



**WuXi Biologics**  
Global Solution Provider

# Code of Business Conduct & Ethics

2024

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# A Message from Our CEO



Since its inception, WuXi Biologics has been at the forefront of pharmaceutical innovation, leveraging groundbreaking vision and technology to empower our global partners. Within a mere decade, we have ascended to become the preeminent biopharmaceutical CRDMO on the world stage.

Our journey has been extraordinary, with a steadfast commitment to business ethics and regulatory compliance serving as a cornerstone of WuXi Biologics' operations worldwide. As we navigate toward an ever-expanding business horizon, we encounter a more intricate commercial landscape. It is against this backdrop that we introduce our updated "Code of Business Conduct and Ethics." This document underscores our unwavering dedication to ethical practices, integrity, fairness, and adherence to legal standards, steering us as we explore further opportunities and tackle new challenges.

This Code serves as a comprehensive guide, deeply rooted in our PROUD culture, mandating that all team members conduct themselves with the utmost integrity and champion the values of diversity, equity, and inclusivity. It calls upon us to respect one another, shoulder our social responsibilities, and fulfill our pledge to sustainable development.

I urge every member of our team to thoroughly engage with this Code, to embrace it as our collective ethos, and to integrate its principles into our daily operations and decision-making processes. By actualizing these values, we will continue to carve out a leadership path that contributes positively to the global biologics landscape.

**Dr. Chris Chen**  
Chief Executive Officer

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## Our PROUD Culture

Our PROUD culture is crucial to achieving our mission and vision.



# Our PROUD Culture

**Our Mission** To accelerate and transform the discovery, development and manufacturing of biologics through a comprehensive open-access platform, enabling our global healthcare partners and benefiting patients worldwide.

**Our Vision** "Every drug can be made and every disease can be treated" by building an open-access platform with the most comprehensive capabilities and technologies in the global biologics industry.



From our inception, WuXi Biologics has placed a premium on compliance and business ethics, which are fundamental to our corporate ethos. Our steadfast commitment to these principles has earned us broad recognition and trust from our clients. As we expand our global footprint, we continue to enforce stringent measures that protect customer data and privacy; assure the confidentiality, security, and compliance of intellectual property; and uphold safe and efficient operations. These initiatives enable us to consistently meet customer demands, ensure our management practices meet international standards, and secure our position as industry leaders.

Our PROUD culture embodies the values of "Passion," "Reward," "Ownership," "Unity," and "Determination." Notably, "Ownership" stresses the importance of adhering to our guidelines – embracing, supporting, and practicing our corporate values and culture. We hold every employee accountable for maintaining integrity, honesty, and transparency, with a zero-tolerance policy towards any breach of business ethics. "Unity" highlights our commitment to diversity and inclusion – championing respect for individual differences and cultivating a high-trust workplace. The tenets of our PROUD culture are not only benchmarks for annual performance evaluations but also vital criteria for promotions and professional development opportunities.

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# About Our Code

The WuXi Biologics Code of Business Conduct and Ethics ("Code") articulates our fundamental stances and principles, guiding us to make correct decisions. It lays the groundwork for our policies and procedures, ensuring that potential business ethics risks are promptly identified and appropriately addressed to maintain the ongoing health of our business.



# About Our Code

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## Who needs to comply with our Code?

The WuXi Biologics Code of Business Conduct and Ethics applies to WuXi Biologics (Cayman) Inc. and its globally controlled subsidiaries and affiliated companies ("WuXi Biologics" or "the Company"). All members of the WuXi Biologics Board of Directors and all employees ("personnel") – including but not limited to full-time employees, part-time employees, and interns – are required to comply with our Code.

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## What should you do if you are not sure?

Refer to Making Ethical Decisions in this Code and seek guidance from your leaders, Senior Management, the Compliance and Risk Management Center, or Human Resources.

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## What happens if there are violations of our Code?

We take all violations seriously. Violations will lead to a range of disciplinary measures, up to and including termination of employment. Furthermore, actions by employees that contravene any legal requirements outlined in the Code may expose the Company to substantial fines and penalties, affect the Company's reputation, and possibly result in legal consequences for the employees, including civil liabilities and criminal sanctions.

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## Waivers

Waivers of this Code apply only in very limited cases. Exemptions can be granted only by the Board of Directors or an appropriate committee thereof and must be disclosed to the public in a timely manner following applicable laws, regulations, and stock exchange rules.

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*This Code is designed to provide employees and other relevant parties with a guideline for ethical and legal behavior. It does not describe all applicable laws or company policies, nor should it be considered as legal advice or interpretation. WuXi Biologics reserves the right to amend, alter, or terminate this Code at any time without prior notice.*

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# Our Responsibilities

## Responsibilities for Every Employee

### Complying with the Code

We rely on each employee to implement the Code. You are expected to understand and follow all provisions outlined in the Code.

### Asking Questions and Seeking Guidance

When in doubt, you should seek advice from your supervisor, the Compliance and Risk Management Center, Human Resources, or other appropriate departments.

### Reporting Misconduct

If you believe there is a violation, or suspect that certain actions may lead to a violation, it is your responsibility to report it to the Company.

### Cooperating with Investigations

You must cooperate fully with company investigations and provide truthful, accurate, and complete information and evidentiary materials. Under no circumstances should you interfere with or obstruct internal investigations (e.g., leak confidential information related to the investigation).

