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# A Message from Our Founders

#### Dear Team BeOne,

When we founded the company, we set out to build something different—a fully-integrated, global oncology company committed to creating innovative medicines that are accessible to cancer patients around the world. As we continue to grow our organization, it is critical that we do so in a responsible and sustainable way, demanding high global standards for how we conduct our business activities and interact with each other and our external stakeholders.

Our Code of Conduct (the "Code") helps us to achieve those standards by providing common rules, principles, and expectations for behavior for our Board of Directors and all Company employees — regardless of role, level, or location. By doing so, the Code not only helps us fulfill our ethical and legal obligations wherever we operate but also earn and maintain the trust of our fellow colleagues, customers, suppliers, business partners, government regulators and, most importantly, the patients we serve.

Every day at BeOne, each of us is responsible for upholding the Code and practicing the Company Values reflected in it. While working in today's increasingly complex and fast-paced business environment can present unique challenges, we must never waver in our commitment to the principles embodied in the Code.

Please take time to review the Code and familiarize yourself with its contents so that you may refer to it whenever you have a question. Many of the Code's rules and principles reflect practical, commonsense guidance to help you in your decision-making. Nonetheless, if you are unsure about the right course of action or if you have concerns about activities or behaviors that you believe may be inconsistent with the Code, we encourage you to consult with the specified resources for guidance.

Through our shared commitment to the Code, we lay the foundation for a culture of lasting integrity and excellence at BeOne. None of this is possible without you, and we are honored each day to work with such an incredible team.

#### Kind regards,



**John V. Oyler** Co-Founder, Chairman and CEO



Xiaodong Wang, Ph.D.
Chairman of the
Scientific Advisory Board
& Co-Founder



# Who We Are

#### Vision

Transform the biopharmaceutical industry, creating impactful medicines that will be affordable and accessible to far more cancer patients around the world.

#### **Mission**

Build the first next-generation oncology company — one that expands the highest quality therapies to more people around the world — through courage, persistent innovation, and challenging the status quo.

#### **Values**



#### **Behavior**

How we get things done is just as important as what we accomplish — we operate with an unwavering commitment to compliance, ethics, and integrity, and always treat fellow colleagues with respect and dignity.





#### Purpose and Scope of the Code

At BeOne Medicines, we are passionate about our people, science, and the communities we serve. As we expand our global organization, our goal is to be recognized for our innovations in cancer research and drug development, talented employees, exceptional therapies, and strong culture. To that end, we are committed to maintaining the highest standards of quality, compliance, and ethical business conduct in all of our activities, both internal and external.

# Although we are a global organization enriched by different cultures, we share common BeOne values through our Code.

The Code embodies our commitment to ethical business practices in all our interactions with the healthcare community, patients, suppliers, business partners, government regulators, shareholders, and each other. Integrity is more than complying with the law. It reflects who we are as a company and as individuals, and it serves as a driving force in how we operate. Our commitment to doing what is right is a shared responsibility of all employees.

The Code applies to all employees, Officers, and Directors of BeOne Medicines, and its related entities worldwide (collectively, "BeOne," "Company," "Company Personnel," "you," "we," "us," or "our").

Company Personnel who engage third party contractors, vendors, and consultants must ensure that they are made aware of and support the principles and requirements set forth in the Code.

#### **Our Responsibilities**

We are each expected to read and understand the Code and its application to our role and responsibilities at the Company, and to seek guidance and report concerns when necessary. We are also responsible for ensuring our decisions and actions comply with the Code in letter and spirit, regardless of the location or nature of our work.

Acting with integrity and doing what is right may not always be easy, but we must strive to be better if we want to achieve our potential as a leading global oncology company.

The Code is designed to provide an overview of common topics relating to our operations and to set standards that promote compliance with many of the laws affecting our business. The Code is not intended to address every situation that may occur.

As such, we must use good judgment, always bearing in mind our commitment to putting patients first, and refer to applicable Company policies, procedures, and other Company resources if further guidance is needed.





The Legal and Compliance Department is charged with administration of the Code, and the Board of Directors and our executive management team are responsible for overseeing its implementation. However, all of us are accountable for:

- Acting with honesty and integrity when representing the Company;
- Conducting Company business in compliance with applicable legal and regulatory requirements;
- Supporting the Company's Quality
   Management System and related policies
   and procedures for Good Manufacturing
   Practices (GMP), Good Distribution Practices
   (GDP), Good Clinical Practices (GCP), Good
   Pharmacovigilance Practices (GPV), Good
   Laboratory Practices (GLP), and other
   internationally recognized quality standards;
- Familiarizing ourselves with and adhering to Company policies and procedures relating to our activities;
- Treating patients, customers, partners, suppliers, and other Company Personnel with respect, honesty, and integrity;
- Avoiding situations where our personal interests are, or appear to be, in conflict with Company interests;
- Protecting Company proprietary information, assets, and resources, as well as those of our customers,

### When faced with a challenging situation, ask yourself:

- -,Ö.-
- Is it permitted by applicable laws and regulations?
- Is it consistent with the letter and spirit of the Code and other Company policies and procedures?
- Would I be comfortable if my actions were disclosed to the media?

