

# **Grand Pharmaceutical Group Limited**

## **Responsible Marketing Policy**

### **Chapter I General Provisions**

Article 1 In order to further regulate the conduct in marketing of Grand Pharmaceutical Group Limited (hereinafter referred to as “Grand Pharma”, the “Company”, “we” or “us”), to ensure that communication with stakeholders and promotion and marketing of the Company’s products and services comply with the requirements of relevant laws and regulations and business ethics, and to demonstrate the Company’s values of social responsibility, the Company has formulated this policy.

Article 2 In this policy, “responsible marketing” is referred to as the Company’s and its employees’ conduct in business management and practices during the process of business publicity, product promotion, exhibition, promotion, sales, customer service, customer relationship maintenance, after-sales service and other business activities that is in compliance with laws, regulations, rules and other normative documents, industry norms, various rules and regulations of the Company and professional ethics and codes of conduct recognised and generally observed by the industry.

Article 3 This policy applies to all employees, including full-time employees, part-time employees, outsourcing employees and temporary employees, of Grand Pharma and its member companies who are engaged in wholesale and retail business.

### **Chapter II Principles of Responsible Marketing**

Article 4 Responsible marketing shall follow the principles as below:

- (i) Compliance with industry laws and regulations. Any form of marketing activities, including their marketing content and marketing methods, shall comply with applicable legal requirements and industry standards of the place where our business is operated.
- (ii) In line with the Company’s development concept. Grand Pharma is committed to becoming a pharmaceutical company respected by doctors and patients, and making significant contribution to the society. We strive to consistently create high value for customers, the country and the society by working together with its member companies and partners to promote sustainable and high-quality

development of the enterprise.

### **Chapter III Accurate Disclosure of Product and Service Information**

Article 5 Product and service information shall be accurately disclosed in accordance with applicable laws and regulations and the requirements of industry standards and guidelines in each location of operation, including:

- (i) Engaging in lawful, accurate and science-based communication, and strictly prohibiting exaggerated, deceptive and false contents in marketing activities; in particular, for pharmaceutical products, ensuring that accurate and truthful information about medicines is communicated to customers or consumers.
- (ii) All marketing activities shall be reviewed internally to ensure accuracy and compliance.
- (iii) No misrepresentation of products, services or prices, nor false or misleading statements about products, services, performance or track record shall be made.

### **Chapter IV Business Co-operation and Relationships**

Article 6 The Company prohibits the practice of commercial bribery in any form for the purpose of obtaining sales, procurement or other advantages. Accepting bribes from customers, soliciting bribes, or obtaining illegal benefits in commercial activities is prohibited.

Article 7 The Company has established sound internal policies and guidelines to ensure that its interactions with healthcare professionals are ethical, compliant and transparent.

- (i) Employees shall not deceive or mislead healthcare professionals by making false or misleading publicity about the function, quality, or sale of products.
- (ii) Interactions between the Company and healthcare professionals shall be appropriate and reasonable, and there shall be business necessity for special applications exceeding standard levels.
- (iii) The Company shall not influence the decision-making of healthcare

professionals or cause them to act in pursuit of illegal benefits for the Company by payment of labour fees.

### **Chapter V Privacy Protection**

Article 8 The Company shall thoroughly respect and protect the privacy and data of customers or consumers, and shall not disclose privacy of customers without their knowledge and consent. When the Company needs to collect, store, use, process, transmit, provide or disclose personal information or third-party business information in the course of promotion or sale of the Company's products, other than as necessary for fulfilment of its statutory duties or legal obligations. The Company shall report in advance to the Compliance Management Department for review of the information collection/usage requirements (content of information, manner of use, scope of use, confidentiality measures) and business situation in order to assess the necessity and legitimacy of collection/usage of such information. If collection/usage of information is assessed to be in line with the compliance requirements, written consent of the information owner shall be obtained prior to the collection/usage of the information. Information collected with consent of information owner shall be used only for the purposes agreed upon by the information owner in manner agreed upon by the information owner, and written consent shall be obtained anew from the information owner in case of any change in the use, purpose, manner of use or other content of information.

### **Chapter VI Environmental Protection and Social Responsibility**

Article 9 We actively promote environmental protection and fulfill our corporate social responsibility by proactively integrating environmental, social and sustainability concepts into all business processes, and doing our best to provide consumers with products and services that are beneficial to society and the environment, including but not limited to:

- (i) Reducing waste of packaging materials and providing recycling and disposal services where appropriate.
- (ii) Prioritising materials that contribute to sustainable development.
- (iii) Providing quality products with longer life at affordable prices.

## **Chapter VII Staff Training**

Article 10 The Company shall conduct annual training on responsible marketing for all employees to enhance their awareness and knowledge on, and compliance with, the relevant principles and requirements. In addition, the Company shall organise business-related responsible marketing training for marketing personnel on a regular basis. Employees are obliged to attend these trainings to understand, gain knowledge and comply with various requirements of this policy. The Company shall, upon completion of the training, ensure relevant training records be kept properly, including but not limited to contents of the training, training schedule, training sign-in sheet or list of participants.

## **Chapter VIII Reporting Channels for Violation**

Article 11 The Company is committed to building a fair, just and transparent working environment and cooperative ecosystem, which encourages stakeholders, including the Group's employees, suppliers and business partners, to report to us any malpractice in violation of this policy.

Article 12 The Company has formulated the *Measures for the Management of Reports and Complaints of Grand Pharma* (《远大医药举报投诉管理办法》), and is committed to protecting whistleblowers in an anonymous manner and upholding a zero-tolerance attitude towards retaliation:

- a) Reported leads will be handled by designated personnel and strictly managed in accordance with the confidentiality level. No one else is allowed to view it without the permission of relevant person in charge;
- b) It is strictly prohibited from disclosing contents of report and whistleblower's name, address, contact details and other information, and it is strictly prohibited from transferring reporting materials to the person or unit under investigation;
- c) Other confidentiality measures that should be taken.

Article 13 If the reported leads are verified to be true, the Company shall offer relevant mental and material incentives to qualified whistleblowers who have actively provided leads and assistance in the case investigation for the Company to recover losses or effectively prevent the widening in losses.

Article 14 Anyone (including all employees of the Company and others who have dealings with the Company (including but not limited to customers and suppliers, etc.)) may report any violation or potential violation of this policy, either in person or anonymously, through the following channels:

- 1) Tel: 027-83565610
- 2) Email: [ts@grandpharma.cn](mailto:ts@grandpharma.cn)
- 3) Mailing address: Supervision and Audit Department of Grand Pharma (China) Limited, 27th Floor, K11 Office Building, No. 626 Jiefang Avenue, Qiaokou District, Wuhan City, Hubei Province (湖北省武汉市硚口区解放大道 626 号 武汉 K11 办公楼 27 楼)

### **Chapter IX Oversight**

Article 15 The Company's Marketing Management Centre is responsible for organising and directing the day-to-day operation of this policy within the Company to ensure the effectiveness of its implementation. The management of Grand Pharma shall oversee the implementation of the Company's Responsible Marketing Policy.

Article 16 The Company has established a Responsible Marketing Audit and Supervision Mechanism, which conducts annual systematic audits of all marketing and sales businesses on a regular basis to ensure that product and service related sales and marketing practices are in compliance with relevant laws and regulations.

### **Chapter X Supplementary Provisions**

Article 17 Any matters not mentioned in this policy or in conflict with relevant laws, regulations and normative documents shall be executed in accordance with such relevant laws, regulations and normative documents.

Article 18 This policy is formulated, revised and interpreted by the Company's ESG Working Group and shall take effect from the date of issuance.