

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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董事长及管理层致辞 A Letter From Chairman and Management

各位同事：

Dear colleagues,

在康龙化成，我们始终秉承“以最高水平的研发服务，帮助合作伙伴开发新药，为人类健康贡献康龙化成智慧”的企业使命，坚持国际化、一体化发展路线，强化全流程、一体化服务平台的核心竞争力，深入贯彻“员工第一，客户为中心”的文化理念。我们为客户提供高质量、高价值的服务及新颖的解决方案。我们致力于打造贯穿药物发现、临床前及临床开发全流程的研发生产服务体系。

At Pharmaron, we have always upheld our mission of "helping our partners develop new drugs with the highest level of R&D services and contributing Pharmaron's efforts to human health." We adhere to an international and integrated development path, strengthen the core competitiveness of our end-to-end process integrated service platform, and deeply implement the cultural values of "Employees Number One, Clients Centered." We deliver high-quality and high-value services and innovative solutions to our clients. We are dedicated to building an end-to-end R&D and production service system covering the discovery, preclinical, and clinical development of innovative medicines.

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 integrity and honest, and trustworthy to 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 dedicated to delivering high-quality service to clients and constantly striving for excellence.
3. 团队协作，尊重他人，助人为乐；
Having a teamwork spirit and being respectful and helpful to others.
4. 重能力，不唯学历；
Valuing competence but not just academic qualifications.
5. 勇于创新，提高效率；
Being innovative to improve efficiency.
6. 节约资源，合理使用；
Conservation and rational use of resources.

7. 自我完善。

Self-improvement.

康龙化成《行为准则》旨在支持这些价值观，为公司全球各地所有员工的行为和业务活动设立标准。我们遵循“诚实守信、互惠共赢”的原则，不断提升供应商管理水平，营造公平透明的营商环境，深化与客户、供应商等利益相关方的合作，实现企业长远发展。

Pharmaron's Code of Conduct is designed to support these values and set standards for the conduct and business activities of all employees globally. We follow the principle of "honesty and trustworthiness, mutual benefits and win-win result" to continuously elevate supplier management capabilities, create a fair and transparent business environment, deepen cooperation with our clients, suppliers, and other stakeholders, and achieve the Company's long-term development.

在康龙化成，我们期待每位员工秉承公司的道德标准和价值观，并以此作为依据与同事、客户、供应商、服务商、商业伙伴及政府部门进行交往。

At Pharmaron, we expect every employee to uphold the company's ethical standards and values as the basis for engaging with colleagues, clients, suppliers, service providers, business partners, and government agencies.

我们将一如既往地重视安全、敬畏科学、敬畏生命。深耕生物医药研发服务领域，深刻理解客户需求，凭借质量、速度、成本优势，以及多学科转化效率，助力客户获得新药研发成功；自信、自省、自律、自强，以极大的热忱为经济、环境和社会的可持续发展及人类的健康事业贡献力量。

We will, as always, value safety and respect for science and life. We are dedicated to biopharmaceutical R&D services, deeply understanding of the needs of our clients, and leveraging our advantages in quality, speed, cost, as well as multidisciplinary conversion efficiency to help our clients achieve success in new drug development. With self-confidence, self-reflection, self-discipline, and self-improvement, we will enthusiastically contribute to the sustainable development of the economy, the environment, the society, as well as the human health.

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，是内部制度以及劳动合同约定的条款的补充。此外，本行为准则为指导我们的管理层、员工或代表公司行事的人员以符合本公司价值观的方式开展活动提供了基本原则和指引。当然，我们也需要遵守公司运营所在地的法律法规及适用的外国法规。

This Code of Conduct serves as a binding guidance for our daily work and a supplement to the internal policies as well as the provisions in employment contracts. In addition, this Code of Conduct is the foundation to guide our management, employees, or persons acting on behalf of the Company in carrying out their activities in a manner that is consistent with our values. Of course, we are also required to comply with the laws and regulations in the places where we operate and 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 avoid the occurrence of such a situation, every one of us shall be familiar with this Code of Conduct and act accordingly. When in doubt, immediate consultation and advice from relevant responsible departments shall be obtained.

2. 道德与合规 Ethics and Compliance

我们的行业受到许多法规和规定约束，它们旨在保护患者和消费者、提高药品和医疗卫生服务的质量，并帮助消除欺诈和对医疗判断的不当影响。我们的卓越承诺表现为遵守适用于我们活动的所有法律和法规要求。

Our industry is governed by a number of laws and regulations designed to protect patients and consumers, improve the quality of medicines and health systems, and help eliminate fraud and undue influence on medical judgment. Our commitment to excellence is manifested in compliance with all legal and regulatory requirements that are applicable to our activities.

康龙化成承诺在我们的所有工作中秉持正直行事的原则。我们将遵守所有适用的法律和法规要求。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、供应商在内的所有利益相关者的关系中，我们将恪尽职守。我们致力于以保障公平竞争的方式开展业务，并在所有业务往来中保持诚实、透明且公平。

Pharmaron is committed to acting with integrity in all aspects of our work. We will comply with all applicable laws and regulatory requirements. We will act responsibly in our relationships with all stakeholders including healthcare professionals, patients, consumers, hospitals, academics, governments, regulatory entities, business partners, customers, suppliers and vendors. We are committed to conducting our business in a way that ensures fair competition and we will be honest, transparent and fair in all our business dealings.

康龙化的主要客户来自于各大药企，因此，我们将参照我们客户遵从的法律及行业准则（例如：欧洲制药工业协会联合会行为准则(EFPIA Code of Practice)、欧洲医疗器械协会商业道德准则(MedTech Europe Code of Ethical Business Practice)、国际药品制造商协会联合会准则(IFPMA Code of Practice)等）要求对向医疗专业人士提供的教育资助、科研支持、咨询报酬、差旅招待等支持进行登记和披露。

As the clients of Pharmaron are major pharmaceutical and life science companies, we will record and disclose the contributions provided to healthcare professionals, such as educational grants, research funding, consulting fees, travel accommodations, and other forms of assistance, reference to the legal and industry standards adhered to by our clients (e.g., European Federation of Pharmaceutical Industries and Associations (EFPIA), Code of Practice, MedTech Europe Code of Ethical Business Practice, International Federation of Pharmaceutical Manufacturers & Associations (IFPMA) Code of Practice, etc.).

康龙化成承诺在所有业务活动中恪守最高的诚信标准和法律法规要求。依照运营第法律法规及时、准确、完整地披露与包括医疗卫生专业人士、政府机构、政府官员、国有企业、政党机关相关的费用支出。此类支出包含：礼品、招待、捐赠、赞助、政治捐赠等。

Pharmaron commits to observing the highest standards of integrity and regulatory requirements in all business activities. Operating in compliance with laws and regulations, the company will timely, accurately, and completely disclose expenses related to Healthcare Professionals (HCPs), government institutions, Public Officials, state-owned enterprises, and political party entities. Such expenses include but not limited to: gifts, hospitality, donations, sponsorships, political donations etc.

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

康龙化成杜绝任何形式的腐败。在康龙化成所在的运营地的任何国家、地区，为谋求获得或保留商业竞争优势而向公职人员行贿都是违法的。同时，向非公职人员行贿以获得或保留商业竞争优势在许多国家、地区也是违法的。任何违规行为都可能对于公司和个人产生严重的后果，如对单位判处罚金，并对其直接负责的主管人员和其他直接责任人员，处以徒刑或者拘役。

Pharmaron prohibits any form of corruption. It is illegal to pay bribes to Public Officials in order to obtain or retain a competitive advantage in business in any country or region where Pharmaron operates. At the same time, it is also illegal to pay bribes to non-Public Officials in order to obtain or retain a competitive advantage in business in many countries and regions. Any violation may lead to serious consequences for the Company and individuals, such as a fine to the Company and imprisonment or criminal detention of the persons directly in charge and other persons directly responsible for it.

