

# **AIM Vaccine Co., Ltd.**

## **Anti-Corruption and Anti-Bribery Management Measures**

### **Chapter 1: General Provisions**

**Article 1:** To effectively promote the governance of corruption and bribery in business practices, strengthen AIM Vaccine Co., Ltd.'s internal control mechanisms, adhere to honesty and integrity, and establish a business philosophy centered on legal compliance, integrity, and high-quality service, this policy is formulated based on the actual situation of the company. It aims to enhance system supervision, promote anti-corruption initiatives, and strengthen the supervision and management of key positions and personnel in areas prone to corruption. The objective is to ensure the governance of commercial bribery, strictly follow fair competition rules, guide company management to act lawfully and with integrity, resist selfishness and dishonesty, and maintain a strong corporate image.

### **Chapter 2: Scope of Application**

**Article 2:** This policy applies to all economic activities within the company, including product sales, procurement of raw materials and equipment, construction projects, management of promotional partners, cooperative and commissioned development, and the management of human, financial, and material resources.

### **Chapter 3: Responsibilities and Obligations**

**Article 3:** The Compliance and Risk Control Department is the supervisory management department against bribery and corruption. Its main responsibilities are as follows:

1. Conduct the company's anti-corruption and anti-commercial bribery initiatives in strict accordance with national policies, laws, regulations, and institutional frameworks;
2. Exercise inspection and supervision duties in accordance with the law;
3. Strengthen supervision and management of the integrity of personnel in key positions and critical areas;
4. Draft and implement the "Commitment Letter against Bribery and Corruption," focusing on preventing and addressing corruption from the source, ensuring both short-term and long-term governance, improving institutional frameworks, and maintaining accurate records of personnel integrity in key positions;
5. Track, supervise, and inspect the implementation of this policy within the company.

**Article 4:** Company employees must comply with the following requirements:

1. Strictly adhere to the contents of the commitment letter;
2. Refrain from engaging in any form of bribery;
3. Consciously accept supervision by the anti-corruption and anti-commercial bribery regulatory departments;

4. If they violate the commitments, employees must comply with the regulatory department's management and be subject to relevant penalties.

**Article 5:** In carrying out anti-corruption and anti-commercial bribery practices, the company's supervisory departments and relevant departments should strengthen communication and cooperation.

**Article 6:** The key activities for implementing "anti-corruption and anti-commercial bribery" measures include:

1. Establishing a leadership body on anti-bribery and anti-corruption, overseeing initiatives to combat bribery;
2. Employees in key positions and units with significant economic activities must sign a "Commitment Letter Against Bribery and Corruption" to regulate behavior and promote integrity and self-discipline;
3. Establishing an anti-corruption and anti-commercial bribery reporting email, with management guidelines formulated separately by the company;
4. Each department should strengthen the management of key personnel and consider their adherence to the "Commitment Letter Against Bribery and Corruption" as a key factor in performance evaluations, promotions, and dismissals;
5. The Compliance and Risk Control Department, in accordance with its responsibilities, will supervise and inspect the implementation of this policy and recommend penalties for those who fail to fulfill their commitment obligations in key positions;
6. For violations by personnel in important positions, the company may require the responsible individual to compensate for any damages caused to the company, terminate their employment contracts, and refer the case to the judicial authorities for further action;

**Article 7:** For key business segments, the Compliance and Risk Control Department may, either independently or in collaboration with business departments, develop and publish specific measures and guidelines against bribery and corruption.

#### **Chapter 4: Supplementary Provisions**

**Article 8:** These measures shall be implemented from the date of publication, and the interpretation of the measures shall be the responsibility of the company's Compliance and Risk Control Committee.