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Fosun Group Global Whistleblowing Policy

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[Audit Department]

Fosun Group
2018-10-23

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1. Leadership Message

Fosun with all of its Subsidiaries, 'The Group', is an organization with strong values and conducts business with the highest standards of principles. The Group is committed to integrity and ethical behavior, and strives to maintain an environment where open and honest communications are the norm, not the exception. This Whistleblowing Policy is established in line with this objective.

2. Purpose

The Purpose of this Policy is to:

- Establish the procedures for receiving, investigating and resolving reported Fraud or Unethical Acts;
- Encourage colleagues to report any Fraud or Unethical Acts of which they are aware or become aware of;
- Establish anti-retaliation rules to strictly protect individuals who report or witness Fraud or Unethical Acts in good faith;

This Policy constitutes the reference document for all Group companies, without prejudice to any specific local laws on the same subject that are found to be in conflict with it.

3. Definitions

Whistleblower:

A person or entity making a protected disclosure about a Fraud or Unethical Act. Whistleblowers may be 'The Group' employees, applicants for employment, vendors, contractors, customers or general public.

Good-Faith:

Good faith is evident when the report is made without malice or consideration of personal benefit and the Whistleblower has a reasonable basis to believe that the report is true. Good faith is lacking when the disclosure is known to be malicious or false.

Fraud:

A dishonest, unethical, irregular or illegal act or practice, and is characterized by deliberate intent at concealment of a matter of act, whether by words, conduct or false representation, which may result in a financial or non-financial loss to The Group.

Unethical Acts:

Examples of Unethical Acts include, but are not limited to:

- Violation of laws and regulations; or Company policies
- Endangerment to public health or safety
- Negligence of duty
- Bribery and corruption
- Conduct likely to damage the reputation of The Group

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- Unauthorized disclosure of confidential information
- Sexual harassment

The First Receivers of Report:

- Board Members of The Group
- Leader of The Group Audit team
- Leader of The Group Anti-Corruption team

The Report Assessment Committee:

The Committee shall be formed and composed of members elected from the following departments of The Group:

- Legal
- Internal Audit
- Anti-Corruption
- Human Resources

4. Reporting and Investigation Procedures

4.1 Reporting:

- Whistleblowers should first report Fraud or Unethical Acts that they are aware of or become aware of using the Whistleblowing System available at each subsidiary company of The Group.
- If no Whistleblowing System is available at the subsidiary level or if the Whistleblower considers that the issue has not been properly resolved at the subsidiary level, the Whistleblower shall report the issue through The Group Global Whistleblowing System using the following methods:
 - By email to ethics@fosun.com
 - Online through the webpage portal of The Group: <https://contact.fosun.com/ethics>
- Where this information is known, Whistleblowers shall include the following information in the report:
 - Detailed description of the events that occurred and how the Whistleblower became aware of them
 - Date and place of the event
 - Names and job positions of the individuals or entities involved, or other information that enables their identification
 - Names of any other parties who can attest to the actions reported
 - Any documentation available that may help substantiate the claim
 - Contact information of the Whistleblower to allow further follow-ups and communication if necessary, unless they wish to stay anonymous

4.2 Investigation:

- Upon receipt of the report, the system automatically forwards the information to The First Receivers of Report. All reports and documents relating to a report shall be retained according to the Fosun Records Management Policy.
- The Report Assessment Committee shall meet to discuss about the action/investigation

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on the reports received from Whistleblowers. The Report Assessment Committee may also exclude from its meetings any persons it deems appropriate, depending on the nature of the complaint.

- vi. The Report Assessment Committee shall delegate specific individuals/employees to perform a prompt and thorough investigation and shall ensure that investigations are carried out using appropriate channels, resources and in observance of the principles of impartiality, fairness and confidentiality towards all parties involved.

4.3 Evaluation:

- vii. Once the investigation phase is completed, The Report Assessment Committee shall prepare a summary report on the investigations carried out and the evidence considered.
- viii. The Report Assessment Committee shall meet to discuss the investigation findings and determine if any disciplinary or/and corrective action is warranted.
- ix. The Whistleblower shall be notified the result of the investigations.

5. Confidentiality

The Group assures that all reports shall be treated strictly confidentially. There might be instances that require external investigation by relevant government authorities, but the identity of the reporting person shall be kept confidential and protected to the maximum extent possible. Only those with a need to know shall be involved in, or know of, the investigation. Due to the nature of the investigation, or where it may be required by law or regulation, it may however be necessary to disclose the identity of the Whistleblower. This may occur in connection with legal proceedings and adhere to the law of the land.

6. Good Faith Reporting

Whistleblowers shall report in good faith, which means that a genuine attempt is made to provide honest and accurate information, even if it may later be proven to be wrong. The Group reserves the right to discipline anyone who knowingly makes a false accusation or has acted improperly. An employee who knowingly or recklessly makes statements or disclosures that are not in good faith may be subject to disciplinary procedures, which may include termination and other legal procedures.

7. Anti-Retaliation

The Group is committed to ensuring that Whistleblowers may report Fraud or Unethical Acts without fear of retaliation. The Group shall not tolerate harassment, demotion, dismissal, disciplinary action, remedial action, suspension, threats or any other method of discrimination or retaliation against Whistleblowers. If a Whistleblower acts genuinely and in good faith when reporting what (s)he reasonably believes to be a Fraud or Unethical Act, (s)he shall not be at risk of losing their job, nor shall they suffer any form of detrimental action as a result of their reporting – even if it is not substantiated in subsequent investigation. Persons who believe that they or other related employees or third parties are being retaliated shall immediately report to the Report Assessment Committee. Any retaliation act against the Whistleblower shall result in

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disciplinary action, including termination of employment.

8. Effective Date of Policy

This Policy shall become effective upon its announcement.