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MORE CARE BETTER CARE

康希诺生物合规手册

CANSINOBIO
COMPLIANCE MANUAL



CANSINOBIO
COMPLIANCE MANUAL

Message from Chairman



Since its establishment in 2009, CanSino Biologics Inc. has been dedicated to exploring the best solutions to the prevention of infectious and contagious diseases through cutting-edge research & development, advanced manufacturing and commercialization of innovative vaccine products for human use worldwide. CanSino is not only a practitioner of the pharmaceutical industry, a driver of R&D innovation, and an enabler in international cooperation, but also a bearer of social responsibility.

In recent years, CanSino has earned valuable trust from clients, business partners and the public all over the world with excellent products, high sense of social responsibility and good business reputation, which stems from our integrity, trustworthiness and compliance in the research and development, production and business events. In the process of establishing excellent goodwill, CanSino always abides by the belief of complying with the rules and laws.

It is integrity, ethics and compliance that are important for CanSino to keep the public's trust, respect and recognition, and achieve sustainable business development and success, both now and in the future. Therefore, it is very important for CanSino to hold fast to integrity, ethics and compliance, which requires every employee of CanSino to abide by the highest standards of ethics, fulfill the promise of compliance and ethics together, act and behave in good faith, strictly follow the industry norms, respect contracts, keep credit, refuse to bribe, compete fairly, and comprehensively improve the ability to manage enterprises according to law.

In this regard, I hereby make the following commitments on behalf of CanSino Biologics Inc.:

- ① We will uphold the highest standards of commercial ethics.
- ② We will abide by applicable laws.
- ③ We will adhere to industry codes of conduct.
- ④ We will make it our mission to be responsible for society, environment, public and industry.
- ⑤ We will value applicable laws and ethical rules more than the economic interests of the company; value the interests of society and the public more than the interests of the company and individuals.
- ⑥ We will not tolerate any violation of applicable laws and ethical rules, and any failure to live up to the social trust.

This manual provides an easy-to-understand explanation of the compliance matters we shall abide by, to assist all CanSino employees in behaving correctly. The responsible and correct action is the first step to realize the corporate vision of CanSino and the career goal of every employee. It is also the cornerstone of the success of enterprise and employees hand in hand. I sincerely look forward to your understanding and cooperation.

A handwritten signature in black ink, appearing to read 'Yu Xuefeng', written in a cursive style.

YU XUEFENG, Chairman

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A Letter from the Risk and Internal Control Management Committee

To all CanSino employees,

Compliance risk is one of the three major risks in corporate governance alongside operational risk and financial risk. If a company operates in violation of law or regulations, it may be imposed administrative penalties or even criminal sanctions, which will bring the company multiple losses including economic losses and reputation losses. Therefore, our company must operate in compliance¹. In order to strengthen risk control and remain operating in compliance, we established the Risk and Internal Control Management Committee, and formulated and issued a series of compliance policies, gradually building an internal compliance management system to escort the development and growth of CanSino.

To carry out the compliance management as well as implement policies of compliance management effectively, we have prepared CanSinoBIO Compliance Manual as a binding guidance on behaviors, which puts forward the specific behavior requirements for all aspects involved in the work, and guides every employee to conduct the business in a compliant and ethical manner. In addition, we will update the Compliance Manual from time to time with the continual improvement of CanSino's Comprehensive Compliance Management System so as to be compatible with the rapid development of CanSino. Please read the manual carefully, thank you.

¹Compliance refers to compliance with and conformity to applicable laws, regulations, industry standards, industry codes of conduct, etc.; compliance with and conformity to the internal policies, systems, processes, procedures and regulatory documents of the Company, etc.; and, compliance with and conformity to socially accepted ethical standards and professional ethics.

Who must abide by this manual?

The Compliance Manual is applicable to every employee of CanSino worldwide, including the directors, supervisors, senior management, all employees and other temporary employees.

Compliance with the highest ethical standard means that every employee shall read, understand and strictly abide by the manual. Meanwhile, our business partners and suppliers shall also comply with the relevant requirements in this manual.

2 What are the possible consequences of violating the Compliance Manual?

CanSino will not tolerate any violation of the Compliance Manual since such violation will bring serious consequences to the company and individuals, which may include:



For the company

suffering damage to reputation, brand and market value, being sued, facing huge fines or damages, and business losses, etc;



For individual employees

suffering damage to personal reputation, being sued, being fined or facing claimed damages, being sanctioned to disciplinary, or suffering injury, etc; and,



For vaccine recipients, the public and investors

losing the safety assurance of vaccine recipients, facing environmental risks, losing confidence in CanSino and products, or depreciating investment value, etc.

3 How do you make the right choice according to Compliance Manual?

When you are unsure of whether your behavior and decision comply with the provisions of this manual, please ask yourself the following questions:

- ④ Will I violate ethics?
- ④ Will I violate relevant applicable laws¹ regulatory requirements, and industry codes of conduct, violate CanSino Bio Compliance Manual, or systems, policies or related procedures of the company?
- ④ Will I go against the values of the company and mine?
- ④ Will my action and decision appearing in the public or media damage the reputation of the company and mine?
- ④ Will my family, friends and colleagues oppose my behavior and decision?
- ④ If this action and decision affect me, will I object?
- ④ Am I not ready to take responsibility for my action and decision?

If the answer to any question is "yes", or if you have doubts or cannot answer it, please get in touch with the contact person below for help.

4 How to find relevant guidance and suggestions and how to put forward doubts, questions and suggestions?



Your immediate leader, department heads and any manager

Generally, they are the most knowledgeable person about the business processes and the requirements and standards to be followed of the company, and can answer your doubts at the first time.



Legal and Compliance Department

Explain the laws and regulations, this manual and relevant policies of the company for you, and provide professional consultation and guidance as well as suggestions.

Applicable law refers to any applicable laws, administrative regulations, departmental rules, normative documents, judicial interpretations, and relevant government policies, as well as their updates from time to time.



HR Department

Answer your questions about employment policy, reward and punishment mechanism and troubles in the workplace



Information Management Department

Provide you with professional explanations on permissions, data security, network security, etc.



Environment, Health and Safety Department (EHS)

Provide you with professional explanations on environmental protection, occupational safety and health.

In addition, you can also put forward complaints and suggestions about the existing policies and processes of the company to relevant departments.

2 CHAPTER

Our Commitment to Compliance



With excellent products, strong sense of social responsibility and good business reputation, CanSino wins valuable trust from clients all over the world, business partners and the public, which is derived from our integrity, trustworthiness and compliance in the research and development, production and commercial activities. Compliance and ethics are critical for CanSino to maintain the public trust, respect and recognition of CanSino and to achieve the sustainability and success of the business now and in the future. Therefore, to keep operating in compliance and with ethics is of paramount importance to CanSino. This requires each CanSino employee to abide by the highest ethical standards, to jointly fulfill the commitment to compliance, and to act with integrity as well as behave with integrity.

To this end, CanSino has established a comprehensive compliance management system and released the CanSino Bio Compliance Manual.

The CanSino Bio Compliance Manual is a binding guidance on behaviors which lays out specific conduct requirements on various aspects of the work involved and guides each employee to conduct business in a compliant and ethical manner.

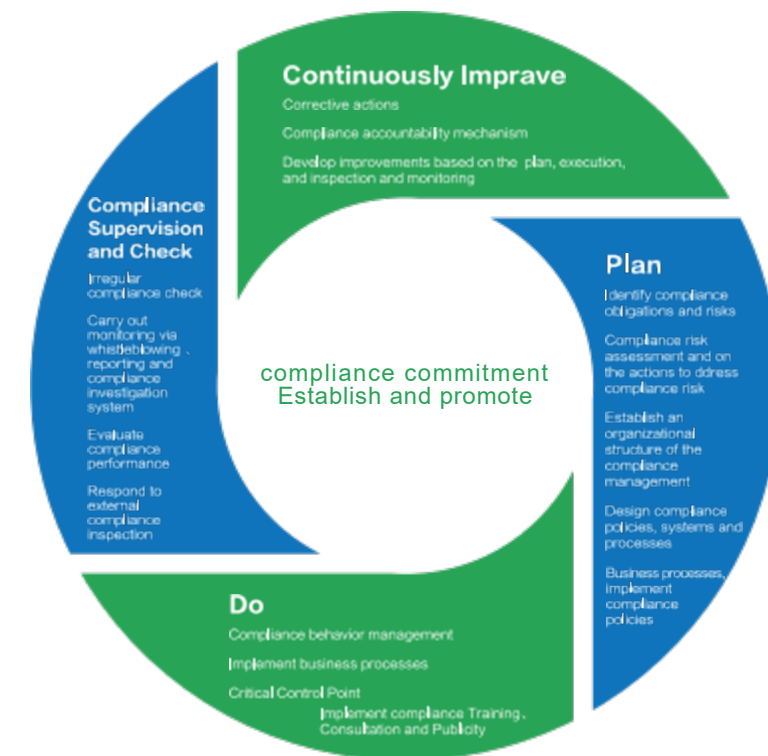
Comprehensive Compliance



Overview of Compliance Management System

Our industry is commissioned with a special task to prolong and save human life under strict regulation. Therefore, integrity, trustworthiness, compliance and law-abiding are the prerequisites for all our business activities and the decisive factors for our success.







To fulfill commitment to compliance, CanSino pursues the comprehensive compliance management of the company and will never tolerate any form of violation of laws and regulations. Therefore, we are committed to establishing a comprehensive compliance management system to achieve this vision. This system covers the following elements:








Note

The organizational structure of compliance management – managed by the board of directors, led by the Executive Committee under general manager (CEO), implemented by the Legal and Compliance Department, and directly responsible by the person(s) -in-charge of various departments/centers.

The compliance management system of CanSino covers all existing activities of business operation and management, including the following important business activities and high-risk areas: (See the table below)

Guidelines for Business Compliance	
 <p>Products Ethical R&D behavior Product production Product promotion</p>	 <p>Anti-money laundering Anti-money laundering</p>
 <p>Anti-Corruption Prohibition of corruption, bribery and fraud Interaction with persons and agencies outside of the company</p>	 <p>IP and confidential information Intellectual property and confidential information</p>
 <p>Anti-unfair competition Avoidance of conflicts of interest Fair competition and anti-monopoly</p>	 <p>Data protection and cybersecurity Data protection and cybersecurity Human Genetic Resources Management cybersecurity</p>
 <p>Management of business partners and suppliers Selection and management of business partners Fair and transparent procurement</p>	 <p>Data protection and cybersecurity Protection of Company Assets Trade compliance</p>

Guidelines for Compliance of Listing Supervision	
 <p>Anti-money laundering Anti-money laundering</p>	 <p>dealing in securities Guidelines on dealing in securities by shareholders, directors, supervisors, senior management and related employees</p>
 <p>Information disclosure Guidelines for connected transactions</p>	

Fair Treatment and Protection of Our Employees	
 <p>rights of employees Protection of fundamental rights of employees</p>	 <p>personal information Protection of employee privacy and personal information</p>
 <p>Occupational health Occupational health and safety</p>	

Compliance responsibilities of management

As the management of the company, you shall set a good example and take an important leadership responsibility for the comprehensive compliance management of the company.

