

康龙化成（北京）新药技术股份有限公司

Pharmaron Beijing Co., Limited

行为准则

Code of Conduct

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董事长致辞 A Letter from the Chairman

各位同事：

Dear colleagues,

在全球生物医药行业持续演进、竞争日益激烈的环境中，康龙化成始终坚持以客户为中心，坚定推进全流程、一体化、国际化、多疗法的核心战略，持续提升专业能力、创新能力和全球协同服务能力。我们依托高标准的质量体系、稳健的运营能力和跨区域协同优势，致力于为全球客户提供高质量、高价值的研发服务与解决方案，并以实际行动践行“以最高水平的研发服务，帮助合作伙伴们开发新药，为人类健康贡献康龙化成智慧”的企业使命。

In a biopharmaceutical industry marked by continuous change and intensifying global competition, Pharmaron remains firmly client-centered and unwavering in advancing our core strategy of being end-to-end, integrated, international, and multi-modality. We continue to strengthen our professional capabilities, innovation capacity, and global collaborative service capabilities. Supported by high standards of quality, disciplined operations, and cross-regional collaboration, we are committed to delivering high-quality, high-value R&D services and solutions to clients worldwide and to fulfilling our mission of helping our partners develop new medicines with the highest level of R&D services and contributing Pharmaron's efforts to human health.

我们的核心价值观：

Our core values:

1. 正直诚实，值得客户、股东、合作伙伴和员工的信赖；

Being honest and acting with integrity, and earning the trust of our clients, shareholders, partners, and employees;

2. 致力于为客户提供优质服务，不断追求卓越；

Being committed to delivering high-quality service to clients and continuously striving for excellence;

3. 团队协作，尊重他人，助人为乐；

Working collaboratively, respecting others, and being willing to help;

4. 重能力，不唯学历；

Valuing competence but not just academic qualifications;

5. 勇于创新，提高效率；

Pursuing innovation and improving efficiency;

6. 节约资源，合理使用；

Using resources prudently and efficiently;

7. 自我完善。

Continuously improving ourselves.

康龙化成《行为准则》承载着公司的价值主张和管理要求，是我们开展全球业务、作出日常决策、处理内外部关系时必须共同遵循的重要准则。无论外部环境如何变化，我们都必须始终坚持质量为本、诚信为先、责任为重，把合规意识、风险意识和长期主义贯穿到经营管理和每一项具体工作之中。我始终相信，只有坚持做正确的事情、坚持诚信，企业才能行稳致远，可持续发展才能真正转化为长期竞争力。

Pharmaron's Code of Conduct embodies the Company's values and management expectations. It is a fundamental standard that we must all uphold in conducting global business, making day-to-day decisions, and managing both internal and external relationships. Regardless of how the external environment evolves, we must remain steadfast in treating quality as our foundation, integrity as our priority, and accountability as our discipline, embedding compliance awareness, risk awareness, and long-term thinking into our management approach and every aspect of our work. I firmly believe that only by doing the right things and upholding integrity can an enterprise move forward steadily and turn sustainability into a true source of long-term competitiveness.

我期待每一位员工都能够自觉践行公司的道德标准和核心价值观，并将其体现在与同事、客户、供应商、服务商、商业伙伴及政府部门的每一次沟通和每一项行动中。我们要持续完善合规、环境、健康安全、质量、信息保护和业务连续性等管理体系，不断提升在系统性风险管理、气候变化、资源利用、生物多样性、实验动物福利及可持续供应链等方面的管理能力。面对复杂问题和不确定情形，我们既要坚守底线，也要主动沟通、及时求助、审慎决策，确保公司的每一项业务活动都经得起法律、专业和时间的检验。

I expect every employee to consciously uphold the Company's ethical standards and core values and to reflect them in every interaction and every action involving colleagues, clients, suppliers, service providers, business partners, and government authorities. We must continue to strengthen our management systems relating to compliance, environment, health and safety, quality, information protection, and business continuity, while continuously enhancing our capabilities in systemic risk management, climate change, resource use, biodiversity, laboratory animal welfare, and sustainable supply chain management. When faced with complexity or uncertainty, we must hold firmly to our principles, communicate proactively, seek guidance in a timely manner, and exercise sound judgment so that every business activity of the Company can stand the test of law, professional scrutiny, and time.

面向未来，康龙化成将继续保持战略定力，坚定不移走高质量发展之路，脚踏实地推进各项工作，不断提升全球服务能力和综合竞争实力。我们将一如既往地重视安全，敬畏科学，尊重生命，以更加坚定的信念、更加严谨的作风、更加务实的行动，推动企业健康可持续发展。我希望全体员工与公司同心同向、恪尽职守、担当作为、共同奋斗，在创新药研发服务的广阔舞台上持续创造价值、赢得信任、成就长远未来。

Looking ahead, Pharmaron will remain strategically focused, stay firmly committed to high-quality development, and continue to advance our work with discipline and determination while strengthening our global service capabilities and overall competitiveness. As always, we will value safety, respect science, and honor life. With stronger conviction, greater rigor, and more practical action, we will continue to support the Company's healthy and sustainable development. I hope that all employees will move in the same direction as the Company, fulfill their responsibilities with dedication, take ownership, work together with purpose, and continue to create value, earn trust, and build a strong long-term future in the broad field of innovative drug R&D services.

楼柏良 Boliang Lou
董事长及首席执行官 Chairman & CEO

1. 概述 Overview

本行为准则适用于康龙化成（北京）新药技术股份有限公司（“总部”）及其分公司、全资或控股子公司（与总部分别及合并称为“康龙化成”或“公司”）以及公司的全体员工，包括正式员工、劳务派遣员工和临时员工（合称“员工”）。

This Code of Conduct applies to Pharmaron Beijing Co., Ltd. (the “Headquarters”) and its branches, wholly-owned or controlled subsidiaries (respectively and collectively “Pharmaron” or “the Company”), and all employees of the Company, including permanent employees, employees under labor dispatching arrangements and temporary employees (collectively, the “Employees”).

本行为准则是我们日常工作中具有约束力的指导方针，是对公司内部制度及劳动合同约定义务的补充。此外，本行为准则为指导管理层、员工及代表公司行事的人员按照公司价值观开展活动提供了基本原则和指引。我们同时必须遵守公司运营地的法律法规及适用的国际法规。

This Code of Conduct provides binding guidance for our daily work and supplements the Company’s internal policies and the obligations set out in employment contracts. In addition, it sets out the fundamental principles and guidance for management, employees, and persons acting on behalf of the Company to carry out their activities in a manner consistent with our values. We must also comply with the laws and regulations in the places where we operate, as well as applicable international regulations.

违反法律法规和行为准则将对公司、员工、客户、商业合作伙伴以及其他利益相关方造成不同程度的损失。因此，我们对于任何违反法律法规、公司政策及本行为准则的不当行为采取零容忍的态度，并将依照公司程序按照其严重程度采取对应的处理措施。员工的不当行为不仅会导致公司承担法律责任，也可能导致员工个人承担法律责任。除法律责任外，公司会按照公司政策对参与不当行为的员工进行调查并采取适当的纪律处分，情节严重的情况下公司有权解雇员工。

Violations of laws, regulations, and the Code of Conduct may result in losses to the Company, our employees, clients, business partners, and stakeholders to varying degrees. Therefore, we adopt a zero-tolerance attitude towards any misconduct that violates any laws and regulations, the Company policies, and the Code of Conduct. We will take the corresponding measures according to the severity of the violations and the procedures as required. Employee misconduct may result in legal consequences, not only to the Company but also to the employees themselves. In addition to legal consequences, the Company will investigate and take appropriate disciplinary action against employees who are involved in misconduct in accordance with the Company policies, and the Company reserves the right to terminate employment in severe cases.

为了避免上述情形的发生，我们每个人都有责任熟悉本行为准则，并遵照此准则行事。当遇到疑问时应立即寻求专业部门的咨询和建议。

To help prevent such situations, each of us is responsible for being familiar with this Code of Conduct and acting accordingly. When in doubt, seek guidance promptly from

the relevant functions or departments.

2. 道德与合规 Ethics and Compliance

我们的行业受到多项法律法规的约束，这些法律法规旨在保护患者和消费者、提高药品及医疗卫生服务质量，并帮助防范欺诈以及对医疗判断的不当影响。遵守适用于我们业务活动的法律法规是最基本的要求，而我们的行为标准高于单纯合规；即使在没有明确法律规定的情况下，我们仍坚持以诚信、责任、公开透明和专业判断行事，始终做正确的事情。我们对这些原则的坚持，体现在与包括医疗卫生专业人士、患者、消费者、医院、学术界、政府、监管机构、业务合作伙伴、客户和供应商在内的所有利益相关方的关系中。我们承诺以负责任、诚实、透明和公平的方式开展业务，维护公平竞争，尊重法律并恪守高于合规的道德标准，以实际行动履行对利益相关方的承诺并赢得信任。

Our industry is governed by a number of laws and regulations designed to protect patients and consumers, improve the quality of medicines and healthcare services, and help prevent fraud and undue influence on medical judgment. Compliance with the legal and regulatory requirements applicable to our business activities is the baseline. Our standards go beyond compliance. Even where the law is silent, we are expected to act with integrity, responsibility, transparency, and sound judgment, and to do the right thing. These principles guide how we engage with all stakeholders, including healthcare professionals, patients, consumers, hospitals, academia, governments, regulators, business partners, customers, and suppliers. We are committed to conducting our business responsibly, honestly, transparently, and fairly, in a manner that supports fair competition, respects the law, upholds standards that go beyond compliance, honors our commitments to stakeholders, and earns trust.

作为公开透明原则的具体体现，康龙化成将依照适用法律法规以及客户所遵循的相关行业准则，对与医疗卫生专业人士、政府机构、政府官员、国有企业及政党机关相关的费用支出进行及时、准确、完整的登记和披露。此类支出包括教育资助、科研支持、咨询报酬、差旅招待、礼品、捐赠、赞助及政治捐赠等。As a practical expression of our commitment to transparency, Pharmaron will, in accordance with applicable laws and regulations and relevant industry standards followed by our clients, record and disclose in a timely, accurate, and complete manner expenses relating to Healthcare Professionals, government institutions, Public Officials, state-owned enterprises, and political party entities. Such expenses may include educational grants, research support, consulting fees, travel and hospitality, gifts, donations, sponsorships, and political donations.

2.1 反贿赂与反腐败 Anti-Bribery and Anti-Corruption

康龙化成坚持廉洁经营，禁止任何形式的贿赂和腐败行为。在我们开展业务的任何国家或地区，为获取或保留商业机会、影响决策或获得其他不当利益，而向公职人员、医疗卫生专业人士、商业伙伴或任何其他第三方提供、承诺、支付或接受不当利益，均可能构成违法违规行为，并可能给公司及个人带来严重的法律、财务和声誉后果。

Pharmaron is committed to conducting business with integrity and prohibits all forms of bribery and corruption. In any country or region where we operate, offering, promising, paying, or accepting an improper benefit in order to obtain or retain business, influence a decision, or secure any other improper advantage may violate applicable laws and regulations and may expose both the Company and individuals to serious legal, financial, and reputational consequences.

行为指引:

Directions for Conduct:

- 拒绝行贿、受贿或参与其他腐败行为;
Refuse to offer or take bribes or participate in other corrupt acts;
- 禁止直接或间接为公职人员、医疗卫生专业人士或商业人士提供、给予或承诺有价值的物品或便利，以获得或保留商业竞争优势，影响公职人员和医疗卫生专业人士的决策，或获得其他不当利益;
Do not provide, offer, or promise, directly or indirectly, anything of value or any convenience to Public Officials, Healthcare Professionals, or business persons in order to obtain or retain a competitive advantage, influence their decisions, or obtain any other improper benefit;
- 禁止支付通融费;
Do not make any Facilitation Payment.
- 遵循公司的财务会计流程，包括留存准确、透明的账簿和记录等内部控制机制。
Follow the Company's accounting processes, including internal control mechanisms, e.g. keeping accurate and transparent books and records.

公司政策:

Company Policy:

- 《全球反腐败合规政策》 Global Anti-Corruption Compliance Policy

示例:

Examples:

1. 我负责销售，并希望能超过今年预设的营收目标。我为一位潜在客户的招标大单准备报价。客户方相关主要决策者提出，他可以影响订单的签订以有利于公司中标，但要求适当的费用补偿。

I am an employee in the sales department and hope to exceed this year's revenue target. I am preparing a quotation for a prospective client's large tender order. The key decision-maker on the client side indicated that he could influence the award of the tender in favor of our company in exchange for compensation.

这是腐败行为。请不要答应客户的需求并立即告知您的上级和合规部寻求指导及帮助。

This is an act of corruption. Do not agree to the client's request, and immediately inform your supervisor and the Compliance Department for guidance and assistance.

2. 我正在负责公司消防安全许可证的获取工作。虽然消防部门已经完成了验收检查，但是迟迟没有发放许可证，这可能影响我们项目的进度。消防部门的负责人暗示我如果支付一定的费用以换取加速发放许可证的承诺。

I am in charge of obtaining the Company's fire safety license. Although the fire department has completed the acceptance inspection, it has been slow in issuing the license, which may affect the progress of my project. The head of the fire department hinted that I could pay a certain fee in exchange for a promise to expedite the issuance of the license.

这是腐败行为。公司严禁向公职人员提供通融费以加快其履行职责。

This is an act of corruption. The Company strictly prohibits any Facilitation Payment to Public Officials in order to expedite the performance of their duties.

3. 作为销售人员，客户找到您，希望您能将客户总经理的女儿安排到公司内任职，客户的女儿没有相关专业背景，但客户希望安排到采购部门或财务部门。这样有助于与客户增进关系以获得更多的订单量或更易于签署合同。

As a salesperson, the customer asked you to arrange for the daughter of the client's general manager to work for the company. The client's daughter does not have relevant professional background, but the client wishes to arrange for a position in the procurement or finance department. Offering employment in this way could be seen as an improper benefit intended to strengthen the relationship with the client, obtain more orders, or make it easier to secure contracts.

您应拒绝该提议。员工入职在合规的公开选聘流程前提下，应具有相关的学历背景、专业能力、技能知识等条件。不合格的员工为雇主工作，这是存在于员工和雇主间的相抵触的利益，并且，为与公司存在利益冲突的第三方（如康龙化成计划收购的公司、有业务关系的公司、从事同类业务有竞争关系的公司等）提供利益，是一种变相的行贿行为。

You should reject the request. Under a compliant and transparent recruitment process, employees should have the relevant educational background, professional competence, skills, and knowledge. Hiring an unqualified candidate at the request of a client may create a conflict of interest and may constitute a disguised form of bribery by providing an improper benefit to a third party connected with the Company's business.

2.2 礼品、招待、邀请、好处与承诺 Gifts, Hospitality, Invitations, Benefits and Promises

康龙化成认识到，礼品、招待、邀请、好处与承诺在正常商业往来中可能出现，但此类安排不得影响独立、客观和公正的商业判断。无论是直接还是间接提供、承诺、给予或接受礼品、招待、邀请、其他好处或相关承诺，只要超出合理范围、具有不当目的，或可能被理解为试图影响决策、交换利益或获取不当优势，均应被禁止，尤其在与公职人员和医疗卫生专业人士交往时更应严格审慎。

Pharmaron recognizes that gifts, hospitality, invitations, benefits, and promises may

arise in the course of normal business interactions, but such arrangements must not compromise independent, objective, and fair business judgment. Whether offered, promised, given, or accepted directly or indirectly, any gift, hospitality, invitation, benefit, or related promise that exceeds reasonable limits, serves an improper purpose, or may be understood as seeking to influence a decision, exchange favors, or obtain an improper advantage is prohibited, particularly in interactions with Public Officials and Healthcare Professionals.

行为指引：

Directions for Conduct:

- 不向公司外部人员提供、给予或承诺任何旨在使接收人不正当地做出有利于康龙化成的决定或行动、或对此种行为进行回馈；
Do not provide, offer, or promise anything to any person outside the Company for the purpose of inducing the recipient to improperly make a decision or act beneficial to Pharmaron, or rewarding the recipient for such acts;
- 不接收可能导致不正当地做出不利于康龙化成的决定或行动的礼品、招待、邀请或好处；
Do not accept any gift, hospitality, invitation, or benefit that may improperly influence your decisions or actions to the detriment of Pharmaron;
- 拒绝接受频繁来自同一提供人的礼品、招待、邀请或好处；
Do not accept gifts, hospitality, invitations, or benefits offered frequently by the same person;
- 在任何情况下，不向公司外部人员提供现金或现金等价物（例如购物卡、礼券）；
Under no circumstances shall cash or cash equivalents (e.g., shopping cards or gift vouchers) be provided to persons outside the Company;
- 遵循公司的财务会计流程，包括留存准确、透明的账簿和记录等内部控制机制。
Follow the Company's accounting processes, including internal control mechanisms such as keeping accurate and transparent books and records.

公司政策：

Company Policy:

- 《全球反腐败合规政策》 Global Anti-Corruption Compliance Policy
- 《有关公职人员和医疗卫生专业人士的费用标准管理流程》
Standard Procedure for Managing Fees and Expenses Relating to Public Officials and Healthcare Professionals

示例：

Examples:

1. 中秋节即将来临，我们的客户要求我向某位指定的医生赠送中秋月饼或现金卡作为风俗礼品。

As the Mid-Autumn Festival is approaching, our client asks me to provide moon cakes or cash cards to a designated doctor as a custom gift.

在任何情况下，您都不能向公司外部人员提供现金卡。

Under no circumstances shall you provide cash cards to persons outside the Company.

公司要求原则上不得向公职人员和医疗卫生专业人士提供（无论是直接提供或是通过第三方提供）任何礼品或私人服务（即：与接收人的职业无关、仅使接收人私人获益的服务）。在《有关公职人员和医疗卫生专业人士的费用标准管理流程》中针对向医生提供小额风俗礼品的限额及审批做出了规定。您需要严格遵循以上的原则及制度中的规定。

In principle, no gifts or private services (i.e., services unrelated to the profession of the recipient and solely for the private benefits of the recipient) shall be provided to Public Officials and Healthcare Professionals either directly or through third parties. Thresholds and approval procedures for offering small-value custom gifts to doctors are set out in the Standard Procedure for Managing Fees and Expenses Relating to Public Officials and Healthcare Professionals. You must strictly follow the above principles and the requirements set out in the relevant policies and procedures.

此外，您还需要特别关注客户内部的合规要求及合同中我方向客户的合规承诺。我们的部分客户为国际制药厂商协会联合会（IFPMA）会员公司，这些公司在制定其内部合规政策时须遵循《IFPMA 行为准则》的要求或行业共识，包括但不限于禁止向医疗卫生专业人士提供（无论是直接提供或是通过诊所和机构提供）个人礼品（如：体育或娱乐项目的入场券，社交或风俗礼品等）；禁止提供现金、现金替代物或者个人服务。这些公司通常也会在合同中对于康龙化成提出同样的合规要求。因此，您按照客户要求向医生提供风俗礼品前，需要确认在和客户的合同中是否做了上述合规承诺。如果您无法判断，请咨询您的上级或合规部。

In addition, you need to pay special attention to compliance requirements within the client's organization and the compliance commitments we made to our client in the contract. Some of our clients are member companies of the International Federation of Pharmaceutical Manufacturers and Associations (IFPMA). When formulating their internal compliance policies, these companies must adhere to the requirements of the IFPMA Code of Practice or relevant industry standards, including but not limited to prohibiting personal gifts to Healthcare Professionals (such as sporting or entertainment tickets, social courtesy gifts, etc.), whether provided directly or through clinics and institutions, and prohibiting the provision of cash, cash equivalents, or personal services. These compliance expectations are often also reflected in their contracts with Pharmaron. Therefore, you need to confirm whether the above compliance commitments have been made in the contract with the client before providing courtesy gifts to doctors as requested by your client. If you are unable to make a judgment, please consult your supervisor or the Compliance Department.

