

WuXi Biologics

Conflicts of Interest Policy

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1 PRINCIPLE RULES

1.1 Purpose and Scope

1.1.1 Purpose

The purpose of this policy is to provide principle guidance to applicable individuals (as defined in Article 1.1.3) of WuXi Biologics (as defined in Article 1.1.2) for effective and timely actions in identifying, avoiding, disclosing, evaluating, and addressing conflicts of interest.

1.1.2 Applicable Entities

This policy applies to WuXi Biologics (Cayman) Inc. and its subsidiaries and affiliates worldwide (collectively referred to herein as “WuXi Biologics” or “the Company”). If requirements specified by the laws and regulations of the country where subsidiaries or affiliated companies are located are stricter than those specified in this policy, the relevant subsidiaries and affiliated companies shall adhere to the stricter requirements stipulated by those laws and regulations.

1.1.3 Applicable Individuals

This policy applies to all employees 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”).

1.2 Definition of Conflicts of Interest

Conflicts of interest refers to a situation in which an employee's personal interest conflicts with the interest of WuXi Biologics, and the employee’s professional judgement and business decisions are compromised, thereby undermining WuXi Biologics’ interests.

Conflicts of interest under this policy include:

- **Actual conflicts of interest:** A real, existing conflict of interest situation that has already occurred.
- **Potential conflicts of interest:** Circumstances that have not yet constituted a conflict of interest but may possibly become a conflict of interest in the future.
- **Perceived conflicts of interest:** A situation that might be reasonably presumed to be perceived as a conflict of interest from the internal perspective (e.g., company management) or the external perspective (e.g., regulators).

For the purpose of effectively identifying, avoiding, disclosing, evaluating and addressing conflicts of interest, this policy divides them into two categories: Business-Related Conflicts of Interest and Personnel Managerial Conflicts of Interest. Please refer to Section 2 for details.

1.3 General Rules

WuXi Biologics Personnel should act in the best interests of WuXi Biologics, and their personal interests should not inappropriately influence their professional judgment or business decisions. In accordance with the provisions of this policy, WuXi Biologics Personnel should identify, avoid, and disclose related conflicts of interest, and cooperate with relevant functional departments in taking measures to evaluate and address these conflicts of interest.

1.4 Responsible Departments

The Compliance and Risk Management Center (“CRMC”) is responsible for handling Business-Related Conflicts of Interest. The Human Resources (“HR”) Department is responsible for handling Personnel Managerial Conflicts of Interest.

2 CLASSIFICATION OF CONFLICTS OF INTEREST

2.1 Definitions

2.1.1 Definitions of Closely Related Persons

Closely Related Persons – persons who may create conflicts of interest due to their relationship with WuXi Biologics Personnel – include:

- Relatives: spouse, ex-spouse, (step) parent, (step) child, (step) siblings, (step) sibling’s child, (step) aunt, (step) uncle, (step) grandparent, (step) grandchildren, and their spouses.
- Individuals who are part of the same household as WuXi Biologics Personnel.
- Individuals in a romantic relationship with WuXi Biologics Personnel.
- Other individuals who are reasonably presumed to be perceived as having conflicts of interest, such as close friends of WuXi Biologics Personnel or someone in business with them.

2.1.2 Definition of Business Partner

WuXi Biologics’ Business Partners include but are not limited to organizations or individuals (non-WuXi Biologics Personnel) who provide WuXi Biologics with services, raw materials, or other products – such as suppliers and distributors – as well as WuXi Biologics investees and potential investees. This definition also includes the employees/personnel of these Business Partners.

2.2 Business-Related Conflicts of Interest

2.2.1 Categorization and Scenarios of Business-Related Conflicts of Interest

There is a wide range of complex and diverse Business-Related Conflicts of Interest scenarios that cannot be exhaustively listed. When identifying and disclosing conflicts of interest, WuXi Biologics Personnel should conduct an assessment based on the definition of conflicts of interest (refer to Section 1.2) and should promptly

consult the CRMC should they have any questions on Business-Related Conflicts of Interest.