- vendors, and collaboration partners;
- Preserving the confidentiality of the Company's non-public information;
- · Using the Company's assets responsibly; and
- Reporting in good faith any suspected violation of applicable laws and regulations, the Code, or Company policies and procedures in accordance with the reporting procedures provided in the Code.

#### **Ethical Leadership**

Managers have an additional, critical responsibility to demonstrate ethical leadership by fostering a culture of integrity, accountability, and transparency. They are expected to create an environment where Company Personnel are encouraged to ask questions and raise concerns without hesitation or fear of retaliation.

Managers fulfill their ethical leadership responsibilities when they:

- Promptly escalate any known or suspected misconduct, including concerns reported by others;
- Actively model BeOne's values by making decisions guided by our high standards of conduct;
- Support their teams in understanding and applying our Code, policies, and procedures; and
- Maintain an open-door approach that invites feedback and the sharing of ideas.

When managers lead with integrity, they strengthen our culture and help ensure ethical behavior is embedded in everything we do.



## Seeking Guidance and Reporting Concerns

BeOne promotes a culture of integrity and encourages a culture of open-door communication. This means that managers are responsible for addressing concerns, listening to suggestions about ways to improve the workplace, and helping find solutions. It also means that Company Personnel should feel comfortable seeking guidance, raising concerns, or making good faith reports about suspected misconduct.

Speaking up by raising questions or reporting concerns helps the Company address issues before they occur and improve policies and training in areas where expectations may be unclear.

Your most immediate resource for any matter related to the Code is your manager. However, you may also seek guidance from or report a concern to any other Company manager, leadership team member, the Human Resources Department, the Legal and Compliance Department, or the BeOne Legal & Compliance Helpline. The BeOne Legal & Compliance Helpline allows for anonymous reporting (where allowed by applicable law) by phone or web portal and is available 24 hours a day, 365 days a year at: BeOne.Ethicspoint.com.

For more information about reporting suspected misconduct or any compliance concerns, please refer to BeOne's *Reporting Misconduct Policy*.

Our commitment to integrity requires us to report any suspected misconduct using the reporting procedures provided in the Code.

#### Confidentiality

BeOne strives to create an environment where Company Personnel feel secure in raising legal, regulatory, or ethical concerns. Confidentiality will be maintained to the fullest extent possible, and information will be shared only with those who need to address or investigate the matter. If an individual chooses to identify themselves, every reasonable effort will be taken to keep their identity confidential. However, there may be circumstances where it is not possible to keep the identity confidential due to the nature of the investigation and/or applicable legal requirements.

#### **Investigative Process**

BeOne takes violations of applicable laws and regulations, the Code, and Company policies and procedures seriously. BeOne acknowledges that a hallmark of an effective compliance program is the existence of a well-functioning and appropriately resourced mechanism for the timely and thorough investigation of any allegations or suspicions of misconduct. Company Personnel are expected to cooperate fully with any investigation.





BeOne investigations are guided by principles of thoroughness, fairness, and accountability. A designated BeOne investigator oversees each case, ensuring appropriate information is gathered, findings are documented, and any applicable disciplinary or remedial measures are addressed based upon the outcome of the investigation. Relevant records will be retained in accordance with applicable laws and Company policies and procedures.

#### Non-Retaliation

BeOne prohibits any form of retaliation against anyone who, in good faith, reports a concern or provides information in an investigation. Examples of retaliation include harassment (unwelcome and offensive comments or actions), threats, unwarranted reduction in compensation, demotion or suspension, or unjustified termination.

Any individual who engages in any threatened or actual retaliatory conduct will be held accountable. Reports of suspected retaliation should be made promptly to your manager, the Human Resources Department, the Legal and Compliance Department, and/or the BeOne Legal & Compliance Helpline.

# If I report suspected misconduct, will I be kept informed of any actions taken by the Company?



We recognize that reporting suspected misconduct can be a challenge. Reporters will always receive confirmation that their report has been received and will be reviewed. When appropriate and consistent with applicable law, we will seek to update you upon completion of action, if any, taken by the Company.

#### **Disciplinary Action**

Failure to comply with the standards outlined in the Code may result in disciplinary action, up to and including termination of employment. Moreover, any manager who directs or approves of conduct in violation of the Code, or who has knowledge of such conduct and does not immediately report it, may also be subject to disciplinary action.

It is important to note that some violations of applicable laws and regulations may require the Company to refer the matter to the appropriate governmental or regulatory authorities for investigation or prosecution, in addition to action taken by the Company.







# Compliance with Laws and Regulations

We operate in a highly regulated industry where virtually every area of our operations is subject to numerous laws, regulations, and industry codes. Our success depends on each of us understanding the legal and regulatory requirements that affect our roles, including but not limited to those that govern the research, development, manufacturing, marketing, promotion, and distribution of our therapies.

If applicable laws, regulations, and industry codes differ from the Code and/or other Company policies and procedures, the stricter requirements shall apply.

Our success depends on our ability to earn and maintain the trust of our stakeholders, including patients, Healthcare Professionals, and regulatory authorities. While this trust takes time to cultivate, we must be mindful that it can be lost in an instant.

