

**SHANDONG WEIGAO GROUP MEDICAL POLYMER COMPANY LIMITED**  
**WHISTLE-BLOWING AND INVESTIGATION POLICY**

**(2024 version)**

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ANNEX I: FORM FOR COLLECTING INFORMATION ON WHISTLE-BLOWING

## 1. GENERAL

### 1.1 Summary

Shandong Weigao Group Medical Polymer Company Limited (“Shandong Weigao” or the “Company”) is committed to the highest standards of openness, fairness and accountability. Pursuant to this commitment, the Company expects and encourages its employees, customers, suppliers and other stakeholders to whistle-blow suspected misconducts or malpractices within the Company, and the Company shall treat these issues equitably and correctly.

### 1.2 Definition

Although it is not possible to list all the activities that constitute misconduct or malpractice, in general, the Company considers the following as “**misconduct**” or “**malpractice**”:

- (1) criminal offence;
- (2) failure to fulfil relevant legal obligations;
- (3) violation of relevant regulations of the Company;
- (4) misappropriation of assets or funds;
- (5) sexual harassment or discriminatory behaviour;
- (6) circumstances of manifest injustice;
- (7) financial misconduct;
- (8) behaviour that endangers the health and safety of individuals;
- (9) behaviour that damages the environment;
- (10) behaviour that may endanger information security;
- (11) behaviour that may create ethical problems with experimental animals; or
- (12) deliberate concealment of any of the above matters.

While the Company does not expect every whistle-blowing of misconduct or malpractice to be substantiated, the whistle-blowing should at least indicate its reason.

### 1.3 Scope of Application

This system applies to the Company and its subsidiaries and associates worldwide in which it holds interests (the “Group”).

## **2. RESPONSIBILITIES**

### **2.1 The Company and the Audit Committee**

#### **2.1.1 Safeguarding and Supporting Whistle-blowers**

Safeguarding is an undertaking to protect any individual against unreasonable dismissal, victimisation or unfounded disciplinary action who makes a proper whistle-blowing under this system, even if the whistle-blowing is ultimately found to be unsubstantiated. Any employee who harms or retaliates against the individual who makes whistle-blowing under this system will be subject to disciplinary action.

The Company will ensure that all employees, customers and suppliers can make whistle-blowing without fear of reprisal. Meanwhile, the Company shall ensure that all customers and suppliers understand that the Company encourages them to whistle-blow any misconduct or malpractice to the Company when they become aware of it.

#### **2.1.2 Responsibility for Implementation and Oversight of This System**

The audit committee of the Company (the “Audit Committee”) accepts full responsibility for this system and is responsible for overseeing the execution of the daily work of the internal audit department. The Audit Committee is responsible for overseeing and reviewing the operation of this system and for investigating any recommendations on complaints.

### **2.2 Heads of each Department**

For the purpose of this whistle-blowing and investigation system, the responsibilities of the heads of each department of the Company are as follows:

- (1) supervising and managing the behaviour of relevant departments and employees in various operations and management, research and development and business activities to comply with the requirements of relevant laws and regulations, systems of the Company and standards;
- (2) handling complaints and whistle-blowing from employees and management of the relevant department, and detecting and stopping all kinds of “misconduct” or “malpractice” of employees and management of the relevant department promptly;
- (3) fully supporting and co-operating with the Company’s whistle-blowing and investigation work; and

- (4) procuring the department to complete the rectification of issues identified and recommendations made in the course of whistle-blowing and investigation in a timely manner, and communicating the result of the rectification in writing to the internal audit department and the departments concerned.

### 2.3 All Employees

For the purpose of this whistle-blowing and investigation system, the responsibilities of all employees of the Company are as follows:

- (1) attending the whistle-blowing and investigation training organised by the Company on time and meeting the training hours and training standards stipulated by the Company;
- (2) refusing to perform any kind of “misconduct” or “malpractice”, and actively whistle-blowing or reporting any “misconduct” or “malpractice” of the Company or other employees discovered or known to the internal audit department; and
- (3) actively co-operating with the Company’s investigation, truthfully providing data and information, and shall not refuse, obstruct, negatively treat or interfere with the Company’s investigation and evidence collection work.