Outlined below are typical scenarios of Business-Related Conflicts of Interest:

2.2.1.1 External Investments

Conflicts of interest may arise when WuXi Biologics Personnel (or their Closely Related Persons) engage in external investments, which may include but are not limited to the following scenario examples:

- WuXi Biologics Personnel (or their Closely Related Persons) directly hold or indirectly hold shares in private companies, including but not limited to Business Partners or competitors of WuXi Biologics.
- WuXi Biologics Personnel (or their Closely Related Persons) directly or indirectly hold shares in public traded companies that are Business Partners or competitors of WuXi Biologics, and such shareholdings appear to be material in influencing the professional judgment and business decisions of WuXi Biologics Personnel.
- WuXi Biologics Personnel (or their Closely Related Persons) obtain financial benefits from a Business Partner of WuXi Biologics through non-equity means (e.g., debt investments).

2.2.1.2 External Engagements and Social/Business Activities

Conflicts of interest situations may arise when WuXi Biologics Personnel (or their Closely Related Persons) hold external positions in other companies/organizations or participate in social/business activities. Typical scenarios include but not limited to:

- WuXi Biologics Personnel (or their Closely Related Persons) hold full-time or part-time positions or roles within a competitor of WuXi Biologics (including but not limited to positions as consultants, directors and supervisors), or they provide services in any other manner to a competitor of WuXi Biologics, or they release non-public information about the Company to any competitor of WuXi Biologics.
- WuXi Biologics Personnel (or their Closely Related Persons) hold full-time or part-time positions or roles within a Business Partner of WuXi Biologics (including but not limited to positions as consultants, directors, and supervisors) or they provide services in any other manner to a Business Partner of WuXi Biologics.
- WuXi Biologics Personnel (or their Closely Related Persons) engage in

commercial collaborations with WuXi Biologics or its Business Partners, including but not limited to the purchase or provision of goods or services.

- WuXi Biologics Personnel engage in external business activities (e.g., presentations, lectures) that are not on behalf of WuXi Biologics.
- WuXi Biologics Personnel provide any form of service to external parties or start their own business.
- WuXi Biologics Personnel join political parties/organizations or social associations that may influence their availability, responsibility, competencies, and conduct in performing their duties for WuXi Biologics.

With respect to other possible scenarios where WuXi Biologics Personnel (or their Closely Related Persons) are holding external positions or participating in social/business activities, the principles outlined below should be followed.

To avoid conflicts of interest, the position or activity:

- Must not compromise or undermine the business interests of WuXi Biologics.
- Must not affect his or her availability, responsibilities, competencies, and conduct in his or her capacity at WuXi Biologics.
- Must not utilize WuXi Biologics tangible assets (e.g., office equipment, office space) or intangible assets (e.g., trade secrets, non-public information related to the Company).

2.2.1.3 Soliciting or Accepting Gifts and Hospitality

Conflicts of interest may arise when WuXi Biologics Personnel accept gifts and hospitality from third parties. The following actions are specifically prohibited:

- Soliciting cash, cash equivalents, gifts or hospitality.
- Accepting cash or cash equivalents.
- Accepting inappropriate or illegal gifts or hospitality (including but are not limited to meals, travel, entertainment).

For specific principles and details regarding the above situations, please refer to WuXi Biologics Anti-Corruption Policy.

2.2.1.4 Other Situations

There are other situations which could be perceived as Business-Related Conflicts of Interest based on analysis and reasonable judgment – excluding Personnel Managerial Conflicts of Interest.

2.3 Personal Managerial Conflicts of Interest

2.3.1 General Rules for Personal Managerial Conflicts of Interest

In cases where colleagues have a direct or indirect reporting or supervisory/inspection relationship, one party holds decision-making authority or can exert influence over employment-related matters concerning the other party. These matters, collectively referred to as "Personnel Managerial Matters", include but are not limited to salary and benefits, performance evaluations, promotions, reassignments, leaves, retention or separation, and etc.