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；
Prohibit to provide, offer, or promise, directly or indirectly, anything of value or facilities to Public Officials, Healthcare Professionals, or business persons in order to obtain or retain a competitive advantage in business, influence the decisions of Public Officials and Healthcare Professionals, or obtain other undue benefits;
- 禁止支付通融费；
Prohibit paying 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 customer side indicated that he could influence the order in favor of our company but requested a certain amount of 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官，寻求指导及帮助。

This is a corrupt act. Please do not agree to satisfy the client's needs and immediately inform your supervisor and compliance officer 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, but 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 a corruption act. The Company strictly prohibits paying any Facilitation Payment to Public Officials to expedite their performance of 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 in 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. The employment offer will help to enhance the relationship with this client, and obtain more orders or make it easier to sign 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 the premise of a compliant public selection process, employees should have relevant educational background, professional abilities, skill knowledge, and other conditions. Unqualified employees work in our company, which is a conflicting interest between employees and employers, and providing benefits to third parties with conflicting interests with the company (such as companies planned to be acquired by Pharmaron, companies with business relationships, companies engaged in similar businesses with competitive relationships, etc.) is a disguised form of bribery.

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

以礼品、招待、邀请等形式出现的商业行为在日常交往中普遍存在。除此之外，向对方提供好处也会时有发生。例如：实习、雇佣机会等。以上行为也可以承诺的方式出现。礼品、招待、邀请、好处与承诺可以是直接或间接给与，或者是主动或被动接受。当礼品、招待、邀请、好处与承诺超出合理范围并且被用于影响正常商业决策时应被禁止。尤其是在与公职人员和医疗卫生专业人士交往时应被格外关注。

Business activities in the form of gifts, hospitality, invitations, etc. are prevalent in daily business. In addition to this, providing benefits to the other party can happen from time to time. Examples include internships, employment opportunities, etc. The above behaviors can also occur in the form of promises. Gifts, Hospitality, Invitations, Benefits, and Promises can be offered directly or indirectly or accepted actively or passively. Gifts, hospitality, invitations, benefits, and promises are to be prohibited when they are beyond reasonable limits and are used to influence normal business decisions. This should be given special attention especially when dealing 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 induce improper decisions or actions against Pharmaron;
- 拒绝接受频繁来自同一提供人的礼品、招待、邀请或好处；

Decline to receive gifts, hospitality, invitations, or benefits frequently provided by the same offeror;

- 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, gift coupons) 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 clients ask 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 of Process for Expense to Public Officials and Healthcare Professionals*. You need to strictly follow the -above principles and rules set out in the 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 RDPAC（中国外商投资企业协会药品研制和开发工作委

员会）会员公司，这些公司在制定其内部合规政策时须遵循《RDPAC 行业行为准则》的要求，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 China Association of Enterprises with Foreign Investment R&D-Based Pharmaceutical Association Committee (RDPAC), which are required to comply with the requirements of the *RDPAC Code of Practice* when establishing their internal compliance policies, including but not limited to prohibiting gifts for personal benefit (such as sporting or entertainment tickets, social courtesy gifts, etc.) of Healthcare Professionals (either directly or through clinics and institutions); prohibiting the providing or offering cash, cash equivalents or personal services. These companies usually have the same compliance requirements for Pharmaron in their contracts. Therefore, you need to confirm whether the above compliance commitments have been made in the contract with the client before providing courtesy gifts to the 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 to hold the conference at the Four Seasons' Ocean Courtyard Hotel Sanya so that participants can enjoy the local customs. This can help the Company to enhance relationships with the attending clients, Public Officials, and Healthcare Professionals to 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 SPA, hot springs, resort hotels, skiing, golf, gambling, cruise, etc.

2.3 捐赠与赞助 Donations and Sponsorships

康龙化成的对外捐赠可面向改善医疗保健体系的研究或方法，以及支持慈善项目或公益事业。捐赠可以是就特定目的给予（例如研究或教育），或是解决人道主义需求，包括紧急事件以及自然灾害状况（例如地震）公益、慈善目的。捐赠绝对不能用于（或被视为用于）对任何有形之物的回馈。

The purpose of donations made by Pharmaron is to improve research or methodologies for the healthcare system, as well as to support charitable projects or due causes. A Donation shall be provided for a specific purpose (such as research or education) or to address humanitarian needs, including in cases of emergencies and natural disaster situations (such as earthquakes). Donations must never be made (or perceived to be made) in return for anything tangible.

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。

Different from donation projects, Pharmaron may receive tangible commercial returns through sponsorship projects. Such return shall be legal, justifiable, and in line with the relevant 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 sponsorship and donation activities to influence or reward in the past, present and future decisions by the recipient of sponsorship or donation in the following circumstances: endorse the products or services of the Company, influence the results of clinical trials, or influence decisions in favor of or adverse to the business of the Company.

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额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 service.
- 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 the tangible commercial benefits in return received by the Company in sponsorship projects are legal, justifiable, and in line with the 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 sponsorship and donation shall be carried out for the purpose of obtaining any improper commercial benefit in return, influencing the past, present, and future decisions by the recipient of the sponsorship or donation (the "Recipients") in the following circumstances: to use or endorse the products or services of the Company, rewarding the Recipients for such decisions, influencing results of clinical trials, influencing decisions in favor of or adverse to the business of the Company.

- 康龙化成所有的捐赠和赞助活动都必须按照公司的运营所在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

康龙化成秉承公开、有责任和负责的原则。我们恪守相关法律法规，包括反腐败法规等，杜绝为了我们的商业利益而影响决策过程或通过政治捐赠影响立法的过程。我们始终以中立的态度处理与政党和利益集团的关系。以不诚实的方

式影响决策者和政府是绝不允许的。

The Company adheres to the principles of transparency, responsibility, and accountability. We strictly comply with relevant laws and regulations, including anti-corruption regulations, to prevent the influence of the decision-making process for our business interests or the influence of the legislation process through political donations. We always interact with political parties and interest groups neutrally. It is prohibited to influence decision-makers and governments dishonestly.

行为指引：

Direction for Conduct:

- 遵守适用的法律法规以及公司政策；
Comply with applicable laws and regulations as well as the Company policies.
- 禁止通过政治捐赠影响决策者和政府的立法或决定。
Prohibit influencing policymaker and government legislation or decisions through political donations.

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?

在中国地区，政治捐赠是不被允许的。在中国以外的地区，如果当地法律允许，公司可以出于为选举活动筹资的目的提供合法且适当的政治捐赠，但是禁止通过政治捐赠影响决策者和政府的立法或决定。建议您就该政治捐赠事宜咨询公司合规部及总法律顾问的意见，获得必要的审批后放开进行。

Political donation is not permissible in China. In regions outside of China, if allowed by local law, the Company can provide appropriate and lawful political donations for the purpose of fundraising for election activities, but it is prohibited to influence the decision by decision makers and government legislation through political donations. Consultation with the company's [Compliance Department and General Counsel] regarding this political donation matter is required, and relevant approval must be obtained before execution.