### Anti-Retaliation

We do not tolerate retaliation against anyone for reporting concerns or assisting in an investigation. Depending on the severity, those who engage in retaliation will be subject to disciplinary actions up to and including termination of employment.





## Additional Responsibilities for Managers

### Leading by Example

As a leader, you should set positive examples of ethical behavior.

### Providing Guidance

You should ensure your subordinates understand and follow our Code and offer them guidance and support.

### Fostering a Culture of Compliance

You are responsible for fostering a culture of compliance within the Company, encouraging lawful and ethical behavior, and ensuring that employees know they can report misconduct safely and without fear of retaliation.

### Supervising

You should monitor the behavior of your subordinates and ensure they follow the Code and take appropriate preventive and corrective actions against misconduct.

### Reporting

You should take employee concerns seriously and report any violations as soon as you become aware of them.

### Continuing Education

You should ensure your team receives regular training and education related to the Code.

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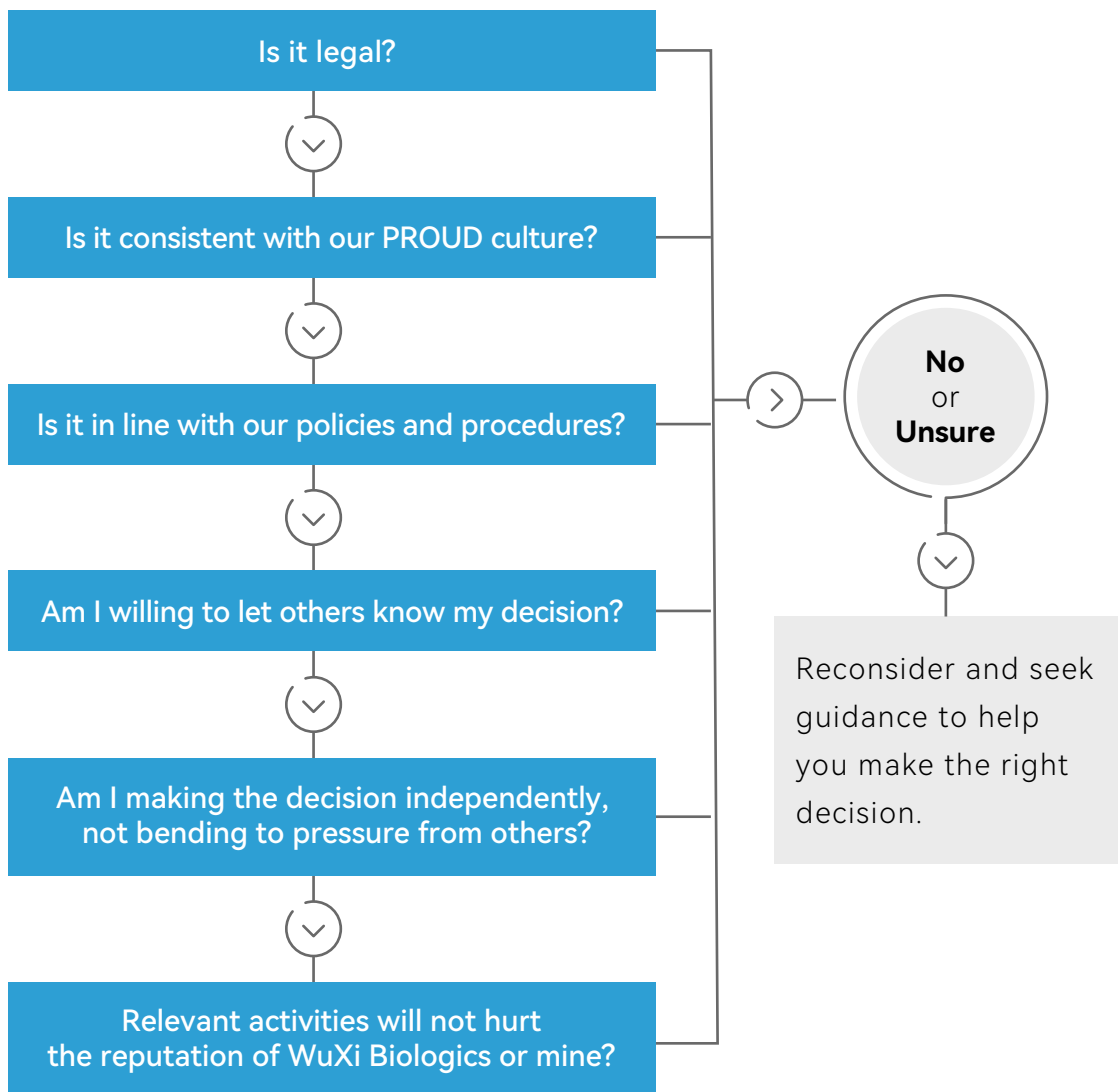
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# Making Ethical Decisions

If you are faced with a difficult business decision, think about the following questions:







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# We Win Trust

## Combating Corruption and Bribery

At WuXi Biologics, we hold the core principle of integrity in the highest regard. We enforce a zero-tolerance policy against corruption and bribery.

We mandate that all personnel of WuXi Biologics and our partners refrain from offering, promising, soliciting, or accepting any illegal benefits when obtaining or maintaining business relationships.

**Corruption** Corruption refers to the misuse of power (such as the power of a public official or an individual's position in a company) to obtain improper personal benefits in an unethical manner. Forms of corruption include, but are not limited to, accepting bribes, abusing power.