Co-workers being Relatives or having romantic relation may lead to Personnel Managerial Conflicts of Interest. Therefore, co-workers having a direct or indirect reporting relationship to each other, or co-workers directly or indirectly supervising/monitoring each other's work must not be Relatives or have a romantic relation. Personnel Managerial Conflicts of Interest should be immediately disclosed by both parties to the HR Department in accordance with this policy.

Co-workers having no direct or indirect reporting relationship, or direct or indirect supervision/monitoring of each other's work may be relatives or have romantic relation, provided that they are mutually consensual and none of the following applies: if any of these types of situations arises, the HR Department shall take appropriate measures or disciplinary actions, depending on the circumstances of each case. The relevant personnel should cooperate in the implementation of these measures and actions.

- Such relationship adversely impacts the business, operations or management of WuXi Biologics.
- The relationship adversely impacts the working relationship between the concerned co-workers and/or it disrupts the dynamics of their team.
- One co-worker in the relationship engages in improper conduct in a decision-making process with respect to the other co-worker, including but not limited to improperly influencing key decision-makers or requesting facilitation from the key decision-makers.

WuXi Biologics expects both concerned parties to continue working in a professional manner to minimize the impact that relative or romantic relationships may have on the performance of their duties.

The HR Department will formulate management guidelines with further details supplementing this policy. If a region or country has specific managerial needs due to the local law or its circumstances, such will also be specified in these guidelines.

2.3.2 Definitions

For the avoidance of doubt, the definition of a “Relative” in this section of the policy is the same as the definition set forth in Section 2.1: spouse, ex-spouse, (step) parent, (step) child/children, (step) siblings, (step) sibling’s child/children, (step) aunt, (step) uncle, (step) grandparent, (step) grandchildren, and their spouses.

A “direct reporting relationship” includes both solid line managers and dotted-line managers. An “indirect reporting relationship” extends up to N-1. In the positions of “direct or indirect supervisory or inspection relationships” will be specified in the management guidelines.

3 CONFLICTS OF INTEREST MANAGEMENT PROCEDURES

3.1 Identifying Conflicts of Interest

WuXi Biologics Personnel should proactively seek to identify conflicts of interest, including actual, potential, and perceived conflicts of interest.

For any questions, WuXi Biologics Personnel should consult the CRMC or HR Department, respectively, depending on the type of conflicts of interest.

3.2 Avoiding Conflicts of Interest

WuXi Biologics Personnel should make every effort to avoid conflicts of interest, ensuring their personal interests do not in any way adversely affect their professional judgment, business decisions or activities in the performances of their duties.

3.3 Disclosing Conflicts of Interest

Most conflicts of interest can be resolved through proper management. Failure to disclose and address conflicts of interest as required may result in violations of company policies, as well as laws and regulations.

3.3.1 Disclosure Obligations of Individuals

Regarding Business-Related Conflicts of Interest and Personnel Managerial Conflicts of Interest, WuXi Biologics Personnel shall make appropriate disclosures in accordance with the following requirements:

- Business-Related Conflicts of Interest: If and when WuXi Biologics Personnel become aware of any possible Business-Related Conflicts of Interest, they must promptly disclose them to the CRMC. In the event of any change in a conflict-of-interest situation or if current disclosures are no longer accurate or complete, employees should update the original disclosure to reflect the latest status.

- Personnel Managerial Conflicts of Interest: the co-workers, who have direct or indirect reporting relationship or directly or indirectly supervise/monitor each other's work, are Relatives or have romantic relations, or such relationship develops, both parties should promptly make disclosure to the HR Department.

The Company will request WuXi Biologics Personnel to disclose Conflicts of Interest on a regular basis.

3.3.2 Disclosure Obligations of Supervisors

Supervisors should promptly report to the CRMC and HR Department respectively when they become aware of any Business-Related Conflicts of Interest involving a team member, or when they learn that a team member has a Personnel Managerial Conflicts of Interest or is likely to develop such a relationship. Any delays, concealment, or unauthorized investigations are strictly prohibited.