2. 作为负责人，您需要组织一场学术交流会议，需要邀请客户、公职人员及医疗卫生专业人士参与会议。您的下属提议将会议安排在四季酒店位于三亚的海滩别墅度假村举办，这样可以使参会者享受当地的风土人情，也可以有助于未来公司与参会的客户、公职人员和医疗卫生专业人士增进关系以获得更多的商业机会。

As the responsible person, you are organizing an academic conference that will invite clients, Public Officials, and Healthcare Professionals. Your subordinate proposes holding the conference at a beach resort hotel in Sanya so that participants can enjoy the local customs. This can help the Company enhance relationships with the attending clients, Public Officials, and Healthcare Professionals and obtain more business opportunities in the future.

作为负责人您应拒绝该提议。学术互动交流活动的举办地应适当且有助于实现其活动的科学或教育目的。活动的举办地不得为与娱乐活动相关联的场所，例如：SPA、温泉、度假酒店、滑雪、高尔夫、赌博、邮轮等。

As the responsible person, you should reject this proposal. Academic conferences should be conducted in appropriate places that are conducive to the achievement of their scientific or educational objectives. The conference should not be held in places associated with leisure activities, such as spas, hot springs, resort hotels, skiing, golf, gambling, cruises, etc.

2.3 捐赠与赞助 Donations and Sponsorships

康龙化成支持出于公益、慈善、教育、科研或人道主义目的开展合规的捐赠与赞助活动，但此类活动必须基于正当目的并依法依规实施。捐赠不得作为获取、保留或回馈商业机会、审批、推荐、使用公司产品或服务或其他不当利益的条件；赞助虽可取得合理的商业回报，但该等回报必须合法、正当，并符合市场公允价值。

Pharmaron supports compliant donations and sponsorships for legitimate charitable, educational, scientific, or humanitarian purposes, but such activities must be undertaken for proper reasons and in accordance with applicable laws and regulations. Donations must not be used as a condition for obtaining, retaining, or rewarding business opportunities, approvals, recommendations, use of the Company's products or services, or any other improper benefit. Sponsorships may involve reasonable commercial returns, but any such return must be lawful, justifiable, and consistent with fair market value.

与捐赠项目不同，赞助项目中康龙化成可以接收具有有形利益的商业回报，但该等商业回报应合法、正当且符合市场公允价值。

Unlike donations, sponsorships may involve tangible commercial returns to Pharmaron, provided that such returns are lawful, justifiable, and consistent with fair market value.

我们不能利用赞助和捐赠的活动，影响或奖励受赞助或捐赠方在过去、现在和将来使用或支持公司的产品或服务的决定，影响临床试验的结果，或影响对公司业务有利或不利的决定。

We shall not use donations or sponsorships to influence or reward a recipient's past, present, or future decisions to use or support the Company's products or services, to influence the outcome of clinical trials, or to affect any decision for or against the Company's business.

行为指引：

Directions for Conduct:

- 谨慎地处理捐赠申请，尤其是如果该申请批准后，能够影响康龙化成销售收入或使某个具体个人受益。例如，不得以获取商业机会或任何其他批准、或者直接增加康龙化成销售额为条件，来给予捐赠；

Handle donation requests with caution, especially if any such approved request could influence the sales revenue of the Company or be beneficial to a specific individual. For example, no donation shall be given if it is conditional on obtaining business opportunity or approval or achieving a direct increase in sales of Pharmaron's services;

- 确保赞助项目中康龙化成接收的具有有形利益的商业回报应合法、正当且符合市场公允价值；

Ensure that any tangible commercial return received by the Company in connection with a sponsorship is lawful, justifiable, and in line with fair market value;

- 不得利用赞助和捐赠的活动，以获取或者回馈不当商业利益为目的，影响或奖励受赞助或捐赠方（“受资助方”）在过去、现在和将来使用或支持公司的产品或服务的决定，影响临床试验的结果，或影响对公司业务有利或不利的决定；

No donation or sponsorship shall be made for the purpose of obtaining or rewarding any improper commercial benefit, influencing or rewarding any past, present, or future decision by the recipient of the donation or sponsorship to use or support the Company's products or services, influencing the results of clinical trials, or influencing any decision in favor of or adverse to the Company's business;

- 康龙化成所有的捐赠和赞助活动都必须按照公司的运营地的法律和法规执行；

All donations and sponsorship activities of the Company must be carried out in line with applicable laws and regulations where the Company operates;

- 遵从公司财务和会计程序，旨在保存完整、准确、透明的协议与票据。Comply with the Company's financial and accounting procedures to maintain complete, accurate, and transparent agreements and supporting documents.

公司政策：

Company Policy:

- 《全球反腐败合规政策》 Global Anti-Corruption Compliance Policy
- 《赞助和捐赠标准管理流程》 Standard Procedure for Managing Donations and Sponsorship

示例:**Examples:**

公司正在和某地政府沟通新建项目，地方政府提出希望公司对该地大学的研究中心进行捐赠，并以此为批准新建项目的前提。

The Company is communicating with a local government on a new project, and the local government indicated that the approval could be obtained on condition that the Company make donations to the research center of a local university.

公司严禁以获取审批为目的的捐赠。您应该拒绝。如果您无法做出判断，请咨询您的上级或公司合规部。

The Company strictly prohibits making donations for the purpose of obtaining approvals. You shall decline this request. Please consult your supervisor or the Compliance Department of your organization when you are in doubt.

2.4 政治捐赠 Political Donations

康龙化成以依法合规、公开透明、中立审慎、责任和问责为原则处理与政治活动及公共政策相关的事项。公司原则上不进行政治捐赠，也不开展与公司环境、气候承诺及《巴黎协定》目标相冲突的游说活动；在涉及气候相关公共政策立场或对外沟通时，公司支持与《巴黎协定》目标相一致的原则，并将持续保持对外沟通中的审慎、透明和一致性。在中国地区，政治捐赠是不被允许的。除个别司法辖区在适用法律明确允许且经严格审批的情形外，公司及员工不得以公司名义参与政治活动或提供政治捐赠。任何政治捐赠、游说支出或其他相关安排均不得违反适用法律法规、反腐败要求或公司政策，不得以不诚实方式影响决策过程、立法活动或政府行为，也不得用于谋取不当商业利益。如在适用法律允许的特殊情形下拟进行相关支出，必须事先经过合规部和法务部审查、管理层批准，并按照公司财务和内部控制要求进行准确记录；任何获准进行的政治捐赠或相关游说支出，均应按照适用法律法规及公司要求进行及时、准确和透明的记录与披露。

Pharmaron addresses matters relating to political activities and public policy in accordance with the principles of legal compliance, transparency, neutrality, prudence, responsibility, and accountability. As a general rule, the Company does not make political donations and does not engage in lobbying activities that conflict with the Company's environmental and climate commitments or the goals of the Paris Agreement. When taking positions or communicating externally on climate-related public policy matters, the Company supports principles aligned with the goals of the Paris Agreement and will continue to act with prudence, transparency, and consistency. Political donations are not permitted in China. Except in limited circumstances where expressly permitted by applicable law and subject to strict prior review and approval,

neither the Company nor its employees may engage in political activities or make political donations in the name of the Company. Political donations, lobbying expenditures, or other related arrangements must not be used to violate applicable laws, anti-corruption requirements, or Company policies, to dishonestly influence decision-making processes, legislative activities, or government actions, or to obtain improper commercial benefits. Where such expenditures are exceptionally permitted by applicable law, they must be reviewed by Compliance and Legal, approved by management, accurately recorded under the Company's finance and internal control requirements, and disclosed in a timely, accurate, and transparent manner as required.

行为指引:

Directions for Conduct:

- 不得使用公司资金、账户、发票、印章、办公场地、车辆、设备或其他公司资源支持任何政党、候选人、政治组织或相关活动;
Do not use Company funds, accounts, invoices, chops/seals, office space, vehicles, equipment, or any other Company resources to support any political party, candidate, political organization, or related activity;
- 未经授权, 不得以公司名义口头、书面或通过第三方作出任何政治支持、捐赠、赞助、背书、承诺或安排, 也不得暗示公司会提供此类支持;
Without authorization, do not make any verbal or written political commitment, donation, sponsorship, endorsement, promise, or arrangement in the name of the Company, whether directly or through a third party, and do not imply that the Company will provide such support;
- 员工如依法以个人身份参与政治活动, 必须与公司业务、职务身份和工作时间明确区分, 不得使用公司邮箱、名片、抬头、会议、差旅或其他工作安排开展个人政治活动;
If employees lawfully engage in political activities in a personal capacity, they must clearly separate those activities from Company business, their job role, and working time, and must not use Company email, business cards, letterhead, meetings, travel, or any other work arrangements for personal political activity;
- 不得通过咨询费、服务费、市场活动费、报销、赞助、捐赠或第三方付款等方式变相支付政治捐赠、游说费用或相关支出; 对用途不清、对象敏感或付款路径异常的请求, 应停止处理并立即报告;
Do not disguise political donations, lobbying fees, or related expenditures through consulting fees, service fees, marketing spend, reimbursements, sponsorships, donations, or third-party payments. If a request has an unclear purpose, involves a sensitive recipient, or follows an unusual payment route, stop processing it and report it immediately;
- 如收到与政治捐赠、政治活动、游说支出或相关披露有关的请求、问询或施压, 或发现相关支出记录可能不准确、不完整或不透明, 应立即咨询上级、合规部或法务部, 不得自行承诺、付款或报销。
If you receive any request, inquiry, or pressure relating to political donations, political activities, lobbying expenditures, or related disclosure, or if you notice that related records may be inaccurate, incomplete, or non-transparent,

immediately consult your supervisor, Compliance, or Legal. Do not make any commitment, payment, or reimbursement on your own.

公司政策：

Company Policy:

- 《全球反腐败合规政策》 Global Anti-Corruption Compliance Policy

示例：

Examples:

某地政府正在进行选举活动，参加竞选的政客们希望从社会上获得资金支持。其中一位参加竞选的政客对于医疗行业的政策改革有自己的想法，而这些想法有助于我们公司未来的业务发展。我们是否可以向该位参加竞选的政客提供政治捐赠以支持其竞选？

A local government is running an election campaign and the candidates are looking for financial support from the community. One of the candidates has ideas for policy reforms in the healthcare industry that would help our business grow in the future. Can we provide political donations to support this candidate's campaign?

原则上不可以。公司原则上不进行政治捐赠，在中国地区政治捐赠不被允许。如果您遇到此类请求，不应自行判断或承诺，而应立即向上级、合规部和法务部咨询并报告，由公司相关专业部门根据适用法律法规、公司政策及具体情形进行评估，并决定后续处理方式。如未经批准，不得代表公司作出任何承诺或安排相关支持。

In principle, no. As a general rule, the Company does not make political donations, and political donations are not permitted in China. If you receive a request of this kind, you should not make your own judgment or commitment. Instead, promptly consult and report the matter to your supervisor, Compliance, and Legal so that the relevant Company functions can assess the situation under applicable laws, regulations, and Company policies and determine the appropriate next steps. Unless approval is obtained, you must not make any commitment or arrangement on behalf of the Company.

2.5 反垄断和公平竞争 Antitrust and Fair Competition

康龙化成坚持公平、合法和诚信竞争，禁止任何违反反垄断、反不正当竞争或公平竞争原则的行为。无论在任何国家或地区，与竞争对手、客户、供应商、行业协会或其他第三方进行沟通和合作时，凡可能导致价格操纵、串通投标、市场分割、滥用市场支配地位、排除限制竞争或获取不公平竞争优势的行为，都可能构成违法违规，并给公司及个人带来严重的法律、财务和声誉后果。

Pharmaron is committed to fair, lawful, and honest competition and prohibits any conduct that violates antitrust, anti-unfair competition, or fair competition principles. In any country or region where we operate, communications or cooperation with competitors, clients, suppliers, industry associations, or other third parties that may result in price manipulation, bid-rigging, market allocation, abuse of a dominant position, exclusion of competition, or any other unfair competitive advantage may

violate applicable laws and regulations and expose both the Company and individuals to serious legal, financial, and reputational consequences.

行为指引：

Directions for Conduct:

- 与竞争对手参加行业会议、协会活动、展会或其他交流时，不得讨论价格、折扣、成本、利润、投标计划、客户分配、区域划分、产能安排或其他敏感竞争信息；如他人提出相关话题，应立即明确表示拒绝并结束讨论；

When attending industry meetings, association events, trade fairs, or other interactions with competitors, do not discuss prices, discounts, costs, profits, bidding plans, customer allocation, territory division, capacity arrangements, or any other competitively sensitive information. If such topics are raised, immediately state that you will not discuss them and end the conversation;

- 在与客户、供应商或其他商业伙伴讨论合作、定价、折扣、返利、排他安排、捆绑销售、转售限制或市场条件时，不得提出、接受或默许任何可能不公平限制交易、排除竞争对手或扭曲市场的安排；如有疑问，应先咨询合规部或法务部；

When discussing cooperation, pricing, discounts, rebates, exclusivity, bundling, resale restrictions, or market conditions with clients, suppliers, or other business partners, do not propose, accept, or tolerate any arrangement that may unfairly restrict trade, exclude competitors, or distort the market. If in doubt, consult Compliance or Legal first;

- 不得通过冒充、误导、套取、交换内部消息、接受来源可疑的信息，或利用他人保密义务中的漏洞来获取竞争对手、客户或供应商的非公开敏感信息；

Do not obtain non-public sensitive information about competitors, clients, or suppliers by misrepresentation, deception, exchanging inside information, accepting information from questionable sources, or exploiting another person's confidentiality obligations;

- 如在会议、电话、邮件、即时通讯或其他交流中出现涉及竞争敏感信息或涉嫌限制竞争的内容，应停止参与、保留相关记录，并及时向上级、合规部或法务部报告；

If competitively sensitive information or potentially anti-competitive content arises in a meeting, call, email, instant message, or any other communication, stop participating, retain the relevant records, and promptly report the matter to your supervisor, Compliance, or Legal;

- 在制定市场策略、参与招投标、与行业协会接触或评估与竞争对手相关事项时，应基于合法、独立和客观的信息作出判断，不得以操纵、误导、串通、歪曲事实或其他不正当手段获取竞争优势。

When setting market strategy, participating in tenders, interacting with industry associations, or assessing matters relating to competitors, rely on lawful, independent, and objective information and do not seek a competitive advantage through manipulation, collusion, misleading conduct, distortion of facts, or any

other improper means.

- 如果康龙化成处于市场支配地位，不滥用这种支配地位来排斥竞争对手或剥削客户。

If Pharmaron holds a dominant market position, do not abuse this position to exclude competitors or exploit clients.

遵从法律：

Applicable Laws & Regulations:

运营地反垄断和竞争法 Antitrust and competition laws in the place of operations

示例：

Example:

1. 在一个行业协会会议上，现受雇于康龙化成某竞争对手的员工在开放讨论环节打趣道，他所在的公司和康龙化成为了避免直接竞争，已经把市场划分好了。

At an industry association meeting, a competitor's employee joked during an open discussion that his company and Pharmaron have divided the market to avoid direct competition.

请不要这样做。您应立即明确表示康龙化成不会与竞争对手划分市场，也不会讨论此类话题；如对方继续讨论，您应终止交流并离开相关场合。会后应保留相关会议记录、邮件或聊天记录，并及时向上级、合规部和法务部报告，由相关部门评估后续处理方式。

Do not do this. You should immediately state that Pharmaron does not allocate markets with competitors and will not discuss such topics. If the discussion continues, end the exchange and leave the meeting or discussion. Afterward, retain any relevant meeting notes, emails, or chat records and promptly report the matter to your supervisor, Compliance, and Legal so that the appropriate functions can assess the next steps.

2. 我想知道竞争对手在临床试验中使用的患者招募排除标准。该信息不公开。我计划冒充一名潜在的招募患者，致电研究中心，并提出一些问题以发现排除标准。

I want to find out a competitor's patient recruitment exclusion criteria in their clinical trials. This information is not publicly available. I plan to pretend to be a potential patient for recruitment and call the research center to ask some questions so as to discover the exclusion criteria.

请不要这样做。不讲实情（不披露您是康龙化成员工或冒充他人）是一种获取竞争对手机密信息的不道德方式。在收集竞争对手信息时，必须诚实，且不得收集对方的保密信息。

Do not do this. Failing to identify yourself as a Pharmaron employee, or posing as someone else, in order to obtain information is an unethical way to seek confidential information from a competitor. Employees must gather competitor information honestly and must not seek or use confidential information.

2.6 贸易管制和经济制裁 Trade Control Compliance and Sanctions

康龙化成在全球范围内开展业务，必须遵守适用于产品、技术、软件、设备、样品、数据以及相关交易和合作安排的贸易管制、出口管制、进口管制和经济制裁要求。此类要求可能限制我们能够与谁开展业务、向何处发货、转移何种物项或技术、是否需要许可审批，以及如何申报和记录。违反相关规定可能给公司及个人带来严重的法律、财务和声誉后果。

Pharmaron operates globally and must comply with trade controls, export controls, import controls, and sanctions requirements applicable to products, technology, software, equipment, samples, data, and related transactions and business arrangements. These requirements may restrict with whom we may do business, where we may ship, what items or technology may be transferred, whether licenses or approvals are required, and how transactions must be reported and recorded. Violations may expose both the Company and individuals to serious legal, financial, and reputational consequences.

进出口管制措施包括禁止和限制措施、政府机关审批、以及跨境交易中的其他监管措施。进出口管制涉及产品、技术、软件及物项的限制转移。

Import and export control measures include prohibitions, restrictions, government approvals, and other regulatory requirements applicable to cross-border transactions. Import and export controls govern the transfer of products, technology, software, and other items.

进出口管制法律和法规适用于众多商品及技术数据（包括软件和试验性药物），可能适用于随身携带的物品，并且可能需要取得事先批准、许可及进行报告。向居住于美国的外国公民（包括康龙化成的员工）转让技术数据可能“被视为出口”。必须准确地对所有进口商品进行分类，以确保遵守国内及国际贸易规定和海关要求。

Import and export control laws and regulations apply to a wide range of commodities and technical data, including software and trial drugs. They may also apply to items carried by travelers and may require prior approval, licensing, or reporting. The transfer of technical data to foreign nationals living in the United States (including Pharmaron employees) may constitute a “deemed export.” All imports must be accurately classified to ensure compliance with domestic and international trade regulations and customs requirements.

此外，经济制裁常被各国政府和国际机构用来施加经济压力，以应对诸如恐怖主义和跨境毒品走私的挑战。常见的经济制裁手段包括关税、贸易禁令、财产冻结、没收或抵制。这些制裁和法律可能限制我们在某些地区开展业务的能力。In addition, sanctions are often used by governments and international agencies to exert economic pressure in response to challenges such as terrorism and cross-border drug trafficking. Common sanctions methods include tariffs, trade bans, property freezing, confiscation, or boycotts. These sanctions and laws may limit our ability to do business in certain areas.

违反现行的贸易管制法律和法规可能给特定的公司员工、参与其中的公司高级管理者、公司及公司董事带来严重的刑事或者财务及声誉影响。任何有关贸易管制法律的问题或疑虑需要及时提交给公司法务部或合规部。

Violations of existing trade control laws and regulations may lead to serious criminal or financial and reputational consequences for specific Company employees, senior management involved, the Company, and its directors. Any questions or concerns regarding trade control laws should be promptly raised with the Company's Legal or Compliance Department.