## 3. WHISTLE-BLOWING

### 3.1 False Whistle-blowing

Employees who make false whistle-blowing on unreasonable grounds or in a malicious manner for personal benefits may face disciplinary action, including dismissal.

### 3.2 Whistle-blowing Procedures

3.2.1 Whistle-blowing may be made orally or in writing in the form attached to Annex I.

3.2.2 For employees, the Company expects employees to conduct whistle-blowing within the Company to their immediate superiors.

3.2.3 If you have concerns about making whistle-blowing directly to your immediate superior, such as if your immediate superior refuses to handle your case, or the subject of the whistle-blowing is your immediate superior, you should contact the internal audit department.

3.2.4 For customers and suppliers, please whistle-blow your concerns to the internal audit department of the Company.

3.2.5 If the whistle-blowing is very serious or involves the internal audit department, you should make the whistle-blowing directly to the chairman of the Audit Committee at [compliance@weigaogroup.com](mailto:compliance@weigaogroup.com).

3.2.6 In your whistle-blowing, you should give full details and provide as much relevant evidence as possible.

### 3.3 Confidentiality

3.3.1 The Company will endeavour to keep the capacity of the whistle-blower confidential. In order not to prejudice the investigation, you should also keep confidential the fact that you have made a whistle-blowing, details of the whistle-blowing, and the persons involved in the whistle-blowing.

3.3.2 In some cases, the nature of the investigation may require disclosure of your capacity. In such cases, the Company will endeavour to notify you in advance. If you are also required to participate in an investigation, the Company will, to the extent reasonably practicable, keep your capacity as a whistle-blower confidential. However, your role as a whistle-blower may also become apparent to third parties during the investigation.

3.3.3 Similarly, if the investigation ultimately leads to criminal proceedings, you may be required to provide corresponding evidence or be interviewed by the relevant authorities. In such cases, the Company will discuss the implications of confidentiality with you again.

3.3.4 Under certain circumstances (e.g. subject to the provisions of the relevant laws and regulations), the Company may be required to refer matters to the relevant authorities without prior notice.

### 3.4 Anonymous whistle-blowing

If a whistle-blowing is made anonymously, the Company may not be able to obtain further information from you and assess it appropriately, and therefore the Company will generally not process anonymous whistle-blowing of complaints.

## 4. INVESTIGATION PROCEDURES

4.1 Upon receipt of a whistle-blowing, the Company will reply to you within three (3) business days to acknowledge receipt of the whistle-blowing.

4.2 The head of the Company's internal audit department is responsible for managing whistle-blowing.

4.4 The Company will evaluate each whistle-blowing received to determine whether a full investigation is warranted. If an investigation is warranted, an appropriate investigative team (with appropriate qualifications and no prior involvement in the whistle-blowing, e.g., internal audit, compliance, legal, human resources, etc.) will be appointed to investigate the whistle-blowing.

- 4.5 If the whistle-blowing reveals a potential violation of law or crime, the Company will refer the matter to the Audit Committee. The Audit Committee, after considering and taking into account the advice of its legal adviser, will decide whether or not to refer the matter to the relevant authorities for further action.
- 4.6 As stated in section 3.3, in most cases, the Company will notify you of its decision before referring the matter to the relevant authorities. However, in some cases, the Company may have to refer the matter to the relevant authorities without notice or consultation.
- 4.7 Once the matter has been referred to the relevant authorities, the Company will not be able to take further action regarding the matter, including informing you of the referral.
- 4.8 You may be requested to provide additional information during the investigation.
- 4.9 The investigation report will be reviewed by a committee comprising senior managers, such as the head of internal audit, the head of human resources or the head of compliance.
- 4.10 The findings may include:
- (1) the allegations are not substantiated;
  - (2) the allegations are substantiated;
  - (3) the allegations have been substantiated and corrective measures taken to ensure that the problems will not occur again;
  - (4) Punishment or other appropriate action has been taken against the wrongdoer.
- 4.11 The final report will be submitted to the Audit Committee with recommendations for improvement (if applicable). The Audit Committee will consider the final report and make recommendations to the Board of Directors.
- 4.12 You will receive the findings of the investigation in writing. Due to legal constraints, the Company will not be able to provide you with details of the action taken or a copy of the whistle-blowing.