#### Interactions with Healthcare Professionals

BeOne is committed to complying with applicable laws, regulations, and industry codes in all of its interactions with Healthcare Professionals. For purposes of the Code a "Healthcare Professional" is defined broadly as any individual who directly interacts with patients or has a role in patient care, diagnosis, or treatment. This includes physicians, nurses, pharmacists, and other staff who interact with patients, and also includes those who do not interact with patients but have influence over the prescription, purchase, or recommendation of therapies, such as payers, formulary committees, pharmacies, healthcare plan administrators, and government health authorities.

All of our interactions with
Healthcare Professionals are
intended to advance medical
and scientific progress, enhance
patient care and, where
appropriate, support
the safe and effective use
of our therapies.

Our interactions with Healthcare Professionals must never be intended to improperly influence a Healthcare Professional's decision to purchase, prescribe, use, or otherwise recommend BeOne therapies. Any interactions where BeOne therapies are discussed must be conducted in a manner that is fair and balanced, scientifically rigorous, truthful, and not misleading. Further, interactions focusing on the promotion and advertising of our therapies must be consistent with the prescribing information approved by the relevant regulatory authorities. Under no circumstances may a product be promoted prior to its approval or for a use that has not been approved by the relevant regulatory authorities.





We may occasionally engage with Healthcare Professionals for legitimate business purposes. Any transfer of value must support a clear business need, remain modest and appropriate, comply with all applicable laws, regulations and industry codes and, where required by global transparency laws, be publicly reported.

Items, activities, or gifts for the personal benefit of a Healthcare Professional, such as tickets to events, sports equipment, jewelry, recreational activities, or gifts of cash or cashequivalents, such as gift cards, are never acceptable and are strictly prohibited.

Because these interactions are subject to complex healthcare laws, they must be reviewed to ensure compliance. If your role involves engaging with Healthcare Professionals or supporting such activities, you are responsible for understanding and following our internal policies and the relevant legal and regulatory requirements. For more detail, consult our Healthcare Compliance Manuals.

BeOne has established internal Company policies and procedures to help ensure that all of its interactions with Healthcare Professionals comply with applicable laws, regulations, and industry codes.

For further information regarding interactions with Healthcare Professionals, please refer to the appropriate BeOne country compliance policies for interactions with Healthcare Professionals.

#### Interactions with Healthcare Professionals Who May be Considered Government Officials

Company Personnel interact with individuals who may be considered Government Officials under relevant anti-bribery and anti-corruption laws and regulations. Government Officials include not only high-ranking officials, but also any persons employed by federal, state or local governments or acting on behalf of such governments. For example, in countries with state-run healthcare systems, doctors and other Healthcare Professionals may be considered Government Officials.

Many government agencies place additional restrictions on interactions with Healthcare Professionals who may be considered Government Officials. Before engaging in these interactions, please refer to BeOne's anti-bribery policies and procedures, the applicable country compliance policies, or consult with the Legal and Compliance Department.





#### Interactions with the Patient Community

At BeOne, one of our core values is putting patients first. We seek to improve the health and well-being of patients globally by developing and improving access to impactful medicines, and by focusing on the whole patient.

We are committed to developing innovative medicines against cancer by partnering with the global community to serve as many patients as possible. We empower patients through education and resources to manage their disease and advance initiatives that help patients live fuller and more engaged lives. BeOne interacts transparently with patients in a variety of ways including unbranded disease education, shared decision-making, access issues, unbranded patient storytelling, and clinical trial participation, as permitted under local laws and regulations.

All interactions and activities with patients must adhere to applicable laws and regulations, the Code, and Company policies and procedures.

#### Safety Monitoring and Adverse Event Reporting

Ensuring patient health and safety is a Company-wide responsibility. We take great pride in ensuring our therapies maintain a favorable risk-to-benefit profile when used in accordance with the approved prescribing information and good medical practice. We perform rigorous testing to characterize the safety and tolerability profile of our therapies and continuously monitor their use through

post-marketing surveillance. Adverse events (AEs) are tracked and reported to regulatory authorities as required by applicable laws and regulations. While all therapies can have possible side effects, we are vigilant in our efforts to provide regulators, Healthcare Professionals, patients, and their caregivers with accurate and timely information to promote their safe and effective use.

We are committed to a quality culture in which all Company Personnel understand and take ownership of the responsibility for protecting patient safety and the integrity of our therapies by:

- Identifying suspected patient AEs that could be associated with one of our therapies;
- Reporting AEs to the Global Patient Safety
   Department within 24 hours of awareness; and
- Complying with all mandatory AE reporting training requirements.

For further information regarding AE reporting, please refer to the <u>Adverse Event and Product</u> Quality Complaint Reporting Global Standard.

# Global Patient Safety makes it easy to report AEs in your local language through various channels:



- Report by Email: adverse\_events@beonemed.com
- Report by Telephone:
   <u>List of Country-Specific</u>

   <u>Telephone Numbers</u>
- Report via Multi-Language Web Form:
   Report Adverse Event

#### **AE reporting during Clinical Trials:**

AEs occurring during Clinical Trials are reported per study protocol and per Good Clinical Practice (GCP) regulations.



