

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

### **Anti-Fraud Management Regulations**

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

**Article 1:** In order to prevent and address fraud, strengthen the governance and internal control of AIM Vaccine Co., Ltd. (hereinafter referred to as "the Company"), reduce company risks, standardize business conduct, protect the company's legitimate rights and interests, ensure the achievement of the company's business objectives, and promote the continuous, stable, and healthy development of the company, these regulations are formulated in accordance with national laws and the actual conditions of the company.

**Article 2:** These regulations primarily define the objectives of anti-fraud work, the concept and forms of fraud, responsibilities for anti-fraud, fraud prevention and control, reporting, investigation, and reporting of fraud cases, the permanent organization and functions of anti-fraud work, guidance and supervision of anti-fraud work, remedial measures and punishments for fraud, and the scope of application.

**Article 3:** The objective of anti-fraud work is to standardize the professional behavior of the company's directors, senior and middle management personnel, and general employees, ensure strict adherence to national laws, industry regulations, professional ethics, and company rules and regulations, promote a culture of integrity and diligence, and prevent behaviors that harm the interests of the company and its shareholders.

#### **Chapter 2: Concept and Forms of Fraud**

**Article 4:** Fraud, as defined in these regulations, refers to actions taken by various personnel within the company who use deceptive or illegal means to seek personal improper benefits at the expense of the legitimate economic interests of the company, or to gain improper economic benefits for the company while potentially gaining personal benefits.

**Article 5:** Fraud that harms the legitimate economic interests of the company refers to actions taken by personnel within the company who use deceptive or illegal means to damage the legitimate economic interests of the company or its shareholders in order to seek personal benefit. The following are examples of such fraudulent behavior:

1. Accepting bribes or kickbacks;
2. Transferring business transactions that should benefit the organization to others;
3. Illegally using company assets, embezzling, misappropriating, or stealing company property;
4. Causing the company to pay for fictitious transactions;
5. Intentionally concealing or misreporting transaction matters;
6. Falsifying or altering accounting records or vouchers;

7. Disclosing the company's commercial or technical secrets;
8. Other fraudulent behaviors that harm the company's economic interests.

**Article 6:** Fraud that seeks improper economic benefits for the company refers to actions by personnel who gain improper economic benefits for the company, while also potentially gaining personal benefits, at the expense of the interests of the state, other organizations, individuals, or shareholders. The following are examples of such fraudulent behavior:

1. Spending for improper purposes, such as paying bribes or kickbacks;
2. Selling nonexistent or fictitious assets;
3. Intentionally misreporting transaction matters or recording fictitious transactions, including inflating income and underestimating liabilities, producing false financial reports that mislead financial statement readers or users into making inappropriate investment or financing decisions;
4. Concealing or deleting important information that should be disclosed externally;
5. Engaging in illegal or unethical economic activities;
6. Falsifying or altering accounting records or vouchers;
7. Evading taxes;
8. Other fraudulent actions aimed at obtaining improper economic benefits for the organization.

### **Chapter 3: Responsibilities for Anti-Fraud**

**Article 7:** The company's management is responsible for addressing and managing fraud. They are tasked with establishing, improving, and effectively implementing anti-fraud procedures and controls, including fraud risk assessment and prevention, as well as conducting self-assessments. The board of directors and the audit committee guide anti-fraud practices. The Integrity and Audit Department, as the company's permanent anti-fraud organization, is responsible for organizing and implementing cross-departmental anti-fraud work. Each business department is responsible for managing anti-fraud practices within its own area.

### **Chapter 4: Fraud Prevention and Control**

**Article 8:** The main tasks of the company's management in anti-fraud work include: advocating a culture of integrity, creating an anti-fraud corporate environment, assessing fraud risks, and establishing specific internal control procedures and mechanisms to reduce the chances of fraud occurring.

**Article 9:** Advocating a culture of integrity includes (but is not limited to) the following measures:

1. Management should lead by example and take the initiative to comply with the company's rules and standards through concrete actions.
2. The company's anti-fraud policies and procedures should be effectively communicated or trained within the company through various forms (e.g., employee handbooks, company regulations, training, or intranet), ensuring employees receive training on relevant laws,

regulations, and professional ethics, and help them understand the concepts involved in the code of conduct. This training should enable employees to distinguish between lawful and unlawful, ethical and unethical behaviors. All employees must clearly understand the company's serious attitude towards preventing fraud and their own responsibilities in anti-fraud efforts, while striving to improve their awareness and skills in anti-fraud matters.

3. Anti-fraud training and education on laws, regulations, and ethics should be provided to new employees.
4. Encourage employees to act lawfully and ethically in their daily work and interactions, helping them manage conflicts of interest and improper temptations, and ensure that information promoting legal compliance and ethical behavior is communicated to all relevant external stakeholders (e.g., customers, suppliers, regulators).
5. Unethical or dishonest behavior should be reported through established channels, with both real-name and anonymous reporting options available. The company should establish and implement effective education and disciplinary policies.

**Article 10:** Fraud risk assessment and the establishment of specific control mechanisms to reduce fraud opportunities are primarily carried out through the following methods:

1. The management should include fraud risk assessment in the annual enterprise risk assessment. Fraud risks should be identified and assessed at the company level, departmental level, and major account level, including the importance and likelihood of fraud risks.
2. Control measures should be implemented to reduce fraud opportunities. Management should establish and adopt measures to confirm, prevent, and reduce false financial reporting or misuse of company assets; each level and department of the company should establish internal anti-fraud controls. These measures may include approval, authorization, verification, checks, division of responsibilities, performance review, and protection of company assets. For high-risk areas such as false financial reporting, management overreach, and information systems, necessary internal control measures should be established. These measures include flowcharting business processes and formulating management systems that connect fraud risks and control measures, thus establishing control mechanisms at the source of fraud and ensuring their effectiveness.

