Anti-corruption and Anti-bribery Policy of Tigermed

Tigermed[1] has maintained steady growth over the years, which is attributable to the culture of compliance and ethical code, as well as the value of honesty and integrity that has been guiding and regulating the business conducts of employees of Tigermed.

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

1. Application Scope

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

2. Management Structure

The Audit Committee of the Board of Directors is responsible for supervision and management of business ethics and corruption issues of the Company, and its responsibilities include:

1) Reviewing and evaluating the formulation of management guidelines and improvement of management systems for the Company's business ethics and anti-corruption policies.

2) Receiving regular reports from the Environmental, Social and Governance (ESG) Committee and Compliance Committee on business ethics and anti-corruption

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

works, monitoring the achievement of relevant management objectives and guiding the formulation of work plans.

3) Reviewing the results of business ethics audits conducted by the Internal Control and Audit Department on the Company's business processes.

4) Inspecting and monitoring the training of board directors and senior management of the Company on business ethics and anti-corruption issues.

5) Supervising the investigations and handling of the ESG and Compliance Management Committee on business ethics and corruption issues that have arisen.

6) Other related matters as delegated by the Board of Directors of the Company.

The ESG and Compliance Management Committee under the Board of Directors is responsible for the specific implementation of business ethics and anticorruption issues of the Company, and its responsibilities include:

1) To be responsible for the specific management and implementation of the Company's business ethics and anti-corruption work in compliance with the relevant national laws, regulations and rules, etc.

2) Organizing the formulation, modification and improvement of the Company's management policies on business ethics and anti-corruption issues under the guidance of the Audit Committee of the Board of Directors.

3) Exercising the responsibilities of supervising and monitoring the whole process of the Company's business activities, strengthening the supervision and management of the integrity of personnel in important positions and aspects, and cooperating with the Internal Audit Department to carry out business ethics audits for the whole process of the Company's business.

4) Organizing trainings on business ethics and anti-corruption issues for all employees of the Company.

5) Reporting regularly to the Audit Committee of the Board of Directors on the progress of the Company’s business ethics and anti-corruption work.

6) Other duties delegated by the Audit Committee of the Board of Directors.

As the internationalization development of the Company deepens, we have taken numerous measures such as developing standard operating procedures (SOPs) to meet the requirements of overseas regulatory authorities in order to ensure that the Company's operations in any countries are in compliance with the requirements of local policies and regulations.

3. Raise Concerns or Blow the Whistle

The Legal and Compliance Department of Tigermed accepts all the real-name or anonymous whistleblowing from employees, third-party representatives and partners who do business with Tigermed about actual or suspected violations they have discovered. Employees are responsible for promptly reporting to the Company about the conduct that they know or believe other employees have engaged or are engaging in that violates the law and this Policy.

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

The whistleblowing shall be based on facts. Malicious whistleblowing, false accusations and frame-ups are prohibited. The whistleblower shall truthfully provide the name and the department of the person being reported, as well as the facts of the violation; if there is any evidence or information, they should be provided together.

Whistleblowing Channels for Non-Compliance of Tigermed

- Official website: A column of compliance concern on the frontpage of the Company's website (the column on the English version of the Company's website is named as "Compliance Concern") is set up, in which the whistleblowers may report by completing the forms according to the page prompts and they can choose to submit the reports in real-name or anonymously.
- Hotline: The hotline for whistleblowing of non-compliance is: 0571-28887227-8077.
- E-mail: The E-mail for whistleblowing of corruptions and non-compliance is:
- compliance.officer@tigermedgrp.com

Protection of Whistleblowers

The personal information of the whistleblowers and the information they provide will be kept in strict confidentiality. From receiving the report to closing the case, the investigators will strictly keep all the relevant information confidential, and no other units, departments or individuals shall have the right to gain access to any of the relevant information unless they are authorized so as to ensure the safety of the whistleblowers. The confidential information includes the identity of the whistleblowers, evidences gathered during the investigation, and all reports written during the investigation. The personnel responsible for violating the confidentiality provisions will be disciplined according to the internal management system and will be held responsible according to law.

