

CHINA RESOURCES PHARMACEUTICAL GROUP LIMITED

(華潤醫藥集團有限公司)

(Incorporated in Hong Kong with limited liability)

(the "Company")

WHISTLE-BLOWING POLICY

(Adopted on the 14th day of September 2016 and amended on the 28th day of December 2022)

1. Purpose

- 1.1 The Company and its subsidiaries (collectively, the "**Group**") are committed to maintaining good corporate governance, emphasizing accountability and high degree of transparency which enable our stakeholders to have trust and faith in the Group to take care of their needs and to fulfill its social responsibility in compliance with relevant laws and regulations. In line with this commitment, the Group expects and encourages its employees, directors and officers as well as other parties with whom the Group has dealings (for example, customers, contractors, suppliers, creditors and debtors, etc.) to report any misconduct concerning the Group.
- 1.2 This Policy sets out the arrangements which:
 - (a) employees, directors and officers of the Group and other parties with whom the Group has dealings can use, in confidence, to raise concerns about Possible Improprieties (as defined in paragraph 4 below) ; and
 - (b) allow fair and independent investigation of the above-mentioned matters and appropriate follow-up action.

This policy aims to provide whistle-blowing channels and guidance for reporting of Possible Improprieties.

2. Scope

- 2.1 This Policy applies to (i) the Group and all of its employees, directors and officers (the "**Relevant Persons**"); and (ii) other parties with whom the Group has dealings (for example, customers, contractors, suppliers, creditors and debtors, etc.) (the "**External Parties**").
- 2.2 This Policy does not apply to complaints relating to customer services or product or service quality, or any loss of properties on the Group's premises or under the Group's custody. Unless such matters fall within the scope of this Policy, they will be handled by the relevant functions or departments (such as customer service, security, etc.).

3. Fundamental Principles

- 3.1 The Group respects and protects all whistle-blowers, and encourages the Relevant Persons and the External Parties to report Possible Improprieties.
- 3.2 The identity of a whistle-blower and the information received from such whistle-blower will be protected and will remain anonymous (except where disclosure is required by applicable

laws and regulations, or any court, governmental authorities, regulatory bodies or other authorities (including but not limited to The Stock Exchange of Hong Kong Limited (the "**Stock Exchange**")), or by the order or directive of any court or judicial bodies having jurisdiction over the Group. Reports of Possible Improprieties will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

- 3.3 The Company strongly encourages the whistle-blowers to provide their names and contact details, so that clarification of the reports can be made, or further information can be obtained, directly from them where required. However, the Company recognizes that in certain cases the whistle-blowers may not prefer disclosing their identities, and in such case, anonymous reports may be submitted by the whistle-blowers but the Company will consider how to handle the anonymous reports on a case-by-base basis.
- 3.4 Anyone filing a complaint concerning a Possible Impropriety must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a Possible Impropriety, and should use his/her best endeavours to ensure the accuracy and completeness of the information reported.

- 3.5 No whistle-blower who in good faith reports a Possible Impropriety should suffer harassment, retaliation or adverse employment consequence. Any employee of the Group who retaliates against a whistle-blower who has reported a Possible Impropriety in good faith will be subject to disciplinary action including termination of employment.
- 3.6 Any allegation by a whistle-blower that proves to be unsubstantiated and to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense, and the Group reserves its rights to take appropriate actions against any such relevant persons (including the whistle-blowers), including imposing appropriate disciplinary actions.

4. Possible Improprieties which the Group will attend to

This Policy may not exhaustively set out all the improprieties, misconducts or malpractices covered hereunder. The Group will attend to reported possible improprieties in the following areas (collectively, the "**Possible Improprieties**"):

- (a) any bribery, corruption, fraudulent behavior or impropriety involving any Relevant Persons of the Group or any External Parties in their dealings with the Group;
- (b) any violation of laws, regulations, rules and policies applicable to the Group;
- (c) any conduct which will or may harm the financial interests or reputation of the Group;
- (d) any improprieties involving financial audit, financial reporting and/or internal audit;
- (e) endangerment of the health and safety of any employees or other stakeholders of the Group;
- (f) damages caused to the environment; and
- (g) deliberate concealment of any of the above.

