

Reporting and Investigation Policy

1 Purpose

HitGen Inc. (hereinafter referred to as "HitGen" or the "Company") is committed to building a world-leading innovative biopharmaceutical company. In accordance with the Company's Articles of Association and Code of Business Ethics, the Company formulates this Reporting and Investigation Policy (hereinafter referred to as the "Policy") to establish a standardized, transparent, and efficient internal supervision mechanism, addressing stakeholder expectations through the practice of business ethics standards.

2 Scope

This Policy applies to the Company, its branches, and controlled subsidiaries.

The Company encourages employees, clients, suppliers, and other stakeholders to report suspected misconduct or illegal activities within the Company using their real names, and also accepts anonymous reports.

The Company cannot guarantee that the outcome of subsequent investigations will fully meet the expectations or satisfaction of all individuals who raise concerns but commits to handling relevant issues properly with a fair and rigorous attitude.

3 Definitions

Misconduct or illegal activities cannot be exhaustively listed, including but not limited to:

- 3.1 Corruption and Bribery:** Accepting bribes, demanding kickbacks, embezzling public funds, false reimbursements, using one's position to seek benefits for others and accepting property, etc.;
- 3.2 Financial Fraud:** Falsifying accounts, inflating performance, evading taxes, altering financial data, or concealing material transaction matters, etc.;
- 3.3 Conflicts of Interest:** Failure to disclose connected transactions, using authority to seek personal gain or harm the Company's interests, etc.;
- 3.4 Data Security:** Leaking customer privacy, trade secrets, intellectual property, or damaging information systems, experimental data integrity, etc.;
- 3.5 Human Rights and Compliance:** Discrimination, harassment, forced labor, violations of labor regulations, including but not limited to violations or improper conduct related

to working hours, rest and leave, salary payment, social insurance, housing fund, and other social welfare guarantees;

- 3.6 Environmental Violations:** Exceeding standards in pollutant emissions, damaging the ecological environment, or failing to fulfill environmental responsibilities and emergency plans, etc.;
- 3.7** Reports concerning confirmed victims of child labor, forced labor, or human trafficking.
- 3.8 Other Violations:** Behaviors violating business ethics, industry standards, or regulatory requirements, and other situations that may damage the Company's reputation or interests.
- 3.9** Other violations of national laws and regulations;
- 3.10** Abuse of laboratory animals or violations of biosafety standards;
- 3.11** Deliberate concealment of any of the above matters.

4 Responsibility

- 4.1** All Employees: This Policy encourages employees to raise reasonable concerns based on professional ethics and social responsibility, working together to maintain the Company's ethical environment. Employees who make false reports or malicious reports without reasonable grounds or for personal benefit will be dealt with according to the Company's disciplinary regulations, and may face termination of their labor contract if the circumstances are serious. Reports should provide specific leads or factual basis.

Employees shall participate in business ethics-related training organized by the Company, thoroughly understand and strictly comply with laws, regulations, Company policies, and business ethics standards, and refuse to engage in misconduct. If any misconduct within the Company is discovered or becomes known, employees should promptly report it through compliance channels to their direct supervisor or the Internal Audit, cooperate fully with investigations, provide truthful evidence, and shall not conceal, obstruct, or interfere with the investigation process in any form.

- 4.2** Heads of all departments (and subsidiary heads, the same below): Must fully support and cooperate with the Company's reporting investigation work. Simultaneously, department heads are fully responsible for the daily management and business conduct of their departments and employees, ensuring compliance with laws, regulations, and Company policies; they must also establish effective internal supervision mechanisms, promptly accept and properly handle employee complaints and reports, and take decisive measures to stop any misconduct discovered; furthermore, they should actively cooperate with investigations, formulate corrective measures for issues identified during investigations, supervise responsible personnel to implement them within a specified time limit, and provide written feedback on the results to the Internal Audit.

- 4.3** Internal Audit: The Company's internal audit (hereinafter referred to as the "Internal Audit") is responsible for the daily supervision and implementation of this Policy.

