InnoCare Pharma Limited

Supplier Code of Conduct

InnoCare Pharma Limited (the "Company") has established the Supplier Code of Conduct (the "Code") to ensure that suppliers fully prioritize labor rights, working conditions, and safety, and effectively implement green supply chain management and ethics.

The Company requires all suppliers to strictly comply with this Code and to adhere to applicable laws and regulations in their respective places of operation. The Company also encourages suppliers to include their core partners (including sub-suppliers, contractors, and service providers) within the scope of this Code to ensure compliance across the entire supply chain. If a supplier is found to have violated this Code of Conduct and refuses to accept or fails to effectively implement an improvement plan, the Company reserves the right to unilaterally terminate its business relationship with such supplier.

1. Human Rights and Labor

1.1 Prohibition of Child Labor

Suppliers shall not employ child labor at any stage of production. Minors (employees under 18 years of age) shall not be assigned to work that may endanger their health or safety, including night shifts and overtime. The Supplier must ensure that all employees possess legal employment eligibility and must strictly comply with all applicable laws, regulations, and industry standards related to employment relationships, compensation and benefits, working hours management, overtime arrangements, and working conditions. Suppliers shall implement appropriate mechanisms to verify the age of employees. Records of student interns must be properly maintained, and rigorous due diligence must be conducted on educational partners who provide student interns. If child labor is discovered, the supplier shall provide remedies and assistance measures.

1.2 Prohibition of Forced Labor

Suppliers shall not engage in forced labor, nor compel workers to labor through violence, threats, or illegal restriction of personal freedom. Suppliers shall also not engage in any form of human trafficking, slavery, or servitude. Employees' identity

documents shall not be withheld, deposits shall not be collected, and no measures restricting personal freedom shall be taken. Written employment agreements must be provided to employees, including a description of the terms and conditions of employment. All work shall be voluntary. Employees may freely resign or terminate their employment relationship at any time upon providing reasonable notice (as explicitly stipulated in the employment contract), without incurring any penalties. Suppliers shall timely and fully pay all remuneration due to departing employees in accordance with applicable laws.

1.3 Anti-Discrimination/Harassment

Suppliers must commit to creating a workplace environment free from harassment and discrimination. The commission of violence, harassment (including sexual and non-sexual harassment), abuse, corporal punishment, mental or physical coercion, insults, or any other inhumane acts is strictly prohibited, as are threats to carry out such acts. Discrimination or harassment based on any characteristic, including race, ethnicity, skin color, age, gender, sexual orientation, religion, political affiliation, marital status, pregnancy, etc., is strictly prohibited. Equal employment opportunities and treatment are firmly safeguarded.

1.4 Working Conditions

Suppliers must ensure that their employees' working hours do not exceed the maximum hours prescribed by local laws, and all overtime shall be voluntary. Suppliers shall effectively ensure that employees enjoy the right to rest and leisure. Compensation paid to employees shall strictly comply with all applicable wage and labor laws and regulations, covering requirements such as minimum wage standards, overtime pay calculations, and statutory benefits, while ensuring equal pay for equal work.

1.5 Freedom of Association and Collective Bargaining

Suppliers shall ensure that employees and their representatives have the right to communicate openly with management regarding working conditions and management practices, express views, and raise concerns without fear of discrimination, retaliation, threats, or harassment. Suppliers shall fully respect all employees' rights to voluntarily form and join trade unions, engage in collective bargaining, and join other lawful forms of employee representative organizations, while also safeguarding their right to refuse participation in such activities.

1.6 Occupational Health and Safety

Suppliers shall strictly comply with applicable laws and regulations and internationally recognized standards, commit to providing a safe and healthy working environment for employees while continuously improving working conditions, and make every effort to control hazardous factors and implement preventive measures. Suppliers shall also conduct regular health and safety training for employees, establish internal procedures covering the prevention, management, tracking, and reporting of occupational injuries and illnesses, implement corrective actions promptly through incentive measures that encourage employees to proactively report hazards, and comprehensively enhance workplace safety levels.

2. Environment

2.1 Energy Consumption and Greenhouse Gas (GHG) Emissions

Suppliers must actively explore ways to improve energy efficiency, commit to minimizing energy consumption, and reducing GHG emissions. Where feasible, suppliers are encouraged to record their GHG emissions and set emission reduction targets.

2.2 Pollution Prevention and Waste Management

Suppliers shall take measures such as source control, installation of pollution treatment facilities, or optimization of production, maintenance, and facility operation processes to minimize pollutant emissions and waste generation. For waste that may pose a hazard to human health or the environment, suppliers must ensure its safe storage and disposal and establish a comprehensive tracking and recording mechanism for hazardous waste data.

2.3 Resource Efficiency

Suppliers shall continuously improve the efficiency of resource utilization—including water, energy, and packaging materials—by optimizing production processes, implementing energy-saving technological upgrades, strengthening water recycling, and advancing green packaging initiatives. Suppliers shall reduce resource waste and practice the concept of a circular economy.

