

# Seres Group Code of Business Conduct

Seres Group Co., Ltd. and its subsidiaries (collectively referred to as "Seres" or "the Company") are committed to upholding high standards of business integrity as a foundation for global expansion and the development of new quality productive forces. In strict compliance with the *Company Law of the People's Republic of China* and all applicable laws and regulations in operating jurisdictions, the Company has established the *Seres Group Code of Business Conduct* (hereinafter "this Code") to deeply integrate ethical business practices into corporate governance and daily operations. Our goal is to become a trusted partner for all stakeholders and enhance customer value.

## 1. Scope

This Code 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 Code.

## 2. Code of Conduct

### 2.1 Conflicts of Interest

- In the course of business operations, the Company requires the proactive identification and assessment of potential conflicts between the Company, its employees, clients, and internal parties. Conflicts of interest should be avoided whenever possible. The Company strictly enforces an investigation recusal mechanism, requiring individuals with a conflict of interest to refrain from participating in related investigations, thereby effectively preventing fraud and safeguarding compliance integrity. Where conflicts between personal, corporate, and client interests are unavoidable, decisions shall prioritize the interests of the client and the Company within the bounds permitted by law.

### 2.2 Anti-Bribery and Anti-Corruption

- The Company maintains zero tolerance toward bribery and corruption. Employees and business partners must comply with the Seres Group Anti-Bribery and Anti-Corruption Policy, including prohibitions on offering or accepting bribes, improper gifts, and corrupt practices involving public officials and business partners.

### 2.3 Non-Discrimination and Equal Opportunity

- The Company provides a workplace free from unlawful discrimination and harassment based on gender, ethnicity, religion, age, disability, or other protected characteristics. The Company is committed to equal opportunity in employment and business practices.

### 2.4 Antitrust, Anti-Money Laundering, and Anti-Unfair Competition

- The Company strictly complies with laws such as the Anti-Monopoly Law of the People's

Republic of China, the Anti-Unfair Competition Law of the People's Republic of China, the Patent Law of the People's Republic of China, and the Copyright Law of the People's Republic of China. The Company firmly opposes all forms of monopolistic and unfair competitive practices and is committed to fostering a fair, transparent, and trustworthy market environment.

- Antitrust: The Company prohibits the abuse of market dominance to monopolize production materials or non-patented technologies, ensuring healthy and orderly market competition.
- Anti-Money Laundering: The Company prohibits any involvement in money laundering activities related to customers, partners, suppliers, or other organizations and individuals.
- Insider Trading: Employees who possess material non-public information about the Company or its business partners must not trade securities or recommend trades based on such information, and must comply with applicable insider trading and securities laws.
- Anti-Unfair Competition: The Company explicitly prohibits employees from using illegal means—such as hacking, theft, bribery, or spreading false or misleading advertisements—to obtain competitors' trade secrets or other confidential information.

## **2.5 Environment, Health, and Safety (EHS)**

- The Company is committed to continuously improving working conditions and implementing preventive measures to protect employee health and safety, providing all necessary safeguards in accordance with occupational health and safety standards to minimize health and safety risks and their impacts. For detailed measures, refer to the *Seres Group Occupational Health and Safety Policy*.
- The Company is dedicated to sustainable development by strictly complying with environmental protection laws, conserving resources, promoting recycling, and protecting the environment. For details, refer to the *Seres Group Environmental Management Policy*.

## **2.6 Intellectual Property and Trade Secrets**

- The Company values the creation, protection, and responsible use of intellectual property and respects the IP rights of others. Employees must understand and comply with laws and regulations regarding trade secrets, proprietary information, and other intellectual property. The Company is responsible for protecting others' confidential and proprietary information and must not misuse or disclose such information without authorization. Third-party confidential or proprietary information may not be used for commercial purposes without explicit authorization.

## **2.7 Protection and Confidentiality of Company Assets**

- Employees are responsible for protecting Company assets and ensuring their proper and efficient use. This includes tangible assets, intellectual property, trade secrets, and other resources. Company assets must only be used for legitimate business purposes. Employees must take all necessary precautions to prevent damage, unauthorized possession, or misuse. Protecting confidential and proprietary information is a core corporate policy. Employees must comply with all applicable laws and regulations related

to privacy and information security to safeguard the Company's confidential information against harm.

## **2.8 Information Security and Privacy Protection**

- The Company strictly complies with all applicable laws and regulations on information security and privacy. Personal data of employees, users, customers, suppliers, and other individuals may only be collected, stored, processed, or otherwise used within the scope permitted by law. For specific management measures, refer to the *Seres Group Information Security Policy*.

## **2.9 Responsible Marketing**

- The Company is committed to ethical sales and marketing practices that comply with laws, regulations, social norms, and ethical standards. All marketing materials must be reviewed and approved by the Company to ensure accuracy and compliance. In all forms of promotion, the Company prohibits misrepresentation of its products, services, or prices, and prohibits false or misleading statements regarding its products, services, performance, or track record. The Company must not withhold from consumers information about products offered by competitors, and fully respects consumers' right to choose and their privacy.
- The Company protects vulnerable consumer segments (e.g., elderly, low-income individuals, and those with limited product knowledge). Product information, fees, and risks must be clearly communicated, and their vulnerabilities must not be exploited.
- The Company conducts an annual Responsible Marketing Audit to identify and correct non-compliant practices.
- The Company provides regular Responsible Marketing training to ensure employees stay updated on the latest legal and regulatory requirements.

## **2.10 Tax Compliance**

- Tax compliance is a cornerstone of Seres' stable operations and sustainable development. The Company establishes and implements transparent tax strategies and governance policies at the group level.
- The Company commits to full compliance with the letter and spirit of tax laws in all operating jurisdictions, ensuring timely and accurate tax reporting and payments.
- The Company will not use artificial tax structures without commercial substance.
- For all global related-party transactions and internal business dealings, the Company strictly adheres to the arm's length principle in transfer pricing.
- The Company will not artificially shift commercial value generated from normal operations to low-tax jurisdictions and will not use secrecy jurisdictions or so-called "tax havens" for tax avoidance.

## **3. Reporting Channels**

Reports are handled by the Supervision Headquarters. The Company protects whistleblowers from retaliation, keeps reports confidential, and investigates reported breaches. Disciplinary action applies to violations of this Code.

Whistleblowers may report through the following channels:

- Phone: 023-65179813
- Mail or In-Person: Room 810A, North Building, Office Building 1, Seres Group  
Headquarters, No. 7 Wuyunhu Road, Shapingba District, Chongqing
- Email: [jczb@seres.cn](mailto:jczb@seres.cn)