

Anti-Corruption and Anti-Bribery System

I. Zero Tolerance

Xiamen Innovax Biotech Co., Ltd. (hereinafter referred to as "IX") has a zero-tolerance policy towards corruption and bribery. We comply with all applicable anti-corruption laws and conduct our business with integrity and transparency.

II. Scope

This policy applies to:

1. IX and all personnel (including full-time and part-time employees, interns, dispatched workers, outsourced staff, etc.)
2. All third parties acting on IX behalf (distributors, suppliers, agents, consultants, channel partners).

III. Prohibited Conduct

1. Internal Conduct Among Employees

- a. Do not claim personal expenses as business expenses.
- b. Do not give or accept gifts, money, or other advantages to or from other employees for improper purposes.
- c. Do not use, convert, misappropriate, or steal IX assets in violation of laws or IX policies.
- d. Do not provide improper facilitation or preferential conditions to other employees.

2. Interactions with Third Parties

- a. Do not offer or accept cash, shopping cards, vouchers, premium alcohol, expensive tea, etc.
- b. No hidden benefits – Do not give or receive kickbacks, secret rebates, off-book payments, or disguised bribes (e.g., fake promotions, loans, or employment).
- c. Do not use fake conferences, fictitious academic events, or sham promotions to misappropriate funds.

3. Interactions with Public Officials

- a. Do not offer or accept cash, gifts, kickbacks, or commissions.
- b. Do not pay for travel or accommodation beyond legitimate business purposes, or use fake events to disguise bribes.
- c. Do not invite public officials to events in a private capacity without employer approval.
- d. Do not use IX assets for political activities or improperly influence public officials.
- e. Do not hire former public officials or their close relatives for improper purposes.

5. Bidding and Tendering

- a. Do not use bidding documents or processes that violate IX policies or applicable anti-corruption laws.
- b. Do not offer gifts or entertainment during the bidding process.

- c. Do not circumvent established procurement procedures to improperly influence bid outcomes.

6. Other Corrupt Acts

Any other form of corruption or bribery not specifically listed above is also prohibited.

IV. Reporting Violations

Email: 6536555@innovax.cn

Phone: 0592-6536555 ext.8125

IX protects whistleblowers and strictly prohibits retaliation.