

Business Conduct Guidelines

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1. A Message from Our CEO

GenScript’s mission is to “Make people and nature healthier through biotechnology”. To fulfill our mission, we strive to build world-class protein and antibody engineering platforms and push for revolutionary breakthroughs in support of life science research, industrial enzyme and medical purposes to benefit mankind. In the pursuit of our cause, we rely on our core values to guide our daily conduct and decision making, and these Business Conduct Guidelines (hereinafter referred to as “Guidelines”) are the guardian of our corporate values.

GenScript’s vision is to “Become the most trustworthy biotech company in the world”. In our practice, we work with a wide range of stakeholders, including customers, shareholders, employees, doctors, patients, suppliers and residents from surrounding communities. As we aspire to build a lasting, healthy and trustworthy business in the international community, we stand unwaveringly on our commitment to comply with these Guidelines and maintain our integrity.

GenScript is a multinational company operated in several countries and exposed to different cultures. Nevertheless, all our employees are required to follow the same set of code of conduct. These Guidelines reflect our philosophy and our mutual commitment on ethics. These Guidelines specify what is morally expected of us in our daily business conduct and provides clear guidance for all our staff, management and board of directors around the world on how to pursue our business goals.

All staff, management, and board of directors are required to uphold these Guidelines and accompanying regulations, because compliance is the foundation for corporate development and all employees must understand and unwaveringly abide by these Guidelines. This will help us conduct ourselves in a way approved and respected by the society and further allow us to take pride in our role at GenScript. I hope all of you will learn these Guidelines and let it guide you in your daily business practice. Together we will comply with our brand and reputation and contribute to GenScript’s growth and success.

If you have any questions regarding these Guidelines or how to apply it in daily practice, please seek advice from Internal Audit Department. We appreciate any questions and suggestions made in good will, and you are welcome to speak freely on this matter.

Thank you all for complying with the business ethics of GenScript and for your continued service to our company.

Rotating CEO: Sherry Shao

2. Our Credo

Our Vision

- Become the Most Trustworthy Biotech Company in the World

Our Mission

- Make People and Nature Healthier Through Biotechnology

Our Core Values

- Customer First, Innovation, Pursuit of Excellence
- Collaborate to Win Together, Integrity, Introspection

Our Spirit

- Dare to Win — Courage, Commitment, Endeavour

Corporate Strategy

1. Serving customers is the sole purpose of GenScript’s existence, and customer needs are the fundamental drive of our growth;
2. “High quality, fast delivery, quick response and cost efficiency” are the keys to enhance our competitiveness and value;
3. Constantly adapt new management ideas, streamline processes for efficient operation and ensure outstanding end-to-end delivery;
4. Build an industrial ecological system with strategic partners, share benefits together, push for a robust and prosperous biotech industry;
5. Make sure “every contributor is appreciated”. Create an environment where leaders train and support employees, while employees serve and help customers to earn their trust. Strive to build the best professional and managerial training platforms to ensure all employees’ continuous growth and success.

3. Introduction

3.1. Purpose

- These Guidelines are designed to help all employees of GenScript (the “Company”) learn about the rules and regulations we need to follow in their business conduct, and to advocate honesty, integrity and ethical behaviors. You are obligated to read these Guidelines and honor it in your daily practice.

3.2. Applicable Scope

- These Guidelines are applicable to all staff, including but not limited to directors, management and contract or outsourcing labor (collectively, “Employees”) of GenScript and its branches or subsidiaries, and sometimes to our partners who conduct businesses in the name of GenScript.
- If you have any questions in relation to these Guidelines, or would like to report any violations thereof,

please contact Internal Audit Department through the following channels.

- Telephone: 00-86-025-58897288-9999
- E-mail: compliance@genscript.com

3.3. Management Approval

These guidelines have been approved by the management to ensure that the code of business ethics is consistent with the company's sustainable development strategy, and meets the expectations of stakeholders.

