

FOSUN PHARMA

复星医药

**Shanghai Fosun Pharmaceutical (Group)
Co., Ltd.**

Responsible Marketing Policy

[ESG Working Group]

Fosun Pharma
March 23, 2026

Shanghai Fosun Pharmaceutical (Group) Co., Ltd.

Responsible Marketing Policy

Chapter I General Provisions

Article 1 To further standardize the marketing practices of Shanghai Fosun Pharmaceutical (Group) Co., Ltd. (hereinafter referred to as “Fosun Pharma”) and its controlled subsidiaries/units (hereinafter referred to as “the Group”), and to ensure that communication, promotion, and marketing of the Group’s products and services comply with applicable laws, regulations, and business ethics while reflecting the Group’s social responsibility values, this policy is hereby formulated.

Article 2 This policy applies to all employees of the Group, including fulltime employees, part-time employees, outsourced employees, and temporary staff.

Chapter II Principles of Responsible Marketing

Article 3 Responsible marketing shall adhere to the following principles:

(I) Compliance with Laws and Industry Regulations. All forms of marketing activities, including marketing content and methods, must comply with the laws, regulations, and industry standards applicable in the jurisdictions where the business operates.

(II) Alignment with Company Values. Marketing activities shall uphold the brand values of “Caring for Life, Continuous Innovation, Pursuit of Excellence, and Sustainable Partnership.” The Group shall work together with its subsidiaries and partners to promote sustainable, high-quality corporate development, and continuously create value for customers, the country, and society.

Chapter III Accurate Disclosure of Products and Services

Article 4 Product and service information shall be disclosed accurately in accordance with applicable laws, regulations, industry standards, and guidelines in the jurisdictions where the Group operates, as well as the Group’s internal guidelines or operating procedures, including:

(I) Conducting communication that is lawful, honest, accurate, complete, and based on scientific facts to ensure the transmission of accurate product information to different audiences, such as healthcare professionals (HCPs) and consumers. Exaggeration, deception, or false content

is strictly prohibited.

(II) Ensuring that all advertisements, promotions, and marketing materials undergo internal review prior to release to confirm accuracy and compliance. The retention period for review records shall comply with regulatory and audit requirements.

(III) Prohibiting any false or misleading statements, including but not limited to: making absolute or guaranteed promises; conducting improper comparisons; or misrepresenting information regarding products, services, and prices.

(IV) Drug labelling content must be based on the package inserts approved by regulatory authorities and shall not exceed the approved scope or contain text and logos that suggest efficacy or mislead users. It is essential to ensure that the text on labels is scientific, standardized, accurate, and legible. Unauthorized modification or deletion of safety information is strictly prohibited.

(V) For prescription (Rx) and over-the-counter (OTC) drugs entering circulation, corresponding warning or cautionary statements shall be prominently printed on the drug packaging or package inserts. If the drug formulation contains ingredients or excipients that may cause serious adverse reactions, they must be clearly marked in the package insert.

(VI) Standardizing interaction with healthcare professionals (HCPs) and strictly prohibiting the provision of improper benefits to HCPs. All interactions with HCPs shall follow the principles of transparency, independence, and honesty, and comply with the industry compliance standards of the jurisdictions where the business operates.

Chapter IV Privacy Protection

Article 5 The Group shall fully respect and protect the privacy and data of customers or consumers. Personal information must not be disclosed without the customer's knowledge and consent.

Chapter V Employee Training

Article 6 The Group shall conduct annual training for all employees on responsible marketing to ensure that employees are aware of, understand, and comply with relevant principles and regulations. In addition, marketing personnel shall receive regular business-related responsible marketing training.

Employees are obligated to participate in such training, understand and comply with the

provisions of this policy. Training records, including but not limited to training content, schedule, attendance sheets, or lists of participants, shall be properly maintained.

Chapter VI Reporting Channels for Violations

Article 7 Any employee, customer, supplier, or other third party may report suspected violations of marketing laws, regulations, industry standards, or this policy. All reports of misconduct shall be handled and investigated in accordance with the Group's Business Ethics Guidelines, and corrective actions shall be taken when necessary.

Chapter VII Supervision and Audit

Article 8 The management of Fosun Pharma is responsible for organizing and leading the day to day implementation of this policy within the Group to ensure its effectiveness. The Board of Directors of Fosun Pharma oversees the enforcement of the Group's Responsible Marketing Policy.

The Group shall establish responsible marketing review and supervision mechanisms and conduct systematic audits of all marketing and sales activities annually to ensure that product and service related sales and marketing practices are legal and compliant.

Article 9 Fosun Pharma shall conduct at least one systematic internal audit of responsible marketing per year, covering all external sales activities. Audit scope includes sales compliance, healthcare compliance, and ant commercial bribery measures. If any violations are found during the audit, the Group shall take strict corrective actions in accordance with relevant regulations and continue monitoring and rectification as needed.

Chapter VIII Supplementary Provisions

Article 10 Matters not covered in this policy, or those inconsistent with relevant laws, regulations, or normative documents, shall be governed by the applicable laws, regulations, or normative documents.

Article 11 This policy is formulated, revised, and interpreted by the Fosun Pharma ESG Working Group and shall take effect from the date of issuance.