**Article 11:** The permanent anti-fraud organization, established by the Audit Committee, is located within the Integrity and Audit Department. It is responsible for receiving fraud reports, conducting investigations, making recommendations, and being supervised by the Audit Committee and the Board of Directors.

**Article 12:** Management should incorporate continuous supervision of fraud into daily control activities, including regular management and oversight activities.

## **Chapter 5: Reporting, Investigation, and Reporting of Fraud Cases**

**Article 13:** The Integrity and Audit Department is responsible for establishing an email inbox for reporting fraud cases and publicizing the reporting email address as a channel for employees and external parties to report fraud issues involving the company or its

personnel. The anti-fraud permanent organization should establish a process for accepting, retaining, and handling allegations, including both real-name and anonymous reports from employees and third parties. Written records of these reports should be maintained for review by management, the Audit Committee, and the Board of Directors.

**Article 14:** The Integrity and Audit Department will assess suspicious, unverified reports involving general employees and decide whether to investigate, in coordination with relevant departments such as Compliance and Risk Control, Legal Affairs, and Human Resources. If the report involves senior management, the investigation team may include members approved by the Board of Directors and Audit Committee, in collaboration with relevant departments. External experts may also be used as needed. For real-name reports, the Integrity and Audit Department must provide feedback on the investigation results to the whistleblower, regardless of whether an investigation is initiated.

**Article 15:** After the investigation and handling of fraud cases, the materials should be archived according to company filing regulations, and the results of investigations and reports should be submitted quarterly to the Board of Directors and Audit Committee as per the nature of the case.

## **Chapter 6: Permanent Anti-Fraud Organization and Functions**

**Article 16:** The Integrity and Audit Department is responsible for organizing and executing cross-departmental anti-fraud work within the company, conducting independent assessments of anti-fraud work, including the risks of false financial reporting, theft of company assets, unauthorized or inappropriate income or expenditures, and evaluating fraud risks for senior management. It also assists in anti-fraud publicity, audits and evaluates the establishment and implementation of anti-fraud controls, and handles reports of fraud, investigates cases, and reports to management, the Audit Committee, and the Board of Directors.

**Article 17:** As the permanent working body of the Audit Committee, the Integrity and Audit Department is responsible for evaluating the company's anti-fraud work plan, implementation, and fraud report handling, and for receiving and reviewing fraud reports, investigation results, and recommendations, while seeking guidance from the Audit Committee and Board of Directors.

**Article 18:** Internal auditors should improve their awareness and technical ability in anti-fraud, maintain professional caution, actively seek and accept training on anti-fraud laws, regulations, industry standards, and knowledge, and stay updated on the company's operations, accounting policies, and relevant regulations.

**Article 19:** The Integrity and Audit Department should actively establish contacts with external organizations, such as local government agencies and external auditors, which

may also receive fraud reports from internal employees, to facilitate necessary cooperation.

## **Chapter 7: Guidance and Supervision of Anti-Fraud Work**

**Article 20:** Management should treat anti-fraud work as part of daily management and support the daily activities of the anti-fraud permanent organization, ensuring adequate resources in terms of budget, personnel, and working conditions.

**Article 21:** The Integrity and Audit Department should hold at least one anti-fraud status meeting per year and convene meetings when major fraud events occur, particularly those involving senior management, subsidiaries, or fraud that significantly impacts company operations. The department should report on anti-fraud work plans, investigation results, and recommendations to the Audit Committee, and solicit guidance from the Board of Directors.

**Article 22:** The independent and joint discussions held by the Audit Committee and the Board of Directors, as well as any instructions given, should be documented in writing. The feedback, opinions, and instructions provided by the management in response to inquiries from the aforementioned bodies, along with the implementation results, should also be recorded in writing and properly kept for future reference.

**Article 23:** The Integrity and Audit Department should consider fraud risks when formulating and executing the annual audit plan, guiding and supervising anti-fraud work as needed, while maintaining communication with management and receiving oversight from the Audit Committee and Board of Directors.

**Article 24:** The Integrity and Audit Department, under the authorization of the Audit Committee and the Board of Directors, may independently investigate reported fraud cases or collaborate with the company's business departments to conduct such investigations. The department may also accept commissions from management to investigate specific fraud matters and conduct specialized assessments of related anti-fraud systems and processes. The investigation reports, handling opinions, and assessment reports produced by the department shall be submitted to management and the Board of Directors.

## **Chapter 8: Remedial Measures and Penalties for Fraud**

**Article 25:** After a fraud incident, the company should evaluate and improve internal controls, take appropriate measures against violators, and inform both internal and external parties as necessary.

**Article 26:** Employees found guilty of fraud, regardless of whether it constitutes a criminal offense, should be disciplined by the management in accordance with relevant internal economic and administrative regulations. If the behavior violates the law, the case should be referred to the judicial authorities for handling.

## **Chapter 9: Scope of Application**

**Article 27:** The subsidiaries of AIM Vaccine Co., Ltd. shall implement the company's anti-fraud regulations in accordance with these provisions.

## **Chapter 10: Supplementary Provisions**

**Article 28:** These regulations are interpreted by the Integrity and Audit Department, as authorized by the Board of Directors.

**Article 29:** These regulations shall take effect from the date of approval.