#### Quality, Manufacturing, and Supply Chain

BeOne's mission to deliver safe, effective, quality drug products that consistently meet or exceed customer and regulatory requirements is championed through the application of a Quality Management System (QMS) that promotes continuous improvement. Our QMS is structured to ensure excellence and safeguard product integrity and patient safety throughout the entire product lifecycle, embedding quality into every stage of development and delivery. We earn and preserve stakeholders' trust by adhering to rigorous quality control standards in the testing, manufacturing, packaging, storage, and distribution of our therapies.

We maintain a comprehensive quality assurance and control program to generate awareness, foster a culture of quality, and to support our compliance with applicable laws and regulations and internationally recognized standards for Good Manufacturing Practice (GMP) and Good Distribution Practice (GDP). Furthermore, we require the same quality control standards from our suppliers and partners, as described in BeOne's <u>Supplier Code of Conduct</u>.

Additionally, we understand our role in protecting patients from counterfeit or substandard medicines. Counterfeit, illegally diverted, and stolen medicines present a danger to patients, our reputation, and trust within the broader healthcare community. BeOne supports a Global Brand Protection function that works internally and externally to monitor and mitigate risks associated with allegations and confirmed matters.

Timely reporting of any potential product complaints or quality concerns is critical to ensuring the integrity of our therapies.

Achieving our goal of making a difference in patients' lives starts with ensuring the quality of our therapies.

As such, you are required to report any suspected product complaints or quality concerns that could be associated with one of our therapies to the Quality Assurance Department within 24 hours of receipt of such information at: <a href="mailto:productcomplaints@">productcomplaints@</a> beonemed.com.

For further information regarding the Company's Quality Program or product complaint reporting, please refer to the BeOne *Quality Policy* or the BeOne *Handling of Product Complaints Global Standard*, respectively.

#### **Anti-Bribery and Anti-Corruption**

BeOne has a zero-tolerance policy for bribery and corruption. We respect and comply with all applicable anti-bribery, anti-corruption, anti-money laundering, and related laws in the countries in which we operate. In addition to exposing the Company to severe sanctions and reputational damage, anyone who violates these laws can be subject to substantial fines and/or criminal prosecution.

Company Personnel are strictly prohibited from offering, giving, or facilitating any form of bribe or kickback. A "bribe" or "kickback" involves the giving, offering or receiving anything of value, to or from any person whether public or private, that is intended as an inducement to do something improperly in order to obtain or retain business or secure a business advantage for the Company.





Business courtesies such as nominal gifts and modest meals may only be offered or provided if appropriate under local standards and consistent with applicable laws and regulations. Financial limits on meals and hospitality vary by country and must never be exceeded.

No business courtesy may, under any circumstances, be offered where a reasonable person might conclude that the courtesy was offered with an expectation or obligation of favorable treatment in a business transaction.

Special requirements apply when interacting with a Government Official, which is broadly defined and includes any employee of a government agency or department, any employee of an enterprise that is government-owned, operated, or controlled, or any political party representative or official or candidate for political office. Healthcare Professionals may be considered Government Officials if they are employed by or act on behalf of government-owned healthcare institutions. Paying, offering, or promising to pay bribes or kickbacks to Government Officials to secure business or favorable treatment is strictly prohibited. Further, many countries prohibit providing anything, regardless of value, to Government Officials, including but not limited to meals, gifts, travel, lodging, and/or compensation for consulting services.

Remember that many anti-bribery and anti-corruption laws apply internationally—so even if an activity may be considered "acceptable" in one country, it can constitute a violation with significant penalties in other countries where BeOne operates.

We are also responsible for managing the risk that third parties acting on our behalf—such as partners, agents, or other intermediaries—follow the same guidelines as all Company Personnel when interacting with Government Officials. BeOne can be held liable for the actions of these third parties, and the consequences may be legal, financial, or reputational. To help mitigate this risk and select qualified third parties for a legitimate need, appropriate due diligence procedures must be conducted and followed consistently. Third parties are also expected to comply with BeOne's Supplier Code of Conduct, which includes specific anti-bribery and anti-corruption obligations.

For further information regarding interactions with Government Officials, please refer to BeOne's Anti-Bribery and Anti-Corruption Policy.

#### **Antitrust and Competition Laws**

BeOne is committed to complying with laws that promote fair competition and prohibit practices that harm consumers or distort open markets. These complex laws are referred to as either antitrust laws or competition laws and vary from country to country.

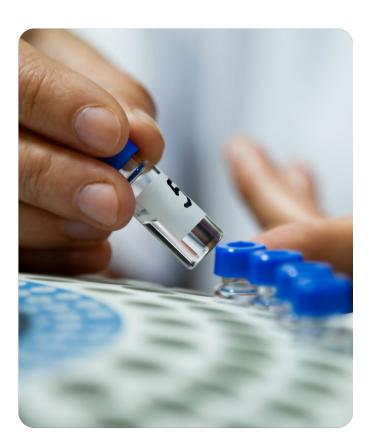
Antitrust and competition laws are designed to protect free enterprise and prevent restraints on trade that could lead to unfair and abusive trade practices. These laws are based on the principle that the public interest and consumers are best served by vigorous competition. Violations of antitrust and competition laws can carry severe penalties, including criminal prosecution and significant fines. It may not always be feasible for you to understand the details of these laws in the various countries where we operate. However, the Company expects you to consult with the Legal and Compliance Department whenever you have a question relating to these laws or believe a potential business arrangement could violate antitrust and competition principles.



