

## **Anti-corruption and Anti-bribery Policy of Tigermed**

Tigermed<sup>1</sup> has maintained steady growth over the years. The progresses the Company has made is attributable to the company's culture of compliance and ethical code. Moreover, it is the Company's value of honesty and integrity that has been guiding and regulating the business conducts of our employees.

We have been adhering to high standards of business conduct and always strictly following the national laws and regulations of China, as well as international practices and business ethics, and have stipulated definite regulations on business ethics including anti-corruption policy in the *Code of Business Ethics and Conduct*, with continuous improvement of the internal supervision mechanism and risk control system and integrity enhancement in the Company's operations, adapting to the increasingly stringent regulation, regulatory updates and compliance requirements for the Company's global development.

### **1. Application Scope**

This policy is applicable to all the employees of the Company (including regular employees, contract workers and interns), senior management, board directors and third party representatives.

### **2. Management Structure**

The Audit Committee of the Board of Directors is responsible for overseeing the management of business ethics and corruption issues of the Company. The Board of Directors has set up the Environmental, Social and Governance (ESG) Committee and the Compliance Management Committee, to promote the Company's comprehensive compliance in operations. As the internationalization development of the Company deepens, we have taken numerous measures such as developing standard operating procedures (SOPs) to meet the requirements of overseas regulatory authorities in order to ensure that the Company's operations in any countries are in compliance with the requirements of local policies and regulations.

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<sup>1</sup> Including Hangzhou Tigermed Consulting Co., Ltd. and its affiliates, consistent with the scope of the annual report and consolidated financial statements of Tigermed (Stock Code: 300347.SZ/ 3347.HK).

### 3. Raise Concerns or Blow the Whistle

Tigermed's legal and compliance department accepts all the real-name or anonymous whistleblowings from employees, third-party representatives and partners who do business with Tigermed about actual or suspected violations they have discovered. Employees are responsible for promptly reporting to the Company conduct that they know or believe other employees have engaged or are engaging in that violates the law and this policy.

We have set up several channels for whistle blowing of non-compliance, such as the Tigermed's official website, the whistleblowing hotline and e-mail box. We will set up a working group to investigate and evaluate each reported incident and deal with it based on the investigation results. If an reported non-compliance case is confirmed, the Company will take appropriate corrective measures to solve it.

All the whistleblowings shall be based on facts. Malicious whistleblowings, false accusations and frame-ups are prohibited. The whistleblower shall truthfully provide the name of the person being reported, the department and the facts of the violation; if there is evidence of information, need to be provided together.

#### Whistleblowing Channels for Non-Compliance Provided by Tigermed

- Official website: We have set up a column of compliance concern on the frontpage of the Company's website (the column on the English version of the Company's website is named as "Compliance Concern"). Whistleblowers may report by completing the forms according to the page prompts and the column provides options for them to submit the reports in real-name or anonymously.
- Hotline: The hotline for whistleblowing of non-compliance is: 400-687-2720.
- Mailbox: The mailbox for whistleblowing of corruptions and non-compliance is: [compliance.officer@tigermedgrp.com](mailto:compliance.officer@tigermedgrp.com)

#### **Protection of Whistleblowers**

Whistleblowers' personal information and the information they provide will be kept in strict confidentiality. From receiving the report to closing the case, the investigators shall strictly keep all the relevant information confidential, and no other units, departments or individuals shall have the right to gain access to any of the relevant information unless they are authorized so as to ensure the safety of the whistleblowers. The confidential information

includes the identity of the whistleblower, evidences gathered during the investigation, and all written reports prepared during the investigation. The personnel responsible for violating the confidentiality provisions will be disciplined according to the internal management system and will be held responsible according to law.

We do not tolerate any acts of retaliation or framing-ups against the whistleblowers and witnesses. The Company will make every effort to ensure that none of the employees will suffer from any improper harms due to expressing their concerns or reporting non-compliance or illegal acts committed by others. The Company will not penalize, discriminate or retaliate against employees who raise concerns in good faith or who provide assistance in an investigation. Any individual (regardless their positions) who take revenge on the employees who raise questions, express their concerns or report potential non-compliance shall be punished by the Company, up to and including the most severe punishment of termination of his or her employment contract. If any crime is involved, such individuals shall be handed over to relevant judicial authorities for legal action according to law.

Tigermed has established an anti-retaliation protection mechanism for the whistleblowers and will protect them in accordance with the law. If the whistleblowers are our employees, the Company will pay close attention to their working status on a regular basis to protect them from being squeezed out or retaliated in disguised forms. If the whistleblowers are the Company's suppliers or partners, the Company shall take measures to protect them and ensure that their lawful rights and interests will not be affected.

#### **4. Policy**

In Tigermed, the following acts are strictly prohibited:

- 1) Taking advantage of one's official position to accept or solicit properties or other benefits from suppliers or other partners;
- 2) Receiving gifts or money in violation of regulations or failing to handed in gifts or money obtained in official activities in a timely manner;
- 3) Embezzling, stealing, swindling and misappropriating the Company's property or setting up or illegally allocating private petty cash;
- 4) Illegally conducting connected transactions or violating the provisions of conflict of interests to gain benefits for oneself or one's friends and relatives by taking advantage of one's official positions;

- 5) Being engaged in jobbery or insider tradings;
- 6) With serious negligence, abuse of authority or violation of the Company's policies and causing damage;
- 7) With other acts of corruption or dishonesty.

All the management and employees must accurately and transparently record true transactions and payment activities in accordance with the Company's internal accounting control system.