5 Reporting Mechanisms and Channels

- 5.1** The Company ensures that the complaint mechanism is open, transparent, and easy to use for all employees, clients, suppliers, and other stakeholders. Reporting email and telephone are available; written reports can be sent directly to the Company's Internal Audit. This Policy is provided in both Chinese and English. If the reporter uses other languages, the Company will provide necessary translation assistance to ensure that they can fully understand the complaint procedure and effectively express their concerns. For employees working remotely, on business trips, stationed overseas, or otherwise geographically restricted, as well as external stakeholders, reports can be made remotely via email or telephone, without geographic limitation. The Company is committed to providing barrier-free complaint support for employees with disabilities, foreign employees, pregnant/breastfeeding employees, employees from ethnic minorities, and other individuals who may be in a vulnerable or minority position. If necessary, assistance may be provided through auxiliary communication tools or third-party support to complete the report.
- 5.2** The Company has established dedicated reporting channels. The Internal Audit accepts reports from all employees, third parties, and other stakeholders regarding suspected misconduct.

Reporting email: internal.audit@hitgen.com

Reporting telephone: 028-58197385-8030

Mailing address: Internal Audit Department, Board Office, Building C2, No.8, Huigu East 1st Road, Tianfu International Bio-town, Shuangliu District, Chengdu, Sichuan Province, China, 610200.

- 5.3** Company employees can also report through the following channels:
- a) Report directly to their immediate supervisor. If it is inappropriate to report to the immediate supervisor, they may choose to report directly to the Internal Audit;
 - b) For human resources-related matters such as discrimination, harassment, forced labor, and violations of labor regulations, reports can be made to the Human Resources Department at: human.resources@hitgen.com.

6 Handling Procedures

- 6.1** Reporters may make complaints and reports through proper means such as written form, email, or telephone. When making a report, the reporter should describe the basic facts of the incident, the name of the reported object, specific individuals involved, the reporter's name, contact information, specific demands of the report, and should provide

as detailed leads or evidence as possible, along with other materials related to the reported matter.

- 6.2** For real-name complaints and reports involving ordinary employees and middle-level managers (including executives of branches and subsidiaries, the same below), the Company's Internal Audit shall report to the Chairman of the Board within 2 business days of receiving the complaint/report.
- 6.3** For anonymous complaints and reports involving ordinary employees and middle-level managers, the Company's Internal Audit shall conduct a preliminary assessment of verifiability and whether it involves major risks. The assessment results shall be recorded and reported to the Chairman, who will decide whether to accept the complaint/report.
- 6.4** For complaints and reports involving the Company's senior executives (including senior executives appointed by the Board of Directors and heads of Company-level departments and subsidiary heads, the same below), the Company's Internal Audit shall report to the Company's Chairman within 1 business day of receiving the complaint/report. The Chairman will decide on further investigation matters. After accepting the complaint/report, the Chairman may decide to engage external auditors or other institutions to assist in the investigation if necessary.
- 6.5** After accepting a reported matter, the Internal Audit shall conduct an investigation. The investigation results involving ordinary employees and middle-level managers shall be reported to their department head and the Company Chairman to form a handling opinion. The investigation results involving the Company's senior executives shall be reported to the Chairman to form a handling opinion.
- 6.6** After accepting a reported matter, the Internal Audit shall inform the reporter of the investigation status or outcome within specified time limits, as follows:

 - a) For matters within the scope of the Internal Audit's authority, the Internal Audit conducts the investigation. The investigation status or outcome, after being reviewed and approved by the Chairman, shall be communicated to the reporter;
 - b) For matters not within the scope of the Internal Audit's authority, the Internal Audit reports to the Chairman to determine the responsible department for handling. Within 5 days of receiving the complaint/report, the handling department shall be notified to accept the case and the reporter shall be informed;
 - c) For matters requiring the formation of a cross-departmental investigation team, the Internal Audit reports to the Chairman to determine the cross-departmental team for handling. After the cross-departmental team completes the investigation, the investigation status or outcome, after being reviewed and approved by the Chairman, shall be communicated to the reporter;
 - d) The investigation period is generally 3 months. If it cannot be completed within this period, the reason shall be explained to the reporter;
 - e) If the report involves transfer to judicial authorities, the Company shall cooperate with and maintain confidentiality regarding the investigation process and results in accordance with national laws, regulations, and requirements of judicial authorities, and

the preceding four clauses shall not apply;

f) If the reporter did not provide a real name or address, making it impossible for the Company to provide notice, the preceding four clauses shall not apply.