**Bribery** Bribery involves directly or indirectly offering, giving, promising (or authorizing someone else to offer, give, or promise) economic benefits with the intention of improperly influencing the behavior or decisions of a person to gain or maintain an undue commercial advantage. Bribery can take many forms, such as providing:



Cash or cash equivalents



Gifts



Hospitality



Entertainment



Travel expenses



Investments



Job opportunities



Debt forgiveness



We ensure that all our business activities comply with the anti-corruption laws and regulations applicable in the countries and regions where we operate, including but not limited to:

- Criminal Law of the People's Republic of China
- Anti-Unfair Competition Law of the People's Republic of China
- U.S. Foreign Corrupt Practices Act (FCPA)
- Prevention of Corruption Act (PCA) of Singapore
- German Criminal Code
- Criminal Justice (Corruption Offences) Act 2018 of Ireland
- UK Bribery Act 2010

In many countries and regions, specific laws govern interactions between businesses and government officials. We never seek to improperly influence the actions or decisions of government officials for the purpose of gaining undue advantage, including directly or indirectly offering, providing, or promising any improper benefits to them.



### Who might be defined as a government official?

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Under certain anti-corruption laws (such as the U.S. Foreign Corrupt Practices Act), the definition of a government official is very broad. It includes but is not limited to:

- > Officials or employees of any level of government (national or local government entities), whether elected or appointed.
- > Members of legislative, administrative, and judicial bodies, and lower-level government agency employees, such as office staff.
- > Executives or employees of state-owned enterprises or entities owned or controlled by the government operating in the commercial sector.
- > Executives or employees of public international organizations (e.g., United Nations, World Bank, International Monetary Fund).
- > Individuals acting in an official capacity for the government, government agencies, or state-owned enterprises (e.g., individuals authorized by government agencies to perform official duties).
- > Officials of political parties and candidates for any political position.



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## Our Anti-Corruption Principles



Legitimacy of intent



Transparency



Appropriateness



Absence of undue influence



Documentation



Internal controls

### You Should...

- ✔ Live up to our PROUD culture, marked by integrity.
- ✔ Comply with all applicable anti-corruption and anti-bribery laws and regulations.
- ✔ Seek guidance from supervisors and relevant departments whenever in doubt.
- ✔ Speak up and report to the Company using established whistleblowing channels when there is actual/suspected corruption or bribery activity.

### You Must Not...

- ✘ Accept or offer bribes to any individual or organization, whether in the form of cash, gifts, or hospitality that exceeds legal and business norms, or any other form of improper benefit.
- ✘ Falsify expenses/outlays, or submit false invoices or vouchers.
- ✘ Engage in fictitious transactions or inflate transaction amounts to harm the Company's interests.
- ✘ Misuse your position for personal gain, whether for yourself, family, or close associates.



## Managing Business Partners

At WuXi Biologics, we are committed to fostering a culture of unwavering integrity. We choose to engage only with business partners who demonstrate similarly high ethical standards in their practices, and together, we strive to create a fair, transparent, and honest business environment.

We identify, assess, and mitigate potential risks by conducting due diligence and responsibly selecting and managing our business partners.

## Prohibiting Facilitation Payments

We prohibit the direct or indirect payment of facilitation payments in any form.

Facilitation payments refer to unofficial payments made directly or indirectly to government officials to ensure or expedite the performance of routine governmental actions (such as speeding up document processing or issuing permits).



### More Guidance

WuXi Biologics Anti-Corruption Policy

WuXi Biologics Conflicts of Interest Policy

WuXi Biologics Code of Business Conduct and Ethics for Business Partners

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## Gifts and Hospitality

All business activities at WuXi Biologics must reflect our commitment to integrity.

While suitable gifts and hospitality can help build relationships with clients, suppliers, and other business partners, their appropriateness must always be considered.

We do not provide gifts or hospitality to obtain undue competitive advantages or opportunities, as it goes against our commitment to fair and transparent business practices. Furthermore, we strictly prohibit accepting or offering inappropriate gifts and hospitality, including but not limited to activities of a sexual nature, gambling, or illegal activities.

### **Before accepting or offering gifts, think about the following:**

- ❓ Does it comply with local laws and regulations?
- ❓ Is it moderate and reasonable?
- ❓ Is it customary?
- ❓ Is it in line with both our and the recipient's policies?
- ❓ Is it a frequent or regular occurrence?
- ❓ Could it affect your or the recipient's objective decision-making?

## Using Company Assets Properly

Employees must use company assets (including tangible and intangible assets) responsibly and limit their use for personal purposes. Misappropriation of company assets, using company assets for personal gain, or utilizing company assets for private purposes is strictly prohibited.



# Avoiding Conflicts of Interest

## What is Conflict of Interest?

Conflict of interest refers to a situation in which an employee's personal interest conflicts with the interests of WuXi Biologics, causing the employee to compromise their business judgment and decisions, potentially resulting in harm to WuXi Biologics.

## Expectations

In the course of performing your duties as a member of WuXi Biologics, you must ensure that you make decisions that are in the best interests of WuXi Biologics. You must avoid situations in which your personal interests actually or potentially conflict with the interests of the Company.

## Principles for Managing Conflicts of Interest

> Identify      > Avoid      > Disclose      > Evaluate and address

## Closely Related Persons

In addition to yourself, you should also be aware of closely related persons who could create a conflict of interest due to their relationship with you.