- Lead by example, be honest and trustworthy, and abide by laws and regulations.
- Help employees understand the Compliance Manual and the company's systems and processes, and help guide employees to comply with requirements of the Compliance Manual.
- Take seriously the potential and existing violations of laws and regulations, fulfill the obligation of reporting, and take timely preventive and corrective actions.
- Protect the whistleblowers and prevent their legitimate rights and interests from being infringed or affected by other negative factors.
- Fully support the investigation of compliance cases.
- Seriously take any compliance concerns, problems and suggestions raised by employees and solve them in a timely and effective manner.
- Perform the duties of management and supervision.

Compliance responsibilities of every employee

CanSino aims for full compliance, and every employee of CanSino assumes an important responsibility for achieving full compliance of the company. Every employee shall strictly follow the policies of company, implement the requirements of Compliance Manual, and constantly enhance the values of integrity and compliance. Please fulfill your obligation to report all violations or potential violations of laws and regulations, and cooperate with the investigation.



Whistleblowing email: compliance@cansinotech.com

Whistleblowing hotline: 0086-22-58213600 to 6218



4 Compliance responsibilities to society, environment and the public

CanSino is dedicated to exploring the best solutions to the prevention of infectious and contagious diseases worldwide and making innovative with high-quality vaccines accessible to people in China and all over the world thus making due contributions to global public health care.

As an enterprise responsible for society, environment and the public, we are committed to

- strictly abiding by applicable laws and regulations, and carrying out R&D, production and commercial activities in a sustainable and environment-friendly manner, and issuing policies and rules to protect the occupational health of the employees, as well as take multiple measures to care the safety production of the company.
- truly, accurately and timely disclosing the relevant data and information, and popularizing disease education, ensuring that the public and every interested party who needs our products can benefit from it; actively participating in charitable events, improving the public health and living quality, and fulfilling the social responsibilities.

Our responsibilities to the environment

CanSino has been following various environmental protection laws, regulations, standards and guidelines, and formulated strict company policies, systems and processes, conducted business activities under the principle of environment protection and sustainable development, and integrated resource conservation, pollution prevention and environment protection into all aspects of activities of R&D, production and other business.

We establish the internal environmental management system by referring to the requirements of ISO 14001 Environmental management systems, ISO 50001 Energy management systems and etc. We formulate the internal Policy and other policies to clarify rules for environmental

management, waste emission, and how to identify environmental risks and the corresponding circumventions.

We are committed to developing, adopting and implementing environmentally friendly technologies, processes and equipment, and promoting the energy-saving and environmental protection measures such as waste reduction, recycling and cyclic utilization to reduce adverse impacts on the environment. We are committed to properly managing and coping with the influence on the environment led by production and business activities, continuously optimizing and improving the existing technologies and processes, reducing waste generation and environmental pollution, and developing a sustainable development model conducive to the environment.

Meanwhile, we identify, reduce and monitor existing and potential environmental risks, and strictly manage dangerous goods such as chemicals and drugs, so as to reduce the possibility of physical, chemical and biological hazards in the workplace and minimize the adverse impact on the environment.

We will also improve the environmental protection awareness of every employee through the information circulation and training. CanSino is dedicated to exploring the best solutions to the prevention of infectious and contagious diseases worldwide and making innovative with high-quality vaccines accessible to people in China and all over the world thus making due contributions to global public health care.

Every employee at CanSino shall

- Comply with the laws, regulations and standards of environmental protection in R&D, production and other business activities, as well as the relevant rules and regulations of environment protection of the company, and strictly abide by relevant operating procedures.
- Raise environmental awareness, regard environmental protection as own responsibility, apply the concepts of environmental protection and sustainable development to daily work, and make contributions to environmental protection.
- Actively participate in the environmental protection projects such as energy conservation and emission reduction, and make suggestions for the innovation and improvement of the technology, process and technique of the company.
- Reasonably use the resources and energy, reduce waste generation, and avoid unnecessary emissions and noise pollution.
- Timely report the accidents, noncompliance and other circumstances that have an impact on the environment in the course of work.
- Fully consider whether it is able to conduct the production and operation in an environment-friendly manner when selecting the suppliers and business partners.

Our responsibilities to the society and the public

CanSino believes that corporate development and its social responsibilities are closely integrated into each other. CanSino gives full advantages of the technology in providing safe, effective and accessible vaccines to protect public health; pursues growth with our partners in the principle of win-win, shares achievements with our investors, and creates values for the society, thus fulfilling our social and public responsibilities in the process of corporate development in multiple levels and aspects

We further perform social responsibilities to society and the public in the following aspects:

Communication and disclosure

It is highly valued by CanSino to communicate with the government, healthcare professionals (HCP)/ healthcare organization (HCO), vaccine recipients, investors, employees, public media and other interested parties legally and with integrity. We circulate product information to HCP/HCO legally through a variety of academic marketing methods. We disclose vaccine-related scientific data in a timely manner. We have set up a complete mechanism to deal with adverse reactions to vaccines and client complaints. With such measures, we safeguard the legitimate rights and interests of the public and the health and ensure the safety of vaccine recipients from the very beginning.

For communication and disclosure, we

- Comply with the laws and regulations, publish and share scientific information and clinical experimental data, and ensure the authenticity and integrity of information and data.
- Provide the healthcare organization, vaccine recipients and the public with true, accurate, complete and easy-to-understand product information and safe use instructions, and ensure that the information provided has sufficient scientific argumentation and factual evidence.
- Continuously monitor and evaluate the safety of products during clinical trials and after marketing, issue safety reports regularly, report and disclose any adverse reactions and other pharmacovigilance data in time.
- Provide education on disease prevention and disease for vaccine recipients and the public, popularize health knowledge and share health information.

- Comply with relevant laws and regulations on financial information disclosure of listed companies, publish the periodic financial reports of companies timely, accurately and completely, and provide reliable financial information for investors and the public.
- Participate in social activities, share information with social media, and communicate with employees, the public and interested parties in a transparent, fair and honest manner.

Every employee at CanSino shall

- Report any adverse reactions related to product safety and other information on pharmacovigilance to relevant departments and leaders in time.
- Not make any statements, or comments and take any actions on behalf of the company without authorization in public places and social media; and, if making remarks related to the company or participating in public activities, make it clear that they are personal views and behaviors.
- Not publish any remarks and information that violates laws and regulations, or is unfavorable to the company and employees or confidential information in public places and social media.
- Report to the public relations department or relevant leaders in time for any unfavorable remarks about the company on the Internet or social media, and shall not reply by yourselves without permission.
- Without the approval of the legal and compliance department, shall not accept any paid or unpaid research, investigation, etc.
- Not disclose any company undisclosed information in any form. Undisclosed information refers to the information that has not been publicly disclosed by the company through such channels as announcements of the listed company, third-party media (such as TV, radio, newspapers, magazines, exhibitions, third-party websites, Weibo, wechat, etc.) and We media (such as company website, company official account, etc.).

Charitable donations, sponsorship and funding

CanSino pays close attention to public health and is committed to making positive contributions to public health care in the world. We take the responsibility of improving public health and living quality through charitable donations and sponsorship, and enhance the competitiveness of products and the good social reputation of the company.

In order to help popularize knowledge of medicine and health, accelerate the development of education, and also pursuing to reputation, establish a good social image and promote our brand or products, we will sponsor healthcare organizations to carry out academic activities, and subsidize healthcare professionals to attend academic exchange meetings. (Please refer to the section Interaction with the healthcare professional (HCP) and healthcare organization (HCO) for details)

Every employee at CanSino shall

- Report to relevant departments and leaders in time for any request for charitable donation, sponsorship and funding, and shall not make a commitment by yourself without approval.
- For any charitable donation, sponsorship and funding, adhere to the principles of openness and transparency strictly abide by relevant laws and regulations and the internal procedures of the company, and shall not implement until obtaining the authorization and approval.
- Ensure that any donations, sponsorships and funding are only for the purpose of improving public health, publicizing the company and enhancing the positive influence of the company.
- Participate in charitable activities in a transparent, fair and honest manner, and never promise to provide and carry out such activities for unethical reasons such as obtaining improper benefits and business advantages.
- Prevent disease education and health popularization from evolving into product promotion activities.
- Actively participate in charity activities organized by the company and contribute to improving public health.

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Guidelines for Business Compliance

It is the insistence on the highest business ethics standards, compliance with applicable laws, and adherence to integrity in our business activities to ensure CanSino to become an innovative vaccine company based in China and with international competitiveness and win the unanimous trust and recognition from domestic and foreign governments, healthcare organizations, vaccine recipients, investors, business partners and the public.

In order to maintain our good reputation and leading position in the industry, provide available and effective disease prevention and solutions, and achieve sustainable development and success, we and our employees promise to, in the course of business activities,

- Remain compliant with applicable laws in the field of products: Strictly abide by all applicable laws and industry standards, conduct R&D in an ethical way, and take measures to ensure product quality and safety with the foundation of safe production during the process of R&D, production and product promotion.
- Prohibit corruption and bribery: prohibit any form of corruption, bribery and fraud; prudently deal with gifts, hospitality, invitations, travel, meeting, and expenses pursuant to company policies; in the meantime, interact and communicate with government officials and agencies, and HCP/HCO in a lawful and compliant manner; strictly comply with the compliance requirements on donation management, sponsorship and funding.
- Anti-unfair competition and anti-monopoly: make judgment without being affected by personal interests and avoid conflicts between personal interests and the company interests; support, promote and protect a fair and competitive market environment, refuse unfair competition such as monopoly, and competes in the market as well as promotes business only by acting in a legal manner.
- Manage business partners and suppliers to comply with applicable laws: monitor, manage and urge our business partners and suppliers to comply with applicable laws as well as to be integrity and trustworthy.
- Anti-money laundering: take preventive and monitoring measures against money laundering and refuse to assist suppliers or business partners, clients or other third parties to disguise or conceal the sources and nature of their funds.
- Protect intellectual property and confidential information: value and protect intellectual property and confidential information, and not disclose the intellectual property and confidential information of the company to others not supposed to know the same.
- Keep the data and personal information compliant: understand the importance of protection of data, personal information and human genetic resources, and take multiple initiatives to safeguard data security and personal information protection, ensure the management of human genetic resources, and maintain cybersecurity.
- Protect company assets: uphold financial integrity and tax integrity and ensure the accuracy of company records to protect company property and resources.
- Ensure trade compliance: comply with applicable laws and rules of countries and regions on import and export of trade, and refrain from prohibited or restricted transactions with unreliable entities.



