.5.1 Employee

At WuXi Biologics, every employee bears the primary responsibility for their adherence to compliance standards.

- All employees should understand and adhere to anti-corruption policies
- All employees should consult the Compliance and Risk Management Center (CRMC) should they have any questions regarding the anti-corruption policy.
- All employees should promptly report any actual or suspected corruption by following established procedures.

1.5.2 Managers

Managers at WuXi Biologics have the responsibility to ensure that their teams comply with this policy.

- Managers should behave with integrity, transparency and ethics, and serve as a role model to inspire employees to adhere to the same standards.
- Managers should provide guidance to team members and ensure they understand and adhere to the anti-corruption policy.
- Managers should monitor their team members to identify any non-compliant

issues and promptly report to the CRMC if any non-compliance is found.

1.5.3 Functional Department

The Compliance and Risk Management Center (CRMC), as the owner of this policy, undertakes the following responsibilities:

- Provide feedback and advice to WuXi Biologics Personnel with regard to anti-corruption.
- Establish effective whistle-blowing programs, be responsible for investigating any reports of suspected corruptive behaviors and ensure that investigations are fair and transparent.
- Provide anti-corruption training to WuXi Biologics Personnel according to their corruption risk exposure. Other relevant functions are responsible for establishing their own internal controls related to anti-corruption and for ensuring operating effectiveness.

2 PRINCIPLE RULES

2.1 Prohibited Behaviors

2.1.1 Bribery

WuXi Biologics Personnel are prohibited from providing (or promising to provide) or accepting (or soliciting) bribes directly or indirectly.

2.1.2 Kickbacks

Kickbacks are a form of bribery that typically involves under-the-table returns of a portion of economic benefits to a third party to achieve undue influence on behavior or decision-making.

WuXi Biologics Personnel are prohibited from providing (or promising to provide) or accepting (or soliciting) kickbacks directly or indirectly.

2.1.3 Facilitation Payments

Facilitation payments are benefits provided to government officials directly or indirectly to expedite or facilitate the performance of a routine action, including but not limited to expedited processing of documents or issuance of licenses.

WuXi Biologics Personnel are prohibited from making facilitation payments to government officials directly or indirectly, even if such payments are common practices locally. Any requests for facilitation payment should be reported promptly to the CRMC.

2.1.4 Disposable Funds

The term “disposable funds” refers to assets formed by the misappropriation, interception, or deceitful acquisition of company funds. Obtaining these funds is

most often done by such means as fake invoices, creating fictitious expenses, and other similar improprieties.

WuXi Biologics Personnel are prohibited from setting up any disposable funds for any purpose.

2.1.5 Improper Use of Company Assets

WuXi Biologics Personnel should always use company assets (including tangible and intangible assets) appropriately and are prohibited from misappropriating or selling company assets without proper authorization, making use of company assets for personal gain or to benefit others, and embezzling company assets for personal use.

2.1.6 Improper Influence on Government Officials

Government official refers to any personnel performing official duties within government agencies, including but not limited to:

- Any elected or appointed officer or employee at any level of government (including national and local government).
- Any officer or employee of legislative, executive, and judicial authorities, as well as working-level staff within government agencies.
- Any senior management or employee of an entity owned or controlled by the government that engages in commercial activities.
- Any executive or employee of a public international organization (e.g., the United Nations, the World Bank, and the International Monetary Fund).
- Any person acting on behalf of the government, governmental organizations or state-owned enterprises (e.g., individuals authorized by government agencies to perform official duties).
- Any political parties, officials affiliated with political parties, and candidates for political positions.

WuXi Biologics Personnel and WuXi Biologics' business partners are prohibited from providing bribery to government officials in any form.

2.2 Gift and Hospitality

The principles outlined below should be followed when offering or accepting gifts and hospitality (including meals, accommodation, travel, and entertainment):

- WuXi Biologics Personnel are strictly prohibited from offering or accepting any amount of cash or cash equivalents.
- Gifts and hospitality should be moderate, reasonable, and infrequent, and should not in any way influence the provider's or the recipient's decisions in business activities.

Gifts and hospitality should be compliant with the recipient's company policies as well as applicable laws and regulations.