The following activities are examples of prohibited conduct:

- Discussing confidential information with competitors, including but not limited to information relating to product pricing, cost of goods, sales data, supply information, and bids and contracts with vendors;
- Entering into agreements that prevent suppliers or customers from supplying or buying from competitors; and
- Entering into agreements with competitors for the allocation of markets or customers in contravention of antitrust and competition laws.

Company Personnel must also avoid engaging in conduct that could raise concerns under antitrust and competition laws, such as informal or verbal understandings with competitors on pricing or other business terms. You must exercise caution and good judgment when interacting with competitors,



particularly at trade association meetings, industry conferences, or other professional gatherings. If you are uncertain whether a conversation or activity may present a risk under these laws, seek guidance in advance from the Legal and Compliance Department.

The above requirements are not intended to restrict Company Personnel from collecting competitive intelligence about competitors through appropriate means, including consulting agencies and public sources such as websites, published articles, price bulletins, advertisements, brochures, public presentations, and other sources of public information. However, such information should only be collected and used in a way that does not violate antitrust and competition laws or third-party confidentiality obligations.

#### **International Trade Controls**

At BeOne, we operate globally, engaging in international transactions — including import and export of goods and services, as well as cross-border financial transactions — which may be subject to national, regional and/or international trade control laws and regulations. The Company is committed to complying with all applicable international trade controls (e.g., import and export control, customs, and sanctions laws) in every country where it conducts business. All Company Personnel involved in activities governed by such trade controls must be knowledgeable of and comply with all applicable trade controls and relevant Company policies and procedures.

For further information regarding international trade controls applicable to a specific activity or project, please consult with the Legal and Compliance Department.



#### **Lobbying and Political Activities**

BeOne complies with all applicable laws and regulations relating to lobbying activities ("Lobbying") and political contributions. Failure to comply with applicable laws and regulations may expose the Company, its directors, and employees to legal and reputational harm, and it may present barriers to the Company's future government relations activities.

Lobbying can include any activities that are intended to influence government decisions, such as changes to government policies and regulations, the negotiation and execution of contracts, and the awarding of research grants. The rules and regulations surrounding Lobbying vary significantly across different countries and territories, typically emphasizing direct engagement with government representatives. In certain regions, these regulations may address a wider range of activities, including participating in conferences and events, contributing to or engaging in consultations, and organizing communication campaigns.

Company Personnel must consult with Government Affairs and the Legal and Compliance Department before engaging in any Lobbying on behalf of BeOne, and before engaging any third party to conduct such Lobbying on behalf of the Company. Any engagement with a third party to engage in Lobbying on behalf of the Company must be recorded in a written agreement.

Further, Company Personnel may not make any loan, donation, contribution, or payment to a political party, candidate, or political action committee on behalf of BeOne, unless authorized in advance by the Legal and Compliance Department.

Nothing contained in the Code prohibits Company Personnel from engaging in political or advocacy activities in their individual capacity as private citizens, provided that the action is exclusively on their own accord and time and does not use Company resources. In addition, the Company does not reimburse any expenses related to personal political activities.







#### **Equal Employment Opportunity**

BeOne values an inclusive culture, which improves innovation, drives collaboration, and strengthens our business. We are firmly committed to providing equal opportunity for all applicants and Company Personnel and a positive working environment in all aspects of employment, without regard to race, color, gender, ethnicity, religion, national origin, sexual orientation, age, disability or medical condition, or any other legally-protected status or characteristic.

### Anti-Discrimination and Anti-Harassment

BeOne does not tolerate discrimination or harassment in the workplace, including any form of unwelcome or abusive conduct or action, such as verbal, non-verbal, written, electronic, or physical conduct that creates an intimidating, hostile, or offensive work environment; unreasonably interferes with an individual's work performance; or demeans or shows hostility toward an individual.

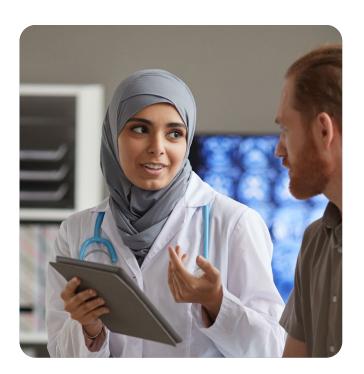
We are all accountable for fostering a culture that embraces the contributions of all Company Personnel. As such, everyone should be treated with openness and respect in our interactions with each other and third parties. Even where disagreement or interpersonal conflicts may arise, we are committed to resolving such conflicts in a respectful and professional manner.