行为指引:

Directions for Conduct:

- 在出口、进口、转运、出差携带设备或样品、发送技术资料、提供系统访问权限、安排远程演示或开展跨境合作前，应确认相关物项、技术、软件、数据、国家/地区、最终用户和最终用途是否涉及贸易管制、制裁或许可要求；如无法判断，应先咨询合规部或法务部；

Before exporting, importing, transshipping, carrying equipment or samples during travel, sending technical materials, providing system access, arranging remote demonstrations, or engaging in cross-border cooperation, confirm whether the relevant items, technology, software, data, country/region, end user, and end use are subject to trade controls, sanctions, or licensing requirements. If you cannot determine this, consult Compliance or Legal first;

- 不得与受制裁、受限制或身份不明的个人、实体、国家/地区开展交易，也不得协助他人规避贸易限制、拆分交易、改变收发货路径或掩盖最终用户和最终用途；

Do not transact with sanctioned, restricted, or unidentified persons, entities, or countries/regions, and do not help anyone evade trade restrictions by splitting transactions, changing shipping routes, disguising the end user, or concealing the end use;

- 如发现交易对象、收货地址、付款路径、运输安排、最终用途说明、技术访问请求或合同条款存在异常、模糊或与业务目的不一致的情况，应暂停相关操作，不得发货、传输、授权或签署，并立即向上级、合规部或法务部报告。

If you identify unusual, unclear, or inconsistent information relating to the transaction party, delivery address, payment route, shipping arrangement, end-use description, request for access to technology, or contract terms, stop the transaction and do not ship, transfer, authorize, or sign anything until you have reported the matter to your supervisor, Compliance, or Legal.

公司政策:

Company Policy:

- 《全球贸易管制合规政策》 Global Trade Control Compliance Policy
- 《制裁标准操作程序》 Sanction Standard Operating Procedures
- 《出口管制标准操作程序》 Export Controls Standard Operating Procedures

示例：

Examples:

1. 我们实验室的一台从美国购买的实验设备不再使用了，有企业想购买，是否可以出售该设备？

We have a piece of laboratory equipment purchased from the United States that is no longer in use, and another company wants to buy it. Can we sell this equipment?

在确认之前不能出售。您应立即联系采购部及合规部，核实该设备是否属于受管制物项、是否仍受出口管制要求约束，以及拟出售对象、最终用途和所在地是否存在限制。在未完成相关审查、分类及必要审批前，不得作出出售承诺、转移设备或签署相关文件。

You must not sell the equipment until this has been confirmed. Immediately contact the Procurement Department and Compliance to verify whether the equipment is a controlled item, whether it remains subject to export control requirements, and whether there are restrictions relating to the proposed buyer, end use, or destination. Do not make any commitment to sell, transfer the equipment, or sign any related documents until the required review, classification, and approvals have been completed.

2. 在选择一家新的原材料供应商时，康龙化成准备在三家候选供应商之间做出最终选择。签订合同前，我们应执行哪些程序识别合作风险？

When selecting a new raw material supplier, Pharmaron plans to make a final selection among three candidate suppliers. What procedures should we follow to identify cooperation risks before signing a contract?

在签约前，应结合采购、业务和合规流程，对候选供应商开展必要的尽职调查和贸易管制筛查，核实其身份、注册地址、实际控制人、资金和货物流向、供货来源以及是否涉及受限制国家、地区、实体或最终用途。如发现任何异常、制裁风险或信息不完整情形，不得继续推进签约，应及时向上级、合规部或法务部报告，由相关专业部门评估后续处理方式。

Before signing, follow the applicable procurement, business, and compliance processes to conduct the necessary due diligence and trade control screening on candidate suppliers. Verify their identity, registered address, beneficial ownership, flow of funds and goods, source of supply, and whether any restricted country, region, entity, or end use is involved. If there is any anomaly, sanctions risk, or incomplete information, do not proceed with contracting. Promptly report the matter to your supervisor, Compliance, or Legal so that the appropriate functions can assess the next steps.

2.7 动物实验与福利 Animal Trial and Welfare

康龙化成在必须开展动物实验的情形下，坚持以替代、减少和优化（3Rs）原则为基础，审慎开展动物研究，并持续寻求和支持可替代动物实验的科学方法。我们要求所有动物研究活动基于明确、正当和经批准的科学目的，严格遵守适用法律法规、伦理要求以及公司动物护理与使用标准，尽可能减少动物数量、

减轻疼痛和应激，并持续维护高标准的动物护理和福利。

Where animal studies are necessary, Pharmaron applies the principles of Replacement, Reduction, and Refinement (the 3Rs), conducts such studies with care, and continuously seeks and supports scientifically valid alternatives to animal use. We require all animal studies to be based on a clear, legitimate, and approved scientific purpose, to comply with applicable laws, regulations, ethical requirements, and the Company's animal care and use standards, and to minimize animal numbers, pain, and distress while maintaining high standards of animal care and welfare.

行为指引：

Directions for Conduct:

- 任何动物实验在启动前，必须完成必要的科学论证、伦理审查和内部审批；未获批准，不得开始试验、采购动物、安排实验或要求他人执行相关操作；

Before any animal study begins, complete the required scientific justification, ethical review, and internal approvals. Do not start a study, procure animals, schedule procedures, or ask others to proceed unless approval has been obtained;

- 仅由经过培训、具备资质并获得授权的人员开展动物实验、护理、麻醉、给药、采样、处置或相关记录工作；如您不具备资质或对操作存在疑问，应立即停止并咨询主管或相关专业人员；

Only trained, qualified, and authorized personnel may perform animal studies, animal care, anesthesia, dosing, sampling, euthanasia, or related recordkeeping. If you are not qualified or are unsure about a procedure, stop and consult your supervisor or the relevant specialist immediately;

- 在研究全过程中，应按照批准方案和操作规范实施动物护理、监测、镇痛、麻醉和人道终点管理，尽可能减少动物数量、疼痛和应激，不得因赶进度、图方便或节约成本而降低福利标准；

Throughout the study, follow the approved protocol and operating procedures for animal care, monitoring, analgesia, anesthesia, and humane endpoints. Minimize animal numbers, pain, and distress, and do not lower welfare standards for speed, convenience, or cost reasons;

- 应如实、及时、完整记录动物来源、数量、健康状态、实验操作、异常情况、偏差、处置和福利观察结果；如发现未按批准方案执行、动物出现异常痛苦、设施条件不符合要求或存在其他伦理/福利问题，应立即报告并采取必要的保护措施；

Accurately, promptly, and completely record animal sourcing, numbers, health status, study procedures, abnormal events, deviations, dispositions, and welfare observations. If you identify a departure from the approved protocol, unusual animal distress, inadequate facility conditions, or any other ethical or welfare concern, report it immediately and take necessary protective measures;

- 如您对动物实验必要性、替代方法可行性、方案合规性、伦理审查要求或福利管理措施存在疑问，或发现不当行为、隐患或违规指示，应及时

咨询主管、动物伦理委员会/IACUC、质量部门或合规部门，不得自行忽视或继续推进。

If you have questions about whether animal use is necessary, whether an alternative method is feasible, whether a protocol is compliant, or whether welfare controls are adequate, or if you observe misconduct, risks, or improper instructions, promptly consult your supervisor, the Animal Ethics Committee/IACUC, Quality, or Compliance. Do not ignore the issue or proceed on your own.

- 以“为科学服务”为目的，尽可能减少对实验动物造成的伤害。

In the objective of "serving science", the harm to laboratory animals should be minimized to the greatest extent possible.

公司政策:

Company Policy:

- 良好实验室规范 Good Laboratory Practice (GLP)
- 实验动物中心管理手册 Laboratory Animal Center Management Handbook
- 机构实验动物伦理委员会（IACUC）政策 Constitution of the Institutional Animal Care and Use Committee (IACUC) Policies
- 零容忍政策 Zero tolerance policy
- 实验动物管理和使用相关纪律管理办法 Regulations on the Management and Use of Laboratory Animals

示例:

Examples:

某项目时间非常紧，项目负责人要求团队先开始动物实验，等动物伦理委员会/IACUC 审批完成后再补齐手续，以免影响客户交付进度。作为参与该项目的员工，我应该怎么做？

A project is under significant time pressure, and the project leader asks the team to start an animal study before Animal Ethics Committee/IACUC approval is completed, with the paperwork to be finalized afterward so that client delivery will not be delayed. As an employee involved in the project, what should I do?

您不应这样做。任何动物实验在启动前都必须完成必要的科学论证、伦理审查和内部审批，不能因为项目进度或客户要求而先开展后补手续。遇到这种情况时，您应立即向主管、动物伦理委员会/IACUC 以及相关管理部门咨询并报告，说明当前安排及潜在风险，由相关专业部门评估是否可以开展、需要补充哪些材料以及后续应如何处理。在未获得批准前，您不应启动试验、采购动物、安排实验或要求他人执行相关操作。

You should not do this. Before any animal study begins, the required scientific justification, ethical review, and internal approvals must be completed, and these requirements cannot be bypassed because of timeline pressure or client expectations. In this situation, you should promptly consult and report the matter to your supervisor, the Animal Ethics Committee/IACUC, and the relevant management functions, explain the proposed arrangement and the related risks, and allow the appropriate functions to

assess whether the study may proceed, what additional materials are needed, and what the next steps should be. Until approval is obtained, you should not start the study, procure animals, schedule procedures, or ask others to proceed.

2.8 利益冲突 Conflict of Interest

康龙化成尊重员工的个人利益和私人生活，但当个人利益、家庭关系、外部活动或其他私人因素影响，或可能被认为影响员工作出独立、客观和符合公司利益的判断时，就可能产生利益冲突。利益冲突既可能是实际存在的，也可能是潜在的或仅因外观上看起来不当而引发疑虑。员工应主动识别、及时披露并妥善管理此类情形，避免利用职位、信息、资源或影响力为自己、亲属或其他相关方获取不当利益。

Pharmaron respects the personal interests and private lives of its employees. However, a conflict of interest may arise when personal interests, family relationships, outside activities, or other private factors affect, or may appear to affect, an employee's ability to make independent, objective, and Company-focused decisions. Conflicts of interest may be actual, potential, or perceived. Employees are expected to identify, disclose, and properly manage such situations in a timely manner and must not use their position, information, resources, or influence to obtain an improper benefit for themselves, their relatives, or any other related party.

行为指引：

Directions for Conduct:

- 如您本人、配偶、伴侣、直系亲属或与您关系密切的人，与公司拟交易、采购、投资、合作、招聘、晋升、评估或管理的对象存在利益关系，应在参与相关决定、流程或沟通之前，及时向上级和人力资源部申报，并按要求回避；
If you, your spouse, partner, immediate family member, or someone close to you has an interest in a person or entity involved in a Company transaction, procurement, investment, cooperation, hiring, promotion, evaluation, or management decision, disclose the situation to your supervisor and Human Resources before participating in the relevant decision, process, or communication, and recuse yourself as required;
- 不得利用职务影响为自己、亲属或其他相关方争取订单、供应商准入、招聘机会、晋升机会、特殊待遇、内部信息或其他利益，也不得参与对自己存在利益关系事项的审批、评估、谈判或监督；
Do not use your position or influence to obtain orders, supplier access, hiring opportunities, promotion opportunities, favorable treatment, internal information, or any other benefit for yourself, your relatives, or any related party. Do not approve, evaluate, negotiate, supervise, or otherwise handle matters in which you have a personal interest;
- 如您负责采购、招投标、供应商管理、招聘、绩效评估或其他需要独立判断的工作，不得接受可能影响或看似影响判断的礼品、招待、便利或

私人请求；如已收到相关物品或难以拒绝，应立即报告并按照要求退回、登记或移交处理；

If you are involved in procurement, tendering, supplier management, hiring, performance evaluation, or any other work requiring independent judgment, do not accept gifts, hospitality, favors, or personal requests that may influence, or appear to influence, your judgment. If you receive such an item or it is difficult to refuse, report it immediately and follow the required process to return, register, or surrender it;

公司政策：

Company Policy:

- 《员工手册》中关于利益冲突的规定 Conflict of Interest requirements in the Employee Handbook

示例：

Examples:

1. 康龙化成计划收购股份的公司是我的伴侣 100%持股的公司。我不确定这是否重要，因为康龙化成仅计划收购该公司少量的股份。

Pharmaron plans to acquire a company in which my spouse holds 100% of the shares. I'm not sure if this is material because Pharmaron plans to acquire only a small percentage of the company's shares.

这属于潜在利益冲突，应立即申报。即使公司仅计划收购少量股份，您与目标公司的关系也可能影响或看似影响您的判断。您应尽快向上级和人力资源部披露该情况，并根据要求回避相关讨论、评估、审批或决策，由公司安排无利益关系的人员继续处理。

This is a potential conflict of interest and should be disclosed immediately. Even if the Company plans to acquire only a small percentage of the target company, your relationship to the target may affect, or appear to affect, your judgment. You should promptly disclose the situation to your supervisor and Human Resources and recuse yourself from related discussions, assessments, approvals, or decisions as required, so that the matter can be handled by personnel without a conflicting interest.

2. 我正在负责一个项目的招标采购，其中一个供应商寄给我一份糖果礼品篮。我可以收下吗？

I am responsible for the bidding and procurement process for a project. One of the suppliers sent me a candy gift basket. Can I take it?

在这种情况下，不建议收下。由于您正在负责招标采购，即使是价值不高的礼品，也可能被认为影响或干扰您的判断。您应优先联系供应商说明公司要求并退回礼品；如确实无法退回，应立即向上级和人力资源部申报，并按照公司要求登记、移交或作其他适当处理。在类似情形下，如不确定是否可以接受，应先咨询后再决定。

In this situation, you should not keep it. Because you are responsible for the bidding

and procurement process, even a low-value gift may be seen as influencing or interfering with your judgment. You should first contact the supplier, explain the Company's requirements, and return the gift. If it cannot realistically be returned, disclose it immediately to your supervisor and Human Resources and follow the required process to register, surrender, or otherwise handle it appropriately. In similar situations, if you are unsure whether an item may be accepted, ask before acting.

2.9 隐私保护 Privacy Protection

康龙化成重视并保护在经营管理、研发服务和日常运营中处理的个人信息，包括员工、求职者、客户联系人、供应商及合作伙伴联系人、受访者以及其他相关自然人的个人信息。我们处理个人信息应遵循合法、正当、必要和诚信原则，并坚持目的限制、最小必要、透明、准确、负责和安全等要求。对于公司为自身业务目的处理的个人信息，康龙化成应按照适用法律法规和公司政策履行相应责任；对于在客户项目、研究活动或其他受托业务中接触或处理的受试者、患者或其他由客户、申办方、研究机构负责管理的个人信息，康龙化成应在授权范围内根据客户要求、合同约定和项目分工开展相关工作，同时满足适用法律法规、监管要求和道德伦理要求，并采取适当的组织和技术措施保护信息安全。

Pharmaron values and protects the personal information it processes in management, R&D services, and daily operations, including personal information relating to employees, job applicants, client contacts, supplier and business partner contacts, respondents, and other relevant individuals. When processing personal information, we follow the principles of lawfulness, legitimacy, necessity, and good faith, and apply purpose limitation, data minimization, transparency, accuracy, accountability, and security. Where personal information is processed for Pharmaron's own business purposes, the Company must fulfill its responsibilities in accordance with applicable laws and Company policy. Where trial participant, patient, or other personal information is accessed or processed in client projects, research activities, or other entrusted services and is primarily managed by a client, sponsor, or research institution, Pharmaron should carry out the relevant work within the authorized scope in accordance with client requirements, contractual arrangements, and project roles, while also meeting applicable legal, regulatory, and ethical requirements and applying appropriate organizational and technical safeguards to protect information security.

在符合法律法规及合同约定的前提下，公司仅将在收集时明确告知的目的范围内使用客户数据。对于任何超出原始目的的二次使用（如分析、优化或其他延伸用途），公司将确保符合适用的数据保护法律要求，并在必要时取得相关授权或进行充分匿名化处理。同时，公司建立相应的数据治理与监控机制，对客户数据用于二次用途的情况进行记录和评估。

In compliance with applicable laws, regulations, and contractual commitments, the Company shall use customer data solely within the scope of the purposes explicitly communicated at the time of collection. For any secondary use beyond the original purpose (such as analysis, optimization, or other extended applications), the Company

shall ensure compliance with all applicable data protection requirements and, where necessary, obtain appropriate authorization or apply adequate anonymization measures. The Company also establishes corresponding data governance and monitoring mechanisms to record, track, and assess the use of customer data for secondary purposes.

行为指引:

Directions for Conduct:

- 处理个人信息时，应基于明确业务目的、实际工作需要和岗位授权，遵循最小必要原则，不得过度收集、查看、留存、转发或使用与职责无关的个人信息；

Personal information should be handled only for a clear business purpose, a genuine work need, and within the scope of role-based authorization, following the data minimization principle. Employees must not collect, access, retain, forward, or use personal information beyond what is necessary for their responsibilities;

- 在客户项目、研究活动或其他受托业务中处理个人信息时，应在授权范围内按照客户要求、合同约定、批准流程和项目分工开展工作；如相关事项可能超出授权范围，或职责边界不清晰，应先与项目负责人或相关职能部门确认，不得自行扩大处理范围；

When handling personal information in client projects, research activities, or other entrusted services, employees must work within the authorized scope and in accordance with client requirements, contractual arrangements, approved processes, and project roles. If a matter may fall outside the scope of authorization or the responsibility boundary is unclear, employees must confirm with the project lead or relevant functions before proceeding and must not expand the scope of processing on their own;

- 个人信息应通过公司批准的系统、工具和渠道进行存储、传输和共享，并仅向具有明确业务需要且有权接收的人员或第三方提供；涉及跨境传输、第三方共享、敏感个人信息或客户特别要求的情形，应按照适用法律、合同和公司流程办理；

Personal information must be stored, transferred, and shared only through Company-approved systems, tools, and channels, and may be provided only to individuals or third parties with a clear business need and proper authority to receive it. Situations involving cross-border transfers, third-party sharing, sensitive personal information, or special client requirements must be handled in accordance with applicable law, contractual obligations, and Company procedures;

- 如误收、误发、误用个人信息，发现可能的数据泄露、安全事件或不当访问，或收到自己无法判断是否适合响应的信息请求，应立即停止进一步处理，妥善保留相关记录，并及时向上级、信息安全、合规或法务部门报告，由相关专业部门决定后续处置。

If personal information is received, sent, or used by mistake, if a potential data breach, security incident, or improper access is identified, or if an information request is received and the employee is unsure whether it is appropriate to

respond, the employee must stop any further handling immediately, preserve the relevant records appropriately, and promptly report the matter to their supervisor, Information Security, Compliance, or Legal so that the appropriate functions can determine the next steps.

公司政策:

Company Policy:

- 《康龙化成隐私政策》 Pharmaron Privacy Policy

示例:

Examples:

1. 我从项目上合作的申办方处收到了一封邮件，该邮件的附件包含了某项目上患者的个人信息，而我公司不应该收集该等个人信息。我应该如何处理？

I received an email from the sponsor of a project I'm collaborating with, and the email's attachment contains personal information relating to a patient in the project, which my company should not collect. What should I do?

如果按照项目分工和合同约定，该类患者个人信息原则上应由研究机构或申办方管理，而不应由公司接收或留存，您不应继续转发、另存或使用该附件内容。您应立即停止进一步处理，并第一时间向项目负责人、上级及相关职能部门报告，说明收到信息的情况和已采取的措施。后续应由公司相关专业部门结合项目安排、合同约定及研究机构或申办方的要求，判断如何妥善处理，包括是否需要协调研究机构或申办方纠正发送方式、删除或限制留存、以及采取其他补救和预防措施。

If, under the project roles and contractual arrangements, this type of patient personal information should in principle be managed by the research institution or sponsor and should not be received or retained by the Company, you should not forward, save separately, or use the attachment. Stop any further handling immediately and promptly report the matter to the project lead, your supervisor, and the relevant functions, explaining how the information was received and what steps you have already taken. The next steps should then be determined by the appropriate Company functions in light of the project arrangements, contractual requirements, and the expectations of the research institution or sponsor, including whether coordination is needed to correct the transmission method, whether deletion or restricted retention is required, and what other remedial or preventive measures should be taken.

2. 我组织了一次有外部人员参与的公司研讨会并收集了所有与会人员的信息，包括任职单位、邮箱地址、联系电话等。有位同事要求分享这些人员信息，我可以提供吗？

I organized a company seminar with external participants and collected information from all attendees, including their affiliations, email addresses, contact numbers, etc. A colleague asked me to share this attendee information. Can I provide it?

是否可以提供，取决于该同事是否对该信息具有明确、合理的业务需要，以及

该等分享是否符合最初收集该等与会者信息的目的、公司政策及适用法律法规要求。与会者信息属于个人信息，不应因便利或一般性参考而随意共享。您应先确认该同事的使用目的、授权范围和所需信息是否符合最小必要原则；如不符合上述条件，不应提供。如您无法判断，应先咨询上级、隐私保护、合规或法务部门，再决定是否分享以及应以何种范围和方式分享。

Whether you may provide the information depends on whether the colleague has a clear and legitimate business need for it and whether the sharing is consistent with the original purpose for which the attendee information was collected, Company policy, and applicable legal requirements. Attendee information is personal information and should not be shared casually for convenience or general reference. You should first confirm the colleague's purpose, the scope of authorization, and whether the information requested satisfies the data minimization principle. If those conditions are not met, you should not share it. If you are unsure, consult your supervisor, Privacy, Compliance, or Legal before deciding whether to share the information and, if so, in what scope and through what method.

2.10 保密信息及社交媒体使用 Confidentiality and Use of Social Media

康龙化成将保密信息视为宝贵的商业资产，保护这些信息免受未经授权的使用或披露对于我们的持续发展和竞争能力至关重要。一般说来，应该假定在工作中产生或了解到的任何信息都是保密信息，在未经授权的情况下，不应向其他人披露。

Pharmaron treats confidential information as a valuable business asset. Protecting such information from unauthorized use or disclosure is essential to our continued development and competitiveness. In general, information created or obtained in the course of work should be treated as confidential unless it has been expressly authorized for disclosure.

康龙化成限制对保密信息的访问权限，使用有效的技术及物理安全措施保护保密信息，以防其丢失、被盗或被误用。

Pharmaron restricts access to confidential information and uses appropriate technical and physical safeguards to protect it from loss, theft, misuse, or unauthorized disclosure.

行为指引：

Directions for Conduct:

- 禁止在未获授权的情况下，在公司外部分享保密信息；
Do not share confidential information outside the Company without authorization;
未经授权，不得将保密信息、客户资料、研究数据、实验记录、化学结构、技术资料或其他敏感信息输入外部或未经批准的人工智能工具、平台或应用程序。
Without authorization, employees shall not input confidential information, client materials, research data, experimental records, chemical structures, technical materials, or other sensitive information into external or unapproved

AI tools, platforms, or applications.

- 仅基于“必须知道”的原则分享保密信息，无论是在公司内部还是与第三方接收者分享信息；

Share confidential information only on a need-to-know basis, whether within the Company or with authorized third-party recipients;

- 避免在公共场合讨论或披露保密信息，如：在电梯、餐厅、公共交通工具等公共场所使用手机时；

Avoid discussing or disclosing confidential information in public places, such as elevators, restaurants, or on public transportation;

- 即使在雇佣关系终止后，仍有义务保守保密信息，直到其被公司公开公布；

Maintain the confidentiality of confidential information even after termination of employment, unless and until such information has been lawfully made public by the Company;

- 只有获授权员工可以在社交媒体中代表公司。对于出现在社交媒体中的可能影响公司业务及声誉的信息应运用良好的判断力来决定是否点赞、分享或评论。

Only authorized employees may represent the Company on social media. Employees should exercise sound judgment when deciding whether to like, share, or comment on information that may affect the Company's business or reputation.

- 员工不得在社交媒体或其他公开渠道披露由人工智能辅助生成、整理或分析形成的涉及公司、客户、项目或研究活动的未公开信息。

Employees shall not disclose on social media or other public channels any non-public information relating to the Company, clients, projects, or research activities that is generated, organized, or analyzed with the assistance of artificial intelligence.

公司政策：

Company Policy:

- 《内部信息保密制度》 Policy for Internal Information Confidentiality
- 《康龙化成信息安全保密制度》 Policy for Information Security and Confidentiality
- 《保密管理制度手册汇编》 Confidentiality Management Manuals
- 《康龙化成商业秘密管理办法》 Policy for Managing Trade Secret

示例：

Examples:

1. 我正在出差途中，飞机延误，为了节省时间，我计划在机场利用携带的电脑工作。

I'm on a business trip, and my flight is delayed. To save time, I plan to work on my laptop at the airport.

请确保周围没有人能够通过您的电脑获取公司的敏感信息，包括拍照截屏或者

通过公共网络侵入。

Please ensure that no one nearby can view or capture sensitive Company information from your laptop, whether by looking over your shoulder, taking photos or screenshots, or exploiting unsecured public networks.

2. 公司正在筹建一个项目，明天是签约仪式，签约后将正式对外公布。我负责场地安排，完成工作之后，我拍照分享在朋友圈，并预祝公司明天的签约仪式圆满成功。

The Company is preparing to sign a new project, and the signing ceremony will take place tomorrow. After the signing, it will be officially announced to the public. I am responsible for the venue arrangement. After completing my work, I took photos and shared them on my social media profile, wishing the Company's signing ceremony tomorrow a success.

请不要这样做。签约事宜尚未对外公布，属于公司保密信息，场地照片中也可能包含保密信息。未经授权不能在公司外部分享。

Please don't do this. Matters related to the signing ceremony have not been publicly disclosed yet and are confidential information of the Company. The photos of the venue may also contain confidential information, and therefore should not be shared outside the Company without authorization.

2.11 知识产权保护 Intellectual Property Protection

康龙化成拥有受保护的专利，并拥有大量的商业秘密及技术知识。这些知识是我们商业成功的基础。未经授权转移此类知识可能给企业带来巨大的损失，涉事员工可能要承担劳动法、民事和刑事责任。

Pharmaron owns protected patents and possesses a substantial body of trade secrets and technical know-how. These assets are fundamental to our business success. Any unauthorized transfer or disclosure of such information may cause significant harm to the Company and may expose the employees involved to labor, civil, or criminal liability.

康龙化成致力于知识产权的建立、保护、维护和防护，并以负责任的方式使用这些权利。我们也尊重他人的知识产权。

Pharmaron is committed to the creation, protection, maintenance, and defense of intellectual property rights and to using such rights responsibly. We also respect the intellectual property rights of others.

行为指引：

Directions for Conduct:

- 签署并按照《雇员专有信息保密及发明协议》中的约定履行责任；
Sign the *Employee Proprietary Information Confidentiality and Inventions Agreement* and comply with the responsibilities set out in it;
- 参与定期及不定期的知识产权保护培训；

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- Participate in regular and ad hoc training on intellectual property protection;
 - 严格遵守公司有关知识产权保护及信息保密的制度及流程;
Strictly comply with the Company's policies and procedures on intellectual property protection and information confidentiality;
 - 在使用人工智能或其他数字工具时, 不得侵犯客户或第三方的知识产权, 不得将受保密义务、合同限制或知识产权保护的信息输入未经批准的外部工具, 并应对相关输出进行适当的知识产权风险审查。
When using artificial intelligence or other digital tools, do not infringe the intellectual property rights of clients or third parties, do not input information subject to confidentiality obligations, contractual restrictions, or intellectual property protection into unapproved external tools, and conduct an appropriate intellectual property risk review of any relevant outputs.
 - 对于知晓的有关知识产权和商业秘密保护的疑点应该按照《知识产权保护手册》中的规定进行报告。
Report any concerns relating to intellectual property rights or trade secret protection in accordance with the *Intellectual Property Rights Protection Manual*.

公司政策:**Company Policy:**

- 《康龙化成信息安全保密制度》 Policy for Information Security and Confidentiality
- 《知识产权保护手册》 Intellectual Property Rights Protection Manual
- 《康龙化成商业秘密管理办法》 Policy for Managing Trade Secret
- 《康龙化成商标规范使用管理手册》 Pharmaron Trademark Usage Management Manual

示例:**Examples:**

1. 我正在主持的一个研发项目接近尾声, 项目中形成的技术很快将交予客户申请专利。此时, 我收到了一个权威学术研讨会的邀请, 主题和这个项目非常契合, 我计划在发言中引用在该项目中形成的新技术信息。
A research and development project that I lead is nearing completion, and the technology developed in the project will soon be handed over to the client for patent filing. At this point, I have been invited to speak at a prestigious academic seminar whose topic is highly relevant to this project, and I am considering referring to the new technical information generated in the project during my presentation.

请不要将在公司工作中形成的或了解到的技术知识, 包括商业秘密, 在外部进行分享。这是违反公司制度的行为, 将造成严重的后果。如果您认为这个学术研讨会对您及公司非常重要, 且希望引用工作中获取的技术知识, 请和您的上级联系并按照公司的制度提请审核。

Do not share externally any technical knowledge developed or learned in the course of your work for the Company, including trade secrets. Doing so would violate Company

policy and could lead to serious consequences. If you believe the seminar is important to you and the Company and wish to refer to technical knowledge obtained through your work, contact your supervisor and submit the matter for review in accordance with Company policy.

2. 我接到一个大学打来的电话，该大学正在研究我参与的项目。我猜想是因为我在网络上发布了关于此项目的某些信息引起了关注。我为自己参与此项目感到骄傲并很想帮助大学学生。我应该提供有关的项目信息吗？

I received a call from a university that is conducting research related to a project I am involved in. I suspect the university became aware of this because I posted some information about the project online. I am proud of my involvement in the project and would like to help the university students. Should I provide them with information about the project?

请不要和公司以外的任何人共享研究数据，也不应该在社交网站上发布与公司工作相关的信息。会有竞争代理人定期在互联网上搜索此类数据，并说服毫无戒心的员工分享额外信息，这些信息可用于拼凑机密项目、流程、计划等的全貌。

Do not share research data with anyone outside the Company, and do not post information about your work for the Company on social media or other public platforms. Competitors or other third parties may regularly search the internet for such information and use seemingly minor details to piece together a fuller picture of confidential projects, processes, or plans.

2.12 负责任人工智能与新兴技术 Responsible Artificial Intelligence and Emerging Technologies

康龙化成支持以合法、合乎伦理、审慎和负责任的方式开发、引入、部署和使用人工智能及其他新兴技术，并将其用于支持药物研发服务、科学创新、质量提升和运营效率。我们认识到，人工智能等新兴技术在数据处理、研究支持、知识管理、流程优化等方面具有重要潜力，但其使用也可能带来数据保护、保密、知识产权、偏差、透明度、安全和合规等风险。因此，公司通过持续完善的治理、风险管理和控制机制，推动相关技术的负责任使用并实施必要的监督，同时持续关注其潜在影响。

Pharmaron supports the lawful, ethical, prudent, and responsible development, introduction, deployment, and use of artificial intelligence and other emerging technologies to support drug R&D services, scientific innovation, quality improvement, and operational efficiency. We recognize that artificial intelligence and other emerging technologies offer significant potential in data processing, research support, knowledge management, and process optimization, but may also give rise to risks relating to data protection, confidentiality, intellectual property, bias, transparency, security, and compliance. Accordingly, the Company promotes the responsible use of such technologies through continuously evolving governance, risk management, and control mechanisms and implements necessary oversight, while continuously monitoring their potential impacts.

核心原则：

Core Principles:

在使用人工智能及其他新兴技术时，我们坚持以下原则：保护客户保密信息、研究数据、个人信息和知识产权；遵守适用法律法规、客户合同义务及公司相关要求；在适当情况下关注技术应用的透明度、可解释性、公平性、安全性和可靠性；对可能影响研究结论、客户交付、质量、合规、受试者或患者权益的重要事项，保留必要的人工判断、专业复核和责任承担。在涉及数据处理的情况下，应遵循数据最小化、目的限制、授权访问、安全存储与传输、加密保护、脱敏或去标识化等原则，并根据数据类型和敏感程度采取相应保护措施。

When using artificial intelligence and other emerging technologies, we adhere to the following principles: protecting client confidential information, research data, personal information, and intellectual property; complying with applicable laws and regulations, client contractual obligations, and relevant Company requirements; giving appropriate attention to transparency, explainability, fairness, safety, and reliability in technology use; and preserving necessary human judgment, professional review, and accountability for important matters that may affect research conclusions, client deliverables, quality, compliance, or the rights and interests of trial participants or patients. Where data processing is involved, principles such as data minimization, purpose limitation, authorized access, secure storage and transmission, encryption protection, masking, de-identification or anonymization should be followed, and safeguards should be applied according to the type and sensitivity of the data.

行为指引:**Directions for Conduct:**

未经授权，员工不得将客户保密信息、研究数据、实验数据、化学结构、技术资料、知识产权敏感信息、个人信息、受试者或患者相关信息输入外部或未经批准的人工智能工具、平台或应用程序。

Without authorization, employees must not input client confidential information, research data, experimental data, chemical structures, technical materials, intellectual property-sensitive information, personal information, or information relating to trial participants or patients into external or unapproved artificial intelligence tools, platforms, or applications.

在开发、采购、引入或使用人工智能工具、模型、平台或相关应用前，员工应确认相关工具或应用已按照公司要求完成必要的业务、信息安全、数据隐私、知识产权、质量及合规评估或批准。未经公司批准，不得自行接入、训练、测试或部署可能处理公司或客户敏感信息的人工智能工具或应用。

Before developing, procuring, introducing, or using any artificial intelligence tool, model, platform, or related application, employees should confirm that the relevant tool or application has completed necessary business, information security, data privacy, intellectual property, quality, and compliance assessment or approval in accordance with Company requirements. Employees must not, without Company approval, access, train, test, or deploy any AI tool or application that may process Company or client sensitive information.

对于涉及客户数据、个人信息、研究数据或其他敏感信息的人工智能应用，员工不得在缺乏法律依据、合同约定、客户授权或公司批准的情况下，将相关信息用于超出原始业务目的的处理，包括但不限于模型训练、系统优化、数据分析或其他次要用途。

For AI applications involving client data, personal information, research data, or other sensitive

information, employees must not use such information beyond the original business purpose, including but not limited to model training, system optimization, data analytics, or other secondary purposes, unless there is a valid legal basis, contractual arrangement, client authorization, or Company approval.

在符合法律法规及合同要求的前提下使用相关数据时，应采取数据最小化、访问控制、加密保护、脱敏或去标识化等保护措施，并在必要时开展人工复核和合规审查。

Where such data are used in compliance with applicable laws, regulations, and contractual requirements, safeguards such as data minimization, access control, encryption protection, masking, or de-identification should be applied, and human review and compliance checks should be conducted where necessary.

人工智能及其他新兴技术可以作为辅助工具提升效率和支持分析，但不得替代必要的科学判断、质量审查、合规审查或其他专业责任。对可能影响研究结论、客户交付、质量、安全、合规、受试者或患者权益的重要事项，不得仅基于人工智能输出作出决定，应保留适当的人工复核、风险识别、结果审查及必要的合规审查。

Artificial intelligence and other emerging technologies may be used as supporting tools to improve efficiency and assist analysis, but they must not replace necessary scientific judgment, quality review, compliance review, or other professional responsibilities. For important matters that may affect research conclusions, client deliverables, quality, safety, compliance, or the rights and interests of trial participants or patients, decisions must not be made solely based on AI outputs, and appropriate human review, risk identification, output review, and necessary compliance review must be retained.

员工不得将人工智能生成或辅助生成的内容在未经适当核实的情况下直接作为研究结论、质量记录、监管沟通材料、客户交付成果或其他重要业务文件使用。对于相关输出，应根据具体场景核实其准确性、适当性、知识产权风险和合规性。

Employees must not use AI-generated or AI-assisted content directly as research conclusions, quality records, regulatory communications, client deliverables, or other important business documents without appropriate verification. Depending on the context, relevant outputs should be reviewed for accuracy, appropriateness, intellectual property risks, and compliance.

公司通过持续完善的治理、风险管理和控制机制，对人工智能及其他新兴技术的使用进行管理。相关职能部门（包括但不限于业务/研发、合规、法务、信息安全、数据隐私及质量等）按照各自职责提供支持、审查和监督。员工如对相关技术使用的合法性、伦理性、数据保护、知识产权、质量或合规风险存在疑问，或遇到高风险、敏感或不确定情形，应在使用前暂停相关操作，并及时咨询上级或向相关职能部门寻求指导。

The Company manages the use of artificial intelligence and other emerging technologies through continuously evolving governance, risk management, and control mechanisms. Relevant functions, including but not limited to Business/R&D, Compliance, Legal, Information Security, Data Privacy, and Quality, provide support, review, and oversight according to their respective responsibilities. If employees have questions regarding legality, ethics, data protection, intellectual property, quality, or compliance risks, or encounter high-risk, sensitive, or uncertain situations, they should pause the

relevant activity before use and promptly consult their supervisors or seek guidance from the relevant functions.

人工智能及其他新兴技术的使用不得减轻或转移员工、管理人员或相关职能部门根据岗位职责、客户要求、法律法规、质量体系或公司政策所承担的责任。对于重要业务场景，公司可根据需要要求保留使用记录、复核记录或审批记录，以支持审计、追溯和持续改进。

The use of artificial intelligence or other emerging technologies does not reduce or transfer the responsibilities of employees, managers, or relevant functions under their job duties, client requirements, laws and regulations, quality systems, or Company policies. For important business scenarios, the Company may require records of use, review, or approval to support auditability, traceability, and continuous improvement.

康龙化成将确保对涉及新兴技术的应用在其全生命周期内开展适当的伦理审查、责任落实和监督管理。公司鼓励员工、用户、研究参与者及公众就新兴技术相关的潜在伦理或安全问题提出反馈和关切，并将持续完善技术流程和治理体系，以更好地满足科学、伦理和责任管理标准。

We will ensure appropriate ethical review, accountability, and oversight throughout the lifecycle of applications involving emerging technologies. We encourage employees, users, research participants, and the public to raise feedback and concerns regarding potential ethical or safety issues related to emerging technologies. We will continue to improve our technology processes and governance systems to better meet scientific, ethical, and accountability standards.

通过上述承诺与行为要求，康龙化成致力于在药物研发服务相关场景中，以负责任、透明、审慎和合规的方式使用人工智能及其他新兴技术，更好地服务客户、保障质量、保护相关方权益并支持可持续创新。同时，确保新兴技术对所有用户和群体公平适用，避免偏见和歧视。

Through these commitments and conduct expectations, Pharmaron seeks to use artificial intelligence and other emerging technologies in a responsible, transparent, prudent, and compliant manner in drug R&D service-related contexts, so as to better serve clients, safeguard quality, protect stakeholder interests, and support sustainable innovation. At the same time, the Company will ensure that emerging technologies are applied fairly to all users and groups while avoiding bias and discrimination.

2.13 信息安全 Information Security

康龙化成按照国际信息安全技术标准化组织 ISO 制定的信息安全管理体系统列标准建立了自己的信息安全管理体系统以保护公司的数据和系统的保密性、真实性以及可获取性。康龙化成将按照当地法律法规、最佳实践以及客户要求对不同数据进行处理、传输、保留及删除。

Pharmaron has established its own information security management system in accordance with internationally recognized ISO information security standards to protect the confidentiality, integrity, and availability of the Company's data and systems. Pharmaron also processes, transfers, retains, and deletes different categories of data in accordance with applicable local laws and regulations, best practices, and client

requirements.

行为指引:

Directions for Conduct:

- 公司信息安全团队负责制定、实施和持续监控该体系以及相关政策和程序;

The Company's information security team is responsible for developing, implementing, and continuously monitoring this management system and its related policies and procedures;

- 公司以《信息安全管理策略》为信息安全管理工作的纲领性文件，并且发布了针对信息资产、信息安全、网络和系统安全及日常运行安全相关的文件，所有员工必须遵守所有这些政策和程序。

The Company uses the *Information Security Management Strategy* as the guiding document for its information security management and has issued related policies and procedures covering information assets, information security, network and system security, and day-to-day operational security. All employees must comply with these requirements.

- 员工在使用人工智能及其他数字工具时，应遵守公司的信息安全要求，仅使用经批准的系统、账号和应用程序，不得绕过访问控制、安全配置、数据传输或存储要求。

When using artificial intelligence and other digital tools, employees shall comply with the Company's information security requirements, use only approved systems, accounts, and applications, and must not bypass access controls, security configurations, or data transmission and storage requirements.

公司政策:

Company Policy:

- 《信息安全管理策略》 Information Security Management Strategy

示例:

Example:

1. 我即将去度假，并希望在目的地完全不与外界联络。我可否将自己的笔记本电脑留给我的行政助理，由其代表我处理公司各种系统中的所有审批？我完全信任此人，所以我不介意告知我的密码。

I am about to go on vacation and want to be completely out of contact while I am away. May I leave my laptop with my administrative assistant so that he or she can handle all approvals in the Company's systems on my behalf? I trust this person completely, so I do not mind sharing my password.

不可以。员工不得将自己的私人密码透露给任何人。某些系统可让您将特定操作委派给他人；而其他系统则可在您缺勤时将问题上报至您的经理。如果您跳过这些管控程序，就是在破坏我们系统的安全性，逃避您的责任，并且将助理置于违反公司政策的境地。

No. Employees must not disclose their passwords to anyone. Some systems allow you to delegate specific tasks to others, while other systems automatically escalate matters to your manager during your absence. If you bypass these controls, you undermine the security of our systems, avoid your own responsibilities, and place your assistant in a position that violates Company policy.

2. 我在整理项目文件时，手头有三种不同类型的文档：一份已对外发布的公司新闻稿、一份内部团队会议记录、一份客户化学分子结构信息的实验报告草案。我应当如何对它们进行分类，并分别采取怎样的处理方式？

While organizing project files, I have three different types of documents on hand: an externally published company press release, internal team meeting minutes, and a draft report containing the chemical molecular structure information of the client. How should I classify and handle each of them?

应根据数据敏感性进行分类并采取相应行动：

Documents should be classified and handled according to their sensitivity as follows:

- 公司新闻稿：因其内容已主动公开，可归类为“公开”信息。可将其存放在一般项目文件夹中供团队参考，或用于对外展示。

Company Press Release: As its content has already been made public, it may be classified as “Public” information. It may be stored in a general project folder for team reference or used for external presentation.

- 内部团队会议纪要：内容涉及内部讨论与计划，但未包含核心机密，应归类为“内部”信息。应将其存储在公司内部共享驱动器或协作平台的相应项目空间内，并确保仅项目相关人员可访问。

Internal Team Meeting Minutes: This content involves internal discussions and plans but does not contain core confidential information. It should be classified as “Internal” information. It must be stored in the Company’s internal shared drive or in the appropriate project space on a collaboration platform, with access limited to relevant project personnel only.

- 含客户化学结构的实验报告草案：此文档包含客户的核心技术信息与未公开的研究数据，根据客户合同、保密协议及公司政策，必须归类为“机密”信息。您必须：将其存储在公司指定的加密存储区域或安全数据管理系统中；仅与已获授权的项目成员通过安全渠道分享；任何打印件需在受控区域使用，并最终使用碎纸机销毁。

Draft Report Containing Client Chemical Structures: This document contains the client’s core technical information and unpublished research data. In accordance with client contracts, non-disclosure agreements, and Company policies, it must be classified as “Confidential” information. You must store it in a Company-designated encrypted storage area or secure data management system, share it only with authorized project members through secure channels, and ensure that any printed copies are used only in controlled areas and ultimately destroyed using a shredder.

2.14 税务 Taxation

康龙化成的组织机构分布在全球多个地区，因此，我们需要根据所有相关税法和法规缴纳适当的税款，禁止将经营活动创造的价值违法转移至低税率管辖区，或利用保密管辖区或所谓“避税天堂”进行激进避税。我们致力于与所有相关税务机关建立透明和建设性的沟通交流。

Pharmaron operates in multiple jurisdictions around the world. We therefore pay the appropriate taxes in accordance with all relevant tax laws and regulations, prohibit the unlawful shifting of value created by our business activities to low-tax jurisdictions, and do not use secrecy jurisdictions or so-called tax havens for aggressive tax planning. We are committed to maintaining transparent and constructive communication with relevant tax authorities.

行为指引：

Directions for Conduct:

- 康龙化成保持合理的程序，以防止员工及第三方从事任何可能有助于逃税的行为。

Pharmaron maintains reasonable procedures to prevent employees and third parties from engaging in any activity that could facilitate tax evasion.

公司政策：

Company Policy:

- 《康龙化成集团税务政策》 Pharmaron Tax Policy

遵从法律：

Applicable Laws & Regulations:

- 遵循各运营地的税法规定

Comply with tax laws and regulations in all jurisdictions where we operate.

示例：

Example:

公司正准备进行一笔大额交易，其中涉及复杂的税务处理。作为税务经理的小张面临如下挑战：

The Company is preparing for a major transaction involving complex tax treatment. As the tax manager, Mr. Zhang faces the following challenges:

- 该交易涉及多个国家或地区，且每个地区的税收法规各异；
The deal involves multiple countries or regions, each with different tax regulations;
- 交易涉及大额资金和复杂的业务结构，需要对涉及的税务风险进行全面评估；
The deal involves a large amount of funds and complex business structures and requires a comprehensive assessment of the tax risks involved;
- 与公司内部不同部门以及外部专业顾问多方合作沟通；

Communicate and collaborate with various internal departments and external consultants;

- 由于项目时间表和期限，该交易需要在有限的时间内完成。
Due to project schedules and deadlines, the deal needs to be completed within a limited timeframe.

面对上述情形，小张应充分发挥自己的专业知识和技能，积极寻求专业税务顾问的支持和建议，确保公司的税务处理妥当。同时，与公司内外部相关方进行有效的沟通以保障税务合规。

In these circumstances, Mr. Zhang should make full use of his professional knowledge and skills, proactively seek support and advice from professional tax advisers, and ensure that the Company's tax treatment is appropriate. At the same time, he should communicate and collaborate effectively with relevant internal and external parties to help ensure tax compliance.

2.15 禁止内幕交易 Prohibition of Insider Trading

康龙化成是在深圳证券交易所和香港交易所上市的公司。根据资本市场法规规定，禁止在股票、其他证券或金融工具交易时使用或披露内幕信息。这同样也包括建议或通过第三方进行内幕交易或非法披露内幕消息。

Pharmaron is a publicly listed company on the Shenzhen Stock Exchange and The Stock Exchange of Hong Kong Limited. Under applicable capital markets laws and regulations, the use or disclosure of insider information in connection with trading in shares, other securities, or financial instruments is prohibited. This prohibition also includes recommending insider trading to third parties, causing third parties to engage in insider trading, or unlawfully disclosing insider information.

当某人在掌握或知悉一家公司的内幕信息时购买、出售或以其他方式交易该公司的证券（例如：康龙化成的股票），或者将其掌握或知悉的信息提供给可能进行交易的其他人，这种行为属于非法内幕交易。内幕信息是指：涉及公司的经营、财务或者对公司股票及其衍生品种交易价格有重大影响的尚未公开的信息。因此，不论员工以何种方式获得这些重要非公开信息，都要实行严格的交易限制。在员工的雇佣关系结束后，这些限制仍然适用。

It is illegal insider trading when a person buys, sells, or otherwise trades a company's securities (for example, Pharmaron shares) while in possession of or aware of insider information relating to that company, or provides such information to another person who may trade. Insider information refers to non-public information relating to a company's operations or finances, or other information that may have a significant impact on the trading price of the company's shares or related derivatives. Accordingly, regardless of how employees obtain such material non-public information, strict trading restrictions apply. These restrictions continue to apply even after employment ends.

行为指引：

Directions for Conduct:

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- 康龙化成不会也不允许员工进行内幕交易，也不会建议或怂恿第三方进行内幕交易；
Pharmaron does not engage in insider trading and does not permit employees to do so, nor does it recommend or encourage third parties to engage in insider trading;
 - 员工未经授权不应使用或披露任何内幕信息；
Employees must not use or disclose any insider information without authorization;
 - 如果员工获得内幕信息，不会依此购买或出售任何证券或金融工具；
If employees obtain insider information, they must not use it to buy or sell any securities or financial instruments;
 - 在得知有关康龙化成的重要非公开信息的情况下，您不得购买或出售任何子公司、附属公司或投资项目的证券或公开上市证券；
If you are aware of material non-public information relating to Pharmaron, you must not buy or sell securities, including those of any subsidiary, affiliated company, or investment project;
 - 不得采取任何其他行动来利用或向他人披露此类重要非公开信息。
You must not take any other action to make use of such material non-public information or disclose it to others.

公司政策：**Company Policy:**

- 《内幕信息知情人管理制度》 Insider Information Management Policy

示例：**Example:**

我是一名高级员工，在公司内部工作多年，对公司的业务和未来计划非常了解。一天，我意外得知公司即将发布一项重大合作伙伴计划，这是尚未对外公开的内幕信息。我意识到这个消息可能会影响公司的股价，并考虑着是否买入或卖出公司的股票以获取利润。

I am a senior employee who has been working within the company for many years and is highly knowledgeable about the company's operations and future plans. One day, I accidentally learned that the company is about to announce a major partnership program that has not been publicly disclosed yet. I realized that this news could potentially impact the company's stock price, therefore, I'm considering buying or selling the company's stock to make a profit.

不可以执行上述操作。不能利用任何未公开的内幕信息进行股票交易，避免涉及内幕交易行为。

Do not do this. You must not trade securities while in possession of material non-public information, as this may constitute insider trading.

如果我意外获得了未公开的内幕信息，我应该立即向公司的证券部、合规部报告，将信息披露给相关部门。

If I accidentally obtain undisclosed insider information, I should immediately report it to the Company's Securities Department and Compliance Department.

遵守公司的内幕交易政策和相关法律法规，避免在公司内部持有或交易与内幕信息相关的股票。尽可能避免接触未公开的重要信息，以避免意外涉及内幕交易的风险。

Comply with the Company's insider trading policy and applicable laws and regulations, and do not trade securities while in possession of insider information. Avoid unnecessary access to material non-public information whenever possible to reduce the risk of inadvertent insider trading.

2.16 反洗钱 Anti-Money Laundering

康龙化成在全球许多国家开展业务，这些国家均打击洗钱和恐怖主义融资，并对违反相关规定的公司及其员工实施监禁和罚款。在康龙化成主要开展业务的中国、英国和美国，法律、法规要求公司和个人履行必要的控制和程序义务，以防止、监测和报告与洗钱和恐怖主义融资相关的可疑交易。

Many countries in which Pharmaron operates combat money laundering and terrorist financing and impose imprisonment and fines on companies and individuals who violate the relevant rules. In China, the United Kingdom, and the United States, where Pharmaron has significant operations, laws and regulations require companies and individuals to implement necessary controls and procedures to prevent, monitor, and report suspicious transactions related to money laundering and terrorist financing.

通过隐瞒或伪装犯罪所得资金的真实来源，使其看似来自合法来源或构成合法资产，这种行为称为“洗钱”。这些资金可能用于购买合法资产、资助其他犯罪活动或合法业务。“恐怖主义融资”的定义是为恐怖主义行为或支持恐怖组织提供或收集现金或任何其他资金的任何情况。

The act of concealing or disguising the true origin of funds derived from crime so that they appear to come from legitimate sources or constitute legitimate assets is called “money laundering.” Such funds may be used to purchase legitimate assets or to finance other criminal activities or legitimate businesses. “Terrorist financing” refers to any situation in which cash or any other funds are provided or collected for terrorist acts or to support terrorist organizations.

行为指引：

Directions for Conduct:

- 公司、员工或第三方不得支付或接受以当地货币、外币和贵金属（如金、银、铂）为形式的现金交易。此外，上述禁止的现金交易还包括现金存款交易和通过汇款机构进行的交易；

Neither the Company, employees, nor third parties may make or accept cash transactions involving local currency, foreign currency, or precious metals (such as gold, silver, or platinum). This prohibition also includes cash deposit transactions and transactions conducted through money remittance agencies;

- 现金交易被视为潜在的可疑交易。员工还应按照《反洗钱政策》中附件1的要求填写所需信息，并按照制度规定的流程进行操作。如本公司负责业务单位发现可疑交易，应按照政策要求向上级和反洗钱联系人报告；
Cash transactions are considered potential suspicious transactions. Employees must follow the reporting process set out in the policy, submit the required information, and report any identified suspicious transaction to their supervisor and the designated AML contact person;
- 公司应审慎检查核实客户、商业合作伙伴、以及希望与公司开展业务的其他第三方的身份信息。公司只与商业行为符合法律规定、经营资金来源合法可查的合作伙伴开展商业合作；
The Company shall carefully verify and validate the identity information of clients, business partners, and other third parties seeking to engage in business with the Company. The Company will only conduct business with partners whose commercial activities comply with legal regulations and whose sources of funds are legitimate and verifiable;
- 公司将收款及时地记录到相应的服务类别，并登记入账。公司确保透明和公开的资金流向。
The Company shall promptly record receipts under the appropriate service categories and enter them into the accounting system. The Company seeks to ensure transparent and traceable financial flows.

公司政策：**Company Policy:**

- 《反洗钱政策》 Anti-Money Laundering Policy

示例：**Example:**

1. 我负责与一家新客户签订服务合同。对方表示希望尽快启动项目，但提出由一家与合同签约主体名称不一致的第三方公司代为付款，并要求将发票开给另一家无明显业务关系的实体。我是否可以按照对方要求继续推进？

I am responsible for signing a service contract with a new client. The client says the project needs to start quickly, but asks that payment be made by a third-party company whose name does not match the contracting entity, and also requests that the invoice be issued to another entity with no clear business connection. May I proceed as requested?

不应直接同意。付款方、合同主体和开票对象不一致，且缺乏合理商业解释，是需要高度警惕的异常信号。您应立即暂停相关流程，要求对方说明安排原因并提供必要的支持文件，同时按照公司反洗钱和第三方尽职调查要求，及时向上级和反洗钱联系人报告，由相关职能部门完成审查后再决定是否继续推进。

You should not agree immediately. A mismatch between the paying party, the contracting entity, and the invoiced entity, without a reasonable business explanation, is a red flag that requires heightened scrutiny. You should pause the process at once, ask the counterparty to explain the arrangement and provide supporting documents, and promptly report the matter to your supervisor and the designated AML contact in accordance with the Company's anti-money laundering and third-party due diligence requirements. The transaction should proceed only after the relevant functions have completed their review.

2. 在处理一笔存在异常特征的付款时，我已按照公司要求准备向上级和反洗钱联系人报告。此时，对方询问我是否已将该交易视为可疑并正在内部上报。我可以直接告知对方吗？
- While reviewing a payment with unusual features, I have prepared to report the matter to my supervisor and the designated AML contact in accordance with Company requirements. The counterparty then asks whether the transaction has been treated as suspicious and is being internally reported. May I disclose this directly?

不可以。您不应向对方透露公司是否已将该交易识别为可疑、是否正在开展内部审查，或是否已准备进行报告。您应保持沟通专业和中性，仅说明该事项正在按照公司正常流程审核，并及时按照公司反洗钱要求向上级和反洗钱联系人报告。

No. You must not disclose whether the Company has identified the transaction as suspicious, whether an internal review is underway, or whether a report has been or may be made. You should remain professional and neutral in your communications, state only that the matter is being reviewed in accordance with normal Company procedures, and promptly report it to your supervisor and the designated AML contact in line with the Company's AML requirements.

2.17 质量管理 Quality Management

康龙化成将质量视为公司开展研发、生产和服务活动的基本要求，也是维护客户信任、保障研究结果可靠性、产品质量、安全和合规的关键基础。作为从事药物研发和生产服务的企业，我们的质量要求贯穿客户项目执行、研究活动开展、样品和数据管理、报告出具及成果交付全过程。我们要求所有员工严格遵守适用法律法规、监管要求、客户要求以及公司质量管理体系，并按照适用业务场景落实良好实验室规范（GLP）、药品生产质量管理规范（GMP）及其他相关质量要求，依据批准的程序、适用标准和职责开展工作，如实、及时、完整、准确地记录相关数据、结果和过程信息。任何可能影响数据完整性、研究结果可靠性、产品质量、客户交付、安全或合规的情况，均应被及时识别、报告、评估和处理。

Pharmaron treats quality as a fundamental requirement in its research, development, manufacturing, and service activities and as a critical foundation for maintaining client trust and safeguarding the reliability of research results, product quality, safety, and

compliance. As a company engaged in drug R&D and manufacturing services, our quality expectations apply throughout the full lifecycle of client projects, including study execution, sample and data management, report issuance, and deliverable release. All employees are expected to comply with applicable laws, regulations, regulatory requirements, client requirements, and the Company's quality management rules, and to implement Good Laboratory Practice (GLP), Good Manufacturing Practice (GMP), and other relevant quality requirements as applicable to their work. They must carry out their responsibilities in accordance with approved procedures and applicable standards, and record relevant data, results, and process information truthfully, promptly, completely, and accurately. Any situation that may affect data integrity, the reliability of research results, product quality, client deliverables, safety, or compliance must be identified, reported, assessed, and addressed in a timely manner.

行为指引:

Directions for Conduct:

- 发现偏差、异常、超标结果（OOS）、投诉、审计发现、数据完整性问题、设备故障、文件错误、标签错误或其他质量风险时，应立即报告，并按照适用流程开展调查、评估和处理；

If you identify a deviation, anomaly, out-of-specification result (OOS), complaint, audit finding, data integrity concern, equipment failure, documentation error, labeling error, or any other quality risk, report it immediately and ensure that it is investigated, assessed, and handled in accordance with the applicable procedures;

- 在完成必要的调查、复核和批准前，不得忽视已发现的问题，也不得提前放行样品、出具报告、交付成果、批准批次或作出可能造成误导的结论；

Before the necessary investigation, review, and approval have been completed, do not disregard identified issues or release samples, issue reports, deliver results, approve batches, or make conclusions that may be misleading;

- 不得因项目进度、客户要求、商业目标、成本压力、绩效考核或管理要求而降低质量标准，也不得要求、暗示或默许他人这样做；

Do not lower quality standards because of project timelines, client expectations, commercial objectives, cost pressure, performance targets, or management expectations, and do not ask, suggest, or allow others to do so;

- 相关质量活动应由经过培训、具备资质并获得授权的人员执行；如您对要求理解不清或不具备相应条件，应及时停止并寻求主管、质量部门或相关专业人员指导；

Relevant quality activities should be carried out by trained, qualified, and authorized personnel. If you are unclear about the requirements or are not in a position to proceed appropriately, stop and seek guidance from your supervisor, Quality, or the relevant specialist;

- 对任何可能影响客户、患者、受试者、安全、合规或公司声誉的重大质量问题，应按照制度及时升级报告并妥善处理。

Any significant quality issue that may affect clients, patients, trial participants,

safety, compliance, or the Company's reputation should be escalated promptly and handled appropriately in accordance with Company procedures.

公司政策：

Company Policy:

- 《质量管理体系相关制度》 Quality Management System Policies and Procedures
- 《数据完整性相关制度》 Data Integrity Policies and Procedures

示例：

Example:

某项目交付时间临近，您在复核一项关键检测结果时发现数据存在异常，可能需要进一步调查。项目负责人表示客户催得很急，建议先按原计划出具报告，后续再补做调查并完善记录，以免影响交付进度。您是否可以这样做？

A project deadline is approaching, and while reviewing a critical test result, you identify an anomaly that may require further investigation. The project lead says the client is pushing hard for delivery and suggests issuing the report as planned first, then conducting the investigation and completing the records afterward so that the timeline is not affected. May you proceed in this way?

不可以。发现异常结果、偏差或其他质量风险时，必须按照适用程序及时报告、调查、评估和处理。在完成必要的调查、复核和批准前，不得忽略问题、补做记录、先行出具结论或继续放行相关结果。您应立即向主管及质量部门报告该情况，并按照公司质量管理要求处理后续事项。

No. When an abnormal result, deviation, or other quality risk is identified, it must be reported, investigated, assessed, and handled promptly in accordance with the applicable procedures. Until the required investigation, review, and approval have been completed, you must not ignore the issue, complete records afterward, issue conclusions in advance, or release the related results. You should immediately report the matter to your supervisor and the Quality function and handle the next steps in accordance with the Company's quality management requirements.

2.18 保护公司资产 Protection of Company Assets

保护公司资产是康龙化成保护公司、员工和客户的方法之一。这些资产包括有形财产和知识产权、设备、服务、记录、想法和康龙化成敏感信息。公司员工应致力于保护公司和客户的资产，并帮助防止公司运营中断。如果出于非法目的对公司资产进行损害，公司将会采取相应的纪律处分。

Protecting Company assets is one of the ways that Pharmaron safeguards the Company, employees, and customers. These assets include tangible property and intellectual property, equipment, services, records, ideas, and sensitive information of the Company. Employees of Pharmaron shall commit to protecting the assets of the Company and its clients and help prevent disruption of the Company's operations. If Company assets are

damaged for unlawful purposes, the Company will take appropriate disciplinary actions.

行为指引:

Directions for Conduct:

在各自的职责范围内识别关键业务资产，并采取保护措施予以充分保护。

Identify critical business assets within one's own areas of responsibility and take adequate measures to protect them.

公司政策:

Company Policy:

- 《内部信息保密制度》 Policy for Internal Information Confidentiality
- 《知识产权手册》 Intellectual Property Handbook

示例:

Example:

1. 我的手提电脑被盗了。我应该怎么做？

My laptop was stolen. What should I do?

立即向当地执法部门报案，同时报告部门主管及 IT 部，以便可以评估该手提电脑是否保存有个人或客户保密数据、这些数据是否已加密，从而采取恰当的措施降低风险。

Immediately report the theft to the local law enforcement authorities as well as to your department head and IT Department to assess whether the laptop contains personal or client confidential data and whether that data is encrypted so that appropriate measures can be taken to mitigate the risk.

2. 在一次行业交流会上，公司员工小李意外地发现一家竞争对手的代表对公司的新技术表现出浓厚兴趣，并在暗地里记录了公司技术的细节。

During an industry conference, an employee, Xiao Li, unexpectedly noticed a representative from a competitor showing a strong interest in the company's new technology and secretly recording details of the company's technology.

小李立刻意识到知识产权保护的重要性，迅速将此情况汇报给公司的法务部知识产权律师。公司采取了紧急措施，限制了展示技术细节的范围，并加强了会场的安全措施，以防止技术的未经授权获取。

Xiao Li immediately recognized the importance of protecting intellectual property and promptly reported this situation to the company's Legal Department's intellectual property attorney. In order to prevent unauthorized access to the technology, the company took special measures to restrict the scope of technical details presented and enhance security measures at the event.

3. 供应链管理 Supply Chain Management

康龙化成重视负责任、合规、稳定和可持续的供应链管理。对于从事药物研发

和生产服务的企业而言，供应商、服务商及其他商业合作伙伴的表现，可能直接影响研究活动、产品质量、客户交付、安全、合规和公司声誉。因此，参与寻源、采购、供应商准入、评估、合作和监督的员工，应按照适用法律法规、客户要求及公司制度开展工作，综合考虑质量、合规、环境与社会影响、业务连续性以及长期合作能力，审慎识别并管理供应链风险，推动建立与公司业务相匹配的高标准供应链体系。

Pharmaron values a responsible, compliant, resilient, and sustainable supply chain. As a company providing drug R&D and manufacturing services, the conduct and performance of suppliers, service providers, and other business partners can directly affect research activities, product quality, client deliverables, safety, compliance, and the Company's reputation. Employees involved in sourcing, procurement, supplier onboarding, assessment, engagement, and oversight are therefore expected to act in accordance with applicable laws and regulations, client requirements, and Company rules, while taking into account quality, compliance, environmental and social impacts, business continuity, and long-term partnership capability. In doing so, they should carefully identify and manage supply chain risks and help build a high-standard supply chain system that is aligned with the Company's business.

公司已制定《商业合作伙伴行为准则》（Code of Conduct for Business Partners）以及《可持续采购管理政策》，用于向供应商、服务商及其他商业合作伙伴传达公司在诚信经营、人权与劳工、环境、健康与安全、信息保护及合规管理等方面的基本期望，并指导公司以风险为基础开展供应商管理和持续改进工作。公司在供应链管理中践行可持续采购原则，包括依法合规开展准入和评估、推动合作伙伴理解并落实相关要求，以及在发现风险时及时采取适当措施。

The Company has adopted a *Code of Conduct for Business Partners* and a *Sustainable Procurement Management Policy* to communicate its basic expectations to suppliers, service providers, and other business partners in areas such as integrity, human rights and labor, environment, health and safety, information protection, and compliance management, and to guide the Company's risk-based supplier management and continuous improvement efforts. In supply chain management, the Company follows sustainable procurement principles, including conducting onboarding and assessment lawfully and in compliance with applicable requirements, helping business partners understand and implement relevant expectations, and taking timely and appropriate action when risks are identified.

行为指引：

Directions for Conduct:

- 按照公司制度开展供应商和服务商的准入、筛选、评估、合作、变更和退出管理，确保相关决定有适当依据、符合授权要求，并能够经得起必要的审查和追溯；

Manage supplier and service provider onboarding, screening, assessment, engagement, change, and exit in accordance with Company procedures so that decisions are properly supported, appropriately authorized, and able to withstand review and traceability requirements;

- 在选择和管理供应商时，不应仅关注价格或短期交付安排，而应综合考虑质量、合规、环境与社会表现、信息安全、业务连续性以及客户和监管要求，作出平衡且负责任的判断；

When selecting and managing suppliers, do not focus only on price or short-term delivery needs. Consider quality, compliance, environmental and social performance, information security, business continuity, and relevant client and regulatory requirements so that decisions are balanced and responsible;

- 对涉及原材料、试剂、耗材、设备、实验相关资源、关键外包服务及其他可能影响研究、质量或交付的合作伙伴，应结合风险程度开展必要的尽职调查、背景核查、持续监督或进一步评估；对于高风险情形，应及时升级并落实适当控制措施；

For partners that provide raw materials, reagents, consumables, equipment, laboratory-related resources, critical outsourced services, or other inputs that may affect research, quality, or delivery, carry out due diligence, background checks, ongoing monitoring, or further assessment in a manner proportionate to the level of risk. Higher-risk situations should be escalated promptly and managed with appropriate controls;

- 推动供应商、服务商及其他商业合作伙伴理解并落实公司在商业道德、人权与劳工、环境、健康与安全及其他合规事项方面的要求；如发现明显差距或潜在问题，应按照流程推动补充说明、整改、限制合作、暂停合作或退出合作；

Help suppliers, service providers, and other business partners understand and implement the Company's expectations in areas such as business ethics, human rights and labor, environment, health and safety, and other compliance matters. Where there is a clear gap or a potential issue, follow the appropriate process to seek clarification, drive remediation, restrict the engagement, suspend cooperation, or disengage as needed;

- 如发现供应商存在贿赂腐败、强迫劳动、童工、严重环境违法、重大质量缺陷、数据安全问题、来源不明、分包不透明、交付异常或其他可能影响公司、客户、患者、受试者、安全、合规或声誉的风险，应立即向上级及相关职能部门报告，由相关专业部门评估并决定后续处理方式。

If you identify bribery or corruption, forced labor, child labor, serious environmental violations, material quality deficiencies, data security concerns, unclear sourcing, non-transparent subcontracting, unusual delivery issues, or any other risk that may affect the Company, clients, patients, trial participants, safety, compliance, or reputation, report the matter immediately to your supervisor and the relevant functions so that the appropriate teams can assess the situation and determine the next steps.

- 在选择和管理供应商时，不得仅以价格作为唯一标准，应结合质量、合规、交付能力、环境健康安全、人权与劳工、信息安全、业务连续性以及客户和监管要求进行综合判断；

Do not use price as the sole basis for supplier decisions. Selection and management should take into account quality, compliance, delivery capability,

environment, health and safety, human rights and labor, information security, business continuity, and relevant client and regulatory requirements;

- 对涉及原材料、试剂、耗材、设备、实验相关资源、关键外包服务及其他可能影响研究、质量或交付的合作伙伴，应按照适用要求开展必要的尽职调查、风险识别和持续监督；如相关合作伙伴属于高风险类别，应及时升级评估并采取相应控制措施；

For partners providing raw materials, reagents, consumables, equipment, laboratory-related resources, critical outsourced services, or other inputs that may affect research, quality, or client delivery, conduct appropriate due diligence, risk identification, and ongoing oversight. If a partner falls into a higher-risk category, escalate the review promptly and apply appropriate controls;

- 推动供应商、服务商及其他商业合作伙伴理解并遵守公司对商业道德、人权、环境、健康与安全及其他合规事项的要求；如发现其行为或管理状况与公司要求明显不一致，应及时报告并按照流程推动整改、限制合作、暂停合作或退出合作；

Promote suppliers', service providers', and other business partners' understanding of and alignment with the Company's expectations regarding business ethics, human rights, environment, health and safety, and other compliance matters. If their conduct or management practices appear materially inconsistent with those expectations, report the issue promptly and follow the appropriate process for remediation, restriction, suspension, or disengagement;

- 如发现供应商存在贿赂腐败、强迫劳动、童工、严重环境违法、重大质量缺陷、数据安全问题、来源不明、交付异常或其他可能影响公司、客户、患者、受试者、安全、合规或声誉的风险，应立即向上级及相关职能部门报告，不得自行忽视或继续推进相关合作。

If you identify bribery or corruption, forced labor, child labor, serious environmental violations, material quality deficiencies, data security issues, unclear sourcing, non-transparent subcontracting, unusual delivery concerns, or any other risk that may affect the Company, clients, patients, trial participants, safety, compliance, or reputation, report the matter immediately to your supervisor and the relevant functions. Do not ignore the issue or continue the engagement on your own.

公司政策：

Company Policy:

- 《采购管理制度》 Procurement Management Policy
- 《供应商管理制度》 Supplier Management Policy
- 《商业合作伙伴行为准则》 Code of Conduct for Business Partners
- 《商业合作伙伴合规尽职调查全球制度》 Global Policy for Compliance Due Diligence for Business Partners
- 《可持续采购管理政策》 Sustainable Procurement Management Policy

示例：

Example:

您正在为某客户项目选择一家具关键原材料的供应商。候选供应商报价具有明显优势，能够缓解项目交付压力，但尽职调查显示其存在环境处罚记录，质量体系文件不完整，且无法清晰说明部分分包安排。业务团队认为问题可以后续再看，建议先完成准入并启动合作。您是否可以继续推进？

You are selecting a supplier of key raw materials for a client project. One candidate offers a clear pricing advantage and could ease delivery pressure, but due diligence shows a record of environmental penalties, incomplete quality system documentation, and limited transparency regarding certain subcontracting arrangements. The business team believes these issues can be addressed later and suggests onboarding the supplier now so the project can proceed. May you continue?

不可以直接继续推进。该情形已显示出供应链合规、质量和透明度方面的重要风险，可能进一步影响研究活动、客户交付和公司声誉。您应立即暂停相关流程，向上级及采购、质量、合规或其他相关职能部门报告，并根据公司制度完成进一步评估、补充尽职调查及必要审批。在风险得到充分识别、控制并获得适当批准前，不应擅自准入或启动合作。

No. This situation already presents significant supply chain risks relating to compliance, quality, and transparency, which may in turn affect research activities, client delivery, and the Company's reputation. You should pause the process immediately, report the matter to your supervisor and the relevant Procurement, Quality, Compliance, or other functions, and complete any further assessment, supplemental due diligence, and required approvals in accordance with Company procedures. The supplier should not be onboarded and the engagement should not proceed until the risks have been adequately identified, controlled, and appropriately approved.

4. 人权 Human Rights

康龙化成尊重、保护并支持国际公认的人权及儿童权利，重视员工的人格、尊严、合法权益、健康、安全与福祉。我们要求所有员工在日常工作中遵循适用法律法规、公司制度及本行为准则，以尊重、公平和负责任的方式对待同事、承包商、供应商、客户及其他相关方。任何与人权、劳动权益、公平对待、歧视、骚扰、报复、工作条件或健康安全相关的疑虑、异常或潜在违规情形，都应及时通过适当渠道反映或报告。

Pharmaron respects, protects, and supports internationally recognized human rights and children's rights, and values the dignity, lawful rights and interests, health, safety, and well-being of its employees. All employees are expected to comply with applicable laws, Company rules, and this Code of Conduct in their daily work, and to treat colleagues, contractors, suppliers, clients, and other relevant parties with respect, fairness, and responsibility. Any concern, irregularity, or potential misconduct relating to human rights, labor rights, fair treatment, discrimination, harassment, retaliation, working conditions, or health and safety should be raised or reported through

appropriate channels in a timely manner.

4.1 自愿选择雇佣、禁止童工或强迫劳动、反奴役和人口贩卖 Freely Chosen Employment, Prohibition of Child Labor and Forced Labor, Anti-Slavery, and Anti-Human Trafficking

康龙化成尊重每一位员工依法、自由、自愿地选择工作的权利，坚决反对并禁止任何形式的童工、强迫劳动、债务劳工、奴役、人口贩卖以及其他任何剥夺人格尊严和人身自由的做法。我们相信，合法、公平和有尊严的雇佣关系，是公司践行人权承诺、营造值得信赖工作环境的重要基础。无论在招聘、录用、在岗管理还是离职过程中，我们都应遵守适用法律法规和公司要求，尊重员工的自主意愿、基本权利与合法权益，不得以任何直接或间接方式限制人身自由、实施强迫、欺骗、胁迫或剥削。

Pharmaron respects every employee's right to choose work lawfully, freely, and voluntarily, and firmly opposes and prohibits all forms of child labor, forced labor, bonded labor, slavery, human trafficking, and any other practice that deprives individuals of human dignity or personal freedom. We believe that lawful, fair, and dignified employment relationships are a fundamental part of our commitment to human rights and of creating a trustworthy workplace. In recruitment, hiring, day-to-day management, and separation, we must comply with applicable laws, regulations, and Company requirements, respect employees' free choice, basic rights, and lawful interests, and never directly or indirectly restrict personal freedom or engage in coercion, deception, intimidation, or exploitation.

行为指引：

Directions for Conduct:

- 不得以扣押身份证件、收取押金、限制离岗离职、威胁处罚、拖欠工资、强制加班、限制行动自由或其他不正当方式迫使任何人工作；

Do not force anyone to work by withholding identity documents, collecting deposits, restricting resignation or departure, threatening penalties, withholding wages, imposing excessive overtime, restricting freedom of movement, or using any other improper means;

- 严格遵守适用的最低工作年龄要求，禁止使用童工；对于依法可以工作的未成年工，应给予特别保护，不得安排其从事危险、有害或不适宜其年龄和身心发展的工作；

Strictly follow applicable minimum working age requirements and never use child labor. Where young workers may lawfully work, provide them with special protection and do not assign hazardous, harmful, or age-inappropriate work;

- 在招聘、用工和管理过程中，应坚持合法、透明、公平和尊重，确保劳动条件、岗位要求、报酬安排和离职规则清晰明确，不得以虚假承诺、隐瞒信息或中介滥用等方式损害员工权益；

In recruitment, employment, and workforce management, act lawfully, transparently, fairly, and with respect. Ensure that working conditions, job

expectations, pay arrangements, and separation rules are clearly communicated, and do not harm employees' rights through false promises, concealed information, or misuse by labor agents or intermediaries;

- 如发现疑似童工、强迫劳动、人口贩卖、非法限制人身自由或其他侵害员工基本权利的情形，应立即停止配合相关安排，并及时向上级、人力资源部、合规部或其他适当渠道报告，不得视而不见或默许纵容。

If you identify suspected child labor, forced labor, human trafficking, unlawful restriction of personal freedom, or any other violation of basic worker rights, stop participating in the arrangement and promptly report the matter to your supervisor, Human Resources, Compliance, or another appropriate channel. Do not ignore it or allow it to continue.

公司政策:

Company Policy:

- 《员工手册》及公司人力资源管理相关制度 Employee Handbook and relevant Human Resources policies and procedures

示例:

Examples:

1. 您发现某外包人员的身份证件由其主管统一保管，且对方表示如果现在离职，不仅无法立即取回证件，还可能被扣发部分工资。您应该怎么办？
You learn that an outsourced worker's identity documents are being kept by the worker's supervisor, and the worker says that if they resign now, they may not get the documents back promptly and part of their wages may be withheld. What should you do?

这属于需要高度警惕的风险信号。您不应将其视为正常管理安排，也不应建议对方继续忍受。应立即向上级、人力资源部或合规部报告，并推动相关情况得到核实和妥善处理，以确保不存在强迫劳动、非法扣押证件或其他侵害员工权利的行为。

This is a serious red flag. You should not treat it as a normal management practice or advise the worker to tolerate it. Report the matter immediately to your supervisor, Human Resources, or Compliance so that it can be verified and addressed appropriately, and to ensure that no forced labor, unlawful document retention, or other abuse of worker rights is taking place.

2. 某用工中介推荐了一名年龄明显偏小的候选人，并表示只要先安排其从事简单辅助工作，就不会有问题。为了赶项目进度，您是否可以先接受？
A labor agent recommends a candidate who appears to be underage and says it will be fine as long as the person is first assigned only simple supporting tasks. Because the project is under time pressure, may you accept the arrangement for now?

不可以。无论岗位是否简单、时间是否紧迫，都不能以任何理由忽视最低工作

年龄要求或冒险使用童工。您应立即停止相关安排，核实候选人的年龄和用工合规性，并按照公司制度向上级和人力资源部报告，由相关部门评估后再决定是否继续。

No. Regardless of how simple the work may seem or how urgent the timeline is, minimum working age requirements must never be ignored and child labor must never be used. Stop the arrangement immediately, verify the candidate's age and the legality of the proposed employment, and report the matter to your supervisor and Human Resources in accordance with Company procedures so that the appropriate teams can assess the next steps.

4.2 包容性、多样性及反歧视、公平对待及反骚扰 Inclusion, Diversity, Non-Discrimination, Fair Treatment, and Anti-Harassment

包容性和多样性对康龙化成的成功至关重要，康龙化成的每位员工都必须采取行动，创造一种能让每个人的个性都在符合企业利益的框架之下得到发展的环境。康龙化成倡导所有员工共同打造安全、无敌意的工作场所，我们绝不容许在工作场所中有任何形式的骚扰行为。骚扰是指胁迫、恐吓、羞辱同事或业务合作伙伴或者令其感到窘迫的任何不受欢迎的行为。

Inclusion and diversity are essential to Pharmaron's success. Every employee is expected to help create an environment in which individuals can grow and contribute in a manner consistent with the Company's values and interests. Pharmaron encourages all employees to work together to build a safe and respectful workplace, and we do not tolerate any form of harassment. Harassment includes any unwelcome conduct that coerces, intimidates, humiliates, embarrasses, or otherwise makes colleagues or business partners feel uncomfortable.

如果知晓、怀疑自己受到歧视或骚扰，请向您信任的直线经理、部门负责人、人力资源部或者合规部报告。如果您知晓存在此类不当行为，请在能力所及的范围内采取不危害自身的方式劝阻或者制止，或者及时报告给人力资源部或者合规部。

If you are aware of, suspect, or experience discrimination or harassment, please report it to a trusted line manager, department head, the Human Resources Department, or the Compliance Department. If you become aware of such misconduct involving others, take reasonable steps within your ability to discourage or stop it without endangering yourself, or promptly report it to the Human Resources Department or the Compliance Department.

行为指引：

Directions for Conduct:

- 对员工在就业、晋升、奖励和制裁方面的决定必须完全基于个人的能力、经验、行为、工作表现和/或与工作相关的表现潜力；
Decisions regarding employment, promotion, rewards, and disciplinary measures must be based entirely on an individual's capabilities, experience, conduct, job performance, and/or work-related potential;

- 不论肤色、种族或社会出身、宗教、年龄、残障状况、性取向、世界观或性别，都可获得平等机会和平等待遇的保障；
Equal opportunity and fair treatment must be ensured regardless of social background, skin color, race, religion, age, disability, sexual orientation, worldview, or gender;
- 绝不容忍针对任何个人或群体的歧视、性骚扰或任何其他形式的侵犯或不当行为；
Do not tolerate discrimination, sexual harassment, or any other form of abuse or misconduct against any individual or group;
- 禁止制造恐吓、敌对或冒犯性工作环境的行为，或者不合理地干扰个人工作能力。
Do not engage in conduct that creates an intimidating, hostile, or offensive work environment or that unreasonably interferes with an individual's ability to work.

公司政策：**Company Policy:**

- 《员工多元化、平等、包容政策》 Employee Diversity Equality and Inclusion Policy

示例：**Example:**

1. 在一个项目中，我作为团队成员与其他同事合作，团队成员中有来自不同国家、文化背景和宗教信仰的成员。他们在处理问题和表达意见时的方式和观点各有不同。

In a project, I worked as a team member with colleagues from different countries, cultures, and religions. They had different ways and viewpoints when dealing with issues and expressing opinions.

尊重团队成员的不同文化习惯和观点，主动促进团队交流，鼓励所有成员坦诚表达自己的观点。

Respect team members' diverse cultural customs and viewpoints. Actively facilitate team communication and encourage all members to express their views openly.

确保在决策过程中，所有成员都有平等的发言机会，以确保多样性的想法得到充分考虑。

Ensure that all members have equal opportunities to speak in the decision-making process to ensure that diverse ideas are fully considered.

主动学习了解其他文化习惯，以便更好地适应多样性团队环境。

Proactively learn about other cultural customs to better adapt to a diverse team environment.

2. 您从一位同事那里获悉，在他部门一名求职者因为肤色被拒绝聘用，虽然

这名求职职对于招聘的职位而言是最合适的人选。

You learned from a colleague that a job applicant in his/her department was rejected based on his/her skin color, even though this applicant was the most suitable candidate for the position.

您应向人力资源部报告此事，以便帮助查明事实，从而采取适当的措施。

You should report this to the Human Resources Department to help investigate the facts and take appropriate measures.

4.3 员工申诉机制 Employee Grievance Process

康龙化成尊重并保护员工依法享有的各项权利，建立员工申诉机制，鼓励员工就工作环境、劳动条件、公平对待、歧视、骚扰、报复、管理行为或其他与人权及雇佣相关的事项，及时提出申诉、疑问或建议。公司致力于确保员工能够通过适当、可及且安全的渠道反映问题，并在不受报复的情况下获得公平、及时和适当的处理与补救。

Pharmaron respects and protects the lawful rights of employees and has established an employee grievance process. The Company encourages employees to raise grievances, questions, or suggestions in a timely manner regarding working environment, employment conditions, fair treatment, discrimination, harassment, retaliation, management conduct, or other matters related to human rights and employment. The Company seeks to ensure that employees can raise concerns through appropriate, accessible, and safe channels and receive fair, timely, and appropriate handling and remediation without retaliation.

本机制适用于公司全体员工，包括正式员工、劳务派遣员工和临时员工。对于在公司场所工作或为公司提供服务的第三方人员，公司支持其通过适当渠道反映与工作环境、人权、劳动条件、公平对待、歧视、骚扰、报复或其他相关事项有关的关切。对于供应链相关的人权、劳工权益、职业健康安全或其他可持续发展相关问题，公司鼓励供应商及相关方通过适当渠道进行反映，并按照适用制度进行受理和处理。

This process applies to all employees of the Company, including permanent employees, employees under labor dispatching arrangements, and temporary employees. For third-party personnel who work on the Company's premises or provide services to the Company, the Company supports the raising of concerns through appropriate channels regarding working environment, human rights, labor conditions, fair treatment, discrimination, harassment, retaliation, or other related matters. For human rights, labor rights, occupational health and safety, or other sustainability-related issues in the supply chain, the Company encourages suppliers and relevant parties to raise concerns through appropriate channels, which will be received and handled in accordance with applicable rules.

员工可根据事项性质，通过直属经理、人力资源部、合规部、法务部或公司提供的其他正式渠道提出申诉；如员工认为通过通常管理渠道提出不适当，也可

向更高层级管理者或指定职能部门反映。公司将按照适用法律法规及公司制度，对申诉信息实行保密管理，并仅在处理相关事项所必需的范围内，向有权且有知悉必要的人员披露。公司在适用法律法规及公司制度允许的范围内，提供匿名或保密反映渠道。

Depending on the nature of the matter, employees may raise grievances through their line manager, Human Resources Department, Compliance Department, Legal Department, or other formal channels provided by the Company. Where an employee believes it is not appropriate to use the normal management channel, the matter may be raised to higher-level management or a designated function. The Company will manage grievance information in accordance with applicable laws, regulations, and Company rules, and will disclose such information only to authorized personnel with a need to know for the purpose of handling the matter. Where permitted by applicable laws, regulations, and Company rules, the Company will provide anonymous or confidential reporting channels.

公司禁止对善意提出申诉、协助调查、提供信息或参与处理程序的员工实施任何形式的报复。公司将根据事项的性质、严重程度及潜在影响，对申诉进行受理、评估、调查与处理，并在必要时升级至更高层级管理者或相关职能部门。对于经核实成立的事项，公司将根据具体情况采取纠正、改进、纪律处理或其他适当补救措施，并在适当情况下向申诉人反馈处理进展或结果。

The Company prohibits retaliation in any form against any employee who raises a grievance in good faith, assists in an investigation, provides information, or participates in the handling process. The Company will receive, assess, investigate, and handle grievances based on their nature, severity, and potential impact, and where necessary escalate them to higher-level management or relevant functions. Where a grievance is substantiated, the Company will take appropriate corrective, improvement, disciplinary, or other remedial measures according to the circumstances, and where appropriate provide feedback to the grievant on progress or outcome.

公司将对申诉受理、调查、处理、升级及补救情况进行适当记录，并在必要时对机制的有效性进行回顾，持续完善相关流程和培训，提升申诉机制的可及性、有效性和公正性。

The Company will maintain appropriate records of grievance intake, investigation, handling, escalation, and remediation, and where necessary review the effectiveness of the mechanism, continuously improve relevant processes and training, and enhance the accessibility, effectiveness, and fairness of the grievance process.

行为指引：

Directions for Conduct:

- 如在日常工作中遇到不公平对待、歧视、骚扰、报复、管理不当、劳动条件争议、安全隐患，或其他与人权及雇佣相关的问题，应及时通过适当渠道反映，不应因担心影响绩效、岗位安排或同事关系而隐瞒不报。

If employees encounter unfair treatment, discrimination, harassment, retaliation, inappropriate management conduct, labor condition disputes,

safety concerns, or other matters related to human rights and employment in daily work, they should raise the matter through appropriate channels in a timely manner and should not remain silent out of concern for performance evaluation, work arrangements, or colleague relationships.

- 员工通常可先向直属经理反映；如事项涉及直属经理本人、存在利益冲突，或员工认为通过通常管理渠道提出不适当，可直接联系人力资源部、合规部、法务部或公司提供的其他正式渠道。

Employees may normally first raise the matter with their line manager. Where the matter involves the line manager, presents a conflict of interest, or where the employee believes it is not appropriate to use the normal management channel, the employee may directly contact the Human Resources Department, Compliance Department, Legal Department, or other formal channels provided by the Company.

- 提出申诉、协助调查或提供信息时，应基于善意并尽可能如实、完整反映情况，不得捏造事实、恶意投诉或借申诉机制打击报复他人。

When raising a grievance, assisting in an investigation, or providing information, employees shall act in good faith and provide information as truthfully and completely as reasonably possible. Employees shall not fabricate facts, make malicious complaints, or misuse the grievance mechanism to target or retaliate against others.

- 申诉相关信息应按照保密要求管理，并仅在处理事项所必需的范围内，由有权且有知悉必要的人员使用；任何人不得擅自传播相关信息。

Grievance-related information shall be managed in accordance with confidentiality requirements and used only by authorized personnel with a need to know for the purpose of handling the matter. No person may improperly disclose such information.

- 管理人员收到员工反映的问题后，不得压制、拖延、敷衍处理，或要求员工保持沉默；对超出自身权限、可能引发报复、涉及多人或影响较大的事项，应及时升级处理。

Managers who receive concerns from employees shall not suppress, delay, dismiss, or improperly discourage such concerns, nor require employees to remain silent. Matters that exceed a manager's authority, may lead to retaliation, involve multiple persons, or may have a significant impact shall be escalated in a timely manner.

- 对于在公司场所工作或为公司提供服务的第三方人员，以及供应链相关方，就工作环境、人权、劳工权益、职业健康安全或其他相关问题提出的关切，公司支持其通过适当渠道反映，并按适用制度处理。

For third-party personnel working on the Company's premises or providing services to the Company, and for supply chain-related parties, the Company supports the raising of concerns through appropriate channels regarding working environment, human rights, labor rights, occupational health and safety, or other related matters, and will handle such concerns in accordance with applicable rules.

遵从法律：**Applicable Laws & Regulations:**

- 运营所在地适用的劳动用工、人权、平等就业、反歧视、反骚扰、职业健康与安全、举报调查及个人信息保护等法律法规

Applicable laws and regulations in the places of operation relating to labor and employment, human rights, equal employment opportunity, non-discrimination, anti-harassment, occupational health and safety, reporting and investigations, and personal information protection

- 《联合国世界人权宣言》、《联合国工商企业与人权指导原则》及国际劳工组织核心劳工标准

Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, and ILO Core Labour Standards

公司政策：**Company Policy:**

- 《员工手册》中关于员工申诉、反骚扰、反歧视、公平对待及纪律管理的规定 Relevant requirements in the Employee Handbook relating to employee grievance, anti-harassment, non-discrimination, fair treatment, and disciplinary management
- 《康龙化成隐私政策》 Pharmaron Privacy Policy
- 《内部信息保密制度》 Policy for Internal Information Confidentiality
- 《康龙化成信息安全保密制度》 Policy for Information Security and Confidentiality
- 与举报、调查、合规、人力资源及劳动用工管理相关的其他适用制度和流程 Other applicable policies and procedures relating to reporting, investigation, compliance, human resources, and labor and employment management

示例：**Example:**

1. 员工在团队会议中多次受到带有侮辱性或冒犯性的言语对待，但担心如果提出申诉，会影响绩效评价、团队关系或后续岗位安排。

An employee is repeatedly subjected to insulting or offensive remarks in team meetings, but is concerned that raising a grievance may affect performance evaluation, team relationships, or future work arrangements.

员工不应因担心负面影响而选择沉默。遇到歧视、骚扰、不公平对待或报复风险时，应及时通过直属经理、人力资源部、合规部、法务部或其他正式渠道反映；如事项涉及直属经理本人，或员工认为通过通常管理渠道提出不适当，也可直接向更高层级管理者或指定职能部门反映。公司禁止对善意提出申诉的员工实施报复。

The employee should not remain silent out of concern for negative consequences. Where discrimination, harassment, unfair treatment, or a risk of retaliation arises, the matter should be raised in a timely manner through the line manager, Human Resources

Department, Compliance Department, Legal Department, or other formal channels. Where the matter involves the line manager or it is not appropriate to use the normal management channel, it may be raised directly to higher-level management or a designated function. The Company prohibits retaliation against employees who raise grievances in good faith.

2. 员工发现直属经理长期对团队成员存在明显不公平对待，并判断向该经理本人反映不会得到妥善处理。

An employee observes that the line manager has treated team members unfairly over a prolonged period and believes that raising the matter with that manager will not lead to proper handling.

如员工认为通过通常管理渠道提出不适当，或事项存在利益冲突、升级风险或其他处理障碍，可直接向更高层级管理者或指定职能部门反映。提出申诉、协助调查或提供信息时，应基于善意并尽可能如实、完整反映情况。

Where an employee believes it is not appropriate to use the normal management channel, or where there is a conflict of interest, escalation risk, or another obstacle to proper handling, the matter may be raised directly to higher-level management or a designated function. When raising a grievance, assisting in an investigation, or providing information, the employee should act in good faith and provide information as truthfully and completely as reasonably possible.

3. 一名在公司场所工作的第三方服务人员发现现场存在安全隐患，但担心提出问题后会影响到后续合作安排。

A third-party service provider working on the Company's premises identifies a safety concern, but worries that raising the issue may affect future cooperation.

对于在公司场所工作或为公司提供服务的第三方人员，公司支持其通过适当渠道反映与工作环境、安全、人权、劳动条件、公平对待、歧视、骚扰、报复或其他相关事项有关的关切。公司将按照适用制度进行受理和处理。

For third-party personnel working on the Company's premises or providing services to the Company, the Company supports the raising of concerns through appropriate channels regarding working environment, safety, human rights, labor conditions, fair treatment, discrimination, harassment, retaliation, or other related matters. The Company will receive and handle such concerns in accordance with applicable rules.

4. 员工在与供应商合作过程中发现其分包环节可能存在超时劳动和职业健康安全风险。

In the course of working with a supplier, an employee identifies potential excessive working hours and occupational health and safety risks in a subcontracting arrangement.

对于供应链相关的人权、劳工权益、职业健康安全或其他可持续发展相关问题，公司鼓励供应商及相关方通过适当渠道进行反映，并按照适用制度进行受理和

处理。员工在发现明显异常、重大风险或潜在违规情形时，也应及时按公司制度报告。

For human rights, labor rights, occupational health and safety, or other sustainability-related issues in the supply chain, the Company encourages suppliers and relevant parties to raise concerns through appropriate channels, which will be received and handled in accordance with applicable rules. Employees who identify significant concerns, material risks, or potential misconduct should also report such matters in accordance with Company rules.

4.4 薪酬、福利及工作时间 Wages, Benefits, and Working Hours

康龙化成在全球范围内遵守所有适用的工作时间规定，严格遵守中国《中华人民共和国劳动法》、《中华人民共和国劳动合同法》、《中华人民共和国社会保险法》、《工资支付暂行规定》、《职工带薪年休假条例》、英国《2010 平等法案（Equality Act 2010）》、美国《公平劳动标准法（Fair Labor Standards Act）》、《薪酬透明度非歧视规定（Pay Transparency Nondiscrimination Provision）》等适用于各运营地的法律法规要求，实行全面薪酬和福利策略，为员工提供符合法律要求的合理报酬和保障。

Pharmaron complies globally with all applicable requirements relating to working hours, compensation, and employee benefits. We observe the legal and regulatory requirements applicable in each place where we operate, including, where relevant, the Labor Law of the People's Republic of China, the Labor Contract Law of the People's Republic of China, the Social Insurance Law of the People's Republic of China, the Interim Provisions on Wage Payment, the Regulations on Paid Annual Leave for Employees, the United Kingdom Equality Act 2010, the U.S. Fair Labor Standards Act, and the U.S. Pay Transparency Nondiscrimination Provision. We implement a comprehensive compensation and benefits approach and provide employees with reasonable pay and protection in accordance with applicable law.

行为指引：

Directions for Conduct:

- 康龙化成人力资源部负责及时关注相关法律的变化并及时调整公司的薪酬福利政策，确保其在符合相关法律的基础上，满足员工的多样化需求；Pharmaron's Human Resources Department is responsible for monitoring relevant legal developments in a timely manner and adjusting the Company's compensation and benefits policies as needed to ensure legal compliance while addressing the diverse needs of employees;
- 康龙化成提供公正且平等的工资、福利和工作时间，通过《员工手册》对于薪酬、福利、工作时间和加班费做出明确说明；Pharmaron provides fair and equitable wages, benefits, and working hours, with clear explanations of compensation, benefits, working hours, and overtime pay set out in the Employee Handbook.
- 康龙化成遵循“同工同酬”原则，严禁性别歧视；Pharmaron adheres to the principle of equal payment for equal work and

strictly prohibits gender discrimination;

- 针对每个员工，公司通过劳动合同、邮件、补充协议等就其具体的薪酬和奖金以及长期激励进行沟通；

For each employee, the Company communicates individual compensation, bonuses, and long-term incentives through employment contracts, emails, or supplementary agreements;

- 康龙化成按照运营地法律法规的要求为员工发放加班工资，并考虑员工的劳逸结合，以避免或减少不必要或过度的工作时间；

Pharmaron provides overtime compensation in accordance with applicable local laws and regulations and also seeks to promote a healthy work-life balance to avoid or minimize unnecessary or excessive working hours;

遵从法律：

Applicable Laws & Regulations:

- 遵循运营地相关的法律法规

Comply with laws and regulations in the respective operating locations

示例：

Example:

我是一名项目经理，我发现团队成员因为项目进度紧张，不得不频繁加班，有些同事向我报告，由于频繁的加班导致工作和家庭生活无法平衡。

I am a project manager, and I have noticed that team members have to work overtime frequently due to tight project deadlines. Some colleagues have reported to me that excessive overtime is affecting the balance between work and family life.

项目成员应共同寻找解决方法，避免频繁加班，例如：在运营地法律法规与人力资源制度允许的情况下，与管理层协商合理的工作安排，以及更灵活的工作选项。

Project team members should work together to identify solutions that reduce frequent overtime, such as discussing reasonable work arrangements and, where permitted by applicable local laws, regulations, and Human Resources policies, exploring more flexible working options with management.

4.5 结社自由 Freedom of Association

我们承认所有员工拥有成立工会和职工代表机构的基本权利。我们承诺与职工代表开展坦诚和互信的合作，并开展有建设性和合作性的对话，以此公平地平衡各方利益。以专业的方式，不偏不倚地与员工代表进行合作、沟通与对话。

We acknowledge that all employees have the fundamental right to establish trade unions and worker representative bodies. We commit to working openly and in mutual trust with worker representatives and to engaging in constructive and cooperative dialogue in order to balance the interests of all parties fairly. We will cooperate, communicate, and engage with worker representatives in a professional and impartial manner.

行为指引：**Directions for Conduct:**

- 康龙化成鼓励员工就工作环境问题和管理层进行坦诚沟通；
Pharmaron encourages employees to communicate openly with the management regarding workplace issues;
- 康龙化成尊重员工的结社自由，员工可以自由选择加入或者不加入工会组织；
Pharmaron respects employees' freedom of association, and employees may freely choose whether to join a trade union or not;
- 员工组织或工会成员既不会因此处于不利地位，也不会占据优势。
Neither employee organizations nor trade union members will be disadvantaged or favored as a result.

遵从法律：**Applicable Laws & Regulations:**

- 遵循运营地的法律法规
Comply with laws and regulations in the respective operating locations

示例：**Example:**

我们工厂冬天很冷，但是没有暖气设备，工人们很有意见。我们应该怎么解决？

Our factory is very cold in the winter, but we don't have heating equipment, and the workers are very dissatisfied. What should we do?

工人们可以通过工会组织或员工代表与公司进行沟通。公司鼓励员工就工作环境问题和管理层坦诚沟通。您也可以将该情况告知您的上级或公司人力资源部门，或者直接向公司总部的人力资源部寻求帮助。

Workers can communicate with the Company through trade unions or employee representatives. The Company encourages open communication between employees and management regarding workplace issues. You may also report this situation to your supervisor or the local Human Resources Department or seek help directly from the Human Resources Department of the Company's headquarters.

4.6 健康保护、安全流程及应急准备和响应 Health Protection, Safety Procedures, and Emergency Preparedness and Response

康龙化成致力于为员工提供一个安全、健康的工作环境，并保护员工和承包商的安全，承诺严格遵循《中华人民共和国安全生产法》、《中华人民共和国职业病防治法》、《中华人民共和国消防法》、《中华人民共和国突发事件应对法》、英国《1974年工作健康安全法（Health and Safety at Work Act 1974）》、美国《职业安全卫生法（Occupational Safety and Health Act）》等适用于各运营地的法律法规要求，以保护员工及承包商免受身体上、心理上、化学或者生物危害。

Pharmaron is committed to providing a safe and healthy working environment and protecting the safety of employees and contractors. We promise to strictly adhere to applicable laws and regulations in each operating location, such as the Law of the People's Republic of China on Safety Production, Law of the People's Republic of China on Prevention and Control of Occupational Diseases, Law of the People's Republic of China on Fire Protection, Law of the People's Republic of China on Response to Emergency, the Health and Safety at Work Act 1974 of the United Kingdom, the Occupational Safety and Health Act of the United States, to protect employees and contractors from physical, psychological, chemical, or biological harm.

公司严格遵循中国《危险化学品安全管理条例》以及各运营地的法律法规要求，制定内部的安全生产条例，保证公司相关业务活动的合规性，并且选择具有资质的第三方提供相关的服务并签订安全协议。

In strict compliance with China's Regulations on the Safety Management of Hazardous Chemicals as well as the local laws and regulations of each place of operation, the Company has formulated internal work safety policies and procedures to ensure the compliance of relevant business activities of the Company and has selected qualified third parties to provide relevant services and signed safety agreements.

行为指引：

Directions for Conduct:

- 了解工作过程中可能产生的安全、健康及环保风险，特别是化学品和医药品以及其他有害物质的风险；

Understand safety, health, and environmental risks that may arise during work processes, especially risks related to chemicals, pharmaceuticals, and other harmful substances;

- 公司制定了一系列的 EHS 章程及操作指引，包括危险事故应急救援预案等；

The Company has established a series of EHS regulations and operational guidelines, including emergency rescue plans for hazardous accidents;

- 遵守 EHS 方面的政策、制度及操作指引并注意安全控制，及时报告意外、伤害和不安全设备、操作或工作条件等为员工创造一个安全、健康的工作环境；

Adhere to EHS policies, procedures, and operational guidelines, pay attention to safety controls, report accidents, injuries, and unsafe equipment, operations, or working conditions promptly, and help maintain a safe and healthy working environment;

- 熟悉工作场所的应急响应计划，并在发生安全事故时遵守规定和程序；

Familiarize yourself with workplace emergency response plans and follow rules and procedures in case of a safety incident;

- 不允许有任何暴力和威胁行为的存在，在自身安全的前提下在本公司尽职尽责，不受酒精、毒品或其他违禁品的影响；

No violence or threats are allowed, and employees should perform their duties diligently under the premise of their own safety and not be influenced by

alcohol, drugs, or other prohibited substances;

- 工作场所严禁毒品或其他违禁品。

Drugs or other contraband are strictly prohibited in the workplace.

公司政策:

Company Policy:

- 《EHS 方针》 EHS Policy

示例:

Example:

作为实验负责人，我理解在实验中使用的化学制剂可能会对人体带来一些影响，因此已经通知了实验团队成员注意防护。我们团队都是非常有经验的人员，因此我觉得大家应该能应对该化学制剂带来的危害，就没有通知 EHS 部门。

As a lab manager, I understand that the chemicals used in experiments may have some effects on the human body, so I have informed the lab team members to take protective measures. Our team is very experienced, so I believe everyone should be able to handle the hazards caused by these chemicals, and I did not inform the EHS Department.

请遵守 EHS 的制度及操作指引，及时识别工作过程中可能产生的安全、健康及环保风险，并及时向 EHS 部门进行报告，进而对于该危害是否可能造成职业健康危害以及危害程度做出合理检测和评价。如果未能及时按照规定向 EHS 部门进行报告，可能会造成未能按照国家 and 地方规定及时向运营地卫生行政部门申报产生职业病危害的项目，未能按照既定的职业健康管理程序开展工作并被地方监管部门处罚。

Please comply with EHS policies and operational guidelines, promptly identify the possible safety, health, and environmental risks that may arise during work processes, and promptly report them to the EHS Department so as to make reasonable detection and evaluation on whether the hazards may cause occupational health hazards and the degree of the hazards. Failure to report to the EHS Department as required may result in the failure to timely report projects causing occupational health hazards to the local health commission in accordance with national and local regulations and may be subject to penalties by the local authority for failure to follow established occupational health management procedures.

4.7 沟通、培训和能力 Communication, Training and Competence

为了符合公司的使命、价值观和要求，所有员工应密切关注所有内部沟通渠道，并及时接受分配给自己的所有必要培训，如：反贿赂与反腐败、职业健康与安全、信息安全、ESG 等，以获得适当的意识、知识、技能和能力水平。

In order to fulfill the Company's mission, values, and requirements, all employees shall closely follow all internal communication channels and receive all necessary training assigned to them in a timely manner, such as Anti-Bribery and Anti-Corruption, EHS, Information Security, ESG etc., to acquire the appropriate level of awareness, knowledge, skills, and competency.

行为指引：**Directions for Conduct:**

- 康龙化成致力于构建一个平等沟通、尊重员工能力的工作环境；
Pharmaron is committed to building a work environment with equal communication and respect for the competence of employees;
- 康龙化成将积极组织培训，以使员工获得必要的意识、知识、技能和能力水平。
Pharmaron will actively organize training to provide employees with the necessary awareness, knowledge, skills, and competency.

示例：**Example:**

公司经常提醒我参加在反贿赂与反腐败线学习课程，但是我的工作繁忙，无暇顾及。如果有在线答题，我通常会联系已经参与过培训的同事帮忙完成。

The Company often reminds me to participate in Anti-Bribery and Anti-Corruption online learning courses, but I am busy with my work and don't have the time. If there is an online quiz, I usually contact colleagues who have already participated in the training to help me with that.

这种行为是不可取的，您应该充分参与到培训中并且独立完成答题评估环节。

This behavior is not acceptable. You should fully participate in the training and independently complete the quiz.

5. 环境 Environment

康龙化成承诺对环境负责并以可持续的方式运营，始终践行绿色低碳发展理念，制定可持续环境目标，从而最小化对环境的影响。

Pharmaron is committed to environmental responsibility and sustainable operations. We consistently uphold the principles of green and low-carbon development and establish sustainable environmental goals to minimize our impact on the environment.

康龙化成严格遵循《中华人民共和国环境保护法》、《中华人民共和国节约能源法》、英国《1990年环境保护法（Environmental Protection Act 1990）》、《2021年环境法（Environment Act 2021）》、美国《能源政策法案（Energy Policy Act of 2005）》等适用于各运营地的法律法规要求，不断完善环境管理体系，积极减少对环境的负面影响、扩大积极影响。我们致力于与实施环境管理体系，定期监测我们的环境绩效，以确保合规性并改善环境实践。

Pharmaron strictly complies with the laws and regulations applicable in the jurisdictions where we operate, including the Environmental Protection Law of the People's Republic of China, the Energy Conservation Law of the People's Republic of China, the Environmental Protection Act 1990 of the United Kingdom, the Environment Act 2021 of the United Kingdom, the Energy Policy Act of 2005 of the

United States, and other applicable legal and regulatory requirements. We continuously improve our environmental management system, actively reduce negative environmental impacts, and expand our positive environmental contributions. We are committed to implementing and maintaining an environmental management system and to regularly monitoring our environmental performance to ensure compliance and continuously improve our environmental practices.

5.1 应对气候变化 Response to Climate Change

康龙化成积极将应对气候变化置于可持续发展的重要位置。我们加入科学碳目标倡议（SBTi, Science Based Targets initiative）设定中期以及长期减碳目标，并承诺就减碳目标进展和其他环境问题进行定期报告。集团层面整体加强气候变化风险管理，并承诺与各利益相关者就环境问题进行沟通。各运营地根据各自实际情况开展节能减排，积极使用可再生能源，探索新能源及新技术，减少温室气体排放。员工在日常工作中，应该遵循公司规定执行节能减排措施，并主动识别新的节能减排机会持续应对气候变化。

Pharmaron places climate change response at an important position in its sustainable development efforts. We have joined the Science Based Targets initiative (SBTi) and have set medium-term and long-term decarbonization targets. We are also committed to regularly reporting on progress toward these targets and on other environmental issues. At the Group level, we continue to strengthen climate change risk management and are committed to communicating with stakeholders on environmental issues. Each operating location shall, based on its actual circumstances, carry out energy-saving and emission-reduction measures, actively use renewable energy, explore new energy sources and technologies, and reduce greenhouse gas emissions. In their daily work, employees shall follow the Company's requirements in implementing energy-saving and emission-reduction measures and proactively identify new opportunities to continuously address climate change.

5.2 污染防治 Waste Management

康龙化成以环境质量改善，加快发展方式绿色转型作为努力的方向，以减少和避免污染物的产生、保护和改善环境、保障人体健康等为目标，承诺严格遵守中国《中华人民共和国大气污染防治法》、《中华人民共和国水污染防治法》、《中华人民共和国固体废物污染环境防治法》、英国《1974 年污染控制法（Control of Pollution Act 1974）》、《2011 年废弃物条例（英格兰和威尔士）（The Waste (England and Wales) Regulations 2011）》、美国《清洁水法案（Clean Water Act）》、《清洁空气法案（Clean Air Act）》等适用于各运营地的法律法规要求。

Pharmaron aims to improve environmental quality and accelerate green transformation, with the goal of reducing and avoiding the generation of pollutants, protecting and improving the environment, and ensuring human health. We are committed to strict compliance with the laws and regulations applicable to each place of operation, including the Law of the People's Republic of China on the Prevention and Control of Atmospheric Pollution, the Law of the PRC on the Prevention and Control of Water

Pollution, the Law of the People's Republic of China on Prevention and Control of Environmental Pollution by Solid Waste, the Control of Pollution Act 1974 of the United Kingdom, The Waste (England and Wales) Regulations 2011 of the United Kingdom, and the Clean Water Act and the Clean Air Act of the United States.

行为指引:

Directions for Conduct:

- 承诺通过遵循“预防、减少使用、循环使用、回收再用和处理”的废弃物处置方针，减少有害废弃物和无害废弃物；

Commit to reducing hazardous waste and non-hazardous waste by following the principle of "prevention, reduction, reuse, recycling, and disposal";

- 对生产运营过程中产生的废气、废水、固体废弃物设置了基于“分类、处置、监测”路径的全流程闭环管理以减少排放到空气、水和土地中的废弃物对人和环境带来负面影响的风险；

Implement a closed-loop management process based on the "classification, disposal, monitoring" path for gases, wastewater, and solid waste generated in production and operations to reduce the risk of the negative impact of the waste being emitted into the air, water, and land on humans and the environment;

- 严格遵守公司与污染防治相关的政策制度及操作指南，确保废弃物使用、转移、存储、处置、回收、再利用及管理以及气体排放、废水处理的安全及有效。

Strictly adhere to Company policies and operational guidelines related to pollution prevention and control to ensure the safety and effectiveness of waste use, transfer, storage, disposal, recycling, reuse, gas emissions, and wastewater treatment.

公司政策:

Company Policy:

- 《环境、社会与公司治理管理办法》 Environmental, Social, and Governance Management Policy
- 《康龙化成环境和可持续发展方针》 Pharmaron Environmental and Sustainability Policy

示例:

Example:

防止污染的示例：对各类存放化学品的容器及时加盖，尽量减少挥发性有机物挥发，并放入带排风的防爆柜或者药品柜中。

Example of pollution prevention: Timely cover all kinds of containers storing chemicals to minimize the volatilization of volatile organic compounds and place them in explosion-proof cabinets or chemical storage cabinets with ventilation.

5.3 使用资源 Use of Resources

康龙化成理解保护自然资源的重要性，通过工艺改良、节约用水及水资源回收

利用、节约用纸、防止包装材料浪费等举措，从源头减少浪费、节约资源。

Pharmaron understands the importance of protecting natural resources. Through technique improvements, water conservation and recycling, paper savings, and waste prevention of packing materials, we aim to reduce waste and conserve resources at the source.

行为指引：

Directions for Conduct:

- 努力减少我们产品和运营对环境的影响，以负责任的方式使用自然资源，不断提升我们的资源和能源效率，并开发新技术，优化流程和创新产品，以保护甚至惠及环境、自然和气候；

Make efforts to reduce the impact of our products and operations on the environment, use natural resources in a responsible manner, continuously enhance resource and energy efficiency, and develop new technologies, optimize processes, and innovate products to protect and even benefit the environment, nature, and climate;

- 努力将我们对自然资源的依赖和影响降到最低，促进环境的可持续性；

Make efforts to minimize our dependence and impact on natural resources to promote environmental sustainability;

- 致力于教育、培训和激励员工采用安全、合规、环保可靠的方式工作。

Commit to educating, training, and motivating employees to work in a safe, compliant, environmentally responsible manner.

示例：

Example:

以下是一些节约资源良好行为的示例：

Here are some examples of good resource-saving behaviors:

- 在卫生间及茶水间张贴节约用水标识，每天巡视办公区域，如发现故障及时报修，避免资源浪费；

Post water-saving signs in restrooms and pantries, conduct daily inspections of office areas, and promptly report any malfunctions to avoid resource waste;

- 采用节水型及具有红外感应的卫生器具以减少供水量，同时降低供水能耗；

Use water-saving and infrared-sensitive sanitary apparatuses to reduce water supply and energy consumption of water supply at the same time;

- 在各运营地灵活推行无纸化办公，例如请假、考勤、领料出库等办公事项均采用电子形式、采用电子实验室笔记本、灵活采用线上系统开展事故报告、风险评估工作以及审计等，从源头减少纸张使用。

Promote paperless offices at various operating locations based on local situations, such as implementing electronic formats for leave requests, attendance records, stockouts, etc. Use electronic laboratory notebooks and utilize online systems for incident reporting, risk assessments, audits, etc., to reduce paper usage at the source.

5.4 生物多样性 Biodiversity

康龙化成尊重并保护生物多样性，避免在运营过程中对自然生态系统造成破坏。我们在开展涉及建设、运营、排放或处置活动的过程中，尤其是在建设研发与生产设施、扩展基础设施或进行废弃物处置时，应优先选择不涉及天然林、生态敏感区域或濒危物种栖息地的区域，以实现零毁林目标。

Pharmaron respects and protects biodiversity and avoids causing harm to natural ecosystems in the course of their operations. When engaging in activities involving construction, operations, emissions, or waste disposal, particularly the development of R&D and manufacturing facilities, infrastructure expansion, or waste treatment—Pharmaron should prioritize locations that do not involve natural forests, ecologically sensitive areas, or habitats of endangered species, in order to achieve the goal of zero deforestation.

康龙化成鼓励在土地使用与管理过程中主动采取生态恢复与土地复原措施，如绿化覆盖、原生植被恢复或生态屏障建设，以减缓对生态环境的扰动，助力维持当地生态系统稳定。对于开展农业、生物原料采购、植物提取或天然产物研发等相关业务的合作方，应在原料采购环节关注产地的土地利用情况，避免因商业活动导致栖息地退化、生物多样性丧失或非法砍伐等问题。

Pharmaron also encourages proactive ecological restoration and land rehabilitation measures in its land use and management practices, such as greening, restoration of native vegetation, or the establishment of ecological buffers, to mitigate environmental disturbance and help maintain the stability of local ecosystems. For partners involved in agriculture, sourcing of biological materials, plant extraction, or the development of natural products, careful attention should be paid to land use at the source to avoid habitat degradation, biodiversity loss, or illegal deforestation resulting from commercial activities.

公司政策：

Company Policy:

- 《环境、社会与公司治理管理办法》 Environmental, Social, and Governance Management Policy

6. 正确决策 Making Right Decisions

康龙化成要求所有员工践行良好的商业道德。本行为准则不可能涵盖适用于每种情况的所有规则，员工需要按照本行为准则中所总结的价值观和要求做出正确决策。当面临选择或者两难时，对于以下问题的判断有助于您做出正确决策：Pharmaron expects all employees to adhere to strong business ethics. This Code of Conduct may not cover all rules applicable to every situation, so employees shall make the right decisions in line with the values and requirements summarized in this code of conduct. When faced with choices or dilemmas, the following questions may help you make the right decisions:

- 这符合我们的价值观和期望吗？

Does this align with our values and expectations?

- 这符合法律法规吗？

Does this comply with laws and regulations?

- 这与我们公司的政策一致吗？

Is this consistent with our Company policies?

- 其他利益相关者对此行为会有什么看法？

How would other stakeholders view this behavior?

- 如果在报纸文章或在电视上看到这种事情，会怎么样？

How would I feel about this if I saw it in a newspaper article or on television?

- 如果我是公司的客户，我会对此感到满意吗？

If I were a customer of the Company, would I be satisfied with this?

如果以上答案是否定的，那么请不要开展相关的行为，请与您的直线领导或者信任的部门负责人沟通。如果仍然不能确定或者您不方便与直线领导及部门负责人沟通，请及时联系公司法务部或者公司合规部寻求指导。

If the answers to the above questions are negative, please do not carry out the related behavior and communicate with your reporting manager or a trusted department head. If you are still uncertain or unable to communicate with your reporting manager or department head, please contact the Company's Legal Department or Compliance Department for advice.

7. 寻求帮助与报告忧虑 Seeking Help and Reporting Concerns

每位员工都有义务以合乎道德的方式行事，并维护康龙化成的诚信及声誉。如对不道德、非法行为或员工的不当行为有任何合理怀疑，请告知直线经理，或向专业部门，如合规部、法务部或人力资源部报告。

Every employee is responsible for acting ethically and defending the integrity and reputation of Pharmaron. If there is any reasonable suspicion of unethical, illegal behavior or improper behavior by employees, please inform your reporting manager, or contact the relevant functions, such as the Compliance Department, Legal Department, or Human Resources Department.

如果对行为准则有任何疑问，或不确定，您可以联系您的上级或人力资源部。同时，每位员工都可以与公司的合规部联系或向合规邮箱发送电子邮件：

If you have any questions or concerns about the Code of Conduct, you can reach out to your supervisor or the Human Resources Department. Additionally, every employee can contact the Company's Compliance Department or send an email to the compliance mailbox:

总部 Headquarters: compliance@pharmaron.com

此外，我们可以向有关部门报告与公司有关的制度的投诉和信息。

In addition, you can report complaints and information about the Company's policies to the relevant departments.

所有针对潜在不当行为的举报都将被保密对待，举报信息仅会提供给在最小限度内需知晓并根据该信息进行调查的人员。所有接触举报及后续调查的员工，均有保密的责任义务，对于举报人的身份信息应严格保密。同时，公司尊重并保护每一位善意提出问题、报告忧虑、参与调查或提供信息的员工，严禁任何形式的打击报复。针对举报人的报复行为将被视为对公司政策的严重违反，公司将对实施报复行为的责任人依照公司相关纪律规定进行处分，并保留追究其法律责任的权利。

Whistleblowing cases concerning potential misconduct will all be treated confidentially; whistleblowing information will be provided, on a minimum basis, only to those who need to know and conduct an investigation on the basis of such information. All Employees having any contact with whistleblowing and the follow-up investigation are subject to this confidentiality obligation and obliged to keep the identity information of the whistleblower strictly confidential. In the meantime, the Company prohibits any retaliation against whistleblowers. Retaliation against whistleblowers will be regarded as a serious violation of the Company's policies, and the Company will take disciplinary action against the one who is responsible for the retaliation in accordance with the Company's relevant disciplinary regulations and reserve the right to pursue the liability against such person for the retaliation.

行为指引:

Directions for Conduct:

- 当遇到或怀疑存在任何不正当员工行为、不道德或违法的活动，告知直线经理，或其他专业部门，如合规部、法务部或人力资源部。

When encountering or suspecting any employee misconduct or unethical or illegal activities, inform your line manager or the relevant departments such as the Compliance Department, Legal Department, or Human Resources Department.

公司政策:

Company Policy:

- 《内部举报和调查政策》 Internal Whistleblowing and Investigation Policy

全球资源: Global Resources:

举报专线: Whistleblowing Hotline: +86 10 5733 0257

举报邮箱: Whistleblowing Email: compliance@pharmaron.com