4. Code of Conduct

4.1. Red Lines

Red lines are fundamental rules that all employees must abide by. Any violation shall be seriously punished accordingly. All employees must keep the following promise:

- No Lies
Don't hold back unpleasant news. Don't spread false information. Tell the truth. Dare to reveal problems.
- No Falsification
Don't fabricate, conceal, or falsify original data. Don't report false results. Be practical and realistic. Stick to principles.
- No Bribery
Don't abuse power to accept bribes. Be honest and self-disciplined. Resist temptation. Be self-possessed, introspective and alert.
- No offering of bribes
Don't offer or promise improper advantages in any form to any person or organization for the purpose of obtaining or maintaining business.
- No Intelligence Leaking
Don't steal or disclose trade secrets. Abide by information security policies. Perform the duty of confidentiality.

4.2. Accepting Gifts and Entertainments

It is GenScript's policy that all employees shall not accept any gifts, donations or entertainments and they are obligated to inform GenScript's business partners of this regulation. The purpose of this policy is to ensure that the Company's honesty and integrity, and therefore its reputation, are not compromised.

4.3. Providing Gifts and Entertainments

Employees shall comply with laws, regulations and practices on gifts, donations and entertainments in a specific country. In addition, employees shall not offer cash, expensive gifts or entertainments beyond common business practice to suppliers, customers or supervisors and staff of any organizations, which may influence the recipient

or be suspected of such intent on their decision making and their relationship with GenScript, thus resulting in damage to our reputation.

4.4. Conflict of Interest

- It is GenScript's policy that all employees avoid any conflict between their personal interests and those of the Company. The fundamental principle guiding this policy is that no employee should have, or appear to have, personal interests or relationships that actually or potentially conflict with the best interests of the Company.
- Since it's impossible to list all the circumstances involving conflicts of interest, if you need more information, please consult with Internal Audit Department.
- All employees are obligated to report conflicts of interest to Internal Audit Department.

4.5. Insider Dealing

Inside information is information about GenScript or other companies that is known to employees at work and not yet generally available, but would, if generally known to the public, be likely to materially affect the price of the listed securities. Such employees who become aware of inside information through any channels are insiders. It shall be prohibited for insiders to trade or procure other persons to trade in the securities or derivatives based on inside information. Employees shall assess if an intended transaction is determined as insider dealing and avoid such deals. If the Company approves an employee's request to pursue said transaction, it shall not be deemed that such employee has no knowledge of inside information or such transaction does not constitute as insider dealing.

4.6. Information Confidentiality and IP Protection

Confidential information is defined as privileged or classified information owned by GenScript or its branches, subsidiaries, as well as their respective customers, partners and licensors (collectively, "Associate"), which if leaked will cause damage and repercussion to GenScript or its Associates. Employees are bound by obligations of confidentiality and non-use which information that they have learnt during daily work.

- During employment at GenScript, Employees shall comply with all confidentiality regulations and policies and fulfill their duty to comply with information confidentiality. Employees shall not transmit or disclose any confidential information without proper authorization, and shall beware of any possible means of information leak.
- Employees shall be bound by obligations of confidentiality to GenScript and its affiliates. Employees' obligations of confidentiality shall survive termination of employment. For the avoidance of doubt, Employees' obligations of confidentiality and non-use shall continue according to their signed Noncompetition and Confidentiality Agreement.

4.7. Corporate Asset Protection and Utilization

Corporate assets are for business purpose only. Stealing, abusing, misappropriating or using corporate assets for any other purposes is strictly prohibited.

4.8. Social Network

The Company respects Employees' rights and freedom of speech on social network, but also asks for employees' understanding of the effect of their activities on social network that might have on corporate image.

When using social network, Employees shall not:

- Leak corporate confidential information on social network, including but not limited to GenScript's operations, financial positioning, business dealings, emergencies or potential crisis, and confidential information about the management or employees;
- Disseminate information regarding corporate training and speeches on social network;
- Post inappropriate, hostile or untrue information or materials that might damage corporate reputation on social network.
- Express any views on social media sites on behalf of the Company without authorization.

The Company expects that when acting online Employees would conduct themselves in a way that is in line with corporate values and policies as well as laws and regulations. Employees with any questions should review the guidelines above and/or consult with their manager. Failure to follow these guidelines may result in discipline, up to and including discharge.

