



Everest Medicines Limited
雲頂新耀有限公司
(Incorporated in Cayman Islands with limited liability)
(Stock Code: 1952)

Whistle-blowing Policy

1. Introduction

Everest Medicines Limited (“**Everest**”, together with its subsidiaries, the “**Group**”) is committed to the highest possible standards of openness and accountability, as well as preventing, detecting and reporting any fraud. This policy reinforces the Group’s approach by setting out the ways in which employees and/or stakeholders can voice their concerns about suspected fraud.

In this policy, fraud is defined as acts such as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. Examples of conduct that would be considered fraudulent include:-

- Misuse of resources (e.g. theft of materials);
- False invoicing or settlement of contracts;
- False work expenses;
- Improper use of commercially sensitive information;
- Collusive activity with trading counterparties or competitors;
- Unauthorized trading activities;
- False accounting or misleading disclosures;
- Accepting or seeking anything of material value from contractors, vendors or persons providing services/materials to the Group;

This policy applies to directors, officers, and employees at all levels of the Group as well as joint ventures or companies in which the Group holds a controlling interest.

2. Responsibility for Implementation of Policy

The audit committee of Everest (the “**Audit Committee**”) has overall responsibility for this policy but has delegated day-to-day responsibility for overseeing and implementing it to the Compliance Officer. All employees are encouraged to disclose any frauds of which

they become aware and the Management of Group shall ensure that all employees feel comfortable to raise concerns without fear of reprisals.

3. Reporting Process

Suspected cases of fraud should be made in writing in the standard report form attached to this policy as Annex I. They should be reported in good faith to the Compliance Officer by email at compliance@everestmedicines.com.

4. Confidentiality

The Group respects confidentiality and takes the reporting cases seriously and will make every effort to keep the identity confidential, it is preferred that these reports not be made anonymously. In order not to jeopardize the investigation, the one who has filed the report shall also keep the nature of the concerns and the identity of those involved confidential. However, if in the circumstances that it will be necessary to disclose the identity, he/she will be informed that his/her identity is likely to be disclosed. Or, during the investigation, it may reveal the source of the information and a statement by the individual concerned may be required as part of the evidence.

5. Investigation Procedures

Any report will be acknowledged receipt by the Compliance Officer within three working days. The Compliance Officer will manage and evaluate the report and decide whether a full investigation is required. The Compliance Officer shall report the status to the Management and monitor the investigation confidentially.

After investigation, the Compliance Officer or the Management will produce a report to the Audit Committee stating the findings, results of the investigation and corrective actions taken to resolve substantiated frauds.

6. Monitoring the Whistle-blowing Policy and Procedure

The Audit Committee will report fraudulent activities to the Board at least annually. This report will include the number of cases reported, the nature of important investigations and the results of those investigations.

This policy will be reviewed and updated, if necessary, annually. Any changes of this policy will be submitted to the Audit Committee for approval.

WHISTLE-BLOWING REPORT FORM

Everest is committed to the highest possible standards of openness and accountability, and preventing, detecting and reporting any fraud. This policy reinforces the Group’s approach by setting out the ways in which employees and/or stakeholders can voice their concerns about suspected fraud.

If you wish to make a report in relation to any suspected fraud within the Group, please use this report form and all information provided will be kept confidential.

Name: _____

Address: _____

Tel. No.: _____

Email: _____

The names of those involved (if known): _____

Detail of concerns (** please provide full details of your concerns including names, dates and places and the reasons for the concerns (continue on separate sheet if required) together with any supporting evidence*): _____

Date: _____