## Definition of Business Partners

Business partners include but are not limited to organizations or individuals (non-employees) that provide services, raw materials, or other products to WuXi Biologics, such as suppliers and distributors, as well as investment targets and potential investment targets of WuXi Biologics. This definition also includes the employees/personnel of these business partners.



It may not always be easy to know whether an activity creates a conflict of interest. If you have any concerns, you should consult promptly with the **Compliance and Risk Management Center** or the **Human Resources Department**.

## Q&A

### Who is defined as a closely related person?

- > Relatives, including spouses, ex-spouses, (step) parents, (step) children, (step) siblings, (step) nephews/nieces, (step) aunts/uncles, (step) grandparents, (step) grandchildren, and their spouses.
- > Individuals who live in the same household as the employee.
- > Romantic relations.
- > Others who can reasonably be presumed to have a conflict of interest, such as close friends of the employee and those with whom they have a vested interest or business relationship.

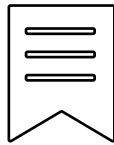
Conflicts of interest can be complex and varied. While it is impossible to list them all, certain situations commonly give rise to conflicts. Here are some examples of situations that could lead to conflicts of interest:

### Business-Related Conflicts of Interest

- > Investing in business partners or competitors outside of the Company.
- > Holding external positions outside of the Company.
- > Accepting gifts and hospitality that go beyond customary business practices.

### Personnel Managerial Conflicts of Interest

- > Having relatives or romantic partners in positions with a direct or indirect supervisory or evaluative relationship.
- > Having relatives or romantic partners in positions with a direct or indirect hierarchical relationship.



### Please Remember

Many actual or potential conflicts of interest can be managed and resolved through appropriate procedures (e.g., submitting a timely disclosure to the Company). Failing to disclose actual or potential conflicts of interest violates our guidelines.

If you have questions about managing conflicts of interest, please consult the **Compliance and Risk Management Center** or the **Human Resources Department**.



### More Guidance

WuXi Biologics Conflicts of Interest Policy

**Before acting in situations that might lead to conflicts of interest, consider the following questions:**

- ① Will my actions affect or appear to affect my ability to make fair business decisions?
- ① Could my behavior hinder or seem to hinder my performance at WuXi Biologics?
- ① Will I or my family members or other closely related persons benefit from this activity because I am an employee of WuXi Biologics?
- ① Will I be using company assets for personal gain?
- ① Am I prioritizing the interests of myself or closely related persons over the best interests of the Company?
- ① Would I be embarrassed, or would it harm the reputation of WuXi Biologics if my actions were made public?



**My friend has started a company, and I learned that WuXi Biologics is considering hiring it as a supplier. Doing business with WuXi Biologics would be significant for my friend's company, and I want to help my friend secure the contract. What should I do?**

Helping your friend's company secure a partnership with WuXi Biologics could likely constitute a conflict of interest and may affect your personal reputation or that of WuXi Biologics. If you are involved in the supplier selection process, you should voluntarily recuse yourself and disclose this to your manager and the **Compliance and Risk Management Center** to seek appropriate guidance. Even if you are confident that your friend's company can provide high-quality products and services, you should not participate in the decision-making process or attempt to influence the outcome in any way.

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**Can I accept business dinners from business partners?**

In most cases, moderate and occasional business dinners are permissible. However, when a business partner invites you to dine together, you need to consider the specific occasion and whether these activities could or might appear to interfere with your ability to make fair decisions. Generally, you should decline invitations to dine with relevant parties during a tender or contract negotiation period. If unsure, consult the **Compliance and Risk Management Center**.

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**I believe my cousin is well-suited for a research and development position currently open at WuXi Biologics. Can I recommend my cousin for the position?**

You can recommend your cousin for the position, but you should disclose your relationship with your cousin to the **Human Resources Department**. Your cousin must undergo the standard application and hiring processes, and you should not attempt to influence the hiring decision in any way. To avoid a conflict of interest, the position your cousin applies for should not have a direct or indirect hierarchical relationship with your position, nor should there be any direct or indirect supervisory or evaluative relationship.



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## Respecting Each Other

We believe respect is the foundation of all successful relationships, whether with colleagues, clients, suppliers, or other business partners. Everyone deserves to be respected and valued in the workplace.

We are committed to creating a safe and supportive work environment where everyone is respected, heard, and acknowledged. Even in the event of disagreements, we pledge to engage in constructive dialogue, ensuring everyone has the opportunity to express themselves and be heard.

## Diversity, Equity, and Inclusion

At WuXi Biologics, we believe that a diverse and inclusive workforce is essential for fostering new ideas and perspectives, and developing solutions that can make positive impacts on our clients and patients worldwide. We are committed to providing an equal and inclusive environment for talents with different backgrounds, and enabling every employee to reach their full potential.



### **More Guidance**

WuXi Biologics Diversity, Equity, and Inclusion Policy



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## Prohibition of Discrimination

At WuXi Biologics, we are committed to treating everyone fairly, valuing the experience and skills each employee brings. We strive to ensure that all employees are treated equally in all aspects of human resource management, including hiring, compensation, training opportunities, work assignments, promotions, disciplinary actions, and terminations. We do not tolerate any form of discrimination. We do not discriminate against anyone based on any protected characteristic, including but not limited to: age, gender, race, nationality, ethnic background, sexual orientation, gender identity, national origin, religious beliefs, disability, marital status, veteran status, citizenship, or any other characteristic protected by local law.