4.9. Outreach Activities

Employees may attend various outreach activities arranged by their departments. In these cases, they shall act in accordance with the following requirements:

- Any inquiries or invitations to interview from government authorities, judicial authorities or news media (including radio stations, TV stations, newspapers, journals and networks) received by employees must be transferred to Corporate Communication Department for handling. Only the designated spokesmen have the authority to communicate with reporters, and other employees are prohibited from giving interviews of any kind without permission.
- Employees may participate in industrial sharing, tech conference and on-campus activities on formal invitation provided that they have acquired permission from departments with the authority beforehand. Without proper authorization, employees shall not attend outreach activities on personal invitation that might involve corporate tech information or business development.
- The content of outreach activities shall comply with the confidentiality regulations and policies. Non-public information that he or she is unauthorized to know shall not be disclosed.

4.10. Laws and Regulations

Legal compliance is the basic requirement for every citizen. Employees shall obey local laws and regulations in a specific city, province, region and country when conducting business, including but not limited to:

- Anti-fraud and anti-bribery laws and regulations;
- Environment protection laws and regulations;
- Trade embargo and import and export control laws and regulations;
- Intellectual property protection laws and regulations;
- Fair competition laws and regulations;
- Biosafety laws and regulations;

- Data and information security laws and regulations.

Employees shall learn and obey all the laws and regulations applicable to their position at the Company. If you have any questions, please consult Legal Department.

4.11. Health and Safety

GenScript is committed to providing a safe working environment for our employees, customers and suppliers. To this end, all our employees shall:

- Commit no violence in entire company areas;
- Never gamble or engage in other kinds of unauthorized money transaction within the Company;
- Comply with GenScript's Drug-Free and Alcohol-Free Workplace Policy, and avoid operating under the influence of alcohol or other controlled substances. The use of illegal controlled substances is strictly prohibited;
- Receive EHS training, comply with EHS policies and regulations, identify hazards, conduct risk assessments, and promptly report incidents and hazards.

5. Corporate Compliance Regulations

5.1. Protection against Discrimination and Harassment

Employees at GenScript shall be respected and treated politely. The following behaviors are strictly prohibited:

- Discriminate, harass, slander or threat employees based on race, color, gender, age, ethnicity, religion, nationality, disability, marital status, or sexual preference.
- Sexual harassment, and inappropriate speech, comment, jokes or acts.

5.2. Lawful Employment

GenScript forbids the hiring and recruitment of any personnel that would constitute unlawful employment in a specific country. The Company is therefore obligated to check the identity and qualification for lawful employment of each new employee, including employees dispatched overseas, in an effort to prevent unlawful employment.

5.3. Personnel and Business Partners Privacy Protection

Protecting staff privacy and business partners' information is of great importance to the Company. GenScript promises to protect personnel privacy and confidential information of our business partners as stipulated below:

- Only specially authorized staff have access to personal information or business partners' information for work purposes (such as HR Department or business departments);
- Disclosing personal information or business partners' information to any third party is strictly prohibited, except for cooperating with authorities on investigations;
- Keep archives (including but not limited to archives on staff, customers and suppliers as well as order information) with personal information and customer confidential information safe.

- Establish regular supervision and inspection mechanisms to prevent and combat acts that violate information security and intellectual property rights.

5.4. Financial Records

Financial records shall be true and accurate for the sake of proper business decision making.

The Company's financial ledgers, records and accounts shall reflect its financial transactions and activities accurately, and comply with recognized accounting standards, corporate financial regulations and internal control regulations.

There shall be no fraudulent, incomplete or misleading records in the Company's ledgers. Employees shall not: 1) Forge or alter signatures; 2) Forge documents or records for any reason; or 3) Set up undisclosed or unregistered corporate accounts.

5.5. Trade Embargo

Out of the concern for national security, foreign policies and human rights protection, many countries have developed restriction on the purchaser, end user and destination of certain cargo, technology and service. Some countries, regions, institutions and individuals are even named directly on the sanction list, which are forbidden to do trade with.

GenScript shall make sure all its international trading comply with laws, regulations and bans of the countries and regions stated above, and avoid any actions that may be suspected of such violation.

