

## WuXi AppTec Co., Ltd. Code of Business Conduct

### Our Values and Expectations

#### Our Vision:

Every drug can be made and every disease can be treated by building an open-access platform with the most comprehensive capabilities and technologies in the global healthcare industry.

#### Our Mission:

Continue building an open-access capability and technology platform to enable our partners to discover, develop and manufacture pharmaceuticals and healthcare products to benefit patients globally.

#### Our Values:

- Integrity and Dedication
- Working Together and Sharing Success
- Doing the Right Things and Doing Things Right

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## INTRODUCTION

### Overview

The Code of Business Conduct (the "Code") for WuXi AppTec Co., Ltd. ("WuXi AppTec", "the Company" or "we") is designed to promote the highest standards of integrity and full compliance with all applicable laws and regulations in the countries in which we operate. It reflects WuXi AppTec's core values and is intended to serve as a general resource for our partners, colleagues, and peers globally.

### Who Must Follow the Code

The Code applies to all full-time employees, part-time employees, contractors, temporary workers, and members of our Board of Directors, as well as those affiliated with our subsidiaries. Applicable provisions of this Code should be included in the contract management of suppliers and business partners engaging in activities on behalf of WuXi AppTec.

### General Principles to Follow

All employees are expected to have read, understand and comply with all applicable laws, regulations and ethical business practices that apply to their activities. Employees are encouraged to seek counsel from management or the Company's Legal Department if they have any questions.

All employees are required to agree to this Code in writing and promptly complete the related annual training activities in local language. Every employee has the opportunity and responsibility to ask questions, seek guidance, and report suspected violations of the Code.

Upon being notified of a violation of the Code, Company policies or laws, WuXi AppTec will promptly act to address the issue and prevent future occurrences. Employees are expected to cooperate and be truthful when responding to an investigation or audit. Depending on the circumstances, corrective and preventive steps might include training, counseling and/or disciplinary action up to and including termination of employment.

### Oversight of the Code

We are committed to addressing business ethics risks through robust governance. We have established a Board-level Environmental, Social, and Governance (ESG) Committee to direct and oversee the Company's compliance activities, including assessing risks; setting standards and policies; and monitoring, auditing, and investigating compliance-related issues. Other departments supporting these activities include Human Resources, Finance, Legal, Environmental, Health and Safety (EHS) and Compliance. These teams provide independent checks, and our Internal Audit department performs periodic reviews to assess adherence to the Code and mitigate risks.

Employees have several options to report potential violations:

- Speak with local management or the Human Resources department
- Submit concerns via email at [InternalAudit@wuxiapptec.com](mailto:InternalAudit@wuxiapptec.com)

- Report concerns anonymously through our global 24/7 toll-free hotlines

### **Manager Responsibilities**

It is the responsibility of all managers within the Company to lead by example, demonstrate integrity and encourage discussion of the ethical and legal implications of business decisions. We expect our managers to create and maintain a work environment where responsible behavior and conduct is upheld and encouraged. Our leadership must be a trusted resource for all employees and provide adequate information and training regarding our Code and applicable policies.

### **TOPICS**

#### **Anti-Corruption and Anti-Bribery**

WuXi AppTec prohibits bribery and corruption in any form, including directly or indirectly giving, offering, accepting or authorizing bribes or related behavior. We expect the same from our business partners. We fully comply with anti-corruption laws in every country in which we conduct business. This includes laws that prohibit bribery of government officials and employees, as well as of employees of commercial organizations.

We do not offer payments or improper financial incentives to any government official or other third party (including customers and suppliers) for the purpose of obtaining or retaining a commercial advantage of any kind. Bribes, kickbacks, or any other similar facilitation payments are never permitted, whether made to a government official or to customers, suppliers, or other private parties. Employees can refer to the anti-corruption and anti-bribery policy for more information, such as additional guidance on what is considered acceptable behaviors.

#### **Anti-Harassment**

We strive to build and maintain a workplace that is professional and free from harassment, intimidation and bullying. "Harassment" includes sexual harassment and non-sexual harassment, intimidation and bullying, all of which are unacceptable behaviors that can lead to an unproductive and unsafe workplace. We will not tolerate harassment, intimidation, or bullying of employees under any circumstance. Employees can refer to the anti-discrimination and anti-harassment policy for more information.

#### **Animal Welfare**

We comply with the high standards established in our animal welfare guidelines and policies. We are committed to achieving the goal of reducing, refining and replacing animal testing through investments in science and technology that will have an impact on animal use.

Whenever possible, the Company seeks alternatives to animal testing and supports the development and adoption of non-animal validated test methods to assess the safety and efficacy of potential new products.

#### **Business Gifts**

Offering, soliciting or accepting gifts and donations related to our business is prohibited. However, gifts and business gratuities, when used correctly, can promote goodwill and reinforce strong business relationships and may be appropriate in certain circumstances. Employees can refer to the anti-corruption and anti-bribery policy for additional details regarding business gifts.

### **Company Assets**

Employees should seek to protect Company assets, both tangible and intangible, and use them efficiently to advance the interests of the Company. Tangible assets are those that have a physical form, such as materials, supplies, equipment, and cash, while intangible assets include intellectual property ("IP"), information assets, brand value, reputation and employee's work time and talents.