2.5 反垄断和公平竞争 Anti-trust and Fair Competition

公平和自由竞争受到反垄断和反不正当竞争相关法律法规的保护。这些法律确保市场可以良性发展，竞争参与者的利益得到保护。这些法律因国家而异，具体的内容可能很复杂，但其宗旨通常都是为了杜绝不公平的商业行为。常见的违反公平和自由竞争原则的行为包括固定价格（竞争对手之间达成协议，以提价、定价或维持价格）、操纵投标（与竞争对手协同决定由谁中标），以及分配市场（竞争对手之间划分客户、产品或地域）。我们要确保康龙化成自身开展的业务行为符合公平和自由竞争原则，在与竞争对手、第三方及商业伙伴互动往来时也同样要符合该原则。不符合公平和自由竞争原则的行为不仅会严重损害康龙化成的良好声誉，也会导致严重的罚款和其他处罚。

Fair and free competition is protected by anti-trust and anti-unfair competition laws and regulations. These laws ensure that the market can develop healthily and that the interests of competitors are protected. While these laws vary from country to country and may be complex in content, they generally intend to eliminate unfair business practices. Common violations of the principles of fair and free competition include price-fixing (where competitors reach agreements to increase, set, or maintain prices), bid manipulation (where competitors collude to determine who wins the bid), and market allocation (where competitors divide customers, products, or territories). It is crucial for Pharmaron to conduct its business in a manner consistent with the principles of fair and free competition, both internally and in its interactions with competitors, third parties, and business partners. Failure to comply with the principles of fair and free competition will not only seriously damage the Company's good reputation, but also result in serious fines and other penalties.

行为指引：

Directions for Conduct:

- 从事公平的商业行为，不与竞争对手、供应商和客户达成任何违反竞争规则的协议；
Engage in fair business practices and not enter into any agreements with competitors, suppliers, and clients that violate the rules of competition;
- 公平对待客户、供应商、竞争对手和其他第三方；
Fair treatment of clients, suppliers, competitors, and other third parties;
- 不透露或者接受任何可以推测竞争对手当前或未来保密业务行为或商业秘密的信息；
Do not disclose or accept any information that can be used to speculate about competitors' current or future confidential business practices or trade secrets;
- 不直接或间接与供应商和客户进行可能不公平地限制贸易或将竞争对手从市场排除的讨论或联系；
Do not engage in discussions or contacts with suppliers and clients that may unfairly restrict trade or exclude competitors from the market, either directly or indirectly;

-
- 不通过操纵、隐瞒或歪曲关键事实或者其他有失公平的手段获取不公平的优势；
Do not obtain an unfair advantage through manipulation, concealment, distortion of key facts, or other unfair means;
 - 不散布其明知错误的关于竞争对手、客户或供应商的信息；
Do not spread knowingly false information about competitors, clients, or suppliers;
 - 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:

运营所在地反垄断和竞争法 Anti-trust 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。

In an industry association conference, 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。此外，在场的康龙化成员员工应该当场澄清，康龙化成不存在与竞争对手划分市场的行为，并且这是一个不适合讨论的话题。如果相关人员继续讨论划分市场的话题，康龙化成员员工应该重申这是一个不适合讨论的话题并离开会议室。事后，康龙化成员员工应将该事件报告给合规部和法务部。

Please don't do this. Additionally, Pharmaron employees present shall immediately clarify that Pharmaron does not engage in market allocation with competitors and that this is not an appropriate topic for discussion. If the relevant personnel continue to discuss market allocation, Pharmaron employees shall reiterate that this is an inappropriate topic for discussion and leave the meeting room. After that, Pharmaron employees shall report the incident to the Compliance Department and the Legal Department.

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。

Please don't do this. Failure to tell the truth (not disclosing that you are a Pharmaron employee or posing as someone else) is an unethical way to obtain confidential information from a competitor. Pharmaron employees shall collect information from competitors in an honest manner, but the information collected must be non-confidential.

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

康龙化成是一家全球公司，办事处遍布全球。我们必须根据贸易法规开展业务，其中包括进出口管制，以及经济制裁法。贸易管制非常复杂且各不相同。

Pharmaron is a global company with offices worldwide. We must conduct business in accordance with trade compliance regulations, which include import and export control and sanctions laws. Trade control can be highly complex and varies from one country to another.

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 and control, government agency approvals, and other regulatory measures in cross-border transactions. Import and export control involves restrictions on the transfer of products, technology, software, and 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) may apply to carry-on items and may require prior approval, licensing, and reporting. The transfer of technical data to foreign citizens living in the U.S. (including Pharmaron employees) may be “deemed exports.” 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律/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 need to be promptly submitted to the Company's [Legal/Compliance Department].

行为指引:

Directions for Conduct:

- 禁止与某些人士、团体或组织进行业务来往。他们包括被认定为恐怖分子或支持恐怖主义或毒贩的人士;
Prohibit to engage in business with certain persons, groups, or organizations. They include those identified as terrorists, those sponsors of terrorism, or drug traffickers;
- 禁止与可能参与如化学或生物武器开发等活动的人士进行业务往来;
Prohibit to engage in business with persons who may be involved in activities such as chemical or biological weapon development;
- 如有任何问题, 请上报至法务部或合规部。
If there are any questions, please report to the Legal Department or Compliance Department.

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 laboratory equipment purchased from the U.S. which is no longer in use, and a company wants to buy it. Can we sell this equipment?

请联系采购部负责人和合规部, 确认该设备是否为从美国获取出口许可证购买

的管制设备，评估该设备目前是否仍在美国管制清单中。在没有确定该设备是否存在贸易管制的风险前，不能出售该设备。

Please contact the head of the Procurement Department and the Compliance Department to confirm if the equipment is a controlled equipment purchased from the United States with an export license, and to assess if the equipment is currently on the U.S. control list. The equipment cannot be sold until it has been confirmed whether there is a risk of trade control.

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?

我们需要对潜在供应商开展尽职调查，以评估其及时和保质保量供货的能力等因素。我们不能与受到贸易限制的第三方开展业务，也不能与那些从受贸易限制的国家或实体采购的供应商开展业务。

We need to conduct due diligence on potential suppliers to assess factors such as their ability to provide timely and high-quality supply. We cannot do business with third parties subject to trade controls or with suppliers that procure from countries or entities subject to trade controls.

2.7 动物研究与福利 Animal Trial and Welfare

康龙化成秉承动物使用的替代、减少和优化原则（即 3R 原则），尽可能寻求替代动物试验的方法，并支持开发和采用非动物验证的试验方法，来评估新药潜在的安全性和有效性。我们会保持高标准的动物护理和福利，达到或超过法律和相关外部监督机构的要求。

Pharmaron adheres to the principles of Replacement, Reduction, and Refinement of animal use (i.e. the 3Rs), seeks alternative methods to animal testing whenever possible, and supports the development and use of non-animal validation testing methods to assess the potential safety and efficacy of new drugs. We will maintain high standards of animal care and welfare that meet or exceed legal and relevant external regulatory requirements.

行为指引：

Directions for Conduct:

- 尽量减少研究动物的使用，并尽可能采用替代方法；
Minimize the use of trial animals and use alternative methods whenever possible;
- 保持高标准的动物护理和福利；
Maintain high standards of animal care and welfare;
- 严格遵循国际通行的动物福利和伦理准则及适用于各运营所在地的法律

法规要求，通过动物伦理委员会审核方可开展动物实验；

Strictly adhere to internationally accepted animal welfare and ethical guidelines, as well as applicable laws and regulations in each place of operation, and carry out animal experiments only after the approval by the Animal Ethics Committee;

- 动物研究及实验相关人员应遵循公司制定的内部管理政策和操作规范；
The personnel involved in animal study and experiments should follow the internal management policies and operating procedures formulated by the company;
- 以“为科学服务”为目的，尽可能地减少给实验动物带来的伤害。
In the objective of "serving science", the harm to laboratory animals should be reduced as much as possible.