- WuXi Biologics Personnel are strictly prohibited from accepting or offering inappropriate entertainment, including but not limited to activities of a sexual nature, gambling, or other illegal activities.

2.3 Business Partner Management

General principles for anti-corruption management with regard to business partners are as follows:

- Appropriate due diligence should be conducted before entering into business relationships with business partners.
- Relevant anti-corruption provisions should be included in contracts with business partners.
- Compliance programs should be established to monitor compliance risks associated with activities with business partners.

2.4 Charitable Donations

Charitable donation refers to the voluntary and complimentary provision of assets by natural persons, legal entities, and other organizations for charitable purposes. Donations might be made to charitable organizations or directly made to beneficiaries, and could be in the form of cash, goods, services, or other means. The principles outlined below should be followed:

- Charitable donations should not be made for the purpose of seeking or retaining unfair business advantages.
- Due diligence should be carried out on the donation beneficiary before making a charitable donation.

A donation agreement should be entered into with the donation recipient, specifying the scope of use for the donated assets to ensure they serve the public good. The recipient should not divert the donated property for purposes not aligned with the charitable intent or beyond the agreed terms of use.

2.5 Political Contributions

Political contribution refers to any gift, loan, advance, or deposit of money or anything of value made to support political activities (e.g., foundations related to political parties). The provision of political contributions by WuXi Biologics to external parties (or the provision of political contributions by other third parties on behalf of WuXi Biologics, or the provision of political contributions by other third parties in connection with the operation of WuXi Biologics) should be conducted in accordance with the following basic principles:

- Political contributions should comply with applicable laws, regulations, and company policies.
- Political contributions should be made only to political parties or relevant committees / originations (e.g., foundations established by political parties), not to individuals.
- Political contributions should be made with full transparency and without any undisclosed exchange of benefits.
- All necessary approvals should be obtained before extending political contributions.

3 IMPLEMENTATION

3.1 Rewards and Disciplinary Actions

Regarding misconducts violating applicable laws, regulations, or this policy (“Non-compliant Misconducts”), the Company will impose disciplinary actions, which is of up to dismissal, on the WuXi Biologics Personnel who committed Non-compliant Misconducts, in accordance with applicable laws, regulations and the Company’s relevant policies. Furthermore, WuXi Biologics reserves the right to undertake measures to recover any gains received by employees from such Non-compliant Misconducts, including but not limited to the refund of bonuses and other unjustified enrichment, and to recover losses caused to WuXi Biologics.

With regard to business partners who engaged in Non-compliant Misconducts, WuXi Biologics will enforce reasonable measures, which may include, but are not limited to, suspension or termination of the partnership. Additionally, WuXi Biologics shall lawfully recover any losses caused to it by such Non-compliant Misconduct.

3.2 Training

- The CRMC shall provide anti-corruption training for WuXi Biologics Personnel.
- WuXi Biologics Personnel should participate in anti-corruption training and comply with the training requirements as directed. This applies in particular to those positions with identified corruption risks.

3.3 Policy Acknowledgment

Employees of WuXi Biologics should sign a written acknowledgment – upon onboarding, periodically, and upon any amendment of this policy – to confirm that they received, understood, and will comply with this policy.

3.4 Whistle-Blowing Program

- WuXi Biologics Personnel – as well as business partners and other third parties – should report actual or suspected corruption to the CRMC through established channels, including telephone, email (SpeakUp@wuxibiologics.com), the Company’s whistle-blowing platform (wuxibiologics.ethicspoint.com), the WuXi Biologics

intranet or the official WuXi Biologics website.

- Managers should promptly report to the CRMC upon receiving any information regarding corruption. Managers should not delay, hide information, or conduct investigations themselves.
- WuXi Biologics will protect the interest of any whistle-blower and will keep confidential both the whistle-blower's identity and the reported matter to the extent permitted by applicable laws. Any retaliation against whistle-blowers is strictly prohibited. WuXi Biologics will take appropriate follow-up actions on whistle-blower cases.

4 SUPPLEMENTARY PROVISIONS

4.1 Precedence in Rule Application

The regulations related to the management of anti-corruption before the issuance of this policy, in case of any inconsistency, this policy shall prevail.

4.2 Interpretation

Compliance and Risk Management Center shall be responsible for interpreting this policy in accordance with its provisions.