Company Personnel are required to report any discrimination or harassment they may witness or experience in the workplace using the <u>reporting procedures provided in the Code</u>. By doing so, you are not only protecting the Company but, more importantly, your fellow colleagues. We do not tolerate any retaliation against Company Personnel for asking questions or making good faith reports of possible violations of the law, the Code or other guidelines.

While laws on discrimination and harassment vary from country to country, everyone deserves a work environment that is respectful and free from discrimination and harassment.

BeOne's policy on discrimination and harassment applies globally. Where necessary, this policy may be adapted for local implementation to comply with local laws and regulations. This policy may set higher standards and provide greater protection for Company Personnel than local law. In case of contradiction between the Company Policy and any applicable law, you should seek guidance from the Legal and Compliance Department.

For further information, please refer to the Global Anti-Harassment, Anti-Discrimination, and Anti-Retaliation Policy.





#### **Human Rights**

At BeOne, we are committed to protecting the fundamental human rights of all individuals, consistent with internationally recognized standards such as the United Nations Guiding Principles on Business and Human Rights. We expect all Company Personnel, business partners, and suppliers to act in accordance with these values.

We do not tolerate child labor, forced labor, or any other form of abuse. We strive to maintain a workplace culture that respects human dignity, promotes fair treatment, and safeguards the safety and well-being of everyone at BeOne.

#### Environmental, Health, and Safety

BeOne is committed to operating in a responsible and sustainable way, which includes the protection of health, safety, and the environment in the local communities in which we operate. We work to prevent injuries as well as assess and reduce our environmental risk and impact, limiting our emissions and pollution, and our use of natural resources and energy wherever possible. Sustainability is embedded in our operations to help create long-term value for all internal and external stakeholders.

Company Personnel are responsible for following environmental, health, and safety (EH&S) requirements and taking necessary precautions to protect themselves and others. This includes working safely and promptly identifying and reporting any unsafe practices, conditions, or incidents to their manager or EH&S Professionals. Managers are expected to promote adherence to EH&S standards and ensure the effective implementation of BeOne's <u>Global EH&S Policy</u> and related programs.

We work with suppliers and contractors to improve EH&S and sustainability performance, and to comply with applicable EH&S laws and regulations.

We support our customers' EH&S and sustainability goals through collaboration and shared focus on responsible business practices. We also engage in community and government initiatives that support broader societal and environmental well-being and impact. Our commitment to EH&S excellence is reflected in how we operate, how we partner, and how we contribute to a more sustainable future.

#### **Substance Abuse**

The abuse of illegal drugs, prescription drugs, or alcohol in the workplace poses serious safety and health concerns and has no place at BeOne. On Company designated occasions, alcohol may be served in connection with a Company-sponsored function or event and, if consumed, must be done responsibly using good judgment. In addition, Company Personnel should not work in BeOne facilities, operate a Company vehicle or a vehicle subsidized by the Company, or conduct any BeOne business if their ability to work responsibly is impaired by alcohol or drugs.

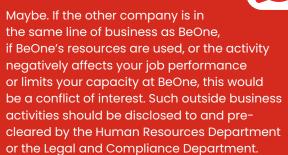


#### **Conflicts of Interest**

We must always act in the best interests of the Company and refrain from engaging in any personal activity that interferes with the interests of the Company. A conflict of interest may take many forms — personal, social, or financial — but is generally characterized by a situation or activity that prevents an individual from performing Company duties and responsibilities honestly, objectively, and effectively. Situations that may create even the appearance of a conflict of interest should be avoided.

If you plan to engage, or have already engaged, in an activity that you think may constitute, or may be perceived by others as constituting, a conflict of interest under BeOne's Code of Conduct, you must disclose the activity to your manager, the Legal and Compliance Department, and the Human Resources Department at <a href="https://Beonecoi.ethicspoint.com">https://Beonecoi.ethicspoint.com</a>. Written approval must be provided by the Legal and Compliance Department and the Human Resources Department before starting or continuing to engage in such activity.

Would it be a conflict of interest if I work as a consultant for another company during my free time?



It is impossible for the Company to identify every situation that may pose a potential conflict of interest, so it is critical that we apply good judgment and common sense before undertaking activities that could impair our work. While not a complete list, the following activities should always be disclosed and pre-cleared:

- Creating an outside business or accepting an additional job that may interfere with your responsibilities at BeOne;
- Hiring, referring, or making employment decisions (e.g., compensation, promotion, and other terms and conditions of employment) relating to a family member, relative, close friend, or significant other;
- Serving as a board member, director, officer, or substantial shareholder of another company;
- Serving as an advisory council member or officer of a professional or industry association;
- Giving or receiving gifts, discounts, or favors of more than modest value from a company that conducts or seeks to conduct business with BeOne;
- Having a significant financial interest in a company that competes or does business with BeOne, where that interest could reasonably appear to influence your judgment; or
- Conducting Company business with a friend, relative, significant other, or someone else with whom you have a close personal relationship that could raise concerns of bias, undue influence or perceived favoritism.



# Would it be a conflict of interest for me to speak at a professional event?

?