## Prohibition of Harassment and Bullying

Our dedication to creating and maintaining a safe, hostility-free work environment means we prohibit any form of harassment, bullying, or other demeaning behaviors. This includes actions or statements that contribute to a hostile work environment. Harassment encompasses any unwelcome, insulting, or offensive remarks, behaviors, actions, or language that target protected characteristics and are derogatory or display hostility. Bullying refers to attacking others through insulting, demeaning, degrading, intimidating, or threatening language or behavior.

### Typical examples of behavior that constitutes harassment or bullying:

- > Inappropriate physical contact.
- > Comments with sexual connotations.
- > Aggressive language or images transmitted through any means, including instant messaging tools and emails.
- > Making overt sexual jokes in the workplace.
- > Describing others with vulgar language.
- > Suggestive or obscene speech.

### Typical examples of behavior that usually does not constitute harassment or bullying:

- > Normal managerial actions, such as adverse performance ratings and negative/critical feedback.
- > Constructive suggestions or opinions.
- > Disciplinary actions for misconduct.



## Respecting Workers' Rights

We support and honor workers' rights, and actively implement relevant policies. We also encourage our employees to engage in the communities where we work and live.

We are committed to supporting and upholding the principles and values outlined in international treaties such as the United Nations International Bill of Human Rights (comprising the Universal Declaration of Human Rights and its related covenants); the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and its Follow-up; and the United Nations Guiding Principles on Business and Human Rights. We strive to prevent, mitigate, and remedy adverse human rights impacts in our workplaces, business operations, and communities.

### **As an employer, we practice our commitment through the following measures:**

- > Strictly adhere to local laws and regulations regarding working hours, providing workers with reasonable rest periods, respecting their right to rest, and, if overtime is required, informing workers and paying overtime compensation in accordance with the law.
- > Provide good employment conditions, offering and paying fair, reasonable and competitive salaries in compliance with law, including but not limited to wages not lower than the statutory minimum standard, providing statutory benefits, and paying overtime compensation according to the law.
- > Ensure a healthy, safe, and secure workplace for all employees and various personnel on company premises.
- > Create an equal, inclusive, and diverse workplace, promoting personal development and professional growth of employees.
- > Handle and protect workers' personal information with high integrity and in accordance with all applicable legal and regulatory requirements.
- > Respect workers' lawful rights of freedom of association, to join legitimate labor organizations, and to engage in collective bargaining.
- > Refuse to use child labor and strictly adhere to local applicable laws and regulations concerning age restrictions for workers, and age-related requirements and restriction on jobs and tasks.
- > Respect workers' freedom of movement and not restrict their freedom unreasonably.
- > Employ workers who freely choose to work for us and whose personal freedom is not restricted; do not participate in, support, tolerate, or condone any form of slavery or forced labor.
- > Do not participate in, support, tolerate, or condone human trafficking.

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# Health and Safety

The health and safety of each of our employees are of paramount importance. We are committed to providing a healthy, safe, and environmentally friendly workplace, preventing workplace injuries and occupational diseases, and ensuring access to safe drinking water, sanitary facilities, and hygienic conditions. We ensure that every employee and partner can work in a safe and healthy environment. We regularly conduct health and safety training to ensure all employees understand and comply with all relevant health and safety regulations.

# Prohibition of Alcohol, Drug and Controlled Substance Abuse

The abuse of alcohol, drugs, and controlled substances is contrary to our commitment to providing a safe, healthy, and environmentally friendly work environment.

Employees must comply with local laws and regulations, refrain from using illegal drugs or misusing controlled substances, and not perform any job duties under the influence of drugs or misused controlled substances.



## More Guidance

WuXi Biologics Environment, Health & Safety (EHS) Policy

## Protecting Personal Data and Privacy

We are committed to respecting and protecting the personal data and privacy of all employees, business partners, and individuals we interact with.

We promise to collect necessary personal data only under lawful and legitimate conditions and to ensure that such data is used exclusively for clear and legal purposes. We also implement appropriate technical and organizational measures to prevent unauthorized access, use, alteration, or disclosure, thus ensuring the security and integrity of personal data.

Unless explicitly consented to or required by law, we will not share, sell, or exchange personal data with third parties. Additionally, we respect the rights of data subjects, including the right to access, correct, delete, and restrict the processing of their data.

### ▀ Scope of Personal Data

The scope of what is deemed personal data varies based on the laws of different countries. Generally, it includes information relating to an identified or identifiable natural person recorded electronically or by other means, such as name, date of birth, ID number, biometric information, address, telephone number, e-mail address, health information, financial information.



**I am an employee of WuXi Biologics and my department has access to HR data. A colleague has approached me to get a list of all the coworkers in his department with their names, birthday dates (year/month/day), home addresses, and phone numbers in order to send birthday cards to their private addresses. Should I provide him with such information?**

**No.** When sharing and using employees' personal data, companies must strictly comply with legal requirements such as "legality," "reasonableness," "minimal necessity," and "informed consent." To send birthday greetings, methods that minimally impact employees' rights, such as sending via company email or on-site at the company, should be considered first. Only under the conditions that meet the legal principles and other legal requirements can such information be provided.



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## Protecting Intellectual Property and Trade Secrets

Intellectual property is the shared lifeline and the foundation of trust between WuXi Biologics and our global customers. We maintain a zero-tolerance policy towards infringement and rigorously combat any criminal acts that violate intellectual property rights.

