



Asymchem Laboratories (Tianjin) Co., Ltd.

凱萊英醫藥集團（天津）股份有限公司

(于中华人民共和国注册成立的股份有限公司)

(Stock Code: 6821)

WHISTLEBLOWING POLICY

(Adopted by the Company at the meeting of the board of directors of the Company)

1. PURPOSE

The Company and its subsidiaries (collectively, the “**Group**”) are committed to responsible business conduct, corporate social responsibility and sustainable development, and have always strictly complied with applicable laws, regulations, and business ethics.

This Whistleblowing Policy (referred to as “**the Policy**” or “**this Policy**”) provides guidance on a wide range of situations, fostering an environment of open communication without fear of retaliation and ensuring a prompt response when ethical or compliance issues come to light.

2. APPLICATION SCOPE

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

It is the responsibility of every Relevant Person to adhere to this Policy. This Policy is not intended to replace any relevant applicable laws, rules and regulations, nor can it resolve all potential issues that may arise.

3. REPORTABLE CONDUCT

- (1) Corruption, bribes, acceptance of improper gifts;
- (2) Embezzlement of public funds, false accounting, dishonesty and fraud;
- (3) Insider trading and internal collusion;
- (4) Violation of fair competition, suppression of competitors;
- (5) Violation of the rules regulating conflict of interest;
- (6) Usage of one’s position for others’ benefits and abuse of power for personal gains, etc.;
- (7) Violation of labor and human rights policies, employee discrimination, forced labor, etc.;
- (8) Divulgence of the Group’s confidential information;
- (9) Unethical behavior or violation of the Group’s Code of Conduct or other policies;
- (10) Other criminal offenses, violations of the law or regulatory obligations, or other improper conduct related to the Group.

Reports should be based on facts, and malicious reporting and false accusations are prohibited. Whistleblowers should provide the name, department of the reported person and the evidence/facts of the misconduct truthfully.

The audit committee of the Company (the “**Audit Committee**”) has overall responsibility for this Policy but has delegated the day-to-day responsibility of oversight and implementation to the Legal Department and the Audit Department, respectively. The Audit Committee is responsible for overseeing and reviewing the implementation of this Policy.

4. WHISTLEBLOWING CHANNELS

The Group has established a dedicated whistleblowing channel to receive both anonymous and named suggestions and reports 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 suggesters and whistleblowers. (Tel: 022-66252888; Email: asymchemaudit@asymchem.com.cn)

5. CONFIDENTIALITY AND PROTECTION FOR WHISTLEBLOWERS

Whether the whistleblower chooses to remain anonymous or not, the Group strictly prohibits any person from disclosing any information about the whistleblower, including their name, department, and company name. The Group also strictly prohibits any person from revealing the report to the individuals or departments under suspicion. All received information including the identity of the whistleblower will be kept confidential unless required by applicable law, regulation, at the lawful request from relevant authorities, including but not limited to the Shenzhen Stock Exchange (the “**Shenzhen Stock Exchange**”) and The Stock Exchange of Hong Kong Limited (the “**Hong Kong Stock Exchange**”) or other competent governmental or regulatory bodies, or by the order or directive of any court having jurisdiction over the Group.

To avoid jeopardizing the investigation, original or copies of reports shall not be circulated, and the identity of whistleblower shall not be exposed. In the case of anonymous reports, handwriting shall not be identified, and reports shall not be lent out. Investigations shall be conducted in accordance with the law and the Group’s needs.

The Group strictly prohibits retaliation against whistleblowers. Those who leak information on whistleblowers or take retaliatory action against them will face dismissal, termination of employment contracts, and will be reported to the judicial authorities if they violate the law.

All complaints shall be submitted using the “Complaint Matters” form (Appendix B) whenever possible. To assist the Group in responding to or investigating a complaint, the complaint should be based on facts rather than speculation and should include specific information to allow for proper assessment of the nature, extent and urgency of the reported matter. It is less likely that the Group will be able to conduct an investigation based on a complaint that contains unspecified wrongdoing or broad allegations with verifiable evidentiary support. The complaint should, to the extent possible, contain the following information:

- A description of the reported event, matter or issue;
- The name(s) of the person(s) involved;
- Time and location details for each specific event if the report involves more than one specific event; and
- Any additional information, documentation, or other evidence available to support the complaint.

