

Asymchem Laboratories (Tianjin) Co., Ltd.

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

(Revised in July 2025)

1. PURPOSE

Asymchem Laboratories (Tianjin) Co., Ltd. (hereinafter referred to as the “**Company**”) and its subsidiaries (hereinafter collectively referred to as the “**Group**” or “**Asymchem**”) are committed to responsible business conduct, corporate social responsibility, and sustainable development. The Group strictly and consistently complies with applicable laws, regulations and business ethics.

This Anti-Corruption and Anti-Bribery Policy (hereinafter referred to as “**the Policy**” or “**this Policy**”) provides guidance on a wide range of situations, implementing and enforcing effective mechanisms to prevent and detect bribery and corruption. The Group curbs unethical behavior and continuously improves its internal supervision mechanisms and risk controls.

2. APPLICATION SCOPE

This Policy applies to all employees (including secondees), officers and directors of the Group (hereinafter collectively referred to as the “**Relevant Person(s)**”) as well as external third parties who deal with the Group, including but not limited to the customers and suppliers (the “**External Parties**”).

It is the responsibility of every Relevant Person to counter corruption and bribery by adhering to this Policy. The Policy is not intended to replace any relevant applicable laws, rules, and regulations, nor can it address all potential issues that may arise.

All Relevant Persons are required to adhere to this Policy, a breach of which may lead to disciplinary action that could ultimately result in termination of employment, or where appropriate, may also be referred to regulatory/ law enforcement authorities.

This Policy sets out the minimum standards of conduct to which all Relevant Persons are required to adhere. Relevant Persons are to comply with any additional requirements set by their employing company or by local law, which may be stricter than those set out in this Policy.

3. MANAGEMENT STRUCTURE

The Board of Directors: Responsible for overseeing the formulation and implementation of anti-corruption and anti-bribery policies.

The Audit Committee: Responsible for managing anti-corruption and anti-bribery matters, as well as reviewing and supervising the effectiveness of the anti-fraud management system and its related policies.

The Audit Department: Responsible for engaging in specific tasks such as auditing ethical standards, receiving whistleblowing reports, investigating and handling whistleblower complaints, and reporting audit results and whistleblowing cases to the Audit Committee.

4. PREVENTION OF CORRUPTION AND BRIBERY

The Group prohibits all forms of bribery and corruption. All Relevant Persons are prohibited from soliciting, accepting or offering bribes while conducting the business or affairs of the Group. In all business or affairs of the Group, the Relevant Persons shall comply with all applicable laws and regulations, including but not limited to the Anti-Unfair Competition Law of the People's Republic of China, the Prevention of Bribery Ordinance (Cap. 201) of the Laws of Hong Kong (the “**POBO**”).

The following conducts are prohibited:

- (1) Soliciting or accepting any benefits or kickbacks from other persons as a reward, or offering any benefits or kickbacks to Relevant Persons as a reward for any action;
- (2) Instigating or inducing other employees to violate the Group's policies, or bribing or agreeing on improper benefits to other employees during or after their employment;
- (3) Illegally conducting related party transactions or violating the provisions of conflict of interest. Taking advantage of a Relevant Person's position for the benefit of oneself or one's relatives or friends;
- (4) Engaging in insider trading and internal collusion;
- (5) Embezzlement of public funds and falsifying accounts;
- (6) Any other acts that violate applicable laws, regulations and the Group's articles of association, rules and regulations or impede the purpose of this Policy or applicable laws and regulations; and
- (7) Deliberate concealment of the above actions.

5. GIFTS AND HOSPITALITY

Gifts: Cash and cash equivalent items, such as jewelry, equity options, gift vouchers, shopping cards, tangible gifts, antiques and fine art, commission charges, etc.

Hospitality: Meals, recreational activities, accommodation and travel arrangements, etc.

The Group refrains from offering or accepting gifts and hospitality that are intended to

improperly influence business decisions. Inappropriate interaction with customers and suppliers should be avoided.

Even gifts with good intentions may be perceived as influencing business decisions. As a result, there are restrictions on the gifts that employees can give and receive. Gifts may be accepted when both of the following conditions are met:

- (1) The gift is of an advertising nature, e.g., pens, notebooks, calendars with logos printed on them; and
- (2) The gift complies with legal and ethics requirements and will not be perceived as intended or likely to unduly influence business decisions. Please consult with the team supervisor if more guidance is needed.