### **Confidential Information**

In the course of official duties for the Company, employees are granted access to information that may be confidential and proprietary. Employees should never use or disclose confidential information except when the use or disclosure is authorized by management or legally mandated. Even if a disclosure outside of the Company is authorized or required by law, the confidential information may not be disclosed unless the necessary confidentiality and/or non-disclosure agreements are in place with the third parties to whom the information will be disclosed and appropriate disclosure is made within the scope of the confidentiality agreements. Additionally, employees should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to the Company or another company, is not communicated even within the Company except to employees who require the information to perform their responsibilities for the Company.

### **Conflicts of Interest**

All employees are expected to act in the best interest of the Company and must refrain from engaging in any activity that could present a conflict of interest. A conflict of interest occurs when personal interests interfere, or appear to interfere, with the interests of the Company. A conflict of interest can also arise when an employee takes action or has an interest that prevents them from performing Company duties and responsibilities honestly, objectively and effectively. Employees should take great care to properly address any conflict of interest before undertaking Company work, and refer to the WuXi AppTec policy on conflicts of interest for additional information.

### **Communications & Social Media**

Posting or commenting on online content can affect the image and reputation of our Company, employees, or business partners. As a result, only designated employees are authorized to communicate on behalf of the Company. We expect our employees to obtain approval from the Public Relations department before making public speeches, writing articles, or engaging in other public communications when they are speaking on behalf of the Company.

### **Environmental, Health and Safety**

We understand that we have a role to play in reducing the impact of industry activities on the

environment and we comply with all applicable health, safety, and environmental laws and regulations. We strive to continually improve the performance of our Occupational Health and Safety management systems and identify, assess, prevent and control physical, chemical and biological risks inherent in our activities.

We are proactive in addressing climate change and have pursued initiatives to limit the environmental footprint of our activities and products across the value chain. We actively seek out and act upon meaningful opportunities to reduce risk and improve EHS performance. We are committed to educating and motivating employees to work in a safe, compliant and environmentally responsible manner and encourage our business partners to do so as well.

### **Equal Opportunity & Anti-Discrimination**

WuXi AppTec provides employment and advancement opportunities to individuals based on merit, qualifications, and abilities, and will not tolerate acts of discrimination. Our policies prohibit discrimination based on race, religion, gender, age, sexual orientation, marital status, gender identity and expression, ethnicity, physical or mental disability, veteran status, or national origin, as well as any protected class. All employees are expected to treat their colleagues with fairness, courtesy and respect.

### **Employee Well-Being**

The safety and well-being of our employees is a core commitment of the Company. We have developed policies and procedures to ensure that relevant local laws and regulations related to working hours and wages are strictly upheld. One example of this commitment is the Company's requirement that employees apply for overtime work in advance, so it can be managed in compliance with local laws and regulations.

### **Fair Competition**

WuXi AppTec is committed to the principle of fair competition and complies with all laws related to competition, antitrust and the gathering of competitive information. Our employees are expected to be aware of antitrust and competition laws and the implications in their respective business areas.

We seek to achieve our competitive advantage through effective and successful performance, and do not condone unfair or illegal business practices. Business information about other companies should only be collected and used in a manner that is ethical, lawful, and meets confidentiality obligations.

### **Government Interactions**

We are committed to engaging with governments, governmental agencies, and public officials as necessary according to the highest ethical standards and in compliance with all applicable laws. We prohibit political involvement of any kind on the Company's behalf.

### **Human Rights**

We acknowledge and respect the fundamental principles contained in the International Bill of

Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the Ten United Nations Global Compact Principles and the United Nations Guiding Principles on Business and Human Rights.

We are committed to supporting equitable remuneration and oppose unethical practices, such as child labor, forced labor and human trafficking. We recognize that human rights due diligence is a continuous process and we have policies and procedures in place in furtherance of this commitment.

### **International Trade Compliance**

Many laws govern trade across borders, including those designed to ensure that transactions are not being used for money laundering or do not involve sanctioned countries or persons. We are committed to preventing money laundering, the financing of terrorism, and other criminal activities, and takes appropriate actions to comply with applicable anti-money laundering laws.

### **Insider Trading**

During the course of employment with the Company, employees may become aware of information that is not yet publicly available but could influence the decision to buy or sell stock. This type of information is often referred to as "material non-public information." Such information includes financial results and information about possible mergers, acquisitions or divestitures, capital increases, capital market transactions, important licensing agreements and other collaborations, losing or gaining major contracts, results from major clinical trials, and ongoing litigation. Employees who have material non-public information about the Company or other companies, including our suppliers and customers as a result of their relationship with the Company, are prohibited by law and Company policy from trading in securities of the Company or such other companies.

### **Non-Retaliation Policy**

WuXi AppTec has a strict non-retaliation policy. We encourage employees to report any violations of applicable law or regulations, and to voice concerns regarding the Code or any other company policies, procedures, guidelines, data and recordkeeping, and ethical or legal questions. Every effort will be made to maintain the confidentiality of reports about potential violations. Concerns about a potential ethics or compliance violation will be taken seriously by WuXi AppTec management and the reporting employee(s) will not be subject to retaliation.

This is the current version of the WuXi AppTec Code of Business Conduct, updated in June 2022, and it supersedes all previous versions.