We value and respect trade secret protection, integrating it into all stages of research and development, manufacturing, and business operations. "Client-first" is a principle we consistently uphold, and ensuring the effective implementation and enforcement of clients' trade secret protection requirements is a critical element of our trade secret protection framework. We also respect other parties' trade secrets, prohibiting their improper acquisition, disclosure, use, or disposal. We do not exploit business relationships to acquire or infringe upon business partners' trade secrets.

### **Client trade secrets include:**

- > Trade secret information received from clients.
- > Trade secret information learned during collaborations.
- > Trade secret information created by the Company but owned by the client.

### **The Company's trade secrets include both technical and business information, such as:**

- > Company research and development-related information.
- > Information related to technology or products, including processes, methods, steps, raw materials, product formulas, technical parameters, algorithms, computer programs, and associated documentation.
- > Non-public financial information, including financial forecasts, pricing, and cost data.
- > Sales and marketing plans.
- > Customer information and customer lists.
- > Purchasing information, including supplier lists and bidding documents.
- > Employee information, such as personnel lists and salary data.
- > Information related to potential acquisitions, investments, and divestitures.
- > Legal opinions and attorney work product.

### **We take the following measures to protect trade secrets:**

- > We ensure that all business activities are conducted legally and ethically with an established "Compliance Management Policy of Wuxi Biologics Trade Secrets," which clearly demands that employees respect and protect their own and others' trade secrets during R&D, production, and business activities.
- > We promote trade secret protection throughout the Company, train our employees, and conduct examinations to verify they understand their roles and responsibilities regarding trade secret protection.
- > We perform inspections and audits to ensure trade secret protection-related policies and procedures are effectively implemented and executed.
- > We pursue accountability and enforce disciplinary actions for violations of trade secret protection.



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### You Should...

- ✔ Ensure that each client's trade secret protection requirements are effectively implemented.
- ✔ Understand the scope of trade secrets and corresponding confidentiality measures.
- ✔ Fulfill the obligation to protect trade secrets and follow the confidentiality agreements.
- ✔ Comply with our trade secrets protection-related policies.
- ✔ Participate in trade secret compliance training.
- ✔ Report risks related to trade secrets and behaviors involving trade secrets leakage.
- ✔ Ensure confidentiality of trade secrets obtained during work, even after resignation.

### You Must Not...

- ✘ Disclose or leak trade secrets of the Company and our customers without proper authorization. Actions such as downloading files to external private or other unauthorized devices (e.g., private USB flash drives), sending them to private email addresses, or uploading them to external unauthorized online storage are prohibited.
- ✘ Induce, instigate, or assist others in activities that may result in the leakage of trade secrets.
- ✘ Share confidential information with others, even within our Company, unless they have permission and a legitimate business need.
- ✘ Discuss confidential matters in public places, such as elevators, trains, airplanes, or restaurants.
- ✘ Share passwords for computers or accounts.
- ✘ Provide consulting to external parties while disclosing confidential Company or customer information.
- ✘ Carry Company trade secrets and sensitive media out of the Company upon resignation.



If you become aware of any trade secret leakage or other types of trade secret-related violations, contact the **Compliance and Risk Management Center** so we can resolve the issue properly and in a timely manner.





**I sometimes have to work remotely for my job, so I email the files needed for work to my private email account for ease of access and occasionally use my personal computer to work on these files. Can I do this?**

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**No.** We are all responsible for protecting the Company's trade secrets, as well as those of our customers and business partners. You should not email internal Company documents or data to your private email or use your personal computer to process them.



### **More Guidance**

Compliance Management Policy of Wuxi Biologics Trade Secrets

## **Anti-Money Laundering**

WuXi Biologics complies with all applicable anti-money laundering laws and does not facilitate money laundering for third parties. We take measures to prevent money laundering activities within our business processes. To this end, we ensure that we fully understand the specifics of our business partners, and we do not accept funds known or suspected to be derived from criminal activities.

## **Global Trade Compliance**

WuXi Biologics is committed to adhering to all applicable laws and regulations regarding global export controls, customs, and trade sanctions. We require all employees to comply with these laws and regulations, as well as company-specific policy requirements. Under no circumstances may anyone represent WuXi Biologics in any activities that violate relevant laws and regulations.

As a global enterprise, we must remain highly vigilant regarding various trade sanctions, and ensure we identify and manage any risks related to export controls and trade sanctions in all our business activities.



### **More Guidance**

WuXi Biologics Export Control Compliance Manual

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## Anti-Trust and Fair Competition

Fair and honest market competition can drive innovation, benefit patient well-being, and spur business growth. We are committed to consistently complying with international and local laws and regulations regarding antitrust and competition.

### Upholding Fair Competition

We prohibit any actions that may impede fair market competition. This includes but is not limited to price fixing, market division, and exclusive trading agreements.

### Interacting with Competitors Professionally

Every WuXi Biologics employee must adhere to the highest professional and ethical standards in any interactions with competitors, and avoid discussing sensitive information that could affect fair competition.

### Gathering Market Intelligence Responsibly

We recognize that market intelligence plays an integral part in making business decisions. However, we must ensure that such information is collected and used responsibly and legally.



### More Guidance

WuXi Biologics Responsible Marketing Policy



## You Should...

- ✓ Understand and comply with applicable antitrust laws and regulations.
- ✓ Treat customers, suppliers, competitors and other third parties with respect and fairness.
- ✓ Respect competitors' rights related to intellectual property and confidential information.