7 Protection of Reporters and Confidentiality

- 7.1** The Company strictly prohibits any person from disclosing the identity information of the reporter and the content of the report, including but not limited to sensitive information such as name, department, position, and company name. Unless required by law, regulation, or regulatory authorities, no reporting details shall be disclosed to the reported party, unrelated employees, or external third parties.
- 7.2** The identity information of the reporter (including name, department, contact details, and any details in the report that could reveal their identity) shall be known only to the head of the Internal Audit and authorized investigation personnel. Other departmental personnel involved in the investigation may access de-identified information only when "strictly necessary" and with the written approval of the head of the Internal Audit. During the investigation, investigators shall not attempt to reverse-track the identity of anonymous reporters. When requesting materials or information from the investigated party or relevant departments, investigators shall not present the original report materials or disclose the reporter's specific characteristics, position, or reporting source. If verification with a third party is required, it shall be conducted under the guise of "routine inspection" or "internal audit" to avoid indicating a specific reporter.
- 7.3** All report materials (including electronic data, paper documents, audio recordings, emails, etc.) shall be managed at the Company's highest confidentiality level and stored in an independent encrypted system or locked filing cabinets. Access to electronic data shall be logged. Paper materials shall not be privately copied, photographed, or removed from designated premises. Materials related to the report, investigation process, and investigation results are Company top-secret archives and shall be uniformly archived by the Internal Audit for a retention period of 10 years.

8 Recusal, Disagreement, and Prohibition of Retaliation

- 8.1** If the reporter believes that the staff receiving or handling the complaint/report is a close relative of the reported person or has an interest relationship that may affect the objective and fair handling of the reported matter, the reporter has the right to request their recusal from the Board Secretary. If the situation is verified, the staff member must recuse themselves.
- 8.2** If the reporter disagrees with the handling result of the Internal Audit or the relevant department, or if multiple complaints/reports are not accepted, they may state their opinion to the Board Secretary. The Board Secretary shall respond to the reporter regarding the handling status within 30 days. If the reporter still disagrees with the handling status, they may state their opinion to the Chairman.

- 8.3** No unit or individual shall interfere with or hinder the staff handling complaints/reports from investigating the reported matters.
- 8.4** Any person who raises a concern, files a report, or cooperates with an investigation through this Policy (including real-name reporters, anonymous reporters, and witnesses) has the right to be free from retaliation, threats, discrimination, or any adverse treatment. The Company strictly prohibits any unit or individual from retaliating against such persons. Adverse treatment includes but is not limited to: unjustified demotion, salary reduction, job transfer, dismissal, or refusal to renew the labor contract; unjustified downgrade in performance appraisal, cancellation of promotion opportunities, or cancellation of eligibility for awards; verbal threats, intimidation, harassment, exclusion, or imposition of unreasonable work pressure; and disclosure of the reporter's identity causing external pressure or harm. To effectively fulfill the protection obligation, the Internal Audit and the Human Resources Department shall, upon receiving a report, simultaneously assess the risk to the reporter's position and compensation, and initiate position protection procedures if necessary. For reports involving the direct supervisor or the head of the reporter's department, the Company has the right to implement temporary job adjustments or change of reporting lines for the reporter during the investigation to eliminate the risk of retaliation. A rapid response channel for retaliation incidents is also established: if a reporter believes they have suffered retaliation, they may immediately report directly to the Board Secretary or the Internal Audit, and the Company shall initiate a special investigation and provide a preliminary response within 5 working days.
- 8.5** Staff receiving and handling complaints/reports shall adhere to the following work principles:
- a) Receiving reports in person shall be conducted in a confidential setting, with dedicated personnel conducting the interview, and unrelated personnel shall not be allowed to listen in or inquire;
 - b) The receipt, opening, reading, registration, transfer, storage of complaint/report letters, and the reception, answering, recording, and recording of in-person or telephone reports shall strictly follow confidentiality principles, strictly preventing the leakage of report content and the loss of report materials;
 - c) Complaint/Report materials shall not be privately excerpted or copied;
 - d) When investigating the reported person or unit, work shall be conducted confidentially without exposing the reporter's identity, and report materials shall not be displayed;
 - e) The internal research situation of the unit handling the complaint/report shall not be disclosed to the reporter, and the content of the complaint/report shall not be discussed with unrelated personnel;
 - f) Complaint/Report materials shall not be withheld, concealed, or privately destroyed;
 - g) Reporters shall not be harassed or threatened.
- 8.6** The Company strictly prohibits retaliation against reporters. Persons who illegally leak reporter information or engage in retaliation against reporters will be subject to

dismissal or termination of their labor contract; if the law is violated, they will be transferred to judicial authorities for handling according to law.

9 Supplementary Provisions

- 9.1** This Policy shall be interpreted and revised by the Company's Internal Audit.
- 9.2** This Policy shall take effect from the date of issuance.

HitGen Inc.