1 Ethical R&D behaviors

CanSino focuses on continuously promoting cutting-edge research and development of innovative vaccines. Therefore, it is very important to be rigorous, scientific, innovative, excellent in the research and development process and clinical trials, and comply with applicable laws, regulations, standards and the highest ethical standards. All our R&D activities and clinical trials are conducted under strict supervision, and we are committed to avoiding ethical and possible safety risks.

CanSino's clinical research is for scientific purposes and takes the latest scientific data as reference. We are committed to maintaining high-quality clinical trial data to ensure its completeness, accuracy and relevance. Meanwhile, we shall continuously improve the transparency of clinical research, provide known information, risks and any new discoveries of all experimental products to healthcare professionals and other interested parties, and publish clinical research reports according to regulations, so as to benefit healthcare professionals and the public, which is of great significance to the improvement of public health.

CanSino always puts the safety and interests of subjects first. All human clinical research operations are carried out by health professionals in conformity with the corresponding conditions and qualifications. We strictly comply with applicable laws and procedural standards in clinical research and any activities involving human genetic resources in China, follow the highest ethical standards, and implement strict internal and external follow-up examinations and regular reports, aiming at protecting the safety and health of subjects. We also attach great importance to the personal privacy of the subjects and ensure that the personal information of the subjects has been deleted before publishing the relevant information.

CanSino promises that all animal experiments will be conducted in a humane, serious and responsible manner following laboratory animal ethics as well as the welfare of laboratory animals, and that laboratory animals will be cared for to a high standard that conforms to or even exceeds laws and regulations. We support the reduction, substitution and optimization of animal experiments, and strive to develop innovative non-animal experimental methods to reduce and replace laboratory animals.

Every employee at CanSino shall

- Comply with all applicable laws, national and international standards, ethical codes and company rules and policies, and conduct scientific research, development and clinical research in strict accordance with the prescribed procedures and processes. Such as the Helsinki Declaration, Biosafety Law, Regulation on the Administration of Human Genetic Resources, Good Clinical Practice, etc.
- Strictly abide by relevant applicable laws and policies of the company when collecting, saving and using personal information of subjects, and record, process and save the experimental data according to relevant regulations and requirements, and ensure their completeness and accuracy.

- Protect the intellectual property rights, business and technical secrets of the company in R&D and clinical research.
- Only use laboratory animals if there is no alternative, and comply with the principles of humanity and ethics if an animal is used, so as to minimize and avoid the pain and discomfort of laboratory animals.

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2 Product production

Products of CanSino are closely bound up with human life. We pay great attention to compliance at every stage of product production.

We insist on providing high-quality, safe, and effective products on the basis of safe production, which is not only our compliance obligation, but also our commitment to society, and, furthermore, is the cornerstone for us to win social reputation and trust.

We take multiple initiatives to pursue the quality and safety of our products and to safely manufacture so as to fulfill the foregoing compliance obligations.

Product quality and safety assurance

CanSino abides by all applicable laws and internationally recognized standards such as Good Clinical Practice (GCP), Good Pharmacovigilance Practice (GVP), Good Laboratory Practice (GLP) and Good Manufacturing Practice (GMP) as well as strict internal quality standards and operating specifications and procedures of the company. Meanwhile, we strictly manage the production supply chain, implement on-site monitoring and continuous supervision to ensure the efficient, safe, high-quality and effective product supply.

In addition, we also carry out industry cooperation and technology transfer, improving product accessibility and the social, economic and environmental impact of the biotechnology industry through excellent scientific and innovation capabilities.

We always put the safety of vaccine recipients first, so we attach great importance to adverse events, including any situations leading to adverse events and product complaints, and actively

cope with them and report them to relevant departments according to regulations. We will continue to pay attention to these adverse events and complaints to ensure that they are solved safely and effectively, and take it as a warning to continuously improve product quality and safety.

We are always vigilant against forging and counterfeiting our products, and committed to protecting the safety and health of vaccine recipients and the public, and maintaining the good reputation of the company.

Every employee at CanSino shall

- Comply with all applicable laws, internationally recognized standards and internal quality standards, operating specifications and procedures of the company.
- Report deviations from standards, problems and concerns in work, and continuously monitor them until the problems are solved.
- Fully understand the safety information and performance characteristics of the company's products, and report any adverse events in time.
- Integrate product quality and safety into every link of work.
- Make suggestions for innovative, high-quality and efficient workflow and methods.
- Ensure that suppliers also comply with our high-quality standards.
- Actively participate in internal and external training related to quality systems and technology, and improve professional level and quality.

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Production safety

CanSino follows the policy of Production Safety First. From aspects ranging from product research and development, and production to quality management, CanSino keeps complying with applicable laws, technology standards and procedures relating to production safety.

We earnestly perform the responsibility of enterprise production safety. We carry out standardization of production safety while gradually establish and improve the standardized production safety management system to continuously improve production safety, prevent and reduce accidents, and guarantee the safety of employees and the orderly conduct of production.

We invest the capital necessary to ensure production safety and provide our employees with a safe production environment.

We cultivate the production safety culture, establish the production-safety-oriented concept and the code of conduct while educate and guide all employees to implement them.

Every employee at CanSino shall

- Bear in mind the policy of Production Safety First at all times.
- Strictly abide by the applicable laws related to production safety as well as the relevant production management system and risk contingency plan of the company.
- Comply with operation specifications of your position.
- Be trained in safety production seriously.

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3 Product information promotion

CanSino promises that the promotion information of products presented in promotion materials is consistent with ones approved by relevant competent governmental departments. All promotional materials will be prepared, reviewed and released in strict compliance with relevant applicable law, and we will promote the registered or listed products according to the marketing license.

We ensure that the promotion information is true, accurate, complete and clear, never contains any misleading information, and does not exaggerate or overestimate the efficacy of products and their role in preventing diseases. The promotion materials we use shall pass strict examination and approval, and the product information we promote is based on the latest scientific evidence and evaluation, so as to ensure that any scientific data and facts in the promotion materials are well documented, and the effectiveness and safety of products will be continuously monitored during the lifecycle, and relevant information will be updated at any time.

Meanwhile, it is essential to make our promotion information relevant, objective, clear and easy to understand, so that vaccine recipients and other interested parties can clearly and completely obtain information about the use of products, including the product uses (or indications), basic safety information and use instructions, etc., to ensure the safe and correct use of our products. Information such as contraindications, adverse reactions and precautions shall be provided clearly, completely and correctly.

Promotional materials that fall into advertisements will strictly comply with applicable laws regarding advertising.

Every employee at CanSino shall

- Strictly abide by the requirements of applicable laws and industry standards related to drug promotion.
- Strictly abide by the internal policies of the company, and only use the promotion, publicity materials and product information reviewed and approved by the internal procedures for promotion.
- Only provide the product information to the outside after being authorized, including the exchange of product information in any public media.
- Always abide by ethical standards and promote the products openly, fairly and transparently.

Prohibition of corruption, bribery, fraud

CanSino prohibits all forms of corruption, bribery, and fraud, and upholds a Zero Tolerance approach towards corruption, bribery, and fraud.

We require all employees and business partners as well as suppliers to resolutely comply with

applicable laws regarding anti-corruption, anti-bribery and anti-fraud; to avoid any unfair competition seeking improper benefits; and to follow high standards of business conduct. We prohibit corruption, bribery, and fraud, regulate gifts, hospitality and invitations, and monitor travel, meetings and expenses to fulfill these compliance obligations.

Business integrity

CanSino prohibits direct or indirect bribery to interested parties such as government officials, healthcare professionals, business partners, suppliers and our clients in exchange for improper benefits, as well as improper behaviors such as bribe-taking, corruption, fraud and embezzlement. It also includes corruption by any third party in CanSino's name or on CanSino's behalf. Our position is strong and firm, our attitude is clear and resolute, and we will never allow any form of corruption and bribery. The Anti-corruption Anti-Fraud Management Policy of the company has made specific explanations and regulations on this.

We shall clearly realize that the corruption will cause serious consequences to the company and individuals which may result in criminal and civil liabilities, and administrative penalties, including high fines and imprisonment. Moreover, corruption will seriously damage the reputation of the company, make the company lose social trust, cause the loss of business and market, and bring value loss to investors. Similarly, the reputation of the individuals involved will suffer serious negative influence.

We must always keep in mind that all business shall be conducted in a compliant and ethical manner. Sometimes, refusing to participate in corruption may lead to temporary loss of business, but corruption refers to improper behavior that violates applicable laws and company policies, and improper behavior taken for temporary benefit shall be sanctioned by law and company.

To act in a way of integrity, trustworthiness, and compliance is the only way for our business to succeed.

Every employee at CanSino shall

- Strictly abide by applicable laws and company policies and procedures during the business process, and ensure that all actions are legitimate and reasonable and conform to ethical standards.
- Never bribe others, never pay "facilitation fees", or "benefit fees", never accept bribes from others, never ask for "kickbacks", etc., and prohibit third parties from doing so on your behalf or the company.
- Obtain approval in strict accordance with the policy standards of the company when offering or accepting gifts and invitations.
- Ensure business partners and suppliers with whom we do business to sign the Integrity Agreement and require them to strictly fulfill their commitments made in such agreement.
- Report all potential corruption and bribery to relevant personnel in time, and cooperate with relevant investigations.
- Follow the requirements of this manual regarding Gifts, hospitality and invitations, and Travel, meetings and expenses.

Gifts, hospitality and invitations

In many cultural practices, offering and receiving the appropriate and reasonable gifts, hospitality and invitations usually help to develop and establish business cooperation, promote and deepen the relationship with the business partnerships. Therefore, CanSino allows the offering and acceptance of gifts, hospitality and invitations which are reasonable and comply with applicable laws and policies of the company, as well as the business ethics.

However, giving and receiving gifts or making hospitality and invitations with the intent to influence any act or decision, or for the purpose of obtaining undue advantage, will be regarded as bribery and are absolutely prohibited.

Every employee at CanSino shall

- Strictly abide by the relevant requirements, standards and strictly-prohibited behaviors about the gifts, hospitality and invitations in the applicable laws and the Anti-Corruption Anti-Fraud Management Policy, Expense Reimbursement Management Policy and related Rules, China Marketing Compliance Standards Manual of the company
- Provide the gifts, hospitality and invitations only after the appropriate pre-approval has been obtained.
- Pay the expenses related to gifts, hospitality and invitations according to the relevant policies of the company, and properly keep the true and complete expense vouchers.
- Consider the following questions when judging whether a gift or treat is appropriate, reasonable, available or acceptable:

Is it cash or cash equivalents, or is it too extravagant or luxurious?

