Hangzhou Tigermed Consulting Co., Ltd.
Code of Conduct

1. Address from chairman of board

Colleagues:

All our practices shall always adhere to the basic values of honesty and integrity wherever Tigermed conducts business in the world. Our individual actions together contribute to the Company's good reputation and therefore every one of us shall strive to be fair and appropriate and do what we are supposed to do and what is expected by each and every one of us. Also, we need to conform to the code of conduct under any circumstances.

This Code of Conduct ("the Code" for short) elaborates the standpoint of Tigermed as an organization as well as our expectations for ourselves and the work we must do to maintain the Company's good reputation and good practice in the clinical trial industry. It structures the ways we work, defines the practices we follow, and clarifies goals to achieve or actions to prohibit.

The Code will create a good environment for us, and enable members of Tigermed to take pride in the work they are doing, the difficulties they have overcome, and the successes they have achieved. At the same time, it also better serves all our key stakeholders. Thank you for your efforts when carrying out the beliefs and values of Tigermed and observing the Code.

2. Corporate Compliance Policy

Tigermed is guided by the values of "honesty and integrity" and deems compliance management as the cornerstone of its steady development. The Company's compliance management system is built on the following main aspects: management structure, management system, operation mechanism and cultural development, covering compliance with daily business operation, anticorruption compliance and business ethics, compliance with subject rights and benefits protection, compliance with intellectual property rights, marketing compliance, labor compliance and other multiaspect highlights.

Tigermed has maintained steady growth over the years, which is attributable to the culture of compliance and ethical conduct, as well as the value of honesty and integrity that has been guiding and regulating the business conducts of employees of Tigermed.. We have always been strictly following the national laws and regulations, international conventions and business ethics with continuous improvement of the internal supervision mechanism and risk control system and integrity enhancement in the Company's operations, so as to adapt to the increasingly stringent regulation, regulatory

updates and compliance requirements for the Company's global development.

3. Scope of Application

The Code applies equally to Hangzhou Tigermed Consulting Co., Ltd. and its wholly-owned and holding subsidiaries (hereinafter referred to as "Tigermed" or "the Company") as well as their employees, contract workers, part-time personnel, interns, and individuals conducting business for and on behalf of Tigermed (hereinafter collectively referred to as "employees").

Tigermed requires all its suppliers to abide by "Supplier Code of Business Conduct" at the same time.

4. How to Raise Your Concerns and Seek Guidance

Employees of Tigermed shall learn about and abide by our "Code" and relevant policies, and at the same time, they are also entitled and obliged to raise concerns and report any potential or known practices that violate the provisions of laws, regulations and industry standards adopted in the countries where our business is operated, as well as "Code" and other policies of Tigermed. If you have any questions or need support in your work, you can seek answers and guidance through the designated channels.

4.1 How to raise concerns (compliance reporting)

If you have any concerns or reports regarding compliance at work, you can report your concerns or compliance reports directly to the Compliance and ESG Committee through the following channels:

- Online Reporting: Contact us | Compliance Concern | Tigermed
- Compliance email: compliance.officer@tigermedgrp.com
- Compliance dedicated hotline: 0571-28887227-8077

Tigermed keeps whistleblowers' identity confidential and takes actions to protect them from anyone's retaliation or other forms of negative actions regardless of the anonymity of the whistleblowers. The whistleblowing shall be based on facts. Malicious whistleblowing, false accusations and frame-ups are prohibited.

Tigermed takes relevant measures against those who threaten, take revenge on, or harass the whistleblowers, including termination of employment relationship.

The Company will establish a work team to conduct fair investigations of the contents reported.

Noncompliant practices may result in administrative penalty, civil and criminal liability, and other relevant punitive measures, e.g., oral warning, circulation of a notice of criticism, termination of labor relationship, etc. If a third-party representative violates the Company's compliance policy, relevant commercial contracts may be terminated, or this

representative may be blacklisted.

If the facts reported are proved as inaccurate, the whistleblowers acting in good faith will not be punished or discriminated.

4.2 How to seek guidance (compliance consulting)

If you have any questions or need assistance at work, you can seek guidance through the contact information provided by the following departments or organizations.

- Legal Compliance Department or ESG and Compliance Management Committee-Questions about Business Ethics: compliance.officer@tigermedgrp.com
- Digitalization and Information Technology Department -Questions about Information Security and Information Protection:

  Tigermed-SMX-IT@Tigermedgrp.com
- Data Protection Officer (DPO)-Questions about Privacy and Data Protection:

  DPO@tigermedgrp.com
- Internal Control and Internal Audit Department-Questions about Internal Control and Internal Audit of Violations of Corporate Policy:

  tigermed-smx-audit@TigermedGrp.com
- Marketing Department and PR Department-Questions about External Speeches, Interviews and Release of External Publicity Materials: marketing@TigermedGrp.com

5. Business Ethics

5.1 Anti-corruption and Anti-bribery

Tigermed does not tolerate any form of bribery or corruption.