### **Gifts and Hospitality**

Offering or accepting inappropriate gifts and hospitality is strictly prohibited at Tigermed. To be specific,

- 1) The employees are strictly prohibited to provide or authorize any third party to provide any valuables to partners in the name of Tigermed, or offer or accept gifts and hospitality/banquets so frequently that such acts may be considered as excessive.
- 2) The employees are strictly prohibited to offer or accept any valuables, cash or services in a non-transparent manner, especially using their private address or bank accounts, without the consent of the Company's compliance department.
- 3) The employees are strictly prohibited from accepting and soliciting gifts or rewards beyond the ordinary business etiquettes in any manner from any organizations with business connections with Tigermed.
- 4) The employees are strictly prohibited from giving money or providing any valuables, directly or indirectly, to government officials in order to win or retain businesses, or improperly affect the acts or decisions to be made by any government officials, political parties, candidates for political positions or officials of public international organizations to obtain improper advantages, or illegally affect the acts of any individual, clients, companies or company's representatives.
- 5) When exchanging gifts and hospitality with other non-government business groups, the employees of Tigermed must comply with local laws and regulations or stricter business unit or regional policies. Cash, gift cards or cash equivalents are not allowed to be exchanged under such circumstances, and acts that are suspected of offering or accepting bribes or kickbacks should be avoided.

- 6) Offering and accepting modest small gifts and hospitality or other gifts for courtesy are permitted, provided that such acts will not affect the business decisions to be made by the related party, or such gifts and hospitality are not provided expressly or impliedly by the employee(s) of Tigermed during the process when the business decisions are made.

Gifts or rewards beyond the ordinary business etiquettes

- Cash or the equivalents;
- Luxury leisure travel or accommodation financed by suppliers or other partners;
- Tickets of sporting events or art shows;
- “Prizes” financed by commercial entities;
- Expensive gifts that cannot be reciprocated with equal values;
- Requesting suppliers or other business groups to support charitable causes;

**Conflicts of Interests**

Employees of Tigermed must make sufficient reports in case of conflicts of interests or potential conflicts of interests.

Employees at the positions of directors or higher levels, including members of board of directors, boards of supervisors, senior management, as well as the employees at special positions specified by the Company’s ESG and the Compliance Management Committee must sign the *Declaration of Conflicts of Interests of Tigermed*; meanwhile, they must disclose to the department manager or the compliance officer the actual circumstances concerning the conflict of interests or potential conflict of interests in a timely manner, and these declarations shall be approved in writing.

Circumstances concerning the conflict of interests or potential conflict of interests

- 1) Employees and their family members, spouses or other intimate persons have one of the followings:
- Work in the same department;
  - Share the same reporting line;
  - Being members of the same administrative team;
  - One of the parties has influence or decision-making power over the position of

the other party;

- 2) Employees are engaged in another sideline or business operation that may cause conflicts with their duties at Tigermed;
- 3) Employees create personal opportunities with the information they obtain at Tigermed;
- 4) Employees or their relatives have financial interests in a competitor company, supplier, or customer of Tigermed or serves on the board of directors or management of such organizations;
- 5) Employees or their relatives have made, directly or indirectly, "substantial financial investments" in any company with which Tigermed competes, has a business relationship, or is establishing a business relationship.

The term "substantial financial investments" is defined as follows: the employees or their relatives own more than 1% of the outstanding capital stock of a company and/or they have invested more than 5% of their individual total assets in a company.

## **5. Control Measures**

### **Internal Audit**

As the leader of enhancing the correct business ethics, Tigermed's senior management has the obligation to establish an environment of honesty and integrity in addition to promoting the implementation of the Company's business ethics system, whilst the internal audit department is responsible for independently reporting the supervision results to the Company's audit committee. The scope of the internal audits shall cover all the the business aspects related to financial reporting and information disclosures in all of the business activities conducted by the Company, including but not limited to sales and collections of accounts receivable, purchasing and payment, inventory management, management of fixed assets, capital management, management of investment and financing, human resource management, management of information system as well as management of information disclosure affairs etc. The departments of internal control and internal audit shall conduct audits on the key aspects on an annual basis, and the audit shall cover all the core business processes at a frequency of once every three years.

The internal audit department may adjust the above business aspects according to the industry in which the Company is operating and the characteristics of the production and operations

conducted by the Company.

### **Training**

Training sessions or lectures concerning compliance and business ethics will be provided on a regular basis (no less than annually) to all the employees on active duty (including regular employees, contract employees and interns), senior management and board of directors of Tigermed.

### **Management of Suppliers**

Tigermed has developed the *Code of Business Conduct for Suppliers of Tigermed* and its Attachment 1, the *Anti-bribery and Anti-corruption Commitments*, includes the anti-corruption and anti-bribery policy, and provides a dedicated hotline or an e-mail box for whistleblowing misconducts related to corruptions and bribes.

The purchasing department is responsible for the management of suppliers. All the new suppliers must sign the *Code of Business Conduct for Suppliers of Tigermed* and its Attachment 1, the *Anti-bribery and Anti-corruption Commitments* when they gain admittance into the suppliers list, with the aim to ensure that all Tigermed's suppliers become aware of the anti-corruption and anti-bribery policy of Tigermed.

Tigermed expects its suppliers to have appropriate management systems and business requirements in place to ensure ongoing satisfaction of and compliance with the *Code of Business Conduct for Suppliers of Tigermed*. Suppliers shall agree that Tigermed or a third party designated by Tigermed will conduct audits to verify compliance and continuous improvements as for the *Code of Business Conduct for Suppliers of Tigermed*.

### **Responsibility**

Anyone who violates this policy shall be disciplined according to the company's internal management system and be held responsible in accordance with the law, including but not limited to dismissal, termination of labor contract and transfer to judicial organs for handling.