Is it based on legitimate business purposes? Are there any improper demands, such as seeking improper advantages?

Is there a conflict of interest? Are there sensitive political figures?

Is it publicly available? Are there non-public or too frequent offerings?

Is it in a high-risk country or region?

Or you can directly contact the compliance contact person of your department, your immediate leader, the Legal and Compliance Department, etc. to raise your concerns.

Travel, meetings and expenses

For the purpose of expanding the market and developing the business, CanSino will hold meetings and pay related expenses for external parties, and reimburse employees for travel expenses (including transportation, accommodation, catering and miscellaneous expenses, etc.). However, these expenses shall be based on reasonable and legitimate business purposes and premised on the provision of appropriate medical or scientific information, and be in conformity with the scientific demands. The contents of meetings and trips, the amount of expenses and the payment methods shall be lawful, reasonable and appropriate.

The company has formulated the relevant policies to make clear the standards of travel and business expenses to help travelers choose the travel modes, accommodations and meeting places, etc., which not only balances the cost-effectiveness, but also ensures the personal safety of travelers and participants. Meanwhile, our strict pre-approval and post-review procedures can also strictly control business expenses and prevent any fraud.

We shall make clear that misuse of company funds and falsification of expense vouchers are illegal and unlawful acts which will be subject to disciplinary actions by the company, including the termination of labor contract. Meanwhile, relative persons may also be subject to civil administrative or criminal penalties, including fines, detention, and imprisonment, etc.

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Every employee at CanSino shall

- Strictly comply with applicable laws, and relevant requirements and standards on travel and business expenses as well as the authorization approval process of the company.

- Carry out any internal and external travel, meetings, etc. only after prior approval, and provide the true, appropriate and reasonable information necessary for the approval while ensure that travel and meetings base on scientific demands.
- Strictly abide by the relevant policies of the company with regard to the expenses of travel and meetings, and properly keep the true and complete expense vouchers.
- Uphold the highest ethical standards in all business activities, make good judgment and not misuse the funds of the company, and only reimburse reasonable and true business expenses directly related to their own responsibilities, and provide true bills and supporting materials.

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5 Interaction with persons and agencies outside of the company

The interaction with government officials and agencies, healthcare professionals and healthcare organization is an integral part of CanSino business activities. However, in the highly regulated pharmaceutical industry, any interaction with such persons/institutions will attract the close attention of the regulatory authorities. Therefore, we shall carry out such exchange activities in a lawful and compliant manner, follow more rigorous and prudent standards of judgment, and uphold the principles of openness and transparency.

We achieve the above compliance by ensuring compliance in interacting with government officials and agencies, as well as healthcare professionals and healthcare organizations.

Interaction with government officials and agencies

We are a vaccine R&D, production and sales enterprise, so the government is often both our regulator and customer, and we shall establish and maintain a good relationship with it. Therefore, CanSino will interact with the officials from different government departments frequently, including the personnel of state organizations, government regulatory departments such as customs officials, government consultants, personnel of public hospitals and center for disease control and prevention,

health and epidemic prevention station, or other public institutions, etc. Offering bribes to government officials is regarded as a serious crime in most countries. Therefore, we shall always be vigilant against bribery and corruption in any country and region where we do business.

Therefore, it is prohibited to provide or promise to provide any improper benefits, whether in cash or in kind, to government officials in any country and region where we do business in order to gain unfair competitive advantage or try to improperly influence the decision-making of government officials.

When establishing cooperation and signing contracts with the government and relevant institutions as our important customers, we shall strictly abide by the relevant regulations, procedures and approvals of various countries and regions, and conscientiously fulfill our contractual obligations. Failure to comply with these regulations may lead to serious consequences such as loss of important business, loss of trust of the government and the public, fines and legal responsibilities.

Meanwhile, we are still under the strict supervision of the government and relevant institutions, so we shall actively cooperate with the investigation, audit and inquiry by the government, provide relevant true information, answer relevant questions and make responses with a serious and professional attitude.

Every employee at CanSino shall

- Interact with government officials in compliance with applicable laws, and internal policies of the company, adhere to the highest ethical standards, never bribe government officials and never provide them with any improper benefits.
- Not sponsor or provide funds for government officials to participate in third-party meetings and other activities, unless the written approval of the government officials' institution has been obtained, and not provide entertainment services to them in the interactive communication.
- Not invite the relatives and friends of government officials and other irrelevant persons to participate in the interactive exchange activities, and not pay any fees for them under any circumstances.
- Give the gifts, banquets and hospitality to government officials strictly in accordance with the policies and approval procedures of the company for reasonable purposes, for which the value and frequency shall be in conformity with the occasion and position of vaccine recipients.
- Behave appropriately, be polite and professional, and remember that you represent the image and interests of the company when communicating with government officials.
- Respond promptly to proposals of the government and governmental reviews related during the negotiation; after entering into the contract with the government, conscientiously fulfill the contractual obligations, and timely fulfill the payment obligations according to the agreed payment methods and amounts.

- Abide by the relevant policies and procedures of the company and obtain corresponding approval in the face of government inspection, audit, inquiry, etc., submit the true and complete materials as required and answer relevant questions truthfully, and pay attention to protecting the legitimate rights and interests of the company such as intellectual property rights and trade secrets.

Interaction with the healthcare professional (HCP) and healthcare organization (HCO)

CanSino interacts with HCP/HCO in many ways, including business exchanges meetings, academic conferences, engagement of speakers and conducting medical research, academic and educational funds/donations, etc. Any interaction shall be carried out for the purpose of conveying product information, providing clinical and scientific information, conducting academic exchanges and discussions, supporting medical research and education, or collecting feedback on our products.

We shall conduct the business and communication activities with HCP/HCO in a compliant manner, and prohibit the bribes, such as offering or promising to offer benefits (whether in cash or in kind), hospitality, travel, financial aid and donation to HCP/HCO, in order to obtain improper benefits that, for example, inducing HCP/HCO to provide convenience in prescribing drugs, recommending, purchasing, supplying and using any company products.

When organizing and funding the interactive exchange meetings, due account shall be taken of the appropriateness and rationality of meeting places, HCP/HCO's qualifications, capabilities, levels, and accommodation, catering, transportation and other expenses.

With regard to charitable donations, we strictly abide by relevant applicable laws and industry standards of the World Health Organization and other countries, and internal procedures of the company. All charitable donations will be provided according to the strict and transparent approval procedures to avoid corruption, bribery and conflicts of interest. Any funds or donations we provide are not for the purpose of gaining trading opportunities or competitive advantages.

Every employee at CanSino shall

- Sign an appropriate written agreement before interacting with HCP/HCO.
- Strictly comply with the requirements, standards, approval procedures and prohibited behaviors of CanSino when interacting with HCP/HCO.
- Engage the external speakers strictly following the requirements of CanSino .
- Not directly or indirectly induce HCP, by paying "lecture fees" or "training fees", to promote or publicize in disguised form any company products in relevant academic or professional conferences.
- Not invite the relatives and friends of HCP and other irrelevant persons to participate in interactive communication activities, and not pay any fees for them under any circumstances.
- Provide the gifts, banquets and hospitality for HCP strictly in compliance with the policies and approval procedures of the company, and not provide any entertainment services. Not directly provide academic and commercial sponsorship, fund and donation to HCP, or subsidize tourism directly or in disguised form.
- Pay the relevant fees to and for HCP/HCO in conformity with the policies and procedures of the company upon approval.

6 Avoidance of conflicts of interest

A conflict of interest refers to a situation where the interests of the company represented by the employee in carrying out his or her duties for the company interfere with his or her own personal interests or the interests of a person/entity with which he or she is associated or has a close relationship (collectively, "personal interests"), which affects/may affect such employee's professional judgment in the performance of his or her duties for the company, or impairs/may impair the rights

and interests of the company and its shareholders, or negatively affects the operations or reputation of the company, or bring legal risks into the company.

We shall make the business decisions on the premise of protecting the interests of CanSino, and our professional judgment shall not be influenced by personal interests, so as to avoid conflicts between personal interests and company interests.

We respect the personal interests of employees and do not interfere in their personal affairs. However, every employee of CanSino is obligated to avoid the conflict between personal interests and company interests, and shall make judgments based on objective facts without affecting by personal interests. Where the personal interests of the employee conflict with the company interests, the employee shall deal with it that is in the interests of the company, without being affected by the personal interests.

Every employee has the obligation to disclose and report any existing and potential conflicts of interest to the company. In fact, many existing or potential conflicts of interest can be resolved in a way acceptable to both individuals and companies. Therefore, the conflicts of interest or suspected conflicts of interest shall be reported to the company in time in order to find the appropriate solutions.

Every employee at CanSino shall

- Strictly abide by the rules and polices of company, as well as the Labor Contract, Intellectual Property Rights and Confidentiality Agreement, Confidentiality and Non-competition Agreement and other agreements with the company, and not use the confidential information of the company to serve or invest in competitors no matter during the employment or non-competition period.
- Make business decisions in CanSino's best interests instead of personal interests.
- Anticipate and avoid conflicts of interest to the extent practicable.
- Report and disclose any existing and potential conflicts of interest in time and never conceal them.
- Without relevant approval, not take advantage of your positions to seek the business opportunities which are supposed to be owned by company for benefiting yourself or others, or operate similar businesses with the company by yourself or for others, or compete with the company in any form.

- Take legal and effective measures to cause the corporate, enterprise or other economic organizations over which you have control not to engage, whether directly or indirectly, in the business which is the same or similar to that of the company.
- Not have obvious economic or work interests in suppliers, clients, competitors or other companies we seek to cooperate with.
- Before engaging in a part-time job, fully consider whether this job will have conflicts of interest with the company, inform your immediate leader and HR Department, and accept this part-time job only after obtaining the approval of relevant leaders, and, moreover, make sure that taking this part-time job will not affect the interests of CanSino.
- Not take advantage of your position in CanSino to seek benefits for yourself and others.

7 Fair competition and anti-monopoly

CanSino always complies with the anti-monopoly laws and competition laws applicable to the countries and regions where we conduct business, adheres to the principles of fair, open and free competition, and supports, promotes and protects the fair competitive market environment. We are committed to participating in market competition only through legal means to promote the business and seek competitive advantages.

Therefore, we prohibit any agreement with suppliers, clients, competitors or other third parties that violates fair competition rules, such as price manipulation, market division or customer allocation, agreement on supply conditions, negotiation of quotation, boycott, etc., including not only the written agreements, agreements, contracts, etc., but also the oral consultations and any other forms of agreement between both parties.

