

Code of Business Ethics

HitGen Inc. (hereinafter referred to as the "Company" or "We") is committed to building a world-leading innovative biopharmaceutical company. This Code of Business Ethics (hereinafter referred to as the "Code") is hereby established to standardize the Company's business conduct and build a positive, circular ecosystem that benefits patients, advances the industry, fosters employee growth, and achieves mutual success for all stakeholders.

Scope of Application

This Code applies to the Company and all its branches and subsidiaries. All directors, executives, and Employees of the Company, including full-time, part-time, advisors, persons authorized to act on behalf of the Company, and temporary personnel (collectively referred to as "Employees"), must comply with this Code. Furthermore, we advocate and expect all the Company's business partners to adhere to this Code.

Management Responsibilities

Executives bear the core responsibility for business ethics. They must lead by example in strictly adhering to the principles of integrity and fairness, conveying value orientation through their actions. The Company's executive team shall formulate and improve detailed business ethics rules, promote their implementation, supervise team conduct, strictly investigate violations, and enforce accountability. Executives themselves should guide Employees to integrate business ethics into daily operations, fostering an organizational culture that internalizes these values.

Employee Responsibilities

Employees of the Company must strictly abide by this Code, perform their duties with integrity, and uphold the bottom lines of honesty and fairness in daily work, prohibit false records and refuse commercial bribery. Employees should proactively uphold the implementation of this Code and have a responsibility to report violations to the compliance department or other designated departments.

If behaviors violating this Code, Company policies, laws, etc., are discovered, the Company will take actions to resolve the issue and prevent recurrence. Employees must cooperate with investigations and audits, provide truthful explanations, and corrective and preventive measures will be formulated based on the specific situation.

Governance Structure

The Board of Directors bears the overall responsibility for the supervision of the Company's business ethics. The Board's Strategy and Sustainability Committee is primarily responsible for the planning, execution, and supervision of business ethics codes. The Company's internal audit establishes independent audit and supervision

mechanisms, conducts independent audits and supervision regarding business ethics codes, and reviews the effectiveness of risk control through routine, special, and annual assessments.

Anti-Corruption and Anti-Bribery

The Company prohibits any form of bribery and corruption and is committed to promoting a business environment characterized by honesty, fairness, and freedom from corruption or bribery. Corrupt and bribery activities include, directly or indirectly, giving, offering, accepting, or authorizing bribes or related actions, including paying, promising, offering, or authorizing property (including monetary gifts) to agents, business partners, government officials, or other third parties, with the intent to improperly influence their performance of duties, decision-making, or judgment.

The Company has established clear policies and restrictions to regulate business entertainment activities. Business entertainment must comply with company policies, be conducted transparently, and Employees are prohibited from providing or accepting illegal services and benefits.

Anti-Fraud

The Company always adheres to the bottom line of integrity and firmly opposes all fraudulent activities. "Fraud" referred to in this Code means acts to obtain benefits or harm the interests of the Company and others through deceit, concealment, misrepresentation, or other improper means (including but not limited to misrepresentation, forgery of documents, fictitious transactions, tunneling of profits, inducement, and misleading). All Employees must maintain honesty throughout all business processes, provide information truthfully, refuse deception, and are prohibited from using their position to commit or assist in fraud; any fraudulent activity, once verified, will be seriously addressed by the Company, with disciplinary action, termination of cooperation, or referral to judicial authorities taken depending on the circumstances.

Anti-Money Laundering

The Company strictly complies with anti-money laundering laws and regulations, integrating compliant operations and social responsibility into all business processes, and firmly resists any form of money laundering and related illegal criminal activities. We only cooperate with clients and business partners whose fund sources are legal, operations are compliant, and who have a good reputation, to prevent money laundering risks at the source.

Employees are strictly prohibited from the following behaviors: participating in or assisting in planning money laundering activities; intentionally misstating or concealing the amount of money or transaction information; illegally transferring funds through fictitious transactions, use of shell companies, or other means to evade tax

obligations; providing financial support or assistance to terrorist activities, drug crimes, smuggling, and other illegal criminal activities.

Anti-Discrimination and Anti-Harassment

The Company is committed to creating an inclusive, respectful, and equal working environment, encouraging Employees from diverse backgrounds and experiences to join, thereby promoting innovation and a culture of diversity. We strictly comply with the laws and regulations of the locations where we operate and prohibit discrimination based on race, color, gender, age, pregnancy, ethnicity, disability, religion, political affiliation, union membership, or marital status.

The Company fully upholds the values of civility and courtesy, building a positive, healthy, and uplifting work environment, and firmly opposes any form of harassment, prohibiting any physical and verbal violence against individuals. Once incidents of discrimination or harassment occur, any individual can report them to the Company. The Company will conduct necessary internal and external investigations while protecting the reporter, take management measures based on the investigation findings, and provide assistance to victims.

Confidential Information

The Company implements tiered protection and management for trade secrets and confidential information. All Employees, partners, and other obligated parties who are aware of or have access to trade secrets must strictly fulfill confidentiality obligations. Without the Company's written authorization, they shall not disclose, copy, transfer, or permit others to use such information in any form, nor shall they use it for non-work purposes without authorization.

We strictly follow laws and regulations such as the "Personal Information Protection Law" and the "Data Security Law," implementing principles of minimal necessity, informed consent, and secure storage for the personal information of data subjects such as clients, users, and Employees. Without authorization, personal information shall not be collected, used, shared, or cross-border transferred.