## You Must Not...

- ✗ Discuss pricing, contract terms, or marketing/sales strategies with competitors.
- ✗ Enter into agreements with competitors to divide markets, territories or customers.
- ✗ Illegally or unethically use our market position to reduce, prevent, or eliminate competition.
- ✗ Provide misleading or deceptive information.
- ✗ Denigrate or slander competitors' products or services or intentionally interfere with their business relationships.
- ✗ Solicit sensitive or confidential business information from competitors or their customers.
- ✗ Use illegal means – such as unauthorized access or theft – to obtain information from or about other companies.

## Data Integrity

At WuXi Biologics, data integrity is at the core of our research, development, and commercial activities. High-quality, reliable, and accurate data are essential for assuring product safety, ensuring regulatory compliance, and supporting scientific decision-making.

All data generated, collected, reviewed, analyzed, recorded, and/or reported must be attributable, legible, contemporaneous, original, and accurate. We prohibit all forms of data manipulation, deletion or falsification. Any changes to experimental data must follow appropriate procedures and leave a clear audit trail.



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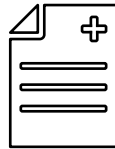
We Speak Up

## Maintaining Accurate Financial Records and Paying Taxes

Accurate, complete, and timely reports, records, and accounts are the foundation of our transparency, credibility, and compliance. We ensure that all financial and non-financial information is accurate, truthful, and complete.

Our financial records and reports should be accurate and give a true and fair view of transactions. This is a matter of financial integrity and a legal responsibility we owe to our shareholders, customers, and regulatory bodies.

Paying taxes in accordance with the law is a critical part of fulfilling our responsibility as a global corporate citizen and is a duty we are committed to uphold.



### More Guidance

WuXi Biologics Travel & Expense Policy

### You Should...

- ✔ Comply with applicable accounting standards, internal controls, policies, and all relevant laws and regulations where we do business.
- ✔ Record all accounting entries and business transactions completely, accurately, and promptly and in the appropriate period.
- ✔ Maintain documentation that presents a genuine picture of transactions and ensure that there are no material misstatements or unreasonable accounting estimates.
- ✔ Submit accurate records to internal and external auditors in a timely manner.
- ✔ Understand and comply with the tax laws of the countries and regions where we operate.
- ✔ Promptly report to a supervisor or the Finance Department regarding any transactions that may be inaccurate, false, or misleading.

### You Must Not...

- ✘ Maintain off-book accounts or conceal assets and liabilities.
- ✘ Mislead or misrepresent to anyone regarding our business operations or financial situation.
- ✘ Create false documents or violate our Code because of any actual or perceived pressure to meet financial goals.
- ✘ Agree to terms and conditions in contracts that do not accurately reflect the actual relationships.
- ✘ Destroy documents that we are required to maintain to fulfill our financial, legal, or tax obligations, except as expressly permitted by our policy.
- ✘ Avoid paying taxes through illegal or unethical means.

## Avoiding Insider Trading

By working at WuXi Biologics, you may become privy to crucial non-public information about WuXi Biologics or other companies (such as current or potential clients, partners, or acquisition targets). You must never use this information for the purpose of stock trading nor disclose it to others.



**Important clinical trial data for a product we are developing for a client will be released next week, and the data suggests that the product is groundbreaking. I think this will have a very positive impact on our client's business in the future, so I'm considering buying stock in this client and telling my friends about it. Is this permissible?**

**No.** The information you have is likely considered material and non-public. You must keep such information confidential and not disclose it to others. Additionally, to avoid violating relevant laws and our Code, you should not trade the client's stock.

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### **What is material non-public information?**

Material non-public information generally refers to information that is not normally available to the general public and, if disclosed, could be perceived as affecting the price of a security or influencing a decision to buy, sell, or hold a security. Examples of material non-public information include:

- > Significant changes in the Company's business strategy or scope of operations, or significant investment activities.
- > The signing of significant contracts, providing substantial guarantees, or engaging in related-party transactions – any of which could significantly impact the Company's operations.
- > The incurrance of significant debts, defaults on significant debts, or the occurrence of substantial losses.
- > Significant changes in the external conditions of the Company's production and operation, or significant changes in internal shareholders, directors, and senior management.
- > Other important information that may cause fluctuations in stock price.

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## Sustainability

We understand that the long-term success of our business is closely linked to sustainability, and we consistently live up to our commitment to sustainability, ensuring that the decisions we make today do not compromise the well-being of future generations.

### Environmental Responsibility

We thrive on reducing our environmental footprint by conserving energy, reducing water usage, minimizing waste, utilizing renewable energy, and implementing sustainable supply chain management. Additionally, we continuously pursue innovations to reduce our carbon emissions, water consumption, waste production, and other environmental impacts.

### Social Responsibility

We are dedicated to creating long-term value for all our stakeholders. This includes providing a safe and fair working environment for our employees, delivering high-quality and responsible products and services to our customers, and supporting the communities and societies where we operate.

### Economic Sustainability

We pursue business growth while ensuring that our business model benefits all stakeholders. We recognize that our social and environmental commitments can be realized only if they are economically viable.

### Transparency

We provide comprehensive, accurate, and timely reporting to demonstrate our progress in meeting commitments regarding sustainability. We encourage all stakeholders to work with us to promote a sustainable future.