We also prohibit any direct or indirect exchange of sensitive information with competitors. Such information includes any sensitive information related to business, such as price range, pricing method, cost, deduction, promotion method, marketing plan, market division, bidding intention,

supplier or customer, product quality, future development plan, etc.

We will never denigrate competitors, suppliers, business partners, and belittle their products and services.

Meanwhile, we promise that if we are in a dominant position in the market, we will never abuse our dominant position to exclude other competitors or exploit client.

Every employee at CanSino shall

Business partners of CanSino include:

- Channel partners who are authorized to promote products of the company;
- International business partners in international sales and international promotion businesses;
- Domestic and international business partners in foreign business cooperation projects; and
- Domestic and international business partners in foreign investment business.

Business partners have always played an essential and key role in the daily operation, business sustainable development and success of CanSino. Therefore, CanSino aims at establishing the long-term, mutual-trust, mutual-benefit and close relation with the business partners. In the meantime, CanSino needs to monitor and manage the business partners whose activities affect CanSino's image.

Therefore, not only does CanSino need to be integrity and comply with the law in the operation, but our business partners shall be law-abiding, integrity and trustworthy, have good business and ethical reputation as well.

We establish the strict standards and procedures in the selection, engagement and management of business partners, for example, we conduct compliance due diligence on our business partners at the stage of evaluation to examine if they are legally established, valid and operating in compliance with the law, and we manage them by conducting compliance training and other compliance management means during the cooperation, so as to effectively prevent the corruption, bribery and other improper behaviors with multimethod approaches. Meanwhile, we also hope and encourage our business partners to follow this manual and other business ethics.

Every employee at CanSino shall

- Carefully evaluate and select business partners according to the requirements of our compliance management policies for business partners, and conduct full compliance due diligence to fairness, impartiality, and transparency and avoid conflicts of

- Sign the written contracts or agreements to prevent partners from misconduct, and record the rights and obligations of both parties completely and clearly before cooperating with business partners. Contracts with such business partners include standard compliance provisions. To modify such compliance provisions, please contact the Legal and Compliance Department for guidance.
- Require business partners to declare and disclose any potential conflicts of interest and related/connected transactions/relationships.
- Inform business partners of relevant internal policies and procedures that the company requires them to follow, and prohibited behaviors.
- Implement continuous and effective supervision on business partners, be vigilant against any "red signals" (especially when partners involve government officials), report the potential violations of laws and regulations in time, avoid losses to the company, and safeguard the rights and interests of the company.
- Stop and report any misconduct of the business partners that harms the interests of the company in time, and terminate the cooperation immediately upon approval, and make detailed records for subsequent investigation and treatment.
- Attach the importance to the legitimate rights and interests of the company, such as intellectual property rights, trade secrets and data during the cooperation.

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Selection and management of business partners

Business partners of CanSino include:

- Channel partners who are authorized to promote products of the company;
- International business partners in international sales and international promotion businesses;

- ◉ Domestic and international business partners in foreign business cooperation projects; and
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Every employee at CanSino shall

- ◉ Carefully evaluate and select business partners according to the requirements of our compliance management policies for business partners, and conduct full compliance due diligence to ensure fairness, impartiality, and transparency and avoid conflicts of interest.
- ◉ Sign the written contracts or agreements to prevent partners from misconduct, and record the rights and obligations of both parties completely and clearly before cooperating with business partners. Contracts with such business partners include standard compliance provisions. To modify such compliance provisions, please contact the Legal and Compliance Department for guidance.
- ◉ Require business partners to declare and disclose any potential conflicts of interest and related/connected transactions/relationships.
- ◉ Inform business partners of relevant internal policies and procedures that the company requires them to follow, and prohibited behaviors.
- ◉ Implement continuous and effective supervision on business partners, be vigilant against any "red signals" (especially when partners involve government officials), report the potential violations of laws and regulations in time, avoid losses to the company, and safeguard the rights and interests of the company.
- ◉ Stop and report any misconduct of the business partners that harms the interests of the company in time, and terminate the cooperation immediately upon approval, and make

detailed records for subsequent investigation and treatment.

- ◉ Attach the importance to the legitimate rights and interests of the company, such as intellectual property rights, trade secrets and data during the cooperation.

9 Fair and transparent procurement

CanSino procures products or services from different types of suppliers such as manufacturers, distributors/dealers, engineering builders, and service providers.

CanSino always adheres to the principle of fair and transparent procurement transactions, and never allows any misconduct (including but not limited to bribery) in procurement transactions. We select and purchase products and services from suppliers based on price, quality, service, safety, reputation and business practices, and persist in the principle of fair and open competition.

To ensure that, we implement the strict control measures in all aspects of procurement transactions.

Before the procurement, we shall evaluate the quality of products, services and production capacity of suppliers in strict accordance with the relevant policies and procedures of the company such as the Suppliers Management Policy to select qualified suppliers prudently; and only after it passes the relevant approval, can we carry out the procurement.

Meanwhile, each procurement transaction shall enter into a formal written agreement which shall be legal, compliant, ethical, and effective in protecting the interests of the company.

Furthermore, our company manages the whole lifecycle of suppliers, including the development and engagement of suppliers, daily management, evaluation, and termination of the cooperation, achieving fair and transparent procurement by these regulations.

Every employee at CanSino shall

- ◉ Conduct the procurement transactions according to the requirements and procedures of Suppliers Management Policy, Purchasing Management Procedures, Bidding Management Policy, Bidding Management Procedures, Compliance Policy for Commercial purchasing, Compliance Policy for Engineering Management ensure openness and transparency in the whole purchasing cycle, and provide accurate and fair information support for the company's decision-making.
- ◉ Never recommend or favor a certain supplier because of personal interests.
- ◉ Never accept bribes from suppliers or solicit bribes from suppliers to provide them with unfair competitive advantages.
- ◉ Require suppliers to comply with the relevant company policies and standards of ethics and integrity.
- ◉ Only conduct the procurement activities after a formal written agreement is signed and approved.
- ◉ Pay in strict accordance with the method agreed in the agreement.

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10 Anti-money laundering

CanSino promises to take preventive and monitoring actions according to law, fully comply with all applicable laws related to anti-money laundering, and only conduct businesses with reputable clients engaged in legitimate business activities, and refuse to assist suppliers, clients or other third parties in concealing the source and nature of their funds.

Anti-money laundering refers to the relevant measures taken according to relevant applicable laws on anti-money laundering money to prevent anybody from concealing the source and nature of their proceeds from the drug crimes, organized crimes of underworld nature, terrorist crimes, smuggling crimes, corruption and bribery crimes, crimes against financial management order, financial fraud crimes and other crimes.

Every employee at CanSino shall

- ◉ Follow the principle of "Know Your Customer" (KYC), and be fully knowledgeable of your business counterparty as well as its transaction purpose and nature in carrying out business activities; update the identity data of clients in time during the cooperation if the customer identity data is changed.
- ◉ Avoid establishing or maintaining relationships with clients without the prior due diligence of "Know Your Customer" (KYC).
- ◉ Avoid accepting clients' payments from entities other than the clients' own account without explicit agreement.
- ◉ Avoid signing agreements where financial elements or systems are not transparent or are incompletely documented
- ◉ Do not release refunds to the bank accounts of third party other than the original paying bank account.
- ◉ Take particular care when the client is the government officials or the person with influence over the government officials or is controlled by the government officials or the person with influence over the government officials.

11 Intellectual property and confidential information

CanSino, as a biotechnology company integrating R&D, production and commercialization, has a large number of intellectual property rights such as patents, trademarks, copyrights, trade secrets (including technical secrets and business secrets) as well as other confidential information protected at home and abroad.

Intellectual property and confidential information are the valuable assets of CanSino and the key to our success. Therefore, it is the responsibility of every employee who directly or indirectly obtains this kind of information to protect intellectual property rights and confidential information. We are obliged to know which information of the company is confidential, and strictly abide by relevant regulations to protect such information. We shall never disclose the confidential information of the company to anyone inside or outside the company, except those who are entitled to know and obtain the relevant approval.

The company's confidential information includes technical information such as designs, applications, product formulas, production processes, production methods, technical know-how, technical parameters, technical solutions, etc. that the company has not yet announced to the public; and commercial information such as major development strategies or business strategies, important supplier information, production, sales and pricing strategies, bidding information, customer information, financial information, etc. that the company has not yet announced.

If we fail to protect this kind of information, then the third party may steal our innovation, technology and secrets and infringe on our legitimate rights and interests, which will lead to the loss of our competitive advantage and then the values of our related research, development and investment, and we will definitely stand the huge losses. Those employees involved will also be severely sanctioned by the company and may assume relevant civil and criminal liabilities.

Meanwhile, we also respect the intellectual property rights and confidential information of competitors, business partners and other third parties.

Every employee at CanSino shall

- Understand the importance of intellectual property rights, enhance the awareness of intellectual property and confidential information protection, participate in various pieces of training of the company, and consciously comply with the relevant rules of the company regarding intellectual property and confidential information protection.
- Take the responsibility to protect the company's intellectual property and trade secrets whether during employment, internship or after demission.
- Actively research and develop, innovate, improve the scientific and technological innovation capacity, and create intellectual property rights;

- Immediately report to the superior leaders when the invention results are obtained in the work, make great efforts to protect and effectively use this right, and study whether such information can constitute the intellectual property right and how it can be protected before the disclosure or release;
- Avoid discussing or sharing confidential company information in crowded public places such as hotels, airports and restaurants.
- Make sure that the surrounding environment is safe, and eavesdropping is not possible when talking about confidential information.
- Implement the approval system for the external communication and publicity of intellectual property and confidential information.
- Carefully secure confidential documents, information, and equipment which stores confidential data and information, such as computers, mobile phones, etc. to ensure that they will not be lost and will be under control.
- Never use the applications from the third party to store or disseminate confidential information; never share or transfer such information to third parties without authorization.
- Immediately report the infringement of intellectual property rights to the immediate leaders, relevant managers, management or Legal and Compliance Department, and stop such acts in time.

12 Data protection and cybersecurity

The pharmaceutical industry is data-rich. The management, business activities of CanSino and daily work of each employee are supported by a huge amount of data. Such data contains personal information of employees, clients, business partners and other third parties. In addition, CanSino business will cover a large number of human genetic resources that are of national security and public interest.

We are aware of the importance of protecting the aforementioned data and personal information as well as human genetic resources. In order to ensure the safety of such information and resources, CanSino complies with the latest applicable laws and national standards, fulfills obligations to protect the information and resources by strengthening data security and personal information protection following integrated plans, the management of human genetic resources, and secures cybersecurity.