Insider Information

The Company prohibits insider trading. Insiders of the Company's material non-public information shall not trade the Company's stocks using such information, shall not disclose insider information, and shall not advise others to buy or sell the Company's stocks. If an employee trades stocks using insider information, discloses insider information externally, or advises others to trade stocks using insider information, causing significant impact or loss to the Company, the Company shall impose sanctions on the relevant responsible person based on the severity of the circumstances or reserve the right to pursue their liability according to law; if a crime is constituted, the case will be transferred to judicial authorities to pursue legal liability according to law.

Conflicts of Interest

A conflict of interest arises when an employee's personal interests, duties, obligations, business activities, or the interests of their close relatives or affiliated parties conflict or potentially conflict with the interests of the Company. All Employees must perform their duties adhering to the principles of integrity and dedication, strictly observing the boundary between personal and company interests. The following behaviors are strictly prohibited: using one's position or influence to seek improper benefits for oneself or others; channeling benefits to oneself or close relatives through business cooperative relationships, clients, or supplier channels; having undisclosed personal interest relationships or transactions with any suppliers, clients, etc., with whom business is conducted, without prior declaration to the Company. Employees should proactively identify and avoid situations that may cause conflicts of interest, ensuring the priority of Company interests and the fairness of decision-making.

Animal Welfare

With the core principle of respecting life and practicing ethics, the Company has established specialized management systems for animal welfare, fully adhering to the "3R Principles" (Replacement, Reduction, Refinement) and the "Five Freedoms" standards (freedom from hunger and thirst; freedom from discomfort; freedom from pain, injury, and disease; freedom to express normal behavior; freedom from fear and distress). We prioritize the use of non-animal testing methods (such as in vitro experiments, computer simulations) to assess product safety and efficacy, promoting the synergistic development of scientific technology and ethical protection; for scenarios where animal use is necessary, we strictly limit the number to the necessary minimum, optimize breeding and operational procedures, and minimize animal suffering to the greatest extent. Employees must strictly comply with animal welfare operating procedures; any act of abuse, neglect, or over-exploitation of animals is prohibited. The Company will continuously monitor industry developments, actively participate in the optimization of animal welfare standards, and fulfill its responsibilities as a corporate citizen.

Environment, Health and Safety

The Company upholds the concept of green and low-carbon development, strictly implements national and local environmental protection laws and regulations, and integrates environmental responsibility into all business processes. Through technological upgrades, process optimization, and resource recycling, we continuously reduce energy consumption and emissions, actively explore sustainable green solutions, and contribute to the synergy between ecological protection and the economy.

Employee health and safety are the fundamental baseline for the Company's development. The Company always aims for "zero accidents, zero harm," strictly implements occupational health and safety regulations, and establishes a risk assessment and prevention system covering all positions. Through regular safety

training, practical emergency drills, and intelligent monitoring methods, we comprehensively enhance Employees' safety awareness and protective capabilities. Simultaneously, we focus on Employees' physical and mental health, improve the working environment, and ensure physical and mental safety and control during the labor process.

Equal Employment and Promotion Opportunities

The Company bases its selection and promotion standards on capability, performance, and job fit, firmly safeguarding the equal employment rights of all Employees, and explicitly prohibits differential treatment based on any non-job-related factors such as gender, age, ethnicity, religion, disability, marital or parental status.

For key processes such as promotions and recruitment, the Company provides anti-discrimination training for managers involved in evaluations, clarifying assessment discipline and compliance requirements to ensure decisions are based on objective capability assessments. Simultaneously, a full-process supervision mechanism is established, anonymous feedback channels are set up, and Employees are encouraged to raise objections regarding unfair practices. The Company promptly verifies each feedback and communicates the outcome, effectively ensuring fair and transparent employment opportunities.

Human Rights

Based on corporate values, the Company is committed to promoting the practice of business ethics, preventing risks to employee rights infringement through system construction, and encouraging partners in the value chain to follow internationally and domestically recognized principles of employee rights. While respecting the laws, regulations, and cultural backgrounds of various countries, we work together to enhance the level of protection for employee rights. The Company respects Employees and treats all Employees fairly and honestly; we are committed to equal pay for equal work, oppose unethical practices such as forced labor and human trafficking, and firmly support the elimination of all forms of forced labor and human trafficking. The Company practices fair governance and employee care, establishing staff representative assemblies and labor unions, while encouraging Employees to engage in constructive dialogue with the Company through various channels. The Company commits to respecting the basic rights of external stakeholders, such as cooperative institutions, suppliers, and business-associated communities, including labor health, occupational health, and cultural dignity.

Fair Competition

The Company strictly complies with laws and regulations such as the "Anti-Unfair Competition Law" and the "Anti-Monopoly Law," conducts business activities in a transparent and compliant manner, maintains a fair and open market environment, and firmly resists any unfair competition practices that disrupt market order. Employees

must prohibit the following behaviors: obtaining competitive advantages through commercial bribery, false advertising, malicious defamation, infringement of intellectual property rights, etc.; participating in or assisting monopoly agreements, abusing market dominance, engaging in unfair transactions, or other acts that restrict competition; using information asymmetry or resource advantages to harm the legitimate rights and interests of clients and other business operators.

Reporting Channels

The Company encourages the reporting of any behavior that violates business ethics and strictly protects the rights of reporters. The Company has established multiple reporting channels; specifics can be implemented according to the Company's "Reporting and Investigation Policy."

Training on this Code

The Company conducts training on this Code through various means such as induction training and regular/irregular compliance training. This Code is also published on the Company's official website. Employees have an obligation to understand and comply with all provisions of this system.

HitGen Inc.