Tigermed promises to strictly abide by relevant anti-corruption and anti-bribery laws and regulations in the countries/regions where its business is operated during business transactions, including but not limited to *Bribery Act* of the United Kingdom, *Foreign Corrupt Practices Act* of the United States, *Anti-unfair Competition Law* of China, corporate policy and industry standards. Tigermed prohibits its employees from providing, bestowing or collecting any forms of bribes, kickbacks and valuables to or from any individuals or public or private organizations or any authorities, under any circumstances, directly or indirectly, for these practices may restrict or influence the receivers' decisions, or the decision-making process of the companies and authorities (including government institutions, hospitals or departments) the receivers represent.

Any third parties conducting business on behalf of Tigermed shall also abide by the same requirements.

Employees of Tigermed may refer to *Anti-Bribery and Anti-Corruption Policy of Tigermed* for further guidance.

5.2 Anti-money Laundering

Tigermed firmly opposes to all forms of money laundering activities and will abide by all applicable anti-money laundering laws.

Tigermed prohibits its employees from participating in any money laundering planning activities. Also, before signing any agreement with customers, Tigermed will verify the customers' identity and the legality of their business activities first.

5.3 Anti-trust and Fair Competition

Tigermed respects and protects fair competition, never abuses its dominant market position, and follows applicable anti-trust and competition laws in the markets of its business operations as well as relevant provisions.

Tigermed encourages, supports and protects all organizations and individuals' supervision of unfair competition practices. If any organizations or individuals find any unfair competition practice related to Tigermed, they shall report to the ESG and Compliance Management Committee and provide relevant facts and evidence.

Since Tigermed has set up multiple overseas representative offices and there may be different laws and policies stipulated in different regions and countries regarding anti-trust and fair competition, employees of Tigermed may refer to *Anti-Trust and Fair Competition Policy of Tigermed* for further guidance.

5.4 No Insider Trading

Since insider information is the Company's confidential information, insider trading may cause the Company and its employees to face a huge sum of penalties and assume criminal liabilities. Before insider information is legally disclosed, people in possession of such insider information shall not utilize such information for insider trading. This rule also applies to the family members of employees of Tigermed and other personnel concerned.

Employees of Tigermed may refer to *Information Disclosure Management System of Tigermed* and *Registration Management System of People in Possession of Insider Information of Tigermed* for more related information.

5.5 Conflicts of Interest

If the private or personal interests of employees of Tigermed or their family members as well as other personnel whose interests are related to those of employees conflict with the interests of Tigermed, the employees may be unable to work for Tigermed objectively and effectively.

Employees of Tigermed must report fully any existing or potential conflicts of interest, and timely disclose any relationship, ownership or business interests they or their relatives may have with other individuals and enterprises, directly or indirectly.

Tigermed will try its best to identify and effectively deal with any potential conflict of interest.

Employees of Tigermed may refer to *Conflict of Interest Policy of Tigermed* for more related information.

5.6 Quality Assurance

Tigermed is committed to continually providing high-quality pharmaceutical and medical device R&D services, and has therefore established an effective quality management system (QMS). QMS will assure the full compliance of Tigermed with any applicable laws within the fields related to its services as well as the requirements of GxP regulations concerning clinical studies and thus guarantee the service quality of Tigermed.

Employees of Tigermed may further refer to *Tigermed Quality Manual* for more related information.

6. Respecting and Protecting Individuals and Environment

6.1 Respecting Employees

Tigermed is committed to fostering a diverse, inclusive, open, respectful, safe, trustable and non-discriminatory work environment. We follow applicable labor laws and regulations and safeguard employees' personal legitimate rights and interests in terms of labor employment. We encourage work-life balance and workplace diversity. We integrate diversity, equality and inclusiveness into our corporate culture, corporate operation and talent management concept, and ensure that they span across employees' career development from top to bottom and cover the whole process from hiring and promotion to training and development programs.

Employees of Tigermed may refer to *Tigermed Labor Standards* to learn about more commitments of Tigermed to employees' job opportunities, labor environment and conditions, wages and welfare, and personal rights and interests.

Tigermed encourages its employees to proactively participate in corporate management activities, and strives to foster an open work environment where employees feel safe to speak up, express their ideas and discuss issues in the hope that employees have sufficient participation and expression rights without fear of retaliation, and a harmonious and stable labor relationship can be established.

