

The United Laboratories Code of Business Conduct

The United Laboratories International Holdings Limited (Stock Code: 3933.HK) (“TUL”, the “Group”, “we”), as a modern pharmaceutical company engaged in drug research and development, manufacturing and operations, upholds the corporate mission of “Love China, For China”. We are committed to leading by example and adhering to high standards of business conduct. The Group firmly believes that establishing and maintaining a sound and transparent set of policies and practices guides us in responding to business challenges in a consistent manner. All members within the TUL’s ecosystem, as well as relevant stakeholders, are expected to observe the highest ethical standards and adhere to the principles of “friendship, equality and mutual development” wholeheartedly dedicating themselves to producing safe and effective medicines for the people of China.

1. Purpose

As a domestic brand, TUL’s brand value and brand equity require the active protection of every user and stakeholder. We firmly oppose and will act against any conduct that harms the Group’s brand or reputation in any form.

TUL is committed to strictly and prudently providing high-quality, highly effective, first-class medicines. By meeting user needs and maximizing stakeholder value, we aim to achieve high-value outcomes and shared success. All parties within the TUL ecosystem should maintain a strong customer-oriented mindset, accept customer feedback and oversight, continuously improve product and service quality, and safeguard the legitimate rights and interests of customers.

2. Employee Rights

Upholding the corporate tenant of “To Make Life More Valuable”, we encourage the pursuit of personal value maximization, inspire a spirit of dedication, and are committed to cultivating top talent, producing first-class products and delivering first-class services.

The Group supports and upholds the principles and values outlined in international conventions, including the United Nations *International Bill of Human Rights* (comprising the *Universal Declaration of Human Rights* and related covenants) and the International Labor Organization (ILO) *Declaration on Fundamental Principles and Rights at Work and its Follow-up*.

The Group adheres to the following fundamental principles:

- (1) We promote a diverse workforce and ensures that all employees are treated fairly in recruitment, compensation, training opportunities, work assignments, promotions, disciplinary actions and termination.
- (2) Discrimination based on race, color, religion, gender, nationality, age, pregnancy, physical disability or illness, marital or family status, sexual orientation, political opinion, or social status is strictly prohibited.
- (3) We are committed to providing reasonable wages and favorable working conditions, ensuring a healthy, safe and secure workplace. Fair compensation and benefits are guaranteed in accordance with local laws and cultural norms.
- (4) We handle and protect employees' personal identity information with high standards of integrity and confidentiality.
- (5) We respect the personal dignity and development of every employee, including their rights to join independent trade unions, engage in collective bargaining and freely associate.
- (6) We strictly oppose forced labor, exploitative child labor, and human trafficking, and ensures that no business is knowingly conducted with organizations involved in such practices.

3. Health, Safety and Environmental Protection

A healthy and safe workplace is the foundation of all operations. TUL is committed to establishing and maintaining a healthy and safe work environment. Employees are expected to actively contribute to and uphold workplace health and safety. Third parties providing products, services or participating in projects within The Group's facilities must comply with relevant national laws and regulations, as well as the Group's health and safety guidelines. Appropriate health and safety training must be provided to ensure a safe working environment.

TUL is also dedicated to sustainable development that balances business operations with environmental protection. We firmly uphold the concept of "We Must Pursue Both Economic Efficiency and Lucid Waters and Lush Mountains, as well as Blue Skies and White Clouds.". Employees should use energy, water and other resources efficiently during business operations and minimize pollution, waste or the use of hazardous substances in an economically feasible manner. Environmental protection must be integrated into responsible business practices and through the promotion of environmentally friendly product development.

Third-party partners of TUL must comply with applicable environmental laws and regulations. Any personnel providing on-site services at the Group's facilities are required to adhere to the Group's environmental protection standards.

4. Protection of the Group's Assets

Company assets are the foundation of the Group's sustainable development and include both tangible and intangible assets. Tangible assets refer to items such as products, materials, machinery and equipment, buildings, and supporting facilities. Intangible assets include the brand, reputation, digital and customer assets, land use rights, software systems, patents, trademarks, copyrights. Employees must handle all company assets with care and responsibility.

Without prior approval from the Group, employees may not disclose, sell, transfer, lease, or otherwise dispose of company assets, nor use them as collateral or guarantees. Third-party partners conducting business with TUL must also exercise due care in protecting company assets they use or manage during business operations.

Neither employees nor third-party partners may store, use, process, or disclose customer or business data for non-business purposes or without authorization. Under no circumstances may such data be stolen, altered, or misused for personal gain.

5. Data Protection

The Group strictly complies with all applicable national and regional laws, regulations and requirements in the collection, use, transmission, and processing of personal and non-personal information related to employees, customers, business partners and other individuals. To ensure comprehensive data compliance, the Group's Legal Affairs Centre has established a dedicated task force in collaboration with the Group's Information Center and the Group's Human Resources Center. For any questions regarding data security and privacy protection, employees are encouraged to consult the dedicated compliance task force.