Employees are only allowed to accept gifts that are appropriate and are encouraged to hand in gifts that should be accepted by the Group. In this regard, the Group clearly stipulates that: employees should refuse to accept all kinds of gifts from work due to non-subjective reasons and report to the Group in time; if they fail to refuse due to various reasons, they should return the gifts in time afterwards; if they are unable to return the gifts, they should hand them over to the Group's Audit Department (the “**Audit Department**”) within 5 days after receipt (except for those who are unable to hand them over within the time limit due to reasons such as being on business trips, etc.).

The Audit Department is responsible for collecting and registering these gifts and reporting to the Group. At the same time, all forms of gifts or benefits will be uniformly surrendered to the Group for handling.

Employees who receive gifts or benefits and fail to hand them in after the deadline without any exceptional circumstances will be regarded as violating the policy on integrity and self-discipline. Employees who receive gifts or benefits with a value of less than RMB100 (inclusive) are not required to hand them in.

It is permissible to provide meals or appropriate social entertainment within the limits of the Policy. Banquets or other hospitality may be offered or accepted when the following conditions are met:

- (1) Legality;
- (2) Under the normal business relationship situation;
- (3) An itinerary that is predicated on training or business activities;
- (4) Compliance with the Group's policies;

(5) It will not be perceived as an attempt to unduly influence the Group's business decisions and the Group will not be subject to public scrutiny inappropriately.

6. CHARITABLE DONATIONS AND SPONSORSHIPS

Charitable donations and sponsorships may, in some circumstances, constitute a disguised form of bribery. The Group and its subsidiaries are responsible for the daily management of social charity activities.

The Compliance Team must ensure relevant policies of the Group are complied with, including but not limited to the Guidelines for Interacting with External Stakeholders of the Group.

7. CONFLICT OF INTEREST

Decisions must be made in strict adherence to the best interests of the Group and its shareholders. Any potential conflict of interest should be disclosed in writing and approved by the management or the authorized department.

The followings are several typical conflicts of interest or potential conflicts of interest:

- (1) Possessing personal investments in suppliers, customers or competitors;
- (2) Having a family member (e.g., spouse, parent, sibling, child, or in-law) or someone else related like a family member (e.g., fiancé(e), cohabitant, live-in relative) employed by the Group's suppliers, customers, or competitors;
- (3) Receiving any form of benefits from suppliers, customers or competitors;
- (4) Using Group affairs for procurement of personal benefits or potential personal benefits;
- (5) Serving as a consultant or director of a company or organization with a business or market similar to that of the Group;
- (6) Having a family member employed by an organization that regulates the Group.

8. RECORDS, ACCOUNTS AND OTHER DOCUMENTS

All Relevant Persons should ensure that all records, receipts, accounts, or other documents they submit to the Group give a true representation of the facts, events or business transactions as shown in the documents. Intentional use of documents containing false information to deceive or mislead the Group, regardless of whether there is any benefit or advantage involved, may constitute an offense under any applicable laws and regulations.

9. REPORTING OF BRIBERY AND SUSPECTED ACTIVITIES

If any Relevant Person becomes aware of any actual or suspected violation of this Policy, he/she is required to report the matter in accordance with the Whistleblowing Policy, which provides a mechanism for Relevant Persons and outsiders to raise concerns about any suspected misconduct or malpractice through a confidential reporting channel.

The Group has established a dedicated whistleblowing channel to receive both anonymous and named suggestions and complaints from all employees, third parties and other stakeholders concerning known or potential misconduct, non-compliance, or violation of the law. The Group will address all types of suggestions and reports in a serious manner while prioritizing the protection of the personal information and safety of proposer and whistleblowers. (Tel: 022-66252888; Email: asymchemaudit@asymchem.com.cn)

10. ANTI-CORRUPTION AUDITING

The Audit Department identifies and evaluates potential high-risk areas of corruption through regular process audits and special audits, and conducts inspections. Corresponding reports are prepared based on identified risk areas resulting from these inspections, and the Audit Department follows up on the completion of relevant corrective actions.

In accordance with the Group's Business Ethics Management System, the Policies, and other relevant requirements, the Audit Department conducts reviews of anti-corruption and anti-bribery risk control systems, as well as special investigations on business ethics standards, anti-corruption management policies for the Group (including all of the subsidiaries of the Company). Such auditing activities are conducted at least once every three years.

11. TRAINING AND COMMUNICATION

For all employees, new hires, part-time employees and labor dispatch, the annual training session on the theme of Business Ethics shall be conducted at least once every year. Communication on professional ethics is conducted through training to avoid corruption and bribery to the maximum extent, such as induction training, on-the-job training, and other forms of training. Through various forms of training, employees can fully understand the requirements and obligations of anti-corruption laws and this Policy, the importance of professional ethics and establish correct and positive professional values. Employee performance evaluation covers compliance, code of conduct and other contents, and their

compensation is linked to anti-corruption, compliance and other performance.

