

Whistleblowing and Investigation Policy

1. General Provisions

1.1 Purpose

In order to strengthen the internal supervision mechanism, adhere to ethical standards and integrity, and ensure healthy growth, the Company expects and encourages all employees, customers, suppliers, and other stakeholders to report any suspected misconduct or malpractice within the Company. We are committed to conducting fair investigations into all reports to the best of our ability.

1.2 Scope

This policy applies to GenScript Biotech Corporation and its subsidiaries and branches (collectively referred to as “the Company”).

2. Responsibilities

2. The Company and the Audit Committee

2.1.1 The Company shall protect everyone who makes reasonable reports from unfair dismissal, disciplinary action, or harm;

2.1.2 The Audit Committee shall oversee the implementation of this policy and the activities of the Internal Audit Department.

2.2 Department Heads

2.2.1 Supervise the conduct of team members in all business, R&D, and operational activities to ensure compliance with relevant laws and company policies;

2.2.2 Support and cooperate with the investigation process;

2.2.3 Urge relevant personnel to rectify issues discovered in the investigation process and report the outcomes to the Internal Audit Department and other departments concerned.

2.3 All Employees

2.3.1 Refuse to engage in any improper or illegal activities and proactively report to the Internal Audit Department upon discovering or being informed of any misconduct or malpractice committed by the Company or any employee;

2.3.2 Cooperate with the Company's investigation, provide truthful information and materials as needed, and not refuse, obstruct, take negative approach to or interfere with the Company's investigation.

2.4 Internal Auditors

2.4.1 Manage whistleblowing channels;

2.4.2 Conduct fraud investigations, generate investigation reports, and regularly report to the Board of Directors and the Audit Committee;

2.4.3 For issues identified during an investigation, provide suggestions on corrective actions, and supervise rectification by relevant departments.

3. Reporting Channels

3.1 Reporting Channels

3.1.1 Employees may report to their superiors or department heads, or directly report to the Internal Audit Department through the following channels:

Hotline: +86-025-58897288-9999

Email: compliance@genscript.com

Online: Visit the company website, and go to "About Us" > "Report Fraud and Corruption".

3.1.2 Clients, suppliers, or other external stakeholders may directly report to the Internal Audit Department through the aforementioned channels.

3.2 A whistleblower shall provide comprehensive details and evidence when making a report.

3.3 While respecting anonymous reporting, the Company encourages real-name reporting and prioritizes investigations into real-name reporting.

3.4 The Company deals with real-name and anonymous reporting with equal

discretion. Reports that fail to indicate key information, such as specific facts, timelines, and identities of involved parties, which is necessary for initiating an investigation, will be registered by the Internal Audit Department. After additional information is further provided, the department will proceed with the investigation.

3.5 Employees who maliciously fabricate evidence or make false reports will be subject to disciplinary action by the Company upon verification.

4. Confidentiality

4.1 The Company will make every effort to keep whistleblowers' identity and whistleblowing reports confidential. Whistleblowing reports and investigations will be known only to investigators. Members of the investigation team shall have the obligation to maintain strict confidentiality of all reports.

4.2 Individuals who are interviewed during an investigation shall also have the obligation to maintain strict confidentiality.

5. Investigation Procedures

5.1 The Company shall evaluate each report received to determine the necessity for an investigation. Where necessary, an investigation will be undertaken by the Internal Audit Department, which may involve other departments or external experts as needed.

5.2 A whistleblower may be required to provide further information during an investigation.

5.3 Possible outcomes of an investigation:

5.3.1 The allegation could not be substantiated;

5.3.2 All or any part of the allegation is substantiated, with

5.3.2.1 Corrective action taken to ensure that such issue will not occur again;

5.3.2.2 Disciplinary action or other appropriate action against the wrongdoer.

5.4 The final report, along with suggestions on correction action (if appropriate), will be submitted to the Audit Committee.

5.5 For real-name reports, the Internal Audit Department shall provide feedback to whistleblowers regardless of whether an investigation is initiated.

5.6 Whistleblowers who are not satisfied with the outcomes may raise concerns again with the Audit Committee. In such case, whistleblowers shall specify the reasons and provide evidence. Where necessary, the Company will investigate into such concerns again.

6. Disciplinary Action

6.1 Employees who make malicious reports, provide false information during an investigation, hinder or refuse to cooperate will be penalized in accordance with relevant company policies.

6.2 Individuals who disclose the whistleblowers' information or retaliate against whistleblowers will be subject to disciplinary action by the Company based on the severity of such offense. In the event of suspected illegal or criminal activities, the Company will refer the matter to a public security or judicial authority.

6.3 For substantiated reports or other violations discovered during an investigation, the Company will impose penalties based on the severity of such offense according to relevant policies. In the event of suspected illegal or criminal activities, the Company will transfer such case to a public security or judicial authority as appropriate.

6.4 For 6.3, the Company will hold department heads of the reported employees based on whether they are informed of such offense.

7. Rewards & Protection

7.1 Where real-name reports are found to be true by investigation or employees, suppliers, or other stakeholders cooperate with the investigation process and provide

information not possessed by the Company, the Company will grant rewards or exemptions as appropriate.

7.2 For business partners who have been involved in misconduct but voluntarily confess the truth, the Company will grant an exemption as appropriate. Business partners that undertake not to commit such misconduct any more may continue their cooperation.

7.3 “Whistleblower Protection List” Mechanism

7.3.1 For real-name reports, the Company establishes a “Whistleblower Protection List” for whistleblowers that provide real and valid evidence. This list is managed exclusively by the Internal Audit Department, and any disclosure of whistleblowers’ information is strictly prohibited. Unless otherwise approved or authorized by the Board of Directors, no other personnel may have access to such information.

7.3.2 A designated coordinator is responsible for contacting and protecting personnel covered by the protection list and ensuring strict confidentiality.

7.3.3 The legitimate rights and interests of whistleblowers or whistleblowing organizations are protected. For covered employees, their transfer and resignations will be subject to regular monitoring. The Internal Audit Department will take protective measures to prevent any form of indirect ostracism, retaliation, or false accusations due to whistleblowing or testimony.

7.3.4 Individuals who disclose reports or retaliate against whistleblowers will be subject to penalties based on severity. In the event of suspected illegal or criminal activities, the Company will transfer such case to a public security or judicial authority as appropriate.

8. Oversight of the Whistleblowing Policy

8.1 The Audit Committee will review and oversee the effectiveness of this whistleblowing policy from time to time, and offer suggestions for revision, if necessary, which will be followed up by the Internal Audit Department.