

# Seres Group Anti-Bribery and Anti-Corruption Policy

Seres Group Co., Ltd. and its subsidiaries (collectively referred to as "Seres" or "the Company") strictly comply with national and local laws and regulations of the jurisdictions in which it operates, uphold business ethics, adhere to honest business practices, and maintain a zero-tolerance policy toward any form of bribery and corruption.

## 1. Scope

This Policy applies to all employees (including full-time staff and interns), directors, supervisors, and senior management across Seres's branches, wholly-owned subsidiaries, affiliated companies, and representative offices. It also covers any individual assigned to or representing Seres, including contractors, consultants, outsourced personnel, and third-party dispatched workers.

The Board of Directors serves as the highest oversight body for matters related to business ethics, responsible for supervising and regularly reviewing the implementation of this Policy.

## 2. Policy Provisions

### 2.1 Anti-Corruption Organization

- The Supervision Headquarter is the dedicated department responsible for anti-bribery and anti-corruption efforts within the company. In accordance with the laws and regulations of the People's Republic of China, and guided by the United Nations Convention against Corruption and the ISO 37001 standard, it independently and lawfully carries out its duties. Its responsibilities include building a comprehensive integrity and anti-corruption management system, supervising and guiding integrity compliance across all business units and subsidiaries, establishing independent reporting channels, and ensuring effective control of compliance risks.
- Each subsidiary or department shall establish an Anti-Corruption Working Group, led by its head, to manage integrity and compliance matters on an ongoing basis. This Group is responsible for coordinating compliance efforts within its unit, reporting relevant information to the Supervision Headquarters in a timely manner, promoting and recognizing exemplary cases of integrity.

### 2.2 Anti-Bribery Provisions

- Employees must strictly comply with all applicable national and local laws, company policies, and partner management regulations. They are prohibited from violating business ethics by directly or indirectly offering bribes—whether monetary or otherwise—or engaging in improper hospitality activities contrary to public policy and good morals toward public officials, customers, business partners, superiors or any other parties with vested interests.

### 2.3 Anti-Corruption Provisions

- Employees must strictly abide by the Employee Handbook and all company regulations. Misusing their position or authority to incur excessive or fraudulent business expenses, squander public funds, or charge personal expenditures to the company is strictly

prohibited. Accepting gifts, cash, bribes, or other benefits to secure improper gains, as well as engaging in any form of quid pro quo arrangements, is also forbidden. Furthermore, employees are prohibited from accepting meals, travel, fitness activities, or high-end entertainment that may compromise the impartiality of their official duties.

## **2.4 Gifts and Hospitality**

- All employees must comply with and have an obligation to inform all business partners that the Company prohibits employees from accepting any gifts, presents, or hospitality that may influence business decisions.
- All employees must comply with applicable laws, regulations, and local business practices regarding gifts, gift-giving, and hospitality. Employees are strictly prohibited from offering money, valuable gifts, or hospitality that exceeds normal business practices to the executives or employees of suppliers, customers, or any other organizations. Such actions may influence—or create the appearance of influencing—the recipient's decisions and their relationship with the Company, thereby adversely affecting the Company's reputation.

## **2.5 Charitable and Political Donations**

- The Company strictly prohibits the use of charitable contributions and donations as a disguise for corrupt purposes, and requires that effective measures be taken to ensure all charitable and donation activities are transparent and lawful.
- The Company does not directly or indirectly participate in any political party activities, nor does it provide sponsorship or contribution to political parties, candidates, their affiliates, or any of their affiliated organizations in any jurisdiction in which the Company operates.

## **2.6 Sunshine Cooperation with Business Partners**

- The Company is committed to fostering a fair and ethical business ecosystem. Business partners must strictly adhere to business ethics and the Seres Sunshine Business Cooperation Agreement and Integrity Pact throughout all stages of engagement, negotiation, contract signing, and performance. Partners are strictly prohibited from offering bribes or improper benefits to Seres employees, their relatives, or any third party entrusted by Seres to perform related duties, with the intent of securing business opportunities, competitive advantages, or improper gains.

## **2.7 Training Programs**

- The Company regularly conducts anti-bribery and anti-corruption training for all staff—including full-time employees, part-time employees, and contractors—to ensure their full understanding and effective implementation of this Policy.

# **3. Reporting and Whistleblower Protection**

## **3.1 Reporting Channels**

All reports are centrally received and managed by the Supervision Headquarters. Individuals may report via:

- Phone: 023-65179813

- Mail or In-Person Visit: Room 810A, North Building, Tower 1, Seres Group Office Building, 7 Wuyunhu Road, Shapingba District, Chongqing, China
- Email: jczb@seres.cn

### **3.2 Reporting Requirements**

- Reports must be truthful and factual. Malicious or false reporting is strictly prohibited.
- Real-name reporting is encouraged to facilitate efficient and accurate investigations. For anonymous reports, please provide detailed information about the person reported, the violation, and supporting evidence.

### **3.3 Whistleblower Protection**

- The Company has established strict management mechanisms and confidentiality measures. The identity of the reporter, the content of the report, and all related materials will be kept strictly confidential.
- Any unit or individual who violates confidentiality or engages in retaliation against a whistleblower will be severely punished. If criminal liability is involved, legal action will be pursued.

### **4. Disciplinary Actions**

- Employees who violate this policy will be held accountable and subject to disciplinary action in accordance with the Employee Handbook and related company regulations.