Data security and personal information protection

Data refers to any record of information in electronic or other forms. Personal information refers to any kind of information related to an identified or identifiable natural person as electronically or otherwise recorded, excluding information that has been anonymized. Data and personal information are extremely important since their leakage, illegal provision or misuse may endanger the interests of the company as well as the personal and property security of the information subject.

The internal data of CanSino, including personal information, shall be strictly protected to avoid data leakage and unauthorized access, transfer, change, destruction, network virus damage, etc. Every employee assumes the responsibility to protect the data of the company, and the information systems and networks in the work.

We attach great importance to the personal information we have, including the information of employees, vaccine recipients, suppliers, business partners, etc. We solemnly promise to take effective protective measures and means to protect the personal information and privacy we collect according to applicable laws; we are committed to truthfully informing the other party how to collect, retain, use, process, transfer, provide and disclose their personal information, and only after obtaining the explicit consent of the other party, can we collect, retain, use, process, transfer, provide and disclose the personal information, which will not exceed our business demands and purposes of processing personal information.

Every employee at CanSino shall

- Collect and process data including personal information in strict accordance with applicable laws and compliance policies of the company.
- Collect and process personal information under the principle of legality, appropriateness and necessity and under the premise of obtaining the consents of personal information subjects.

- Prior to processing personal information, inform individuals of matters including company name and contact information, the purpose of processing personal information in a prominent manner and in clear and understandable language that is true, accurate and complete.
- Ensure the security and confidentiality of the personal information collected, log in to the personal information system of the company upon authorization, keep the login password properly, and do not share the password with third parties without authorization.
- Follow "the principle of minimum necessity" when storing personal information.
- Ensure that the transmission of personal information is carried out in a secure manner. When the transmission of sensitive personal information is involved, security measures such as encryption shall be taken. Where cross-border transmission of personal information is involved, applicable laws and technical standards shall be observed.
- When providing some of the patients' personal information to the competent authorities for purposes like pharmacovigilance, strictly follow policies and procedures of the company, conduct the personal information protection impact assessment, and obtain the separate consent of the information subject.
- Participate in personal information protection training conducted by the company, as well as emergency response training and emergency drills for personal information security incidents.

Human Genetic Resources Management

Human genetic resources, including materials of human genetic resources and information of human genetic resources, are essential elements for pharmaceutical companies to develop several products, and are an inevitable part of communication in international cooperation, moreover, they are critical to national biosecurity and are of great significance for maintaining public health, national security and social public interests.

CanSino uses information and materials of human genetic resources in China to develop products and services to benefit society by strictly following the requirements of applicable laws.

We follow ethical principles and strictly abide by the regulatory requirements and technical specifications set by the administrative department for science and technology under the State Council. We obtain the necessary approval or filing from the competent authorities when cooperating with relevant domestic institutions to use Chinese human genetic resources for scientific research activities and where it is necessary to transport, deliver by post or carry China's materials of human genetic resources abroad.

We attach importance to the internal management of human genetic resources and establish special compliance policies to regulate the company and internal department involved and to clarify the internal approval procedures when managing human genetic resources.

We also carry out organized and planned management for activities related to the collection, preservation, utilization and external provision of Chinese human genetic resources that may be involved by our suppliers and other partners.

Every employee at CanSino shall

- ⦿ Understand the importance of human genetic resources to national biosecurity.
- ⦿ Strictly abide by the provisions of applicable laws and internal company policies and comply with the company's requirements on human genetic management resources in the daily work, in order to prevent and control risks in human genetic resources management at all times.
- ⦿ Any human genetic resources project shall be carried out in accordance with ethical principles and received the ethical review required by relevant national requirements.
- ⦿ Not to collect and preserve China's human genetic resources within the territory of China.
- ⦿ Prohibit to purchase or sell human genetic resources. However, lawful supply or utilization of human genetic resources for the purpose of scientific research, which making payment or collecting reasonable costs, shall not be deemed as purchase or sales.
- ⦿ Ensure to obtain the necessary approval or filing from the competent authorities prior to using China's human genetic resources for international cooperation, and prior to transporting, delivering by post or carrying China's materials of human genetic resources abroad where such acts are necessary.
- ⦿ Voluntarily report any identified or potential violations of laws or regulations, as well as risks relating to human genetic resource management.
- ⦿ Promptly seek compliance advice on human genetic resources management when in any doubt.

Cybersecurity

Security of data, including personal information, needs to be supported by a strong information system and cybersecurity. In order to ensure the security and integrity of the data, we stipulate the internal policies of the company that employees should use the data system according to access rights, and any unauthorized operation will be regarded as a violation.

With the requirements of the Classified Protection of Cybersecurity, we perform the obligation of security protection to safeguard the network from interference, damage or unauthorized access.

We ensure the confidentiality, completeness and availability of the personal information processing system and its services. Technology measures such as encryption and de-identification are adopted to meet relevant regulatory requirements.

We pay attention to continuously evaluating the technical solution and business process to detect relevant network risks and learn the correct methods to reduce these risks. We have set up a cross-departmental working mechanism and take measures to prevent and respond to personal information security incidents.

In addition, we have strict control over the processing of personal information. Only persons who have a need to know and are authorized to process personal information may access corresponding personal information. Any device that stores the company data, such as computers, mobile phones, mobile hard disks and other tools, shall be set with a password and properly kept in order to avoid loss. Unauthorized viewing and use by others are not allowed.

Every employee at CanSino shall

- ⦿ Store the data and documents of the company with electronic equipment provided by the company, and, without permission, do not store or process the non-work matters on the electronic equipment provided by the company.
- ⦿ Only use the authorized genuine systems, software, programs, equipment, etc.
- ⦿ Set complex passwords that are difficult to crack, change them regularly, and never disclose them to others; change the password immediately if the password expires or is cracked.

- Never transmit, store and process the company data in any network or cloud server or electronic device which is not authorized and approved.
- Never share company data with any unauthorized third party.
- Beware of "phishing" emails from external sources and delete such emails immediately while report them to the Information Management Department; ask the Information Management Department for help in time if there is any doubt or uncertainty, meanwhile; avoid processing such emails without authorization, such as replying, opening links or attachments.
- Obtain the corresponding authority according to the company policies before using the company system.
- Conduct regular and irregular safety inspections on the company data, systems and networks.

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13 Protection of company assets

CanSino has always been committed to pursuing long-term stable and sustainable development. Our continual success attributes to the high quality of our products and to our continued commitment to financial integrity, aiming at providing truthful, accurate, complete and reliable information to our shareholders and investors.

Following financial integrity and tax integrity and ensuring the accuracy of company records are the basis for CanSino to gain and maintain the trust and confidence of the shareholders, government, vaccine recipients, healthcare professionals, the public, our employees and other interested parties.

As a member of CanSino, each of us is obligated to protect the assets and resources of the company, and create more value for the company. The safety of the company is our safety, and the success of the company is our success.

We protect company assets by upholding financial integrity and tax integrity and ensuring the accuracy of our records, as well as protecting any property and resources of the company.

Financial and tax integrity and the accuracy of company records

As a listed company, CanSino shall persist in financial integrity, and accurately record financials, disclose and truly reflect our transactions and operations, because government regulators, shareholders, partners, investors, the public and other interested parties all rely on our true, complete, reliable and timely financial reports to make accurate judgments. Therefore, we shall strictly abide by accounting standards and applicable laws related to financial reporting, and establish a strict internal financial control management system.

It is our bounden duty to pay taxes according to law. We are committed to abiding by relevant applicable laws to provide true and transparent information to tax authorities, paying relevant taxes and fees in a timely, accurate and complete manner, and never using any fraudulent means to obtain illegal tax concessions.

Accurate business records are the basis of ensuring financial and tax integrity, and the guarantee of making correct business and strategic decisions. Therefore, we shall ensure that accurate and complete accounts, bills, business records, etc. are properly created, maintained, and updated, including the records and data of R&D, production and quality inspection, sales records, financial and accounting records, expense records, bills and vouchers of travel, hospitality, etc., compensation and benefits and performance evaluation, e-mail and other important company data. Meanwhile, we shall carefully handle and keep relevant paper or electronic documents and records according to the relevant system requirements of the company, and strictly keep relevant sensitive and confidential information confidential.

Any incorrect accounting, false accounting, false and misleading statements or records, forgery or alteration of records and distortion of facts are not allowed. The company will be responsible for such violations, and employees who commit such acts will also be severely punished.

Every employee at CanSino shall

- Publish the financial report of the company on time, and disclose the financial information truthfully, completely and accurately.
- Ensure that all financial information is entered into the financial system timely, accurately and completely.
- Maintain the account books, records and accounts that accurately and appropriately reflect the transactions and disposals of assets to prove the reasonableness and propriety of the business.
- Apply for the reimbursement with true and reasonable business, and never defraud the reimbursement expenses with fictitious business.
- Submit complete, true and accurate invoices and other supporting materials when making reimbursement.
- Never forge or alter any financial vouchers, such as invoices and bookkeeping vouchers.
- Resolutely make a payment according to company policies and approval processes.

- ◉ Never make false accounts or incorrect accounts for any reason, and resolutely maintain the accuracy of the company's accounts and records.
- ◉ Establish, retain, store, modify and destroy company records/data/documents according to company regulations and relevant approval processes.

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Protection of company property and resources

Every employee is obligated to protect the property and resources of CanSino, including but not limited to the property, funds, equipment and facilities, materials, articles, intellectual property rights, archives, data, etc.

The property and resources of the company shall be used only for the lawful, legitimate and reasonable business by authorization of use, and shall not be used for any other non-commercial purposes. Embezzlement, misappropriation and abuse of company property and resources for personal/others' gain or other deceptive purposes are illegal and absolutely prohibited.

Meanwhile, we shall take good care of the company's property and resources to avoid damage, loss, theft, transfer, removal, etc.

- ◉ Every employee at CanSino shall: Regularly check and count the property and resources of the company to ensure their safety and integrity.
- ◉ Make corresponding protection measures for different types of property and resources.
- ◉ Use the equipment and facilities of the company in strict accordance with the operating procedures.
- ◉ Use the property and resources of the company only after obtaining the corresponding authorization and approval.
- ◉ Take good care of property and resources of the company to avoid damage and loss.
- ◉ Never use the property and resources of the company for any private purpose.

14 Trade compliance

From an international perspective, different countries and regions have different control measures regarding products, information, software, technology and services. Some jurisdictions restrict the export of certain goods or technology to certain countries or individuals while some prohibit conducting business with certain individuals or legal entities. As a multinational company engaged in international trade, CanSino shall comply with these rules. Violation of applicable laws regarding trade compliance may expose CanSino to serious risks.

