

Conflict of Interest Policy

1. In order to effectively prevent the occurrence of fraudulent practices in the business development of HitGen Inc. (hereinafter referred to as the "Company"), and to prompt employees to correctly handle conflicts of interest in their work, this Conflict of Interest Policy (hereinafter referred to as the "Policy") is formulated in accordance with the Company's Articles of Association, the Company's Code of Business Ethics, and other relevant rules.
2. This Policy applies to the Company, its branches, and controlled subsidiaries.
3. A "Conflict of Interest" is deemed to occur when an employee's ability to perform duties impartially is compromised due to the potential for personal economic gain influenced by their authority in decision-making.

If a conflict of interest constitutes a related transaction, it shall be handled in accordance with the Company's "Related Party Transactions Policy".

4. Common situations involving actual or potential conflicts of interest include, but are not limited to:
 - a) The employee or the employee's Related Person holds an interest in another company.
 - i. Holding any interest in a company that competes with the Company (excluding investments made through the securities market where the holding is less than 5% of the issued share capital of that company);
 - ii. Holding any interest in a company that has business dealings with the Company (such as the Company's suppliers, clients, or agents) (excluding investments made through the securities market where the holding is less than 5% of the issued share capital of that company).
 - b) The employee or the employee's Related Person engages in a transaction with the Company.
 - i. Providing loans to, guaranteeing loans for, obtaining loans from, or obtaining loans with the assistance of individuals or entities that have business dealings with the Company (such as the Company's suppliers, clients, or agents) (excluding normal borrowing and lending with financial institutions);
 - ii. Co-establishing an enterprise with the Company;
 - iii. Engaging in any form of business dealings with the Company, or facilitating any Related Person to engage in any form of business dealings with the Company. This includes (but is not limited to) purchasing or selling goods or other assets, providing or receiving services, acting as an agent, leasing assets or equipment, providing funds (including in-kind), jointly researching and developing projects, signing license agreements, giving gifts, or entering into any non-monetary

transactions, causing the employee themselves or a Related Person to become a client, agent, distributor, supplier of the Company, or entering into any other transactional relationship.

- c) Employment relationships or activities with a competitor of the Company.
 - i. The employee is simultaneously employed by a competitor of the Company, or has any form of connection with a competitor of the Company (including activities undertaken as a consultant, advisor, volunteer, or in a similar capacity), and engages in other activities that can reasonably be expected to advance the interests of the competitor to the detriment of the Company's interests, including but not limited to becoming a supplier, client, or agent of that competitor.
 - ii. During employment with the Company, the employee or the employee's Related Person sells any products that compete with the Company's existing or potential business activities, or provides any services that compete with the Company's existing or potential business activities.
- 5. The term "Employee's Related Person" in this Policy refers to the employee's parents, spouse, siblings, children, parents-in-law, children's spouses, spouse's siblings, and siblings' spouses. Furthermore, persons acting in concert with the employee and the employee's Related Persons (i.e., natural or legal persons with whom the employee has partnerships, cooperation, or joint ventures) and persons with a special relationship (other persons with common interests) are also considered Related Persons of the employee.
- 6. The Chairman of the Board of the Company is the approver for conflicts of interest.
- 7. The Company's internal audit (hereinafter referred to as the "Internal Audit") is responsible for managing conflicts of interest within the Company, has centralized management over conflict of interest investigations, and conducts investigations regarding conflict of interest reports.
- 8. The Company's Human Resources Department is responsible for compiling the list of Key Position Personnel.
- 9. Heads of Company-level departments (and subsidiary heads) are responsible for approving the Conflict of Interest Declaration Forms within their respective departments, and are overall responsible for the daily management tasks within their departments regarding conflict of interest, including promotion, training, information establishment, and implementation of conflict mitigation measures, ensuring their effective execution.
- 10. Key Position Personnel in principle include heads of Company-level departments and key function heads below that level, as well as other key position personnel designated by the Chairman. The list of Key Position Personnel shall be compiled by the Company's Human Resources Department and submitted to the Company

Chairman for review and finalization prior to the annual conflict of interest declaration. The "List of Key Position Personnel" is attached as Appendix 2.

11. The Internal Audit, based on the "List of Key Position Personnel" reviewed and finalized by the Chairman, is responsible for organizing employees to complete the conflict of interest declaration, summarizing all declaration documents, and submitting them to the approver based on their position.