5. Whistle-blowing Channels

- 5.1 Whistle-blowers can report Possible Improprieties to the disciplinary department of the Company (the "**Disciplinary Department**") by email (jubao@crpharm.com), post or face-to-face meeting, and the Disciplinary Department shall report to the chairman of the audit committee of the Company (the "**Audit Committee**"). If the Possible Improprieties involve the Disciplinary Department or the chairman of the Audit Committee, the whistle-blowers may directly report to the other members of the Audit Committee and the chairman of the board of directors of the Company (the "**Board**").

- 5.2 Each business unit should post a notice on the Whistle-blowing Policy in prominent positions of each office. Please refer to a template of the notice (which notice will contain the name of the designated personnel of the Company who will receive the whistle-blowing reports) and the form of the whistle-blowing report as set out in Attachment 1.
- 5.3 All whistle-blowing reports shall be made in person or in writing by the whistle-blowers. All whistle-blowing reports and relevant information shall be sent in a sealed envelope, clearly marked with "Strictly Private and Confidential – To be Opened by Addressee" to ensure confidentiality. The whistle-blowers should provide all details of the Possible Improprieties (including but not limited to details of the relevant incidents, conducts or activities, dates, locations, names of the persons involved and other relevant information).
- 5.4 Whistle-blowers should report Possible Improprieties through the above-mentioned channels. They should not report Possible Improprieties through channels outside of the Group or take extreme measures to report such Possible Improprieties.

6. Handling of Complaints

- 6.1 The Disciplinary Department and the chairman of the Audit Committee are jointly responsible for the registration of the reported Possible Improprieties, verifying the received information and determining carefully whether an investigation is necessary based on the information available, validity and relevance of the concerns raised.
- 6.2 For reported Possible Improprieties which are accepted for investigation, the Disciplinary Department or the chairman of the Audit Committee may designate appropriate investigation officers for an internal investigation. The format and time required for an investigation may vary, depending on the nature and specific circumstances of each whistle-blowing report made. Where appropriate, the report made by the whistle-blowers may be handled in the following manner:
- (a) being investigated and/or handled internally by the Audit Committee or persons determined and delegated by the Audit Committee;
 - (b) being referred to external auditor or consultant as instructed by the Audit Committee;
 - (c) being referred to the relevant judicial or regulatory bodies as instructed by the Audit Committee; and/or
 - (d) taking any other actions to investigate and/or handle the matter as the Audit Committee may determine in the interest of the Group.

- 6.3 Upon receipt of the whistle-blowing report, the Disciplinary Department, the chairman of the Audit Committee or the designated investigation officers should, to the extent practicable, write to the whistle-blower in case where he/she is contactable to:
- (a) acknowledge that the reported Possible Improprieties has been received;
 - (b) advise whether or not the reported Possible Improprieties will be further investigated; and
 - (c) to the extent practicable, give an estimate of how long the investigation will take to provide a final response, and (where appropriate) inform the whistle-blower whether any initial enquiries will be made and whether further investigation will take place.
- 6.4 After completing the necessary internal investigation, the Disciplinary Department, the chairman of the Audit Committee or the designated investigation officers should issue a report based on the results of the investigation, and provide improvement recommendations.
- 6.5 All such reports should be made available by the Company to the Audit Committee upon request.
- 6.6 After the report has been distributed, the whistle-blower should be informed of the investigation results in a timely manner wherever possible.

7. Rectification Measures and Punishment

- 7.1 For control weaknesses identified during the investigation, the management of the relevant business unit should prepare and implement effective rectification measures and prevent the occurrence of fraud or other wrongdoings.
- 7.2 Where it is confirmed that any employee of the Group has misbehaved, appropriate disciplinary action will be taken against him/her in accordance with the relevant human resources provisions of the Group. If the behavior of the relevant employees violates the law, the Legal and Compliance Department of the Company should report them to the relevant regulatory bodies.