Therefore, we shall be knowledgeable about applicable laws, prohibitions and restrictions, customs regulations on import and export and the regulatory requirements of government agencies of the countries and regions where we do business. When expanding our international business, we shall investigate and screen our transaction targets at the early stage of the deal in order to determine whether they are the object of sanctions by certain countries and regions, analyze the potential trade risks, and proceed with the trade compliance management of the transaction targets.

From a domestic perspective, as a Chinese enterprise, CanSino firmly supports the measures and actions taken by the Chinese government to safeguard national sovereignty, security and development interests.

We will strictly abide by Anti-Foreign Sanctions Law of the People's Republic of China, refuse to implement or assist in the implementation of discriminatory restrictive measures taken by foreign countries against Chinese citizens and organizations, and implement the counter-measures taken by relevant departments of the State Council against relevant foreign individuals and organizations.

We will fulfill CanSino's reporting obligations under the Rules on Counteracting Unjustified Extraterritorial Application of Foreign Legislation and Other Measures according to law, and abide by the injunction issued by the Ministry of Commerce that the relevant foreign laws and measures shall not be recognized, implemented or followed.

We will cooperate with the implementation of the measures taken by the Chinese government to cope with foreign individuals and organizations in the list of unreliable entities, and will not engage in prohibited or restricted transactions with unreliable entities.

Every employee at CanSino shall

- ◉ Avoid participating in the prohibited trade activities.
- ◉ Investigate and screen the transaction targets when the business functions develop new foreign and/or international business partners.
- ◉ Conduct a comprehensive review of commercial operations in countries subject to trade restrictions.

- Fully understand the relevant applicable laws of the countries or regions involved and obtain necessary licenses before carrying out import and export business.
- Always pay attention to international trade control measures and customs policies and provisions of various countries, and make timely adjustments when formulating procedures concerning import and export-related.
- Cooperate with customs inspection, provide true and accurate materials, and truthfully answer customs inquiries.
- Assess whether the relevant foreign laws or measures are discriminatory restrictive measures taken by foreign countries against Chinese citizens and organizations as referred to by the Anti-Foreign Sanctions Law, and whether refusing, suspending or terminating relevant transactions will violate Anti-Foreign Sanctions Law before deciding whether to refuse, suspend or terminate the transactions with Chinese citizens or organizations in accordance with foreign laws or measures.
- Conduct due diligence and screening on foreign individuals and entities that intend to conduct transactions or other cooperation, and do not carry out prohibited or restricted transactions or other cooperation with individuals and entities (including individuals, entities and their specific related persons listed in the counter-measures list) subject to the counter measures or individuals and organizations in the list of unreliable entities.
- Immediately report to the Legal and Compliance Department when CanSino is prohibited or restricted from conducting transactions or other cooperation with third countries and their citizens, legal persons or other organizations.
- Abide by the injunction issued by the Ministry of Commerce that the relevant foreign applicable laws and measures shall not be recognized, implemented or followed.
- Consult the Legal and Compliance Department immediately if you are in doubt or uncertain about the transaction.

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Guidelines for Compliance of Listing Supervision

CanSino is a pharmaceutical enterprise operating in compliance and with integrity. Besides paying close attention to the impact of national industry policies on business and operational development, as a public enterprise listed in Shanghai and Hong Kong, CanSino also strictly complies with the supervision requirements of the listing rules of the two stock exchanges.

According to the listing supervision rules, noncompliant behaviors may result in not only high administrative fines and severe administrative penalties, but also the risk of investigation for criminal responsibility or even delisting due to serious circumstances. The management and all employees of the enterprise shall be aware that compliance risks are everywhere, and shall consciously understand the relevant provisions of the listing rules of the two stock exchanges on compliance, and be vigilant against relevant risks. We hope that all employees of CanSino can assume the compliance obligations of information disclosure and insider trading, connected trading, and securities trading under the applicable listing rules. Through the listed compliance

management system established by the company that meets the regulatory requirements of the two stock exchanges, we avoid and prevent compliance risks, actively guard against economic risks and social risks, help the company achieve business growth, create competitive advantages, establish a good

social image, protect the company brand, and continuously create value for the employees and financial performance for the company.

As the Guidelines for Compliance of Listing Supervision applicable to shareholders, directors, supervisors, senior management and ordinary employees who control the company or participate in the decision-making, operation and management of the company, this chapter mainly includes:



1 Information disclosure guidelines and prohibition of insider trading

Information disclosure is the basis of the effective allocation of resources in the securities market and investment decisions made by investors. The company and relevant information disclosure obligors shall disclose all matters that may have a great impact on the stock trading price of listed companies or the investment decisions according to the listing rules of the two stock exchanges.

We continuously disclose the matters related to the science and technology attributes and business-related progress of the company through regular reports and interim reports. In addition, in order to help investors evaluate the scientific advantages and development of biotechnology companies, we clearly and accurately disclose business models and product pipelines according to the listing rules of the two stock exchanges without affecting scientific accuracy.

CanSino ensures that the information is disclosed in a timely, fair, impartial and accurate manner. We establish an information disclosure management system and an internal standard system for directors, supervisors, senior management and other relevant personnel to release information externally, and make clear the procedures and methods for releasing information and the issues which may not be released externally without the permission of the board of directors.

In addition, we regulate the management of "insider information" through the Registration Management System of Insiders. The non-public information (including but not limited to financial information, planned acquisitions or mergers, new business, new product approval, important contracts, important clinical trial results, etc.) ("insider information") which the investors think will affect their investment decisions and is likely to have a significant impact on the security price of CanSino once it is made public, shall not be used and disclosed by anyone without authorization by the company.

We prohibit all transactions with insider information, and the insider information shall neither be used to buy nor sell the company securities. Insiders shall not suggest others to buy or sell company securities as well. It is an illegal act, which will lead the company and individuals to severe administrative, civil or criminal penalties. Employees who may be exposed to insider information in the course of performing their duties, whether accidentally or necessarily, are regarded as insiders along with their spouses, children and parents. Insiders shall not disclose insider information directly or indirectly to any external personnel, and internal communication about insider information is limited to those persons who need to know.

Every employee of CanSino who becomes or could become an insider shall

- Assist the Office of the Board of Directors to disclose information in a timely and fair manner and ensure the truthfulness, accuracy and completeness of the disclosed information according to the requirements of applicable laws and the listing rules of Shanghai and Hong Kong; there are no false records, misleading statements, major omissions or fraudulent information.
- Assist the Office of the Board of Directors to disclose material information fairly and publicly to all investors at the same time, and ensure that all investors have equal access to information.
- Assist the Office of the Board of Directors to prepare the announcements and related disclosure documents, and avoid the marketing language, agitating statements and unfounded descriptions.
- Actively cooperate with the company to disclose the information, timely inform the company of major events that have occurred or may occur, and strictly fulfill its commitments. If the core technical personnel leave their posts, they shall cooperate with the company to make timely disclosure according to applicable laws and regulations, assist in providing the reasons for their demission and sign the relevant documents.
- Keep the insider information confidential before the disclosure, and not disclose it to any external personnel, and limit the insiders to a minimum; not buy or sell the shares of the company, not disclose the insider information or suggest others buying or selling the shares of the company before the insider information is made public; avoid publicly talking about and evaluating the major information disclosed by the company after the disclosure of insider information, except as necessary for job responsibilities. If it is necessary to talk about and evaluate the major information disclosed by the company due to job responsibilities, keep consistent with the public disclosure by the company.
- Actively cooperate with the company to submit the information of insiders, fill in relevant information truthfully, accurately and completely, and submit the files of insiders in time.
- Be extremely careful when reading company emails, documents and conversations in transportation or public places.
- Ensure the third parties who have to be disclosed the insider information keep it confidential and sign a non-disclosure agreement.

Guidelines for connected transactions

CanSino promises to make any decision or transaction on the premise of protecting the legitimate rights and interests of listed company and all shareholders. The company will strictly regulate the related/connected transactions in accordance with the relevant provisions of the listing rules on related/connected transactions in Shanghai and Hong Kong, and improve the standardized operation level of the company. The company and its affiliated/connected persons have taken measures to reduce the related/connected transactions. For the inevitable related/connected transactions such as the business development in production and operation, the company will continue to follow the open, fair and just market principles. In accordance with the listing rules of the two stock exchanges, Articles of Association, Rule of Procedure of Shareholders Meeting, Rule of Procedure of Board and Related Transaction Management System, we will earnestly implement the decision-making procedures for related/connected transactions, give full play to the role of independent non-executive directors, ensure the legality and fairness of transactions, and fully and timely disclose related/connected transactions to protect the interests of shareholders to the maximum.

The natural person shareholder who directly or indirectly holds more than 5% of the company's shares, or related/connected persons such as directors, supervisors and senior managers, top executives and their close family members shall neither cause the transfer of resources or obligations through transactions between them or their controlling entities and CanSino or CanSino's holding subsidiaries, nor use the related/connected transactions to reconcile the financial indicators of the company or harm the interests of the company. The necessary related/connected transactions shall be based on reasonable business logic, and the signed agreements shall conform to general commercial terms and be fair and reasonable to the company and all the shareholders.

Every employee of CanSino who becomes or may become a related/connected person shall

- Not damage the interests of the company, infringe on the property rights of the company or seek business opportunities by using its affiliated relationship or through related/connected transactions or capital occupation.
- Inform the company of its relationship with the listed company before it may become a related/connected person, and assist the company in checking and sorting out the related/connected transactions.
- Cooperate with the company to disclose the transaction in time, complete the evaluation or audit, submit it to the board of directors or the general meeting of shareholders for deliberation, and abide by the procedural provisions such as vote avoidance for related/connected transactions of which the amount reaches the disclosure limit required by applicable laws and the listing rules of the two stock exchanges.

- Cooperate with the company in preparing and submitting the application materials and comply with the requirements of the relevant announcements/circulars for specific related/connected transactions that can be exempted from the requirements under the relevant listing rules.
- Sign a written agreement on related/connected transactions with the company to clarify the pricing policy of related/connected transactions and set the price fairly.
- Try to avoid unnecessary related/connected transactions with the company, and not enter into contracts, transactions or arrangements with the company except in compliance with Articles of Association or otherwise approved by the board of directors and the general meeting of shareholders.
- Comply with the relevant regulations of related/connected transactions within 12 months after leaving their posts or dissolving their relationships.

3

Guidelines on dealing in securities by shareholders, directors, supervisors, senior management and related employees

The controlling shareholders, shareholders holding more than 5% of shares, directors, supervisors and senior managers of the company shall keep optimistic about the business prospects of the company and fully support the development of the company. They are expected to hold the shares of the company for a long time. In order to stabilize CanSino's share price in the secondary market, protect the interests of small and medium-sized investors and support the healthy development of the capital market, the above-mentioned persons have made commitments on restricting stock trading (including the lock-up period, shareholding ratio reduction, shareholding price reduction, etc.) before the initial public offering of new shares in Science and Technology Innovation Board of Shanghai Stock Exchange. Relevant employees also directly or indirectly hold the shares of the company through the strategic placement plans, employee stock ownership platforms and equity incentive plans/employee stock ownership plans that the company may set up from time to time.