The directors, supervisors and senior management members are required to participate annually in training sessions of “critical few” organized by regulatory bodies and the China Association for Public Companies.

The Group’s zero-tolerance approach to bribery and corruption must be communicated to the External Parties at the outset of the business relationship with them and as appropriate thereafter.

12. SUPPLIER AND CUSTOMER MANAGEMENT

The Group has established the "Supply Chains Code of Conduct," mandating that all suppliers collaborate in compliance with applicable laws and regulations, industry-standard ethical norms, and the company's anti-corruption requirements while providing services to the company and fulfilling contractual obligations.

The Group will sign the “*Employee Integrity and Self-Discipline Agreement*” with relevant employees, including but not limited to the employees involved in procurement, sales, and other related business operations, inspection and supervision department and those whom the Group deems necessary to sign. The Group will also sign the “*Supplier Integrity Agreement*” with cooperative organizations and set up an anonymous reporting phone number and mailbox.

In the course of business negotiations, the Relevant Persons should strictly adhere to the Group’s internal process and regulations, and make their best efforts and utilize professional expertise to obtain the most favorable trading conditions for the Group. In the event that the counterparty legally grants favorable terms in accordance with the law or the agreement, it should be reported to the Group and handled in accordance with the Group’s regulations.

13. ENGAGEMENT WITH DOMESTIC AND INTERNATIONAL PUBLIC OFFICIALS

The Group adopts an approach characterized by openness and transparency in its communications, encouraging an exchange of information with public servants, to garner trust, endorsement, and collaboration of the public officials and the government. Any use of any illegal or non-compliant methodologies, such as bribery, in interactions with public officers is forbidden.

The Group abides by the standards of conduct prescribed by international anti-corruption laws and regulations, as well as anti-money laundering legislation in all jurisdictions where it operates. It strengthens centralized governance to mitigate overseas integrity risks and improves risk assessment in international investment decisions. Leveraging technological and informational capabilities as essential tools, the Group enhances the effectiveness of its efforts to prevent and address integrity risks abroad.

14. PENALTIES FOR VIOLATION OF THE POLICY

Relevant Persons are responsible for reporting any known or suspected violations of laws, regulations and Group policies. This behavior is not a sign of disloyalty to others, but rather protects the reputation and credibility of the Group and its employees.

Knowing of or suspecting a violation of this Policy, the Relevant Persons are responsible for immediately reporting the violation to the Group's management. The Group will treat all queries and reports with sensitivity and caution.

The Group strictly prohibits retaliation against whistleblowers. Individuals who illegally leak information on whistleblowers or retaliate against whistleblowers will be dismissed, their employment contracts will be terminated, and they will be transferred to judicial authorities for legal action if they violate the laws.

The Group adopts a zero-tolerance attitude towards any misconduct that violates anti-corruption and anti-bribery policy any related laws and regulations. The corresponding measures such as warning, dismissal, and transfer to the judicial authorities are taken, according to the extent of the violations and the procedures as required.

15. RESPONSIBILITY AND REVIEW OF THE POLICY

This Policy shall be read in conjunction with and subject to any relevant laws, regulations, rules, directives or guidelines that The Stock Exchange of Hong Kong Limited (the “**Stock Exchange**”) or any other regulatory authorities of mainland China and Hong Kong may from time to time prescribe or issue on the matters governed by this Policy.

In the event that any procedures herein are inconsistent or in conflict with any relevant laws, regulations, rules, directives or guidelines as prescribed by the Stock Exchange or any other regulatory authorities of mainland China and Hong Kong or any part thereof (the “**Legal**

Requirements”), the latter shall prevail within the scope of such inconsistency or conflict unless the procedures herein comply with the Legal Requirements and are more stringent than the Legal Requirements.

The Group’s primary business operations are mainly located in mainland China, and it has business dealings with External Parties from all over the world. Therefore, in case of inconsistency or conflict with this Policy, members of the Group may establish specific whistleblowing policies in accordance with the laws, regulations, rules, directives or guidance applicable to such Group member’s respective jurisdictions. The audit committee of the Company is responsible for the periodic review of this Policy to ensure its relevance and effectiveness and shall make recommendations on any necessary changes to the Board for approval.

16. DISCLOSURE OF THE POLICY

This Policy is required to be published on Asymchem’s website (**www.asymchem.com**) under the section of “Investor Relations - Corporate Governance”.

NOTE: This document is originally drafted in Chinese. In case of discrepancies between the English version and Chinese version, the Chinese version shall prevail.