In light of the complexity of the according laws and regulations, Employees when in doubt shall consult Legal Department and Technical Support Department about legal feasibility before any transaction.

5.6. Import & Export Management

GenScript is a global company that provides import and export services to many countries around the world. In order to protect public wellbeing and social interests and better comply with import and export laws and regulations, trade compliance and customs regulatory requirements, GenScript has developed relevant policies and SOPs and require all employees to abide by applicable laws, regulations and regulatory requirements.

5.7. Biosafety

Preventing and managing biosafety risks is crucial to people's health and the protection of biological resources and the ecological environment. As a global biotech company, GenScript is actively involved in law awareness campaigns and requires all employees to learn and abide by biosafety laws and regulations in a bid to ensure operational compliance and drive the healthy development of biotechnology.

5.8. Data Compliance and Information Security

It is of great significance to ensure information security and proper data use in the information age. GenScript has strict control over data compliance and information security, including but not limited to efforts to raise employees' awareness of information security, improve information system development, prevent cybersecurity

risks, and improve response to information security incidents.

5.9. Fair Competition and Anti-Fraud

All countries have laws on fair competition and anti-fraud to ensure adequate competition and protect the business growth.

GenScript relies on the quality of its products and services to maintain its market place, rather than resorting to unethical conduct to win in competition. All employees should follow the principles of fair competition and comply with relevant laws and regulations, not gain advantages by manipulating, concealing or abusing privileged information and other unfair means. If there is any misunderstanding, our staff should correct the misunderstanding in a timely manner. Unfair competition includes but is not limited to:

- Manipulate market with malicious intent;
- Withhold vital information;
- Abuse confidential information;
- Release misleading statements on important matters to public.

5.10. Environmental Protection

GenScript's mission is to "make people and nature healthier through biotechnology". Protecting environment and natural resources and promoting ecological civilization construction are our responsibilities to the society. GenScript complies with all environmental protection laws and regulations, takes actions to save and recycle resources and protect and improve the environment, and aligns business growth with environment protection.

5.11. Anti-Corruption

GenScript advocates and safeguards fair business environment. The Company forbids employees from offering or accepting illegal gains when conducting business in its name. All employees shall strictly comply with anti-corruption laws and regulations of domestic and international areas, including but not limited to Foreign Corrupt Practices Act (US) and Criminal Law of the People's Republic of China.

In light of the complexity of anti-corruption laws and regulations adopted by different countries, employees shall learn about the laws and regulations and the according punishments when conducting business in a specific country, as a way to avoid any actions that might be considered as violations of such rules. Employees may consult Legal Department for their professional opinion when necessary.

5.12. Anti-Money Laundering

GenScript strictly observes all applicable laws and regulations on anti-money laundering:

- Payment suspected of money laundering is forbidden;
- Refuse to do business with any customer who is unwilling to provide complete information, or provide false or suspicious information, or avoid reports and records with all their might;
- Abnormal trading terms or transferring money unrelated to the transaction into or out of country are prohibited;
- Helping abnormal customers change trading methods or evade reports is prohibited.

6. Reporting

GenScript is committed to procuring employees to comply with laws and regulations applicable to our business, and encourages the reporting of violations against the laws or these Guidelines.

6.1. What to Report

Employees may report to Internal Audit Department on any violations against GenScript's Business Conduct Guidelines or the laws and regulations.

6.2. How to Report

The Company encourages whistleblowers to state their name when reporting questionable conducts, which would facilitate the verification and processing of such cases. However, one can still file an anonymous report through the following channels, or talk directly with the Internal Audit Department.

Telephone: 00-86-025-58897288-9999

E-mail: compliance@genscript.com

6.3. Retaliation Prevention

The Company prohibits discrimination and retaliation of any kind. Any retaliation against a whistleblower will be handled accordingly based on severity by the Company.

- Any department or employee that has received a report shall keep it confidential. The circulation of the report shall follow the principle of "work-related access and minimum permission".
- Leaking report information, or disseminating related information, or retaliating against whistleblower, if verified, will be punished by the Company according to punishment policy.