External speaking engagements may create actual or perceived conflicts of interest. If the engagement is not organized by BeOne, you must request approval from your manager and the appropriate contact in Corporate Affairs, Compliance, or Legal, depending on your region, at least 30 days in advance of the event. Presentation materials must be reviewed to assess confidentiality and reputational risk. When speaking in an individual capacity on professional topics, clearly state you are not representing BeOne and avoid sharing confidential or otherwise sensitive information.

Action by members of your immediate family, significant others, or other persons who live in your household ("family members") may also present ethical issues to the extent that they involve Company business. For example, a conflict may arise if a family member is employed by a competitor, customer, supplier or partner of BeOne. Acceptance of a gift by a family member from one of our suppliers or partners could also create a conflict of interest and result in a Code violation attributable to you. Consequently, in complying with the Code, you should consider not only your own conduct, but also that of family members.

#### Gifts, Gratuities, and Hospitality

We must always use caution when accepting gifts, gratuities, hospitality, or anything of value from any current or potential vendor, contractor, supplier, or other person doing or seeking to do business with the Company.

Company Personnel may accept modest and inexpensive gifts, meals, or hospitality from third-party vendors, contractors, or suppliers of BeOne, provided that such gifts, meals, or hospitality are not (a) cash or a cash equivalent (e.g., a gift card); (b) susceptible of being construed as a bribe or kickback; (c) made or received on more than an occasional basis; (d) solicited by Company Personnel; (e) a potential conflict of interest; or (f) in violation of applicable laws or regulations. Any gifts inconsistent with these requirements should be returned immediately and reported to your manager or through the reporting procedures provided in the Code. If you are unsure whether a gift is appropriate, consult your manager, the Human Resources Department, or the Legal and Compliance Department before accepting it.

Moreover, any Company Personnel involved in procurement decisions must ensure that such decisions are based exclusively on normal business considerations, such as quality, cost, availability, service, and reputation, and not on the receipt of special favors or personal benefit.

Gifts, gratuities, or hospitality may be offered or provided to external parties only when they are appropriate under local standards and consistent with applicable laws, regulations, and Company policies. You must never offer anything of value when it could improperly influence or appear to influence a business decision.

#### **Corporate Opportunities**

All Company Personnel have a duty to advance the legitimate interests of BeOne. Therefore, you may not take for yourself corporate opportunities that are offered to you or you are aware of as a result of your relationship with the Company without first offering such opportunities to the Company.



#### Company Information Technology Assets

BeOne's information technology assets, systems, and communication networks are intended for the sole purpose of conducting Company business and may only be used in accordance with the BeOne Acceptable Use Policy and other applicable Company policies and procedures. Company equipment, electronic messaging applications such as email, and other systems must never be used to access, receive, or transmit material that is illegal, inappropriate, or otherwise violates applicable laws and regulations, the Code, and/or Company policies and procedures. Inappropriate use of such assets owned or leased by the Company, or otherwise in the Company's possession, may expose our data and systems to substantial risk. Company Personnel with access to personal data must treat such data with the utmost confidentiality and strictly follow the relevant requirements defined in the Global Privacy and Data Protection Policy.

Computers, smartphones, tablets, and other personal devices used for conducting Company business should be password protected with multi-factor authentication and properly secured at all times. Software that is not properly licensed or lawfully acquired may not be introduced into a Company computer or communication device. Further, no software of any kind may be introduced into Company-provided devices and communication systems without the prior approval of the Global Technology Solutions Department, in accordance with Information Security policies and standards.

While the Company recognizes that Company Personnel may occasionally use BeOne devices and email for incidental personal matters, such use should be reasonable and kept to a minimum.

Company Personnel should follow the Artificial Intelligence Policy and the AI Lifecycle Management Standard to use AI technology in a responsible way.

### Protecting Our Information Technology:



- Always be professional when using Company systems
- Stop, look, and think before clicking on links or opening attachments in email.
   Report phishing emails using the Phish Alert button
- Do not create, send, or download content or communications that could be considered offensive, derogatory, defamatory, harassing, obscene, or vulgar
- Do not download or use unauthorized software or other programs, such as public versions of Al

Take precautions to protect the security of computer systems, including corporate data, electronic communications, and applications.





Moreover, subject to applicable laws and regulations, Company Personnel have no expectation of privacy regarding any communications or materials (including emails or text messages) that are created, viewed, accessed, received, or stored on BeOne systems, applications, or networks, including through BeOne email and other systems used on their personal devices.

The Company's business records, including email and computer records, may become subject to internal review and/or public disclosure during internal investigations, audits, litigation, or government investigations.

Report any suspicious or malicious activity and security incidents to Information Security at <u>itsecurity@beonemed.com</u>. If personal data is involved, also copy the Privacy and Data Ethics Office at <u>privacy@beonemed.com</u>.

For further information regarding the acceptable use of Company assets, please refer to the BeOne Acceptable Use Policy and Information Security Policy.



# Confidential Information and Intellectual Property

Confidential information is one of the Company's most valuable assets. Confidential information is a source of our competitive advantage and must be protected. "Confidential information" includes but is not limited to all non-public information that might be of use to competitors or harmful to the Company or our customers if disclosed, such as our intellectual property as well as proprietary information about the Company's operations, performance, technology, products, and/or personnel.