公司政策 Company Policy:

- 良好实验室规范 Good Laboratory Practice (GLP)

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。但是，当员工的个人利益使其不能客观、有效地履行工作义务和责任，或者因为员工在公司的职位获得不正当的利益，就会产生利益冲突。员工必须确保将自己的个人利益和公司的利益区分开来，即使这些现象只是看似利益冲突。

Pharmaron respects the personal interests and personal lives of its employees. However, conflicts of interest occur when employees' personal interests may make them unable to objectively and effectively fulfill their work duties and responsibilities, or because employees obtain undue interests in their position in the company. Employees must ensure that their personal interests are distinguished from those of the Company, even if these phenomena only appear to be conflicts of interest.

行为指引：

Directions for Conduct:

- 严格遵从公司《利益冲突管理办法》的规定，当发生利益冲突或疑似发生利益冲突时及时申报，并竭力避免与康龙化成的利益有冲突或看似有冲突的活动或关系；
Strictly comply with the provisions of the *Policy for Conflicts of Interest* of the company, timely report any conflict of interest or suspected conflict of interest, and make every effort to avoid any activity or relationship that has or seems to have a conflict of interest with Pharmaron;
- 康龙化成的所有员工都有义务识别和报告任何实际存在的或潜在的利益冲突；
All Pharmaron employees are responsible for identifying and reporting any

actual or potential conflicts of interest.

- 如果员工不能确认某种情况是否会导致实际的、潜在的或者被认为存在的利益冲突，将及时联系合规部或者法律部进行咨询。

If the employee is unable to confirm whether a situation may result in actual, potential, or perceived conflicts of interest, he/she should contact the Compliance Department or Legal Department for consultation in a timely manner.

公司政策 Company Policy:

- 《利益冲突管理办法》 Policy for Conflicts of Interest

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.

上述情况构成潜在的利益冲突，您应该立即按照《利益冲突管理办法》向您的上级经理和人力资源部进行利益冲突申报。

The above situation constitutes a potential conflict of interest. You shall promptly report this potential conflict of interest to your supervisor and the Human Resources Department, following the *Policy for Conflicts of 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 to procure a project. One of the suppliers sent me a candy gift basket. Can I take it?

您可以接受价值适度的小礼品。但是，由于您正在负责招标采购，接受供应商的低价值礼品，依然可能被认为其会影响或干扰您的决策。请联系供应商退回，如果无法退回，请向您的上级负责人及人力资源部进行申报。

You may accept small gifts of modest value. However, as you are in charge of the bidding and procurement, accepting low-value gifts from a supplier may still be perceived to influence or interfere with your decision-making. Please contact the supplier to return it, and if you are unable to do so, declare it to your supervisor and Human Resources.

2.9 保护试验参与者和患者 Protection of Trial Participants and Patients

康龙化成致力于协助我们的客户为试验参与者和患者带来可显著改善生活的创新疗法。我们的工作重心是确保安全并保护临床试验参与者的权利，同时在所

有研发活动中坚守最高道德、科学和医疗标准。将对试验参与者的权利（包括他们的健康权和直接获取信息的权利）产生不利影响的风险降至最低，严格遵循医学伦理学原则各运营所在地的法律法规要求开展临床研究，并严格保护受试者隐私。

Pharmaron is committed to assisting our clients in bringing innovative therapies that can significantly improve the lives of trial participants and patients. Our focus is on ensuring safety and protecting the rights of participants in clinical trials while upholding the highest ethical, scientific, and medical standards in all research and development activities. We will minimize the risk of adverse effects on the rights of trial participants (including their right to health and right to direct access to information), conduct clinical studies in strict compliance with the principles of medical ethics and the laws and regulations in place of operation, and strictly protect the privacy of participants.

行为指引：

Directions for Conduct:

- 遵从伦理、标准操作程序、工作指导，内部管理流程，以及围绕临床试验项目建立的风险管控程序；

Comply with ethics, standard operating procedures, work instructions, internal management processes, and risk control procedures established around clinical trial projects;

- 参加必要的培训以更好的服务于临床试验注重试验参与者的权利与隐私保护。

Participate in necessary training to better serve clinical trials with a focus on the rights and privacy protection of trial participants.

公司政策 Company Policy:

- 《康龙化成隐私政策》 Pharmaron Privacy Policy

示例：

Example:

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。请问我应该如何处理？

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

从第三方收到的文件里如果包含任何个人信息，应当特别注意并在必要时进行适当的处理。如果公司在具体项目中不应该收集患者的个人信息，而您出于任何原因接触到了该等信息，您应该立即删除收到的个人信息，并在事件发生后立即向您的上级经理汇报，以讨论后续适当的处理方式，例如联系 IT 部门删除系统记录，与项目合作方进行沟通。

Documents received from third parties that contain any personal information shall be treated with special care and handled appropriately where necessary. If you access the

patients' personal information that the company shall not have to collect in a specific project, you shall immediately delete the personal information received and report the incident with your supervisor. Additionally, remediation shall be discussed between you and your supervisor subsequently to make sure that the case is handled properly., e.g., by contacting the IT department to delete system records and communicating with project partners.

2.10 数据及隐私保护 Data Privacy Protection

我们保护个人数据，包括同事、第三方和客户的数据。我们重视委托给我们的个人数据，致力于以公平、透明和安全的方式收集、使用、保留和披露个人数据，尊重和保护数据主体的隐私。

We protect personal data, including data of employees, third parties, and clients. We value the personal data entrusted to us and are committed to collecting, using, retaining, and disclosing the personal data in a fair, transparent, and secure manner, while respecting and protecting the privacy of data subjects.

行为指引：

Directions for Conduct:

- 仅收集、处理和保留实现特定目的所必需的个人数据；
Only collect, process, and retain necessary personal data based on the “Need to know” principles and for particular business purpose;
- 遵循相关知情同意程序，保护个人数据；
Follow relevant notification and consent procedures to protect personal data;
- 使用有效的技术、采取物理安全措施，确保所有公司个人数据不被任何未经授权的使用、损坏、泄露、转移或移除；
Use effective technology and take physical security measures to ensure that none of the Company's personal information is used, damaged, disclosed, transferred, or removed without authorization;
- 只与具有合理需求并将保护信息的第三方分享个人数据；
Share personal data only with third parties who have a reasonable need and will protect the information;
- 尊重数据主体的权利，并回应个人就其个人数据提出的查询和请求。
Respect the rights of data subjects and respond to queries and requests made by individuals regarding their personal data.

公司政策 Company Policy:

- 《康龙化成隐私政策》 Pharmaron Privacy Policy

示例：

Example:

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

括了任职单位、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?

与会者信息包括了个人隐私数据，应按照《康龙化成隐私政策》予以保护，不应将其分享给与收集信息目的无关的人员。

Attendee information contains personal privacy data and should be protected according to Pharmaron Privacy Policy. It should not be shared with persons unrelated to the purpose of collecting the information.

2.11 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, and protecting such information from unauthorized use or disclosure is essential to our continued development and competitiveness. In general, it should be assumed that any information generated or learned in the course of work is confidential and should not be disclosed to others without authorization.

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 effective technical and physical security measures to protect it from loss, theft, or misuse.

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；
Prohibit sharing confidential information outside the company without authorization.
- 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受者分享信息；
Share confidential information only on a "Need to know" basis, whether within the company or sharing information with 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 when using cell phones in public places of elevators, restaurants, and public transportation.