Employees who hold or intend to hold CanSino shares shall

- Be aware of the provisions of relevant applicable laws on insider trading, market manipulation, short-term trading and other prohibited acts and market misconduct before buying and selling the stocks and their derivatives of the company, and not conduct illegal transactions.
- Comply with the provisions of relevant applicable laws, abide by relevant statements and commitments, and do not borrow other people's accounts or buy or sell shares of the company by providing funds to others.
- If you are insiders, neither increase or decrease your holdings of the shares when the trading is prohibited by applicable laws and listing rules, nor use insider information to provide suggestions to others on increasing or decreasing their holdings of the shares (regardless of whether they are profitable or not).
- If you are directors, supervisors or senior managers, cooperate with the company to notify, declare and disclose the shares held by them and the act of buying and selling the shares in advance, and ensure the timeliness, truthfulness, accuracy and completeness of the declared data.
- If you are directors, supervisors or senior managers, do not carry out securities margin trading with the shares of the company as the underlying securities.

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Fair Treatment and Protection of Our Employees

Every employee is the valuable asset of CanSino and the cornerstone of our success. We respect and value the basic rights of every employee, and are responsible to every employee. We are committed to creating a company

culture and working atmosphere of respect, fairness, diversity, inclusiveness and concerted efforts, protecting the health, safety and basic rights of every employee, and making efforts for common development with every employee.

CanSino is committed to

- Treating every employee fairly, respecting and protecting the basic rights of every employee.



Protection of fundamental rights of employees

CanSino respects and protects the fundamental rights of every employee and provides equal employment and promotion opportunities for every employee.

Respect for human rights: We respect and protect human rights and will not allow any child labor, forced servitude or forced labor by companies, suppliers or partners (e.g. suppliers, business partners).

Prohibition of discrimination, humiliation and harassment: We prohibit all acts that damage personal dignity. We will never tolerate any discrimination, offense, insult and other improper behaviors based on race, nationality, gender, religious belief, physical defect and social origin. We will not tolerate any form of harassment, such as physical harassment, sexual harassment, mental harassment, verbal harassment or any other form of harassment.

Equal opportunities: the employment and promotion of every employee are based on the qualifications and abilities of the employees, which is our principle of employing people all the time. We actively create a fair development environment for every employee, so that every employee's talent could be brought into full play.

Reasonable working hours and remuneration: we strictly comply with the applicable laws and regulations on working hours, overtime and maximum working hours, and the applicable laws and regulations on wages, remuneration and minimum wages, and provide fair and competitive remuneration and various welfare projects, performance bonuses, holiday gifts, etc., and adhere to the principle of "equal pay for equal work".

Every employee at CanSino shall

- Be honest, frank, polite, willing to help, understand and make allowance for others.
- Respect everyone around, including their race, nationality, gender, faith, etc..
- Never discriminate, insult, offend, insult, humiliate, intimidate or be hostile to others for any reason.
- Stop and report the misconducts such as harassment, insult and discrimination in time.
- Respect the different views and opinions of others.
- Get promoted by constantly improving your skills and abilities instead of other improper means.

2 Occupational health and safety

CanSino attaches great importance to the safety and health of every employee, and it is our bounden duty to ensure the safety and health of every employee.

CanSino is committed to creating a safe, stable and comfortable working environment, continuously improving working conditions, developing strict internal systems and processes to standardize various preventive and safeguard actions, providing the welfare physical examination, etc., to protect the physical and mental health of employees and continuously improve their job satisfaction. Meanwhile, we will conduct regular and irregular safety inspections on the working environment to ensure the safety of the workplace and eliminate potential dangers in time.

No matter where you are, the threats, violence and other illegal acts that endanger the health and safety of others are absolutely prohibited. It is strictly forbidden to bring illegal drugs and alcohol into the workplace, and it is never allowed to work under the influence of alcohol and drugs. We can drink alcohol in certain workplaces, but even in these permitted places, excessive drinking shall be avoided.

CanSino is committed to creating a relaxed and happy working atmosphere and paying attention to the balance between work and life of employees. We hope that every employee can fully enjoy the fun of life and maintain physical and mental health while making achievements at work. In this regard, we will hold colorful employee activities to attract every employee.

Every employee at CanSino shall

- Understand and comply with the safety system and processes of the company.
- Strictly abide by the operating procedures in the process of R&D and production.
- Operate equipment and facilities in strict accordance with the operating procedures.

- Take safety protection in accordance with relevant regulations, and carefully check whether the protection is in place before carrying out the operations in need of safety protection.
- Never commit any dangerous behavior, avoid rash and reckless actions, and not expose yourself and your colleagues to unnecessary dangers.
- Fully understand the dangers of your work, and take them seriously and cope with them.
- Stop working immediately in case of any unsafe situation, notify others of the dangerous situation, report it immediately after ensuring the safety of on-site personnel, and take timely measures.
- Take reasonable and compliant measures to ensure personal safety.
- Report any existing and potential safety problems and hidden dangers in time.
- Participate in professional safety training as required.

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Protection of employee privacy and personal information

CanSino respects the personal privacy of employees and promises to collect or use employees' personal information only for reasonable and legitimate uses and after telling the employees how to use their personal information and obtaining their consent. We guarantee that the personal information and privacy of every employee are strictly confidential.

Every employee at CanSino shall

- Always respect the privacy of others
- Ensure the express consent of the other party is obtained before collecting, retaining, using, processing, transferring, providing, and disclosing the personal information of employees.
- Keep the personal information of employees strictly confidential and never disclose it to irrelevant personnel.
- Only process such information after it is confirmed that appropriate technical and protective measures have been taken to effectively avoid the loss, tampering, unauthorized access or disclosure of personal information.
- Do not store personal privacy data or information in the electronic equipment provided by the company without permission.
- Report to relevant leaders and the Legal and Compliance Department in time if the personal information of employees is accidentally stolen, lost, tampered or improperly disclosed.

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Compliance management

As described in the Overview on Compliance Management System, in order to fulfill our commitment to integrity and compliance, we built a comprehensive compliance management system based on our business development and our features.

Our compliance management system is comprehensive with strong focuses. The system comprehensively covers current operation and management,

embeds compliance requirements and standards into business areas and management links covering R&D, production, sales, and promotion, and therefore spreads the whole business processes. At the same time, it focuses on high-risk areas such as anti-corruption, product promotion, and data

security to prevent and control risks strictly.

Our compliance management system is objective, independent, reasonable and appropriate. It has a solid foundation since it follows applicable laws. On such basis, our compliance management system is designed and operated under the principle of independence, which will not be influenced by any interfering factors.

Our compliance management system is to stress responsibility and embodies coordination. It builds an organizational structure with a clear hierarchy for



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1 Compliance management

Due to the above advantages, the compliance management system of CanSino is highly enforceable. The responsibility of compliance management is implemented into specific business and specific positions through various measures, which is embedded with business.

These compliance management measures include:

Compliance due diligence

Before cooperating with business partners, suppliers and other third parties, we conduct compliance due diligence on them in accordance with the compliance policies of the company, so as to carefully select business partners, suppliers and other third parties. We then take all necessary precautionary measures based on their compliance status to achieve prior control of compliance risks related.

Compliance monitoring

We establish the organizational structure for compliance management, with the Board of Directors taking overall responsibility, the Executive Committee under general manager (CEO) leading, the Legal and Compliance Department implementing, and the heads of each department/center directly responsible. Within the structure, we take heads of departments/centers as the First Ones to assume compliance responsibility, in which each responsible person will review the compliance in the business processes according to the compliance work plan of such department/center, identify and warn the compliance risks, and manage the responses. Through daily compliance monitoring of business activities, we control compliance risks.

Compliance training

Compliance training is an important way for the company to communicate compliance concepts and requirements to employees and is a significant measure for making compliance corrections in compliance management.

CanSino carries out compliance training systematically. We incorporate compliance training into pieces of training for the employee, develop compliance training plans, and conduct regular compliance training for management, all employees, new employees, and implement special compliance training for high-risk business areas and key positions. Through compliance training, we expect every employee to master the applicable laws, company policies, and compliance requirements that they should know, and raise their awareness of compliance and their ability to implement relevant policies and procedures.

Compliance performance

In order to achieve full compliance as well as ensure the full implementation of employee's compliance responsibility, CanSino evaluates the compliance performance of employees, so as to promote compliance by evaluating personal performance.

We evaluate the compliance performance base on the performance of the personal compliance

matters related to that year, and, upon relevant approval, evaluation results will be incorporated into the comprehensive annual performance evaluation of such individual.

According to company policies issued from time to time, such compliance performance may be an important basis for merit evaluation, job appointment and removal, promotion, and compensation.

Reporting of noncompliance and noncompliant behaviors

Reporting and investigation are important measures of compliance management. CanSino detects non-compliance through reporting and investigation.

It is the responsibility of both management and every employee of CanSino to report potential, suspicious or occurring noncompliant behaviors.

If you find or suspect any violations of this Compliance Manual or serious violations of laws and regulations in daily work, you can report them through the whistleblowing hotline and provide detailed information and evidence to the extent practicable so that we can solve the problem quickly and thoroughly.



Whistleblowing email: compliance@cansinotech.com



Whistleblowing hotline: 0086-22-58213600 to 6218



Whether it is anonymous or real-name reporting, we will do our best to protect the identity of the whistleblower and the information provided by him/her. CanSino will not tolerate any form of retaliation against whistleblowers and infringement of the legitimate rights and interests of whistleblowers.

Abuse of the whistleblowing system to make any false reports, or any retaliation and discrimination against whistleblowers will be regarded as serious violations, the company has the right to take disciplinary measures including termination of the labor contract according to the regulations of company.

3 Treatments for noncompliant behaviors

In case of violations of this manual, laws and regulations, by following the Compliance Whistleblowing, Reporting and Internal Compliance Investigation Procedures, we will thoroughly investigate and take corresponding corrective or preventive actions as appropriate, for example:

- Internal circular in the company;
- Business or compliance training;
- Disciplinary sanctions, including verbal warnings, written warnings, serious written warnings or termination of employment contracts (employees subject to disciplinary actions will have their year-end performance evaluation and the salary of such year affected accordingly, and, depending on the severity of the situation, employees may not be able to receive a promotion or salary increase, or even suffer demotion and salary reduction);
- Violation of applicable laws or causing damage to the company may subject you to criminal, administrative or civil liabilities.

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Edition Statement

CanSino Biologics Inc.

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