2.4 Biodiversity and Land Conservation

Suppliers shall monitor the operation of their wastewater treatment and control

systems to prevent contamination of water sources and surrounding land. Suppliers must take effective measures to protect biodiversity. Suppliers shall not, without authorization, occupy or damage typical ecosystems such as mangroves, coral reefs, seagrass beds, and coastal wetlands, nor the habitats of rare and endangered marine species. Furthermore, they shall not conduct business in environmentally sensitive areas and natural ecological protection zones where prohibited by law.

3. Business Ethics

Suppliers shall uphold the highest standards of business ethics in their business operations and practices, consistently adhering to principles of integrity and equity, and complying with the Anti-Unfair Competition Law of the People's Republic of China, the Interim Provisions of the State Administration for Industry and Commerce on Prohibiting Commercial Bribery, as well as all relevant laws and regulations concerning anti-corruption and other business ethics in the countries and regions where they operate. As used in this Code:

1) Bribery refers to the act whereby a supplier uses money, property, or other means to bribe Company personnel (including agents and their relatives) for the purpose of selling goods or services.
2) Property refers to cash and physical assets, including property provided by suppliers to Company personnel through methods such as red envelopes, monetary gifts, securities (including bonds, stocks, etc.), physical items (including various high-end daily necessities, luxury consumer goods, crafts, collectibles, etc., as well as major commodities such as houses and vehicles), or by reimbursing various expenses. However, this does not apply to incidental small advertising gifts or small souvenirs with a market price of no more than RMB 200.
3) Other forms refer to property interests, such as free travel, free entertainment, debt relief, loans and guarantees, as well as non-property interests, including educational opportunities, honors, special treatment, and introducing relatives to work with suppliers.

3.1 Anti-Corruption

Suppliers shall not engage in any act of embezzlement, corruption, bribery, or extortion against Company personnel; shall not employ commercial bribery to sell

goods; and shall not pay or accept bribes in business or government relationships to obtain business opportunities or improper benefits. Suppliers and their personnel shall be prohibited from providing kickbacks, commissions, securities, gifts, or other financial or non-financial benefits to Company personnel, with the exception of business meals costing no more than RMB 50 per person per occasion. The following acts are prohibited, including but not limited to:

1) Reimbursing personal expenses for Company personnel.
2) Hosting or inviting Company personnel to entertainment activities without the approval of the head of the Company's procurement department.
3) Hiring or arranging for Company personnel to work for suppliers without authorization.
4) Proposing or actually allowing Company personnel to obtain benefits through equity participation, involvement in operations, or other means.
5) Providing or organizing tourism or disguised travel activities for Company personnel.
6) Providing loans or debt relief and other property interests to Company personnel.
7) Other acts violating national laws and regulations or business ethics standards.
8) Other acts affecting fair transactions.

3.2 Avoid Conflicts of Interest

Suppliers shall be committed to avoiding any situation that may give rise to a substantive or potential conflict between personal interests and the Company's interests. Suppliers shall promptly disclose to the Company any actual or potential conflicts of interest arising from or expected to arise due to changes in the relationship between the parties, and cooperate in taking effective measures to avoid or eliminate any adverse effects such conflicts may have on existing and potential business collaborations.

3.3 Anti-Unfair Competition

Suppliers shall comply with laws and regulations governing fair trade, advertising, and competition, including those related to unfair competition and anti-monopoly, and shall obtain business opportunities through fair competition. Suppliers must ensure that all information, declarations, and representations submitted to the Company and other relevant parties are true and accurate.

4. Reporting Channels

If any violation of this Code, the Company's business regulations, or supply chain principles by suppliers and their employees is identified, or if related risks are detected, such matters may be reported through the Company's confidential and anonymous feedback channels. If Company personnel solicit or accept bribes from suppliers, suppliers also have an obligation to promptly report such incidents to the Company and provide relevant evidence. The Company is committed to strictly maintaining the confidentiality of whistleblower information, prohibiting any form of retaliation, and ensuring that all reports are handled promptly and appropriately.

Reporting Email	legal_compliance@innocarepharma.com
Reporting Hotline	(010)66609747
Mailing Address	Legal and Compliance Department, InnoCare Pharma Limited Building 8, 8 Life Science Park Road, ZGC Life Science Park, Changping District, Beijing, PRC, 102206

Attachment:

Commitment Letter to the InnoCare Pharma Limited Supplier Code of Conduct

To: InnoCare Pharma Limited

We have carefully read and fully understood the *InnoCare Pharma Limited Supplier Code of Conduct*. As a supplier to the Company, we commit to complying with this Code of Conduct, continuously improving our performance in human rights and labor, environment, and business ethics, and working together with your company to jointly contribute to the sustainable development of the industry.

Legal Representative (Signature):

Corporate Seal:

Date: