Sino Biopharmaceutical Limited

Responsible Marketing Policy

1. Purpose

This policy aims to improve and strengthen the sustainable operation and development of Sino Biopharmaceutical Limited together with its subsidiaries (hereinafter referred to as " Sino Biopharmaceutical", "the Group"), to ensure that the company complies with the requirements of the relevant laws and regulations as well as business ethics when promoting and marketing the Group's products to stakeholders, and to demonstrate the Group's values of responsibility.

2. Applicability

The policy applies to the Group. All directors, management, and other employees, including the Group's full-time and part-time employees, must comply with the policy.

3. Basic Requirements

The Group has set up a full-life circle quality management system under the direct leadership of the heads of member companies to ensure product quality and patient safety.

4. Marketing Principles and Internal Control

Conduct legal, true, and accurate communication and publicity based on scientific facts, refrain from any false or misleading publicity, and ensure that accurate and true drug information is conveyed to stakeholders.

Provide drug information in accordance with the principles of appropriateness and accuracy. All marketing materials must comply with the requirements of the local regulations, based on the latest scientific and valid evidence, and shall not mislead the audience by means of misconstruction, exaggeration, overemphasis, neglect, or otherwise.

Establish a strict internal control management system, and all marketing activities, including contents, methods, and approaches, must conform to the corresponding procedures and be in line with the Group policy to prevent liability risks such as misleading sales and the sale of unapproved drugs.

Conduct regular marketing and sales audits at lease once a year to ensure the accuracy and compliance of advertising and marketing activities, as well as legal compliance of sales and marketing practices.

Comply with the drug label management regulations. The corresponding prompt or warning is printed in a prominent position in the package or instruction manual. Ingredients or excipients that may cause adverse reactions contained in the drug formulation, shall be clearly stated in the instructions.

Established a pharmacovigilance management system. Upon the adverse reactions caused by drugs of the Group are confirmed, we will report them to the competent drug regulatory authority in a timely manner and deal with them as per related regulations.
Staff of the Group shall not, in any name, provide property or other benefits to medical institutions and/or medical professionals who are or may be using the Company's products.

Any relevant party can whistleblow any behavior or individual that may violate national laws and regulations, current international business standards, and the Company's policies through the open whistleblowing channel, and the information of the whistleblowers shall be kept strictly confidential. All whistleblowing shall be registered, investigated and dealt with in accordance with the relevant procedures of the Group.

5. Customer Information Protection

Fully respect and protect the privacy and data of customers or consumers, and use management and technical means to prevent unauthorized access to or disclosure of customer information.

6. Regular Training

Regularly carry out responsible marketing training to the senior management, marketing and sales personnel, and enhance employees' awareness of compliance marketing, and achieve a level of competence with sufficient medical and professional knowledge to provide accurate and responsible drug information.

7. Violation Reporting and Process

Any relevant party can whistleblow any behavior or individual that may violate national laws and regulations, current international business standards, and the Company's policies through the open whistleblowing channel, and the information of the whistleblowers shall be kept strictly confidential. All whistleblowing shall be registered, investigated, and dealt with by the relevant procedures of the Group. Corrective measures will be taken if necessary, and the results of investigation and treatment will be reported to the whistleblowers.

8. Supplementary Provisions

Anything not covered in this policy, or contrary to the relevant laws, regulations, or normative documents of the People's Republic of China, should be implemented in accordance with the relevant laws, regulations, or normative documents of the People's Republic of China.