- 在终止雇佣关系或在公司要求时，必须归还所有包含保密信息的载体并不得保留副本。不得利用康龙化成的保密信息为新雇主服务；
Upon termination of employment or when requested by the Company, must return all carriers containing confidential information and shall not retain copies. Do not use Pharmaron's confidential information for the service of a new employer.
- 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 confidentiality of confidential information even after the termination of employment until it is publicly disclosed 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 can represent the company on social media. Make good judgment in deciding whether to like, share, or comment on information that appears on social media that may affect the Company's business and reputation.

公司政策 Company Policies:

- 《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 around you can access sensitive information about the Company through your laptop, including taking pictures or screenshots or hacking through 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 for a project. The signing ceremony of the project will

be held tomorrow. After the signing, it will be officially announced to the public. I am responsible for the venue arrangement. After the completion of 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 then are the 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.

2.12 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 has a large amount of trade secrets and technical knowledge. This knowledge is the foundation of our business success. Unauthorized transfer of such knowledge may bring huge losses to the Company, and the employees involved may bear labor law, civil and 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 establishment, protection, maintenance, and defense of intellectual property rights, and the responsible use of these rights. We also respect the intellectual property rights of others.

行为指引：

Directions of 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 fulfill the responsibilities set forth in it;
- 参与定期及不定期的知识产权保护培训；
Participate in regular and ad hoc intellectual property protection rights training.
- 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 adhere to the company's policies and procedures regarding intellectual property rights protection and information confidentiality.
- 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 doubts related to intellectual property rights and trade secret protection in according with the provisions of 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 I am hosting is nearing its end, and the technology formed in the project will soon be handed over to the client for patent application. At this point, I am invited to an authoritative seminar on a topic that fits well with the project, and I plan to refer to the new technical information that was formed in the project in my speech.

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。

Please do not share technical knowledge, including trade secrets, that is formed or learned in your work in the company externally. This is a violation of the company policies and will cause serious consequences. If you think this seminar is very important to you and the company, and you wish to quote the technical knowledge gained from your work, please contact your supervisor and seek approval according to the company's policies.

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'm involved in. I suspect it's because I shared some information about the project on the internet, which caught their attention. I'm proud of my involvement in this project and would like to help the university students. Should I provide 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。

Please do not share research data with anyone outside the Company, nor publish information about your work in the Company on social media. Competitors' agents would regularly search the Internet for such data and persuade indiscreet employees to share additional information that can be used to piece together a full picture of a confidential project, process, plan, etc.

2.13 应用新兴技术的道德和责任 Ethical and Responsible Emerging Technologies

康龙化成秉持负责任创新的原则致力于探索和应用使用新兴技术，如人工智能（AI）技术来改进产品和服务。我们充分认知在推动新兴技术的应用过程中，可能引发的技术伦理、社会公平、隐私安全及法律合规等风险与争议，并将持续评估相关技术应用的潜在影响。我们承诺将积极支持独立第三方研究，主动与学术界、监管机构及公众等利益相关方开展对话，共同推动新兴技术的安全标准、伦理框架与治理路径的建立。同时，我们将定期公开披露新兴技术的应用场景、实施目的及效果评估，确保技术部署的透明性与可追溯性。针对已识别风险，公司将建立分级管控体系并持续优化技术治理流程，以降低技术应用带来的潜在风险。

Pharmaron upholds the principle of responsible innovation in exploring and applying emerging technologies, such as artificial intelligence (AI), to enhance our products and services. We fully recognize that advancing such technologies may involve risks and controversies related to technical ethics, social equity, privacy security, and legal compliance. We will continuously evaluate the potential impacts of these technology applications. We commit to Actively supporting independent third-party research and engaging with stakeholders (including academia, regulators, and the public) to collaboratively establish safety standards, ethical frameworks, and governance pathways for emerging technologies; Regularly disclosing application scenarios, implementation objectives, and effectiveness assessments of emerging technologies to ensure transparency and traceability in deployment; Implementing a risk-tiered management system and continuously optimizing technology governance processes to mitigate potential risks arising from technology adoption.

数据隐私保护 Data Privacy Protection:

我们尊重和保护客户和用户的个人信息。在使用 AI 技术处理数据时，我们将严格遵守适用的数据保护法律和法规，并采取必要的技术和组织措施来保护数据的安全。我们只会收集、使用和存储符合合法目的的数据，并且不会将其用于其他不相关的目的。

We respect and protect the personal information of clients and users. When using AI technology to process data, we will strictly comply with applicable data protection laws and regulations and implement necessary technical and organizational measures to protect the safety of the data. We will only collect, use, and store data for legitimate purposes and will not use it for unrelated purposes.

透明度和可解释性 Transparency and Interpretability:

我们将努力确保我们的 AI 系统是透明且可解释的。我们会努力解释 AI 技术的决策过程，尤其是那些可能对用户产生显著影响的决策。我们会在可能的情况下提供透明的解释，以使用户了解 AI 系统是如何产生结果的。

We will strive to ensure that our AI systems are transparent and interpretable. We will strive to explain the decision-making process of AI technology, especially decisions that may significantly impact users. Where possible, we will provide thorough explanations to enable users to understand how the AI systems produce the results.

公正和多样性 Fairness and Diversity:

我们将尽力避免偏见和歧视，以确保 AI 系统的公正性和多样性。我们会定期审查和监控 AI 系统的性能，以确保它们不会对特定群体或个人造成不公平的影响。We will make our best efforts to eliminate prejudice and discrimination to ensure the fairness and diversity of the AI systems. We will regularly review and monitor the performance of the AI systems to ensure that they do not unfairly affect specific groups or individuals.

问责制和持续改进 Accountability and Continuous Improvement:

我们将确保对 AI 系统的开发、部署和使用进行适当的问责和监督。我们鼓励员工和用户向我们提供有关 AI 系统潜在问题的反馈和建议，并将持续改进我们的 AI 技术，以更好地符合道德和责任的标准。

We will ensure appropriate accountability and oversight for the development, deployment, and use of the AI systems. We encourage employees and users to provide us with feedback and advice on potential problems with our AI systems and will continuously improve our AI technology to better meet the ethical and accountability standards.

通过这些原则和措施，我们承诺在使用 AI 技术的过程中始终保持透明、负责和道德，以确保我们的产品和服务能够更好地造福于用户，并为社会创造积极的影响。

Through these principles and measures, we commit ourselves to remain transparent, accountable, and ethical in the use of AI technology to ensure that our products and services can better benefit our users and create a positive impact on society.

行为指引:

Directions for Conduct:

- 确保数据隐私保护，合法收集和使用数据。
Ensure data privacy is protected and that data are collected and used legally.
- 保持 AI 算法的透明度与可解释性，以增加用户的信任和理解。
Maintain transparency and interpretability of AI algorithms to enhance user trust and understanding.

-
- 确保 AI 系统对所有用户和群体公平适用，避免偏见和歧视。
Ensure AI systems apply fairly to all users and groups, avoiding prejudice and discrimination.
 - 持续监测 AI 系统的表现并作出改进
Continuously monitor AI system performance and make improvements.
 - 不使用未经授权或违反法律的个人数据。
Avoid using personal data that is unauthorized or violates the law.
 - 不隐瞒 AI 系统的决策过程和影响。
Do not conceal the decision-making processes and impacts of AI systems.
 - 不容忍对特定群体的偏见和歧视。
Do not tolerate prejudice and discrimination against specific groups.
 - 不忽视用户和利益相关者对 AI 系统的反馈和担忧
Do not ignore feedback and concerns from users and stakeholders about the AI systems.