6. Intellectual Property and Trade Secrets

TUL places great importance on the creation, protection and use of its intellectual property, while also respecting and avoiding infringement of the intellectual property rights of others. Any intellectual property generated by employees during their employment or through the use of the Group's resources belongs to the Group and must be safeguarded against misuse. Third-party partners must respect the Group's rights to patents, trademarks, copyrights and other intellectual property, and must comply with the Group's restrictions and prohibitions regarding the use of such assets. They may only use the Group's information and assets for specifically authorized purposes.

All parties are obligated to protect TUL's trade secrets. These include, but are not limited to, non-public information, customer data, financial and cost data, business plans, operating reports, pricing information, marketing and sales data, business activity details, personnel files and organizational charts. Employees must use such

information within a reasonable scope and in accordance with the Group's internal policies and relevant agreements, with proper authorization.

7. Financial Information

TUL complies with accounting standards, Generally Accepted Accounting Principles (GAAP) and other applicable laws and regulations related to financial reporting and accounting practices. The Group's accounting records and financial statements must accurately and truthfully reflect transaction details to ensure the reliability and accuracy of all financial information related to TUL's business activities. Improper or falsified accounts, documentation, or financial reports, deliberate misclassification of accounting entries and the premature recognition of payments or revenues are strictly prohibited.

8. Anti-Corruption

TUL strictly opposes any direct or indirect offering or acceptance of bribes for the purpose of securing new business or retaining existing business. Bribery can take many forms, including but not limited to: cash, gifts and giveaways, securities, travel or entertainment, kickbacks, or any items or services of value.

This prohibition against bribery applies to all parties conducting business related to the Group, including but not limited to its employees, third-party partners, and their affiliates.

9. Conflict of Interest

When conducting business on behalf of TUL, employees must not offer or accept business gifts or hospitality of more than nominal value. Frequent acceptance of such hospitality may impair objective judgment. Employees must ensure that any business gifts or hospitality given or received are appropriate and cannot reasonably be interpreted as a bribe or improper attempt to gain unfair advantage or violate applicable laws and regulations.

10. Anti-Money Laundering

Money laundering refers to the act of disguising or concealing the origin and nature of proceeds obtained through illegal activities, making them appear legitimate. Employees must comply with anti-money laundering laws and avoid involvement in any form of money laundering.

11. Fair Competition

We strictly comply with all applicable laws, regulations and the Group's policies. While doing business, the Group expects its employees to interact with customers, suppliers,

competitors, government officials and other third parties without providing misleading or deceptive information. Employees must not seek advantages through unfair means such as manipulation, concealment, or misuse of privileged information. If a misunderstanding is identified, employees are expected to correct it promptly. If there is any uncertainty about whether a specific action is appropriate, employees should consult their department supervisor or the legal department.

12. International Trade Compliance

As a globally operating pharmaceutical enterprise integrating production and R&D, TUL strictly adheres to all applicable national, regional, and international trade laws, regulations, rules, sanctions and export control directives. If employees have any questions regarding cross-border transactions, they should consult their department supervisor or the legal department.

13. Prohibition of Insider Trading

TUL's policy, in line with relevant laws and regulations, strictly prohibits any trading of stocks or securities based on insider information. Employees may gain access to material non-public information about TUL or its related entities during the course of their work. The Group does not permit the use of such non-public information for any securities trading, nor does it allow the disclosure of this information to others for trading purposes.

14. Contract Performance

TUL selects business partners through a fair and impartial process, conducting due diligence beforehand to ensure they meet required standards and maintain a good reputation. Business terms, rights and obligations of both parties are clearly defined through contracts, with all transactions being transparent and properly documented.

Employees must understand and comply with the terms of contracts signed with the Group, follow the Group's procedures for contract execution, use of company seals and authorization protocols, to effectively fulfill business obligations.

15. Interactions with Government

TUL's business activities involve interactions with various levels of government departments and their branches. The Group values mutual support and cooperation with governmental entities and complies with all applicable laws and regulations related to government dealings and business conduct.

When representing the Group in dealings with government authorities, employees must provide timely and accurate data and documentation. In government-related transactions, it is essential to ensure that all project participants understand the detailed

terms of the transaction and that those terms are fulfilled in a timely and compliant manner.

16. External Communication and Disclosure

All communications with the media, investors and the public must be accurate and timely, and must not include misleading statements. Public disclosure of information must be authorized by the Group and carried out in accordance with TUL's disclosure policies. No information may be released to public media on behalf of the Group without prior approval or authorization.

17. Audit

TUL reserves the right to audit all books and records related to its business activities. In the event of any violation of this Code or the terms of any agreement entered into with TUL that results in losses, damages, liabilities, or costs, the Group reserves the right to seek financial compensation and pursue legal responsibility.