6.2 Respecting Patients

As a patient-centered enterprise, Tigermed also respects patients and fully protects their rights. Tigermed will conduct clinical trials in strict accordance with international standards including ICH-GCP, China GCP and relevant internal policies of Tigermed, as well as laws and regulations adopted in the project sites. Also, Tigermed will guarantee the conformity of the trials to relevant laws and regulations, standards and ethical requirements, and ensure that subjects' dignity, safety, rights and interests are protected.

6.3 Safeguarding Health and Safety and Protecting Individuals and Environment

Tigermed will strive to provide its employees and partners with safe and healthy workplaces, strictly follow applicable legal requirements and industry standards related to health and safety, and formulate relevant risk prevention and management systems for the purpose of creating a safe, healthy, and reliable work environment actively.

Tigermed will also strictly follow applicable environmental protection laws and regulations in each operation location, actively respond to climate change, lower the energy consumption of daily operation, strictly dispose wastes, reduce environmental pollution, save resources, and prevent and eliminate various kinds of accidents so that our employees, customers, patients, suppliers and the public environment can be protected.

Tigermed will also supervise and urge external business partners to follow the same rules.

7. Data Protection

7.1 Abidance by Applicable Data Protection Laws

Tigermed respects the confidentiality of personal private information and dedicates to protecting any personal private information collected by Tigermed from any unauthorized access, modification, disclosure or destruction, especially subjects' personal health information.

At Tigermed, any information related to identified or identifiable individuals must be collected and processed according to applicable data privacy laws, including applicable *Personal Information Protection Law* of China, *General Data Protection Regulation* (GDPR) of the EU, *Health Insurance Portability and Accountability Act* (HIPAA) of the United States.

Employees of Tigermed shall comply with the requirements of all specifications regarding usage restrictions and privacy, process the data in a legal, fair and transparent manner, and ensure the conformity to the requirements for data accuracy, safety (storage and transmission), integrity and confidentiality.

Employees of Tigermed may refer to *Information Protection Policy and Policy of Protection of Subject Privacy* and other relevant internal documents for more information.

7.2 Protection of Employees' Personal Data

Tigermed respects and protects all employees' personal data. When collecting, using and disclosing employees' personal data, Tigermed strictly follows the principles of data minimization and purpose restriction and takes appropriate technical and organizational measures to ensure the security of employees' personal data. At the same time, employees of Tigermed may learn about the status quo of their personal data protection from HR department of the Company, and exercise their rights in accordance with applicable privacy protection laws.

7.3 Information Security and Protection of Tigermed

Information system equipment and data are the property of Tigermed. Tigermed reserves the right to test, monitor and investigate all information systems and data. When being authorized to use information systems and services of Tigermed, employees of Tigermed must comply with local laws and regulations as well as relevant policies of Tigermed.

Confidential and sensitive information is a core asset of Tigermed. Employees of Tigermed are obliged to maintain the security, integrity and privacy of information systems and data of Tigermed, and timely report any misconduct to relevant responsible personnel or give feedback through relevant approach. Any event or hidden danger that threatens the information security shall be timely reported to relevant responsible personnel or fed back through relevant approach. No employee may utilize the information of Tigermed to engage in activities irrelevant to the business operation and production of Tigermed without approval.

For specific provisions on confidential and sensitive information and use and protection of the Company's information, employees of Tigermed may refer to relevant documents including *Information Protection Policy* for further information.

7.4 Intellectual Property Protection of Tigermed

Intangible assets are one of core assets of Tigermed, including the Company's knowledge, ideas and working methods. To maintain the interests of Tigermed, employees shall properly protect and manage the Company's intellectual property. Similarly, Tigermed also respects other parties' intellectual property. Employees who find any act infringing upon intellectual property or intellectual property being infringed upon shall timely report to relevant responsible personnel or give feedback through relevant approach.

8. External Communication Management Specifications

To ensure the legality and compliance of externally communicated contents, and establish and pass on a unified corporate image, the external public speeches, market activities and publicity materials of Tigermed shall follow *External Communication Management Regulations of Tigermed* and *Tigermed Brand and Visual Identity Guideline*. Employees of Tigermed shall scrupulously abide by the brand specification of Tigermed and relevant laws and regulations in all business activities and the process of external communication. Under no circumstance should the non-public major information of the Company and customers be disclosed in any form in any external communication.

Employees of Tigermed may refer to *External Communication Management Regulations of Tigermed* , *User Manual of Tigermed for External Communication Compliance* and *Tigermed Brand and Visual Identity Guideline* for more related information.

9. Operation Mode

Tigermed respects and follows all laws, rules and regulations applicable to the business operations of Tigermed globally, as well as corporate policies and standards applicable to the communication and interaction between Tigermed and external parties. External parties include customers, medical providers, medical institutions, regulatory bodies, government officials and civil servants, suppliers and any other entities and individuals other than Tigermed. The communication of Tigermed with external parties shall not cause any improper influence on its performing of duties or decision-making.