示例：**Example:**

我是康龙化成的一名研发工程师，负责研发 AI 决策支持系统。这个系统旨在帮助公司内部的项目团队更好地管理实验数据和项目资源。在研发过程中，我一直思考着如何确保系统的道德性和公平性。为了优化项目推荐，系统需要使用员工的个人信息，我意识到数据隐私保护至关重要，违反相关法律和规定可能对公司造成严重的法律和声誉风险。同时，员工的个人隐私也需要得到尊重和保护。

I am a R&D engineer in Pharmaron responsible for the R&D of the AI decision support system. This system is designed to help project teams within the company manage R&D data and project resources more effectively. During the R&D process, I have been thinking about how to ensure the system's ethics and fairness. To optimize project recommendations, the system needs to use employees' personal information. I realized that data privacy protection is crucial and that violation of relevant laws and regulations could pose serious legal and reputational risks to the Company. At the same time, the personal privacy of employees also needs to be respected and protected.

积极与公司的数据保护专家、合规部、法务部专家团队合作，确保 AI 决策支持系统的数据收集和处理符合最高标准的数据隐私保护要求。请专家团队共同审查收集的数据类型，并确保只有符合合法目的的数据被使用在系统中。此外，确保对数据进行加密和安全存储，以防止未经授权的访问。

Actively work with Pharmaron's [Data Protection Expert, Compliance Department, and Legal Departments] to ensure that data collection and processing for the AI decision support system meet the highest standards of data privacy protection. Ask the expert teams to jointly review the types of data collected and ensure that only data for legitimate purposes are used in the system. Furthermore, ensure data is encrypted and stored securely to prevent unauthorized access.

熟悉公司的数据隐私政策，并严格执行关于个人数据收集和处理的流程。
Familiarize yourself with the company's data privacy policies and strictly follow the procedures for collecting and processing personal data.

2.14 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。

Pharmaron has established its own information security management system in accordance with the series of information security management system standards formulated by the International Organization for Standardization (ISO) of international information security to protect the confidentiality, authenticity, and accessibility of the company's data and systems.

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 the system, as well as 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 takes the *Information Security Management Strategy* as the guiding document for information security management and has issued documents related to information assets, information security, network and system security, and daily operation security. All employees must abide by all these policies and procedures.

公司政策 Company Policy:

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

示例:

Example:

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 hope to have no contact with the outside world at my destination. Can I leave my laptop to my administrative assistant who will act on my behalf for all approvals in the various systems of the Company? I trust this person

completely, so I don't mind telling him/her 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 shall not disclose their passwords to anyone. Some systems allow you to delegate specific tasks to others, while others can report problems to your manager in your absence. If you skip these controls, you are undermining the security of our systems, evading your responsibility, and placing your assistant in a position that violates company policies.

2.15 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 and 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 is a globalized company that operates in multiple regions across the world. Therefore, we strictly prohibits the illegal transfer of value created through business activities to low-tax jurisdictions, or the use of secrecy jurisdictions or so-called "tax havens" for aggressive tax avoidance. We are committed to a transparent and constructive communication with all 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 activities that could contribute to tax evasion.

公司政策：

Company Policies:

- 《康龙化成集团税务政策》 Pharmaron Tax Policy

遵从法律 Applicable Laws & Regulations:

- 遵循各经营所在地的税法规定
Comply with tax laws and regulations in all operating locations.

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 large deal involving complicated tax processing.

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，与公司内部外部相关方进行有效的沟通写作以保障税务合规。

Based on the above circumstances, Mr. Zhang should leverage his expertise and seek support and advice from tax advisors to ensure the company's tax handling is appropriate. At the same time, Mr. Zhang should effectively communicate and collaborate with relevant internal and external parties to ensure tax compliance.

2.16 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从第三方从事内幕交易或非法披露内幕消息的行为。

Pharmaron is a publicly traded company listed on the Shenzhen Stock Exchange (SZSE) and the Stock Exchange of Hong Kong Limited (HKEX). According to capital market regulations, the use or disclosure of insider information is prohibited when trading stocks, other securities, or financial instruments. This also includes advising or encouraging third parties to engage in insider trading or illegally 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 securities (e.g., Pharmaron stocks) when he/she has access to or is aware of the company's insider information, or when he/she makes such information available to others persons who may be involved in the transaction. Insider information refers to undisclosed

information involving the operation and finance of a company or having a significant impact on the transaction price of a company's stock and its derivatives. Therefore, no matter how an employee accesses this important undisclosed information, strict trading restrictions should be imposed. These restrictions still apply after the termination of an employee's employment relationship.

行为指引:

Directions for Conduct:

- 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 will not and does not allow employees to undertake insider trading, nor will it recommend or encourage third parties to undertake insider trading;
- 员工未经授权不应使用或披露任何内幕信息；
Employees shall 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 shall 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；
You are not allowed to buy or sell securities or publicly listed securities of any subsidiary, affiliated company, or investment project if you have obtained important undisclosed information of Pharmaron;
- 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。
No other action shall be taken to utilize such important undisclosed 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。不能不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。

Please don't do that. You should avoid using any undisclosed insider information for stock trading, and avoid insider trading behavior.

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、合规部门报告，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, Compliance Department] and disclose the information to the relevant 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 relevant laws and regulations and avoid carrying or trading stocks related to insider information within the company. Try to avoid exposure to important undisclosed information to avoid the risk of unintentional involvement in insider trading.

2.17 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 around the world where Pharmaron operates combat Money Laundering and Terrorist Financing and impose prison sentences and fines on companies as well as their employees. In China, the United Kingdom and the United States where Pharmaron mainly operates, the laws and regulations imposing on both company and individuals a duty to carry out necessary controls and procedures to prevent, monitor and report suspicious transactions of 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 are used to purchase legitimate assets or to fund other criminal activities or legitimate businesses. "Terrorist Financing" is defined as any situation in which cash or any other funds are provided or collected for terrorist acts or for supporting 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。

Cash transactions of local currency, foreign currency and precious metals (such as gold, silver and platinum) shall not be made or accepted either by the Company, the Employees or by Third Parties. In addition, the above prohibition on cash transactions includes cash deposit transactions and transactions via 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，并按照第 6 条的流程进行操作。如本公司负责业务单位发现可疑交易，应按照附件 1 的规定向监管人员和反洗钱联系人报告。

Cash transactions are considered as potential Suspicious Transactions. The employee shall fill in the required information as required by Anti-Money Laundering Policy, Annex 1 and follow the process described in Section 6. If there is any Suspicious Transaction identified by the responsible business unit(s) of the Company, reporting to Supervisors and AML (Anti-Money Laundering) contact person is required in accordance with Annex 1.

- 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 into the appropriate service categories and register them in the accounting system. The Company ensures transparent and open financial flows.

公司政策 Company Policy:

- 《反洗钱政策》Anti-Money Laundering Policy

示例:**Example:**

我是康龙化成的一名员工，公司的一名客户超付了一笔款项，并要求不通过银行转账还款到原有商业账户，而是汇入一个瑞士账户或者现金支付，我是否应该同意客户的需求？

I am an employee of Pharmaron. A client of company has overpaid a payment and requested that it be remitted to a Swiss account or paid in cash instead of a bank transfer to the original business account. Should I agree to the client's request?

我不应立刻同意客户的需求，因为这样的行为需要解释。需要客户解释为什么相应款项不能原路退回。请您向行为指引中的反洗钱联络人联系，并填写《反洗钱政策》中的附件 1。

I should not immediately agree to the customer's request, because such behavior requires explanation. The customer needs to explain why the corresponding amount cannot be returned in the original way. Please contact the Anti-Money Laundering contact in the Directions for Conduct and fill in the forms of Anti-Money Laundering Policy, Annex 1.

