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PART 1 GENERAL RULES

Article 1: In order to effectively strengthen the anti-corruption compliance construction of Shanghai Fosun Pharma (Group) Co., Ltd. (hereinafter referred to as the company), give full play to the active role of employees or external personnel of the company in discovering and reporting illegal conduct or wrongdoing in the workplace, protect the legitimate rights and interests of whistleblowers and witnesses under national laws and regulations and company rules and provisions.

Article 2: A whistleblower refers to an individual or unit that disclosure illegal, immoral, or illegitimate practices to the ACSD (Anti-Corruption Supervision Department) or other relevant departments. A witness refers to a natural person who knows the relevant facts of the case and fulfill the obligation to testify according to law.

Article 3: Three reporting modes include real-time reporting, confidential reporting and anonymous reporting:

- (1) Real-name reporting refers to the report that the whistleblower provides the real name and effective contact information;
- (2) Confidential reporting refers to the report that the whistleblower does not provide the real name, but provides other information or effective contact information that can be traced back to the identity;
- (3) Anonymous reporting refers to the report that the whistleblower does not provide the real name, effective contact information or any other information that can be traced back to the identity.

Article 4: No department or individual of the company may use any excuse to block or suppress the report of whistleblowers and the truthful testimony of witnesses. The company takes practical measures to provide convenience for whistleblowers to report and for witnesses to testify, and to protect the legitimate rights and interests of whistleblowers and witnesses.

Article 5: Functional departments include the company's ACSD, Human Resources Department, Finance Department and Administrative Support

Department shall actively cooperate to jointly protect and reward whistleblowers and witnesses.

PART 2

PROTECTION OF WHISTLEBLOWERS AND WITNESSES

Article 6: Any individual or unit shall report violations of laws and regulations to the ACSD according to law with legitimate rights and interests protected by the company.

Article 7: The ACSD must keep the identity of the whistleblower and reporting content confidential:

- (1) Reported information must be accepted and entered into the database by specially-assigned person and filed by the level of classification. Other personnel may not access the information without the approval from the ACSD;
- (2) the report materials should be placed in the confidential cabinet, filed by the level of classification, organized by specially-assigned person to maintain the Integrity, security and confidentiality. The case should be filed after concluded;
- (3) It is strictly forbidden to disclose the report content and the name, address and contact information of the whistleblower and to transfer the report to the accused person and unit;
- (4) During the investigation, it is strictly forbidden to reveal the original report or the copy of the report;
- (5) Contact the real-name whistleblower in an appropriate way and verify the information without exposing the identity of the whistleblower;
- (6) Reward eligible whistleblowers and keep strictly confidential of the name, address and contact information of the whistleblower unless received informed consent
- (7) Other confidentiality measures should be taken. The staff of the ACSD shall abide by the work discipline, keep witnesses identity confidential. It is strictly forbidden to disclose personal information such as the witness's name, address and work unit to irrelevant personnel.

Article 8: The company has zero tolerance for retaliation. It is strictly forbidden to retaliate against whistleblowers and witnesses, and to infringe upon the legitimate rights and interests of whistleblowers and witnesses. The company will penalize the

perpetrator according to the company provisions once verified the retaliation against whistleblowers, witnesses or the relatives. The case will be transferred to judicial authorities if the perpetrator committed a crime.

Article 9: If whistleblowers or witnesses believe action was taken against them in retaliation for their disclosure, they may appeal to the ACSD, which will take effective measures to protect the legitimate rights and interests of whistleblowers and witnesses according to laws and regulations as the case stands.

Article 10: The company provides witnesses with transportation, catering or reasonable subsidies to testify. Reasonable subsidies include the transportation, accommodation and meals expense and unemployment assistance while witness fulfilling the obligation to testify. The subsidy shall be guaranteed by the finance department of the company.

Article 11: The company will penalize the responsible person under violation of confidentiality, disclosure of reporting information, disclosure of personal information of witnesses, or violation of work discipline. The case will be transferred to judicial authorities if the perpetrator committed a crime.

PART 3

WHISTLEBLOWER AND WITNESS REWARD

Article 12: The company will value the contribution of eligible whistleblower who assists in the investigation and in saving losses or avoiding the expansion of losses for the company by providing financial reward. The contribution will also value as an important consideration in promotion. The company will reward witnesses who make significant contributions to the breakthrough of the case based on the nature of the case, the role played by the witnesses, the loss recovered, etc., with reference to the reward for eligible whistleblowers.

