

Vamos Biotech (Shanghai) CO., LTD

(91310000MA1H3AQB3D)

Global Whistleblower Policy

Policy No: 1.5.

Date May 2021

1. Policy Statement

This policy applies to all current and former directors, employees of, and contractors to, the Company, including relatives of such individuals regardless of their location, i.e., a Company office, a Customer site or any other location associated with the individual's employment. Such individuals may collectively be referred to as "discloser" in this Policy.

From time to time, the Company may exercise its prerogative to change this Policy or to introduce new Policies in line with legislation and/or Company practice. Accordingly, those Policies do not form a contract of employment.

This Policy is applicable globally unless superseded by local legislation. References in this Policy to the Company include references to Vamos Biotech (Shanghai) CO., LTD and all its subsidiaries.

This Policy will be published and be made available across the Company on the Policies and Procedures section of SharePoint, a copy may also be requested from the Human Resources or the Legal department of the Company.

This Policy should be read in conjunction with the Company's Code of Conduct, and the Company's Grievance and Complaints Procedure.

2. Purpose

The purpose of this Policy is to:

- help detect and address unacceptable conduct;
- help provide employees and contractors with a working environment in which they feel able to raise issues of legitimate concern to them and the Company;
- provide an avenue for disclosures to confidentially report unacceptable conduct; and
- help protect people who, in good faith, report unacceptable conduct.

The Company is committed to corporate compliance, ethical behavior, and good corporate governance.

This Policy supports the Company's commitment to maintaining an open working environment in which all employees are able to report instances of unethical, unlawful, or undesirable conduct without fear of intimidation or reprisal. Unethical, unlawful or undesirable conduct is referred to

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in this Policy as **unacceptable conduct**, Example of unacceptable conduct are given in section 3 below.

3. Unacceptable conduct

Unacceptable conduct covered by this policy includes, but is not limited to any conduct which:

- Is dishonest, fraudulent, corrupt conduct regarding or related to the Company;
- Conduct that breaches the Corporations Act, or applicable statutes;
- Conduct that relates to an offence against any law of P.R. China which is punishable by imprisonment for 12 months or more;
- Is a danger to the public or the financial system;
- Is unethical (such as dishonestly altering Company records or willfully breaching the Company's Code of Conduct);
- Is potentially damaging to the Company or an employee (such as unsafe work practices);
or
- Involves any other kind of serious improperly (such as gross mismanagement).

4. Incident Reporting

The Company expects that employees will be able to resolve most concerns or queries related to their employment with, or the operations of, the Company by discussing them with their immediate Manager or the Manager's Manager.

However, the Company understands that, on occasion, there may be issues of such sensitivity that an employee does not feel able to do so. In such instances, the employee or discloser may provide a report of wrongdoing to Officers of the Company, Directors, Senior Managers, or Auditors, collectively referred to as 'Disclosure Recipient'.

A report of wrongdoing should be in writing preferably (although a verbal complaint or disclosure would be accepted) and contain details about the date and time and nature of the alleged wrongdoing and include any available support material.

An employee raising an issue under this Policy should ensure that there is reasonable basis for the report before coming forward. However, it is not the responsibility of the employee reporting the incident to investigate or prove a case of unacceptable conduct.

All the relevant data provided by the employee will be recorded. The employee may request that their name remain confidential.

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The Discloser Recipient will refer the matter, with a copy of the relevant record, to the relevant person for confidential investigation.

5. Privacy and protection

Where personal information regarding a complaint is recorded by the Company centrally, the accused employee will be notified of:

1. the Company's Whistleblower Policy;
2. the purpose of processing data under the Whistleblower Policy;
3. the facts the employee is accused of;
4. any party which may receive the data;
5. the rights of access and rectification and how they may be exercised; and
6. the process for reviewing, investigating, and adjudicating the complaint in a fair manner in accordance with the Company's Grievance and Complaints Procedure.

6. Investigation

In all instances, the Company's Chief Executive Officer will determine who initially should be responsible for investigating the report.

Where a report of suspected unacceptable conduct relates to a significant matter involving the Chief Executive Officer, or a senior manager that reports to the Chief Executive Officer, the Company Secretary will refer the matter directly to the Chairman. In certain circumstances (for example where the report involves allegations of fraud), the Chief Executive Officer may decide to appoint external investigators.

Subject to local legal requirements, an employee who has committed or been involved in unacceptable conduct may not be immune from disciplinary action merely because they have reported the unacceptable conduct in accordance with this Policy.

Once a report is being made to the relevant person of authority, the process outlined in the Company's Grievance and Complaints Procedure will be followed.

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7. Protecting Confidentiality and Privacy

If an employee of the company or discloser makes a report of unacceptable conduct under this Policy, the Company will endeavor to ensure that person's identity is protected, and that the discloser is not subject to any detrimental treatment as a result of making the report. Therefore, the Company will not disclose the employee's identity unless:

1. the employee making the report consents to the disclosure;
2. the disclosure is required by law;
3. the disclosure is necessary to prevent or lessen a serious treat to the employee's health or safety;
4. it is necessary to protect or enforce the Company's legal rights or interests or to defend any claims; or
5. the employee making the report maliciously or intentionally makes a false statement.

The Company will also ensure that any records relating to a report of unacceptable conduct will be regarded as a disciplinary matter and will be dealt with in accordance with the Company's disciplinary procedures.

The Company is committed to protecting and respecting the rights of any employee who reports unacceptable conduct in good faith.

The Company will not tolerate any reprisals, retaliation, discrimination, harassment, intimidation, or victimization against any employee suspected of making a report of unacceptable conduct. Any such retaliation action will be treated as a serious misconduct and will be dealt with in accordance with the Company's disciplinary procedures.

Privacy guidelines will be adhered at all times when collecting personal information of any employee going through this process.

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