3. 供应链管理 Supply Chain Management

康龙化成关注供应链的全生命周期管理，围绕诚信经营、商业信息安全、环境保护、劳工权益和产品质量等核心议题，建立了一系列的管理政策、制度及操作指南，我们关注供应链的可持续发展、劳工、多元化等领域，不断完善供应链的全生命周期管理，防控供应链环境和社会风险，并要求供应商采取和公司一致的价值观，共同打造负责任和有道德的可持续供应链。构建稳定、可持续的供应链有助于康龙化成稳定发展和提供更好的服务。康龙化成根据客观标准遴选供应商，对供应商提出高标准要求，负责任且有道德地开展寻源及采购行为。康龙化成维护每一位供应链劳工的权利，以国际社会认可的方式让他们能拥有尊严和得到尊重。同时，我们特别关注供应链的多元化以及弱势群体，并给予同等的竞争机会。

Pharmaron pays attention to the whole life cycle management of its supply chain and has established a series of management policies, guidelines, and operational procedures around core topics such as integrity in operation, business information security, environmental protection, labor rights, and product quality. We are committed to sustainable development, labor, diversity, and other fields of the supply chain, continuously improving the full lifecycle management of the supply chain and preventing and controlling environmental and social risks within the supply chain. We require suppliers to adopt the values consistent with Pharmaron and work together with us to create a responsible and ethically sustainable supply chain. Building a stable and sustainable supply chain contributes to Pharmaron's stability and the provision of better services. Pharmaron selects suppliers based on objective criteria, sets high standards and requirements for suppliers, and conducts responsible and ethical sourcing and procurement activities. Pharmaron upholds the rights of every labor in the supply chain, allowing them to have dignity and respect in internationally recognized approaches. Furthermore, we pay special attention to the diversity within the supply chain and vulnerable groups, offering equal competitive opportunities.

康龙化成希望与供应商携手提升产品及服务质量，确保安全，创建阳光透明，绿色健康的供应链生态。

Pharmaron hopes to work with its suppliers to improve the quality of products and services, ensure safety, and create a responsible, ethical, and sustainable supply chain ecosystem.

行为指引:

Directions for Conduct:

- 严格执行供应商准入政策，执行尽职调查及审计，以确保供应商符合法律法规、监管要求以及康龙化成内部制度要求；
Strictly enforce supplier access policies and conduct due diligence and audits to ensure that suppliers comply with legal requirements, regulatory requirements, and internal requirements of Pharmaron.
- 多维度定期评估供应商的整体水平，不以价格为导向；
Regularly assess suppliers from multiple dimensions without being solely price oriented.
- 不容忍任何形式的强迫劳工、雇佣童工。
Do not tolerate any form of forced labor or child labor.

公司政策:

Company Policies:

- 《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 Partner
- 《商业合作伙伴尽职调查全球制度》 Global Policy for Business Partner
- Due Diligence
- 《供应商多元包容政策》 Supplier Diversity and Inclusion Policy

示例:

Example:

1. 我负责采购办公用品和设备，我发现市场上有许多环保型办公用品，例如再生纸张、环保墨盒等，但价格较高。相对与环保产品，还有一些非环保产品，价格很低，我发现提供非环保产品的供应商在最近一年由于不合规排放污水被环保部门处以多项处罚。

I am responsible for procuring office supplies and equipment. I have noticed that there are many environmentally friendly office supplies available in the market, such as recycled paper and environmentally friendly ink cartridges, etc., but the prices are relatively high. In contrast, there are some non-environmentally friendly products available at a much lower price. I have also learned that a supplier providing non-environmentally friendly products has been penalized multiple times by the environmental department in the past year due to non-compliance with wastewater discharge regulations.

在选择供应商时将可持续绿色采购作为重要考虑因素。虽然绿色供应商的价格较高，也应考虑向该供应商采购，打造一个积极向上的环保文化，并在可持续

发展的道路上不断前进。

When selecting suppliers, I should consider sustainable green procurement as an important factor. While products from green suppliers may have higher prices, it is worth considering purchasing from them to foster a positive environmental culture and progress toward sustainability.

4. 人权 Human Rights

我们尊重、保护和促进世界上现行有效的保护人权和儿童权利（以下称人权）的规定。我们拒绝使用任何童工。康龙化成坚信人才是公司实现可持续发展的核心竞争力之一。我们支持国际公认的人权规定和员工的就业权，尊重员工的人格和尊严，承诺维护安全的工作环境、员工健康安全和福祉。

We respect, protect, and promote the provisions of currently effective regulations in the world protecting human rights and children's rights (referred to as human rights). We refuse to use any child labor in any form. Pharmaron firmly believes that talent is one of the core competitive advantages for the Company to achieve sustainable development. We support internationally recognized human rights provisions and employees' rights to employment, respect employees' dignity and integrity, and commit to maintaining a safe working environment, employee health, safety, and well-being.

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, Never Use of Child Labor or Forced Labor, Anti-Slavery, and Anti-Trafficking

康龙化成严格遵守中国《中华人民共和国劳动法》、《中华人民共和国劳动合同法》、《中华人民共和国未成年人保护法》、《禁止使用童工规定》、英国《1998年儿童（工作保护）条例（Children (Protection at work) Regulations 1998）》、《2004年儿童法（The Children Act 2004）》、《2015年现代奴隶法案》（Modern Slavery Act (UK) 2015）、美国《国家劳资关系法案（National Labor Relations Act）》等适用于各运营所在地的法律法规要求，响应国际劳工组织对于废除强迫劳动、禁止童工、男女同工同酬、反就业歧视、反暴力及骚扰等公约，坚持合规平等雇佣，禁止童工或强迫劳动。

Pharmaron strictly complies with the labor laws and regulations applicable in various operating locations, including the *Labor Law of the People's Republic of China*, the *Labor Contract Law of the People's Republic of China*, the *Law of the People's Republic of China on the Protection of Minors*, the *Provisions on Prohibition of Child Labor*, the *Children (Protection at work) Regulations 1998* of the United Kingdom, *The Children Act 2004* of the United Kingdom, the *Modern Slavery Act (UK) 2015* of the United Kingdom, the *National Labor Relations Act* of the United States, etc, responds to the conventions of the International Labor Organization (ILO) regarding the abolition of forced labor, prohibition of child labor, equal pay for work of equal value for men and women, anti-discrimination, and anti-violence and harassment, adheres to compliance with equal employment, and prohibits child labor and forced labor.

员工应遵循公司相关的政策制度、招聘流程等保证上述承诺的实现，如果任何人知晓或怀疑存在不合规的情形，请向您信任的直线经理、部门负责人、人力资源主管或者合规部主管报告。

Employees are expected to follow the Company's policies, procedures, and recruitment processes to ensure the fulfillment of these commitments. If anyone becomes aware of or suspects non-compliance, please report it to your trusted line manager, department head, HR leader, or Compliance Department head.

行为指引：

Directions for Conduct:

- 绝不使用或纵容使用强迫、担保或契约劳工或非自愿监狱劳工；
Never use or tolerate the use of forced, bonded, or contract labor, or non-voluntary prison labor;
- 绝不参与、支持或纵容任何形式的奴役或人口贩运；
Never engage in, support, or tolerate any form of slavery or human trafficking;
- 在招聘过程中以公正自愿为第一要义，仅雇佣那些自愿加入公司的员工，禁止以任何强迫或欺骗手段招聘员工并且保证员工可以随时选择终止雇佣关系、离开公司；
Prioritize fairness and voluntariness in the recruitment process, hiring only those employees who voluntarily join the company. Prohibit any form of coercion or deception in recruiting employees and ensure that employees can choose to terminate their employment and leave the company at any time;
- 不以暴力、威胁或其他手段限制员工人身自由或强制劳动；
Do not use violence, threats, or other means to restrict employees' personal freedom or force them into labor;
- 不要求员工为获取工作而提供报酬；
Do not require employees to pay for employment opportunities;
- 按照经营地的劳动法对于童工的认定，不使用童工。
Do not employ child labor in accordance with labor laws of the jurisdiction in which we operate.