The "Conflict of Interest Declaration Form" for heads of Company-level departments and Key Position Personnel designated by the Chairman shall be submitted by the Internal Audit to the Chairman for approval; the "Conflict of Interest Declaration Form" for other employees shall be submitted by the Internal Audit to the heads of their respective Company-level departments for approval.

The "Conflict of Interest Declaration Form" is attached as Appendix 1.

12. For conflicts of interest existing or potential before the effective date of this Policy (including behaviors or transactions ongoing at the time of promulgation), employees must declare them to the Internal Audit within 1 month of this Policy taking effect. For other newly identified actual or potential conflicts of interest, employees shall make a declaration within 5 business days of becoming aware.
13. When an employee is unsure whether a conflict of interest exists, they have the responsibility to promptly consult the Internal Audit and truthfully, accurately, and completely state the specific circumstances.
14. Employees have the responsibility to disclose their interest in any proposed transaction regarding any existing or potential conflict of interest.
15. The Chairman approves the "Conflict of Interest Declaration Form" filled and declared by heads of Company-level departments and Key Position Personnel designated by the Chairman; heads of Company-level departments (and subsidiary heads) approve the "Conflict of Interest Declaration Form" filled and declared by employees within their department.

During the above approval process, if the Chairman or a head of a Company-level department identifies an employee requiring further investigation, they shall instruct the Internal Audit to request the declarant to provide supplementary explanations. The Company's Internal Audit shall conduct relevant investigations, and relevant departments and individuals shall actively cooperate. Upon conclusion of the investigation, the Internal Audit shall provide feedback on the corrective actions to the declarant, their Company-level department head, and report to the Chairman for record.

16. After receiving the corrective actions, the declarant must rectify the conflict of interest according to the specified timeframe based on the corrective actions. The Company's Internal Audit shall track and supervise the implementation, form an implementation brief, and report it to the declarant's Company-level department head and the Company Chairman for record. Refusal to rectify may result in the Company taking measures to enforce compliance.
17. The Chairman and the Company management representatives designated by the Chairman may form a Conflict of Interest Management Team to adjudicate whether an employee has a conflict of interest.
18. Upon determination of a conflict of interest, the employee must immediately proactively recuse themselves and withdraw from discussions, approvals, and subsequent handling related to the relevant transaction.
19. For any type of conflict of interest situation where the employee neither proactively declared nor proactively recused themselves, or who violates regulations by refusing to resolve the conflict of interest, once discovered, corresponding disciplinary action will be given according to the Company's "Employee Handbook" based on the severity of the circumstances. For serious circumstances causing losses to the Company, termination of the labor contract may be imposed;
20. When a Company employee has already caused damage to the Company's interests due to a conflict of interest, the Company has the right to seek necessary compensation or pursue their legal liability; Company employees may report conflict of interest behaviors to: internal.audit@hitgen.com.

The receiving personnel shall maintain confidentiality regarding the report. No reported person shall retaliate against the reporter. For issues raised by employees, the Company's Internal Audit shall conduct appropriate investigations and provide feedback.

21. This Policy shall be interpreted by the Company's Internal Audit.
22. This Policy shall take effect from the date of issuance.

HitGen Inc.

Appendix 1

Conflict of Interest Declaration Form

1. Does any of your related persons work for our company or a subsidiary of HitGen?

Yes (please complete the following information)	No
Family Member/Related Person:	
Relationship:	
Employer:	
Department:	
Position:	
ID Number of Family Member/Special Relationship Person:	

2. Do you or any of your related persons have an employment relationship with any of the company's competitors, clients, or suppliers?

Yes (please complete the following information)	No
Family Member/Related Person:	
Relationship:	
Employer:	
Department:	
Position:	
ID Number of Family Member/Special Relationship Person:	

3. Do you or any of your associated persons hold any equity interests in the company's competitors, clients, or suppliers?

Yes (please complete the following information)	No
Family Member/Related Person:	

Relationship:	
Employer:	
Department:	
Position:	
ID Number of Family Member/Special Relationship Person:	

4. Do you or any of your associated persons have any other circumstances that may lead to a conflict of interest?

Yes (please complete the following information)	No
Family Member/Related Person:	
Relationship:	
Employer:	
Department:	
Position:	
ID Number of Family Member/Special Relationship Person:	
Declaration of circumstances that may lead to a Conflict of Interest:	

5. I hereby declare that all information provided is true and correct, and no other matters requiring declaration have been omitted apart from what has been stated.

Employee Signature:

Date:

Appendix 2

List of Key Position Personnel

Date:

[illegible]