## **5. REWARD, PUNISHMENT AND INSPECTION**

### **5.1 Reward and Punishment**

- 5.1.1 In the case of real-name whistle-blowing, if the whistle-blowing is substantiated after internal or external investigation of the Company, the Company will reward the whistle-blower, including recognition through notification or material rewards.
- 5.1.2 The Company will penalise malicious whistle-blowing according to the subsection headed “False Whistle-blowing”.
- 5.1.3 Employees are obliged to cooperate with the Company’s investigation. For employees who obstruct or refuse to cooperate, the Company has the right to impose disciplinary sanctions depending on the severity of the case, the most serious of which is the termination of the labour contract or the send back the secondee to the labour dispatch agency.
- 5.1.4 If the whistle-blowing is substantiated, the Company has the right to give a warning in writing and more disciplinary sanctions depending on the circumstances and the severity of the impact, the most serious of which is the termination of the labour contract or send the secondee back to the labour dispatch agency, and if the whistle-blowing involves a violation of law or a crime, the Company will deal with it according to section 4.5;
- 5.1.5 If the whistle-blowing is not substantiated, but other irregularities are found in the course of the investigation and have an impact on the Company, the Company has the right to give a verbal warning or more disciplinary sanctions depending on the circumstances and the severity of the impact, the most serious of which is the termination of the labour contract or send the secondee back to the labour dispatch agency, and if the whistle-blowing involves a violation of law or a crime, the Company will deal with it according to section 4.5;
- 5.1.6 With respect to sections 5.1.4 and 5.1.5 above, the Company will, depending on the knowledge of the management of the department involved in the whistle-blowing, pursue the management of the department to take the corresponding management responsibility. With respect to the departmental management who intentionally conceals or connives the “misconduct” or “malpractice” of the employee of the department, the Company will strictly pursue the management responsibility of the departmental management.

### **5.2 Overseeing the Implementation of the Whistle-blowing System**

The Audit Committee will review and monitor the effectiveness of this whistle-blowing system from time to time and make recommendations for amendments, which will be followed up by the internal audit department.



## **6. SUPPLEMENTARY PROVISIONS**

### **6.1 Effectiveness of the Rules**

If there is any inconsistency between the regulations on whistle-blowing and investigation management of the Company before the issuance of this management system and this management system, this management system shall prevail.

### **6.2 Interpretation**

The internal audit department of Shandong Weigao is responsible for the interpretation of this system.

*(The Chinese version shall prevail in case of any discrepancy or inconsistency between the Chinese version and its English translation.)*

**ANNEX I: FORM FOR COLLECTING INFORMATION ON WHISTLE-BLOWING  
(CONFIDENTIAL)**

|   |  |
|---|--|
| Name of whistle-blower:   |  |
| Capacity:   | <input type="checkbox"/> Employees <input type="checkbox"/> Customers <input type="checkbox"/> Suppliers <input type="checkbox"/> Others: _____ (please specify) |
| Departments and positions:<br><i>(Applicable to the employees of the Company only)</i>  |  |
| Contact address:  |  |
| Contact number:   |  |
| Mailbox:  |  |
| Date:   |  |
| Name of individual involved (if known):   |  |
| <p>Particulars:</p> <p>Please provide full details of the matter you wish to whistle-blow: including relevant names, dates and address and the reason for submitting the whistle-blowing (you can add more information to the list if necessary) and any supporting evidence.</p> |  |