遵从法律 Applicable Laws & Regulations:

- 遵循各经营地相关的法律法规及国际公约
Comply with relevant local laws, regulations in each place of operation, and international conventions.

示例：

Example:

1. 一家供应商的生产基地位于一个低收入国家。在当地，童工是一个令人担忧的问题。当公司的供应链管理团队在当地考察时，发现一家合作工厂有使用童工的嫌疑。这是一个涉及道德和法律问题的情况。

A supplier's manufacturing site is in a low-income country where child labor is a concerning issue. When the company's supply chain management visited the area,

they suspected that a partner factory was using child labor. This is a situation involving ethical and legal issues.

公司的供应链管理团队立即启动调查，并与当地政府和非政府组织合作，确保这种不道德的行为被终止。公司遵循国际劳工组织的指导方针，确保任何未成年人都不会在工厂从事工作，并确保这种情况不再发生。公司应采取的供应链审查措施，以避免将来再次发生类似问题。

The company's supply chain management team immediately initiated an investigation and collaborated with local governments and non-governmental organizations to ensure that this unethical behavior was terminated. The company follows the guidelines of the International Labor Organization to ensure that no underage individuals work in the factory and to prevent such situations from recurrence. The company should take supply chain review measures to avoid similar problems in the future.

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 Non-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 crucial to the success of Pharmaron. Every employee in Pharmaron shall take action to create an environment where everyone's personality develops within the framework that is in the Company's interests. Pharmaron advocates all employees to collectively create a safe, non-hostile workplace. We do not tolerate any form of harassment in the workplace, including coercion, intimidation, humiliation, or embarrassment to colleagues or business partners, or any unwelcome behavior that makes them 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、人力资源主管或者合规部主管报告。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主管或者合规部主管。

If you are aware of or suspect that you are being discriminated against or harassed, please report it to your trusted line manager, department head, HR leader, or head of the Compliance Department. If you are aware of such misconduct, please take reasonable steps to discourage or stop it without endangering yourself, or promptly report it to the HR responsible or head of the Compliance department.

行为指引：

Direction 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 sanctions for employees must be based entirely on individual capabilities, experience, behavior, job performance, and/or performance potential relating to work ;

- 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 opportunities and equal treatment are guaranteed regardless of social background, skin color, race, religion, age, disability status, 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；

Discrimination, sexual harassment, or any other form of abuse or misconduct against any individual or group is not tolerated;

- 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。

Prohibit the behavior that creates an intimidating, hostile, or offensive work environment or improperly interferes with an individual's work capacity.

公司政策:

Company Policies

- 《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，虽然这名求职者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.

您应向人力资源部门报告此事，以便帮助查明事实，从而采取适当的措施。

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

4.3 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）》等适用于各运营所在地的法律法规要求，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 with all applicable worldwide regulations regarding working hours. Strictly adhere to 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 *UK Equality Act 2010*, the *US Fair Labor Standards Act*, and the *US Pay Transparency Nondiscrimination Provision*, and other laws and regulations applicable to each place of operation. We implement comprehensive wages and benefits strategies and provide employees with reasonable compensation and protection as required by the 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 promptly monitoring updates in relevant laws and adjusting the company's compensation and benefits policies to ensure compliance with the law and meeting 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、福利和工作时间做出明确说明；Pharmaron offers fair and equal wages, benefits, and working hours, as

detailed 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 wages, bonuses, and long-term incentives through employment contracts, emails, or supplementary agreements.

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

- 遵循经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.

过度加班的不良后果，作为项目成员应共同寻找解决办法。例如：与管理层协商工作时间的合理安排，并提供更灵活的工作选项，例如远程工作或弹性工作时间。

To address the negative consequences of excessive overtime, project team members should collectively seek solutions. For example, members can negotiate with management for a reasonable work schedule that provides more flexible work options, such as remote work or flexible working hours.

4.4 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, engaging in constructive and cooperative dialogue to balance the interests of all parties fairly. We will cooperate, communicate, and talk 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:

- 遵循经营地的法律法规
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 Company's [Human Resource Department] or seek help directly from the Human Resource Department of the Company's headquarters.

4.5 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, 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)》等适用于各运营所在地的法律法规要求, 以保护员工免受身体上、心理上、化学或者生物危害。

Pharmaron is committed to providing a safe and healthy working environment for employees. 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 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》以及各经营地当地的法律法规要求，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 safety production regulations 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 create a safe and healthy working environment for other employees;
- 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 地方规定及时向当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主管部门处罚。

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.

4.6 沟通、培训和能力 Communication, Training and Capability

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，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, 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 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.

4.7 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 部门，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.

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, consistently adhering to the principles of green and low-carbon development. We 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）》等适用于各运营所在地的法律法规要求，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。

Pharmaron strictly complies with relevant laws and regulations in each operating location, 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 in the UK*, the *Environment Act 2021 in the UK*, the *Energy Policy Act of 2005 in the US*, and others. We continuously improve our environmental management, actively reduce negative environmental impacts, and expand our positive contributions.

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。我们积极响应国家的“双碳”战略，科学地减少碳排放，并推动价值链低碳转型，设定中期以及长期减碳目标并定期进行年度报告。集团层面整体加强气候变化风险管理，各运营地根据各自实际情况开展节能减排，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 proactively places addressing climate change at the forefront of sustainable development. We actively respond to the national "dual carbon" strategy by scientifically reducing carbon emissions and promoting the low-carbon transformation of our value chain. We establish mid-term and long-term carbon reduction targets and provide annual reports. At the group level, we enhance climate change risk management, and each operating location conducts energy-saving and emission-reduction efforts based on their special situation to reduce greenhouse gas emissions. Employees shall follow the Company's policies for energy conservation and emissions reduction in their daily work and proactively identify new opportunities for energy conservation and emissions reduction to 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）》等适用于各运营所在地的法律法规要求。

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 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:

- 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；
Follow the principle of "prevention, reduction, recycling, reuse, 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 Corporate Governance Management Measures

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 drug 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 lower the impact of our products and operations on the environment. Using natural resources in a responsible manner. Continuously enhance our resource and energy efficiency, develop new technologies, optimize processes, and innovate products to protect or 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, and 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 avoid 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—business partners 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 proactively implement ecological restoration and land rehabilitation measures in their 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.

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 correct decisions in line with the values and requirements summarized in this code of conduct. When faced with choices or dilemmas, the following questionnaires 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，请及时联系公司总法律顾问或者公司合规部需求指导。

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 General Counsel or Compliance Department for advice.

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

每个员工都有义务道德行事，并捍卫康龙化成的诚信及声誉。如果员工碰到或怀疑存在任何不正当员工行为、不道德或违法的活动，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 an employee encounters or suspects any unethical or illegal activities or improper employee behavior, please inform your reporting manager, or contact the expert departments 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 Headquarter: [compliance @pharmaron.com](mailto: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，公司禁止任何针对举报人的打击报复行为。针对举报人的报复行为将被视为对本政策的严重违反，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 be all treated confidentially; the 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 the 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 this policy, 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：

Direction 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，或其专业部门，如合规部、法务部或人力资源部，或
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], or
 - 向专业部门，如合规部、法务部或人力资源部寻求关于道德行为标准的指导
Seek guidance on the standard of ethical conduct from departments, such as [Compliance Department], [Legal Department], or [Human Resource 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