3.4 Evaluating and Addressing Conflicts of Interest

WuXi Biologics shall evaluate disclosed conflicts of interest and take appropriate actions to address risks.

WuXi Biologics Personnel should cooperate and promptly take steps to execute the conclusions and solutions made by the CRMC or the HR Department pertaining to the disclosed conflicts of interest.

For Personnel Managerial Conflicts of Interest, WuXi Biologics reserves the right to take any reasonable and lawful measures it deems necessary to eliminate such conflicts, including but not limited to reassigning work/tasks, assigning new positions, or terminating the employment relationship with one of the parties involved. For measures to eliminate the conflicts of interest, the relevant department(s) should provide feasible proposal, and HR department will support the deployment. Upon holistic consideration of factors including but without limitation to its actual operation status, business needs, available vacancies, and etc., WuXi Biologics may provide reasonable alternative position to one party. Despite that, for avoidance of doubt, WuXi Biologics is not obligated to provide a new position. If the concerned co-worker refuses to take upon the new position reasonably offered, it may lead to separation.

3.5 Recruitment of Employees' Relatives and Those Who have Romantic Relationships with Employees

As stipulated hereinabove, the co-workers with direct or indirect reporting relationships, or those with direct or indirect supervisory or inspection relationships, who are Relatives or have romantic relation, are in situations of Personnel Managerial Conflicts of Interest. Therefore, the Relatives of employees and those who have romantic relation with our

employees may not apply for vacant positions at WuXi Biologics where they would have a direct or indirect reporting relationship to each other, or positions with direct or indirect supervisory/monitoring relationship to each other ("COI Position").

Relatives of employees and those who have romantic relationships with our employees who want to apply for a non-COI Position are required to comply with the following:

- The employees must not participate in the hiring screening process.
- The employees must not leverage their position at WuXi Biologics to influence or attempt to influence the recruitment, screening process or hiring decisions.
- The candidates must disclose that they are Relatives of employees or have romantic relationships with employees according to WuXi Biologics' requirements.

The above provisions also apply to any position change resulting from the "Fresh Water" program, position reassignment, etc.

4 IMPLEMENTATION

4.1 Policy Acknowledgement

WuXi Biologics Personnel are required to sign a written acknowledgment (upon onboarding, periodically, and upon any amendment of this policy) confirming that they received, understood, and will comply with the policy.

4.2 Training

WuXi Biologics Personnel should familiarize themselves with this policy and participate in relevant training as required.

4.3 Disciplinary Action

For any violation of this policy – or supplemental rules / management rules related to this policy – the Company will impose disciplinary actions on the responsible persons in accordance with relevant rules and regulations, and, in serious cases, will unilaterally terminate the labor relationship in accordance with the law. In addition, WuXi Biologics reserves the right to request that personnel compensate WuXi Biologics for any relevant loss it incurs due to the violation of this policy.

4.4 Whistle – Blowing Program

WuXi Biologics Personnel, Business Partners or other third parties may report any actual or suspected conflicts of interest to the CRMC through email (SpeakUp@wuxibiologics.com), telephone, our whistle-blowing platform, the WuXi Biologics intranet or the WuXi Biologics official website. If Personnel Managerial Conflicts of Interest are involved, the CRMC will refer the matter to the HR Department. Managers should promptly report to the CRMC or the HR Department, depending on the

type of conflicts of interest, whenever they receive reports of conflicts of interest. Managers should not delay, hide information, or conduct investigations themselves.

WuXi Biologics will ensure that all reported information is handled appropriately to protect the rights and interests of whistle blowers and will take appropriate follow-up measures.

Reprisals against whistleblowers are strictly prohibited.

5 SUPPLEMENTARY PROVISIONS

5.1 Precedence in Rule Application

The regulations related to the management of conflicts of interest before the issuance of this policy, in case of any inconsistency, this policy shall prevail.

5.2 Interpretation

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