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

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

4. Policy

In Tigermed, the following acts are strictly prohibited:

1) Taking advantage of one's official position to accept or solicit properties or other benefits from suppliers or other partners;

2) Receiving gifts or money in violation of regulations or failing to handed in gifts or money obtained in official activities in a timely manner;

3) Embezzling, stealing, swindling or misappropriating the Company's property, or setting up or illegally allocating private petty cash;

4) Illegally conducting connected transactions or violating the provisions of conflict of interests to gain benefits for oneself or one's friends or relatives by taking advantage of one's official positions;

5) Being engaged in jobbery or insider trading;

6) Severe negligence of duty, abuse of authority or violation of the Company's policies and causing damage;

7) Other acts of corruption or dishonesty.

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

Gifts and Hospitality

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

1) The employees are strictly prohibited from providing or authorizing any third party to provide any valuables to partners in the name of Tigermed, or offering or accepting gifts and hospitality/banquets so frequently that such acts may be considered as excessive.

2) The employees are strictly prohibited from offering or accepting any valuables, cash or services in a non-transparent manner, especially using their private address or bank accounts, without the consent of the Compliance Department.

3) The employees are strictly prohibited from accepting and soliciting gifts or rewards beyond the ordinary business etiquettes in any manner from any organizations with business connections with Tigermed.

4) The employees are strictly prohibited from giving money or providing any valuables, directly or indirectly, to government officials in order to win or retain businesses, or improperly affecting the acts or decisions to be made by any government officials, political parties, candidates for political positions or officials of public international organizations to obtain improper advantages, or illegally affecting the acts of any individual, clients, companies or company's representatives.

5) When exchanging gifts and hospitality with other non-government business groups, the employees must comply with local laws and regulations or stricter business department or regional policies. Cash, gift cards or cash equivalents are not allowed to be exchanged under such circumstances, and acts that are suspected of offering or accepting bribes or kickbacks should be avoided.

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

Gifts or rewards beyond the ordinary business etiquettes

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

Conflicts of Interests

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

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

Circumstances concerning the conflict of interests or potential conflict of interests

1) Employees and their family members, spouses or other intimate persons have one of the followings:
   - Working in the same department;
   - Sharing the same reporting line;
   - Being members of the same administrative team;
   - One of the parties has influence or decision-making power over the position of the other party;
2) Employees are engaged in another sideline or business operation that may cause conflicts with their duties at Tigermed;
3) Employees create personal opportunities with the information they obtain at Tigermed;
4) Employees or their relatives have financial interests in a competitor company, supplier, or customer of Tigermed or serves on the board of directors or management of such organizations;
5) Employees or their relatives have made, directly or indirectly, "substantial financial investments" in any company with which Tigermed competes, has a business relationship, or is establishing a business relationship.

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

5. Control Measures

Internal Audit

The Internal Control and Internal Audit Department conducts audits on business ethics and anti-corruption issues of the key aspects on an annual basis. The Internal Audit Department formulates business ethics and anti-corruption audit plans on an annual basis, determines the scope of audits and business areas in accordance with the results of the comprehensive risk assessment, formulates business ethics and anti-corruption audit plans and carries out audits in accordance with the plans, and the business ethics and anti-corruption audits are required to cover all of the Company's business processes every three years. From 2022 to 2023 to date, there have been 13 occasional compliance audits, and no major corruption-related Litigation cases. The results of the audits are reported independently to the Company's Audit Committee.

Training

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

Tigermed’s overseas part-time consulting staff are required to annually complete the online training courses that includes our compliance and business ethics policies.

Management of Suppliers

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

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

Tigermed expects its suppliers to have appropriate management systems and business requirements in place to ensure ongoing satisfaction of and compliance with the Code of Business Conduct for Suppliers of Tigermed. Suppliers shall agree

Tigermed or a third party designated by Tigermed to conduct audits to verify compliance and continuous improvements on the business conducts.

Responsibility

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