6. INVESTIGATION

The Group prudently evaluates each report and determines whether further investigation or action is necessary. The Group has established a specialized investigation team to review reports based on the results of the investigation, and all employees must fully cooperate with the Group's investigation. The Audit Committee shall designate the personnel to record the complaints in the "Whistle-blower Tracking Matrix" (Appendix A) and periodically update the matrix to reflect the status of the measures taken regarding the complaint. The complaint will be logged in the "Whistle-blower Tracking Matrix" once it is received and an investigation will be initiated promptly in a discreet manner as permitted under reasonable circumstances.

The format and length of an investigation depend on the nature and specific circumstances of each report. Reports may:

- be investigated internally by the Legal Department and Audit Department or any suitable individual, team or department within the Group as determined and delegated by the Audit Committee;
- be referred to the external auditor as instructed by the Audit Committee;
- be referred to the relevant public or regulatory bodies as instructed by the Audit Committee; and/or
- be subject to any other actions as determined by the Audit Committee in the best interest of the Group.

Audit Department, upon receipt of a report, will respond to the whistleblower as soon as practicable by:

- acknowledging receipt of the report;
- informing the whistleblower whether further investigation will be conducted and, as appropriate, actions taken or reasons for not investigating;
- where practicable, providing an estimated timeline for the investigation and final response; and
- indicating whether any remedial or legal action will be or has been taken.

7. MALICIOUS WHISTLEBLOWING

In the event that a whistleblower engages in malicious whistleblowing, false accusations and framing with ulterior motives or for personal gain, the Group reserves the right to take appropriate action against any relevant individuals, including the whistleblower, to recover any loss or damage caused. In particular, the relevant individual concerned may face disciplinary action, including dismissal, where appropriate.

8. TRAINING MECHANISM

The Group shall organize specialized training on this Policy at least annually for all employees.

9. 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 Shenzhen Stock Exchange and the Hong Kong Stock Exchange or any other regulatory authorities may from time to time prescribe or issue on the matters governed by this Policy.

In case of any inconsistencies or conflicts between the procedures outlined in this Policy and the legal requirements of relevant laws, regulations, rules, directives or guidelines that prescribed or issued by the Shenzhen Stock Exchange and the Hong Kong Stock Exchange or any other regulatory authorities (the “**Legal Requirements**”), the latter shall prevail within the scope of such inconsistency or conflict unless the procedures in this Policy are compliant with the Legal Requirements and are more stringent.

The Group’s primary business operations are 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 member’s respective jurisdictions.

The Audit Committee is responsible for the periodic review of this Policy to ensure its effectiveness and shall make recommendations on any necessary changes to the Board for approval.

10. DISCLOSURE OF THE POLICY

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

NOTE: This document has been translated into English. In case of discrepancies between the English version and Chinese version, the Chinese version shall prevail.

Appendix A
Whistle-blower Tracking Matrix

*Submitted by Codes: Employee (E); Customer (C); Vendor (V); Shareholder (S); Other (O)

** Current Status Codes: Resolved (R); Under Investigation (UI); Dismissed (D); Withdrawn (W); Pending/No Action (P)

Date Submitted	Submitted by*	Audit Committee Chairman Notified	Assigned Investigator	Nature of Concern	Current Status**	Conclusion	Date of Closure

Appendix B

Complaint Matters

General Information (Optional)

Complaint Submitted By: _____
 Mailing Address or Email: _____

 Address (if you wish to receive a response)

Is the person submitting this Complaint an Employee (E); _____ Customer(C); Vendor (V); Shareholder(S); or Others (O)? _____

Complaint

Date of Complaint: _____

Complaint: *(To the extent possible, describe below the alleged event, matter or issue that is the subject of the Complaint, the name(s) of the person(s) involved, the date and location of the event, and, if available, the documentation to support the Complaint.)*

Administrative

Date Received: _____
 Audit Committee Chairman Notified: _____
 Person Responsible for Investigation: _____
 Date Presented to the Audit Committee: _____
 Date of Response: _____

Note: All supporting documentation must be attached and filed with this document.

Personal Information Collection Statement

All personal data collected will only be used for purposes which are directly related to the whistleblowing case you reported. The personal data submitted will be held and kept confidential by the Group and may be transferred to parties with whom we will contact during our handling of this case or other relevant parties concerned. The information provided may also be disclosed to law enforcement authorities or other concerned units. Where relevant, under the Personal Information Protection Law of the People's Republic of China and the Personal Data (Privacy) Ordinance of Hong Kong, you shall have the right to request access to and correction of your personal data.