Article 13: A eligible whistleblower refers to a whistleblower who meets the following conditions:

- (1) Report with benign motive;
- (2) Report with no conflict of interest;
- (3) The report is specific and clear;
- (4) The report is an incremental contribution to the company;

(5) The report is verified to be true. If the unit report is verified to be true, the company will give honorary rewards to the unit whistleblower by giving priority to the partnership and maintaining the stable business development if the unit whistleblower is a current business partner.

Article 14: Reward includes spiritual reward and bonus reward. The ACSD shall determine the reward method and amount according to the nature of reported violations, the amount of money involved, the loss and the value of the report.

(1) If a bonus is given, the bonus amount for each case is generally RMB3,000;

(2) If the whistleblower has made significant contributions to recover or avoid major losses of the company, he would be rewarded with 3-5% of the loss recovered or avoided;

(3) If it is impossible to put a value on the avoided loss or protected interest, the company will evaluate the contribution of the whistleblower in accordance with relevant provisions and determine the amount of bonus award.

Article 15: Reward principles:

(1) If there are multiple eligible whistleblowers for the same case, in principle, the reward would be given to whistleblower who reports first or plays a major role in the breakthrough of the case. Other whistleblower who plays a major role in the breakthrough of the case may be rewarded as appropriate;

(2) If a number of eligible whistleblowers jointly report the same case, one case would be rewarded with one prize. The distribution of the reward can be based on the contribution or determined by the whistleblowers;

(3) If the eligible whistleblower reports the same content for multiple times, the reward would be given only once. For two reports have shared content, the shared part would be rewarded only once;

(4) If report is verified to be partly true, the verified part shall be rewarded according to provisions.

Article 16: The reward shall be submitted by the ACSD to get the approval from the company. After the case concluded (finished investigation or the decision is made by the court), the ACSD shall inform the award decision to eligible whistleblowers within 15 workdays and start the reward procedure if the eligible whistleblower is willing to accept the award.

Article 17: The ACSD shall submit the reward scheme for approval from the company and start the reward procedure for eligible whistleblowers.

Article 18: The ACSD shall include the reward list, reward method and reward amount in the reward scheme for approval. The dedicated reward

fund shall be included in the budget by the finance department and audited by the finance department and audit department.

Article 19: The ACSO is responsible to provide the reward:

(1) The ACSO shall notify the eligible whistleblower to accept the award through appropriate means. The eligible whistleblower shall collect the reward with Personnel ID or other valid certifications at the company or other designated location within 1 month after the notification. Late collection is considered a waiver of rights.

(2) Anonymous whistleblowers shall provide information which leads to the identity as identity codes at the time of reporting, and shall set a reporting password with the ACSO. After the report is verified, anonymous whistleblowers can claim the reward by providing the identity codes and reporting password.

(3) When issuing the reward on site, two or more company staffs shall present. If the real-name whistleblower is inconvenient to collect the reward from the company or other designated location, the whistleblower may provide the real-name bank account and account information. The company may transfer the reward after confirmation and file the transfer voucher. Anonymous whistleblower shall collect the reward at the company or designated location after the identity is verified.

Article 20: The whistleblower shall pay tax in accordance with the relevant law after receiving the reward.

Article 21: In the process of reward claiming, the ACSO shall penalize in accordance with the severity of the following circumstances; The case will be transferred to judicial authorities if the whistleblower committed a crime:

(1) Forging or abetting, collaborating with others to forge the report, fraudulent reward;

(2) Disclosure the information of whistleblower without the consent of the whistleblower;

(3) Embezzling, misappropriating, dividing privately or intercepting the reward.

Article 22: If the whistleblower falsified to claim the reward, the whistleblower shall bear corresponding responsibilities in accordance with the law; The case will be transferred to judicial authorities if the whistleblower committed a crime.

PART 4

SUPPLEMENTARY PROVISIONS

Article 23: The Provision applies to all departments and platforms of the company headquarter. All wholly-owned or holding member enterprises and all shareholding enterprises shall comply with or refer to the Provision.

Article 24: The ACSD of the company is responsible for the interpretation and revision of the Provision.

Article 25: The Provision shall come into force as of the date of issuance.

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