8. Record retention

- 8.1 The Disciplinary Department shall ensure that all relevant information relating to the reported Possible Improprieties, as well as details of rectification measures taken, is completely retained and kept strictly confidential.
- 8.2 The retention period of reported Possible Improprieties which led to an investigation is ten years (or any other period specified by any relevant laws and regulations). The retention period of reported Possible Improprieties which did not lead to an investigation is ten years (or any other period specified by any relevant laws and regulations).

9. Review and Interpretation of this Policy

- 9.1 The appropriateness and effectiveness of this Policy should be reviewed by the Audit Committee as and when appropriate. Any subsequent change of this Policy after its adoption should be considered and approved by the Audit Committee and the Board.
- 9.2 The Audit Committee and the Board shall be responsible for providing clarification to this Policy in the event of any ambiguity.
- 9.3 This Policy should be read in conjunction with and subject to any relevant laws, regulations, rules, directives or guidelines that the Stock Exchange or any other regulatory bodies or any authorities may from time to time prescribe or issue in relation to the matters governed by this Policy (collectively, the "**Applicable Laws and Regulations**"). In the event of any inconsistency or conflict between this Policy and the Applicable Laws and Regulations, unless this Policy prescribes a more stringent requirement, the Applicable Laws and Regulations shall prevail in respect of such inconsistency or conflict.
- 9.4 This Policy is published in English and Chinese. In the event of any inconsistency, the English text shall prevail.

10. Attachment

10.1 Please refer to Attachment 1 for a template of the notice and form of the whistle-blowing report on this Policy.

China Resources Pharmaceutical Group Limited

28 December 2022

CHINA RESOURCES PHARMACEUTICAL GROUP LIMITED

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Notice of Whistle-blowing Policy

If you know of any improper conduct of our employees, we want to hear from you

Please contact the Disciplinary Department and the chairman of the Audit Committee of the Company by:

Disciplinary Department of the Company

Phone : +86 (10) 57985266
Email : jubao@crpharm.com
Post : Block 7, Complex 2, Beisanhuan Road Central
Chaoyang District, Beijing
PRC

Attention: Disciplinary Department

Chairman of the Audit Committee

Phone : +852 2593 8991
Email : dshsw@crpharm.com
Post : China Resources Pharmaceutical Group Limited
41/F, China Resources Building
26 Harbour Road, Wanchai
Hong Kong

Attention: Chairman of the Audit Committee

Where the Possible Improprieties involve the Disciplinary Department or the chairman of the Audit Committee of the Company, please directly report to the other members of the Audit Committee or the chairman of the Board by:

Phone : +852 2593 8991
Email : dshsw@crpharm.com

Post : Block 7, Complex 2, Beisanhuan Road Central
Chaoyang District, Beijing
PRC

Attention: Audit Committee and chairman of the Board

- Your identity and all reports of improper conduct will be kept confidential.
- For details of the Group's whistle-blowing policies and procedures, please refer to the full text of the Whistle-blowing Policy.

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**Form of Whistle-blowing Report
(Confidential)**

If you wish to make a report, please fill in this form and follow the procedures and requirements as set out in the Whistle-blowing Policy of the Company. All information provided in the whistle-blowing report will be kept strictly confidential. Please read the Whistle-blowing Policy carefully before completing this form.

Whistle-blower's Information

Name : _____
Title : _____
Department : _____
Company name : _____
Phone number : _____
Email : _____
Correspondence address : _____

Details of Concerns:

Please provide full details of your concerns, including but not limited to the details of the incidents, conducts or activities, dates, locations, names of the persons involved and other relevant information, and all relevant supporting evidence. If necessary, please continue on separate sheets.

Personal Information Collection Statement: All personal data collected will only be used for purposes which are related to the whistle-blowing case made by you. The personal data submitted will be held and kept confidential by the Group, and may be transferred to the parties with whom the Group may contact during our handling of the case or other relevant parties concerned. The information provided may also be disclosed to law enforcement authorities, courts, regulatory bodies or other parties concerned. Where relevant, under the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong), you shall have the right to request access to and correction of your personal data. If you wish to exercise such rights, requests should be made in writing to the Company at 41/F, China Resources Building, 26 Harbour Road, Wanchai, Hong Kong or via email at dshsw@crpharm.com.