### More Guidance

[WuXi Biologics Climate Change Policy](#)

[WuXi Biologics Environment, Health & Safety \(EHS\) Policy](#)

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## Quality Management

Quality is one of the core values of WuXi Biologics' culture. We are committed to implementing a world-class quality system to produce bioproducts that meet the highest standards of safety and efficacy, fulfilling customer needs, continuously empowering our global partners, and advancing every stage – from clinical trials to commercial production.

### Global Standards and Compliance

WuXi Biologics adheres to the comprehensive guidelines and regulations of global health regulatory agencies – including GMP standards – to ensure the safety and efficacy of our biopharmaceuticals and vaccines. We maintain GMP compliance through responsible governance and continual improvement of our quality systems, with the agility to adapt swiftly to new external regulatory requirements.

### Communication and Culture Building

We promote open communication with employees, customers, and government agencies, establishing a sustainable quality culture that motivates innovation and advances technology.

### Role and Responsibility of Employees

We require all employees to understand and fulfill their duties responsibly; to focus on product quality and patient safety; and to take proactive steps regarding any issues that could affect product quality or compliance.



### More Guidance

WuXi Biologics Quality Manual

## Charitable Donations

WuXi Biologics recognizes the importance of corporate social responsibility and we are committed to supporting the sustainable growth and prosperity of the communities where we operate.

Our charitable donations are intended to support health, education, culture and other causes that benefit our communities. All charitable donations must comply with applicable laws and regulations, and should be consistent with our Company's values and strategic goals.

## Political Activities and Contributions

We respect the political process and do not make political contributions to gain undue business benefits or advantages. WuXi Biologics employees have the right to participate in political activities as individuals, but – unless explicitly authorized by the Company – they may not represent the Company or use company resources for political activities. All political donations and any participation in political activities representing the Company or using Company resources must undergo proper internal review and be approved by senior management.

## Social Media

Social media provides a platform for the Company, its employees and other members of the public and stakeholders to connect. While using social media, we must ensure that our behavior reflects the Company's core values.

We comply with all laws, regulations and industry guidelines related to social media, particularly those concerning advertising, privacy and intellectual property.

We encourage open and constructive dialogue, but we must always remain respectful, and refrain from making inappropriate statements about other individuals or organizations, whether online or offline. Furthermore, disclosure of the Company's trade secrets, non-public or sensitive information on social media is forbidden.

## External Inquiries

Only a limited number of authorized and specially trained individuals may respond to external inquiries on behalf of WuXi Biologics. All external inquiries from the media, investors, regulators or the public should be directed to the designated department. This ensures the accuracy and consistency of information that we communicate to external stakeholders.



### More Guidance

WuXi Biologics External Communication Management System



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## Animal Welfare

We comply with applicable regulations and standards related to the care of laboratory animals, and make every effort to minimize pain and stress in experiments. When we work with laboratory animals, our practices are based on our full commitment to animal welfare and guided by the internationally accepted principles related to the humane use of animals in research, known as the 3Rs (Replacement – Reduction – Refinement).

## Ethics of Science and Technology

WuXi Biologics is dedicated to empowering the biopharmaceutical industry with advanced technologies to benefit human health. We recognize the broad potential of applying technologies such as artificial intelligence, nanotechnology, and genetic engineering in the biopharmaceutical field, and are committed to using these technologies ethically and responsibly.



### More Guidance

[WuXi Biologics Laboratory Animal Welfare and Use Policy](#)



# 07

## We Speak Up

We encourage employees – as well as suppliers, customers, and other third parties – to report any misconduct to WuXi Biologics through our established channels.



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## Speaking Up

Our Integrity Hotline and EthicsPoint website are managed by a third party independent of WuXi Biologics. The Integrity Hotline provides 24/7 service and is available in your local languages. You may choose to report anonymously or not.




### WuXi Biologics Integrity Hotline

	<b>China</b> 400-120-5045	<b>Germany</b> 0800-182-3784
	<b>United States</b> 833-416-8867	<b>Singapore</b> 800-492-2740
	<b>Ireland</b> 1800-770-066	

### EthicsPoint Website

 [wuxibiologics.ethicspoint.com](http://wuxibiologics.ethicspoint.com)

## Compliance and Risk Management Center

	<b>Phone</b> 400-820-9577 ext. 3
	<b>Mailing Address</b> Compliance and Risk Management Center Building 4, Lane 800 Qifan Road, Pudong New Area, Shanghai, China
	<b>E-mail</b> SpeakUp@wuxibiologics.com

We take all reports seriously and will conduct fair and objective investigations, maintaining confidentiality to the full extent permitted by law.



### Can I report misconduct anonymously?

In most areas, you may report anonymously. Still, we encourage you to make a named report and to provide as much detailed information as possible so the Company can quickly and effectively investigate the issue.





## Zero Tolerance for Retaliation

At WuXi Biologics, we do not tolerate retaliation of any kind. We want every employee to feel free to raise concerns without fear of retaliation.

Employees who engage in retaliation will be held accountable, up to and including termination of employment. If you believe you are being retaliated against or that someone else is suffering from retaliation, please contact the **Compliance and Risk Management Center**.

Q&A

### What does retaliation look like?

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Retaliation refers to adverse actions taken against an employee as a response to them reporting violations of laws, regulations or Company policies, or cooperating with investigations.

Examples of retaliation actions include:

- > Demotion, suspension, or negative performance evaluations that do not reflect the employee's actual job performance.
- > Withholding an employee's benefits.
- > Harassment or threats against the employee.
- > Denying promotions, raises, or bonuses to the employee.
- > Removing the employee from projects or assignments.