Company Personnel must only use confidential information for legitimate business purposes in accordance with the Data Classification Standard and may not disclose or distribute such information, except when disclosure is authorized by the Company or required by legal or regulatory requirements.

Company Personnel must also be careful to maintain the confidentiality of information entrusted to them by the Company's customers, suppliers, business partners, and collaborators.

# What do I do if I receive confidential information about a competitor?



The confidential information of third parties, including our competitors, must be respected and must not be used by BeOne. If you become aware of information about a third party you believe to be confidential, refrain from further sharing or distributing the information and immediately contact the Legal and Compliance Department for guidance.



To help protect BeOne confidential information, always keep the following principles in mind:

- Utilize care when conducting BeOne business in public areas;
- Use screensavers when working on computers in unsecure spaces;
- Beware of requests for information from external sources;
- · Dispose of confidential information properly;
- Exercise care when storing and transmitting confidential information;
- Protect and do not share any login account names, usernames, and passwords used for Company business;
- Report any incident of improper or accidental disclosure to your manager or the Legal and Compliance Department; and
- Do not provide confidential information to third parties, including vendors or contractors, without appropriate authorization and required confidentiality agreements.

The obligation to preserve and protect BeOne confidential information continues even after employment with the Company ends. Additionally, Company Personnel must abide by any legal and contractual obligations that they have to a former employer or third party restricting the use and disclosure of its confidential information. Company Personnel must not use any confidential information from a former employer or third party in conducting BeOne business unless written authorization has been obtained from the former employer or third party.







#### Integrity of Books and Record Keeping

Accurate financial and business records are essential for managing our business, maintaining investor confidence, complying with legal and regulatory requirements, and satisfying obligations to our customers, vendors, and others with whom we do business.

Therefore, our corporate and business records must always be completed accurately, honestly, and in a timely manner. The making of false or misleading statements and entries relating to our financial and accounting records or results is strictly prohibited. Any individual who becomes aware of a departure from these standards has a responsibility to promptly report this information using the reporting procedures provided in the Code.

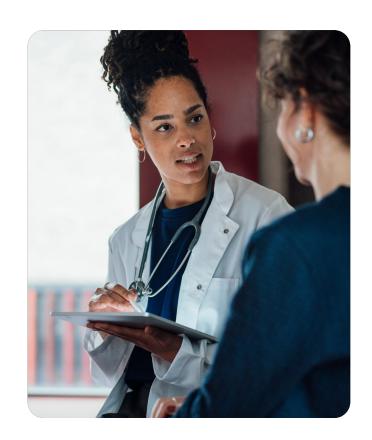
#### **Record Retention**

BeOne's business records must be maintained in compliance with applicable laws and regulations (e.g., regulatory filings, tax filings, employment and contractual obligations) and retained and disposed of in accordance with the Company's Global Records Retention and Disposition Policy and Global Records Retention and Disposition Schedule. "Business records" are any recorded information captured in any medium that reflects circumstances, events, activities, transactions, or results created or maintained as part of conducting business for BeOne. These records may be physical or electronic.

Examples of media containing business records include paper documents (including handwritten notes or lab notebooks), audio or video recordings, and computer-based information such as email messages and computer files. Company Personnel are expected to be familiar with the records retention requirements applicable to their role and business activities and should consult with their manager for guidance when needed.

In addition, under some circumstances, such as litigation or government agency requests, the Company may be required to preserve documents and information beyond their normal retention period. If required to do so, we must be diligent in adhering to any document hold requests.

For further information regarding records retention, please consult with the Information Governance team in the Legal and Compliance Department.





#### **Securities Trading**

Company Personnel are prohibited from buying, selling, or engaging in any transaction with respect to securities (e.g., shares, ADSs, options, RSUs, PSUs or derivatives) of BeOne or any other company with whom BeOne conducts business or exchanges confidential information while in possession of material, non-public information ("Inside Information"). This restriction applies to all securities markets where BeOne securities are traded (e.g., the Nasdaq Stock Market, the Stock Exchange of Hong Kong Limited, and the STAR Market of the Shanghai Stock Exchange). "Material information" is any information that a reasonable investor could consider important in making an investment decision. Those in possession of material, non-public information must refrain from buying or selling relevant securities until market close after the first full trading day following BeOne's public disclosure of that information. Also prohibited is disclosing Inside Information to others or recommending that others buy, sell, or hold BeOne securities when you are aware of Inside Information commonly known as "tipping."



Examples of material, nonpublic information that an investor could consider important in deciding whether to buy, sell, or hold securities could include:



- Financial results;
- Potential mergers or acquisitions;
- Licenses;
- Clinical trial results; and
- Regulatory guidance or action.

To avoid even the appearance of trading on Inside Information, some Company Personnel may be designated as "Restricted Insiders" by the Company's Insider Trading Compliance Officer and subject to additional requirements under BeOne's Special Trading Procedures for Insiders ("Trading Procedures"). Generally, the Trading Procedures require Restricted Insiders to obtain pre-clearance of all transactions in the Company's securities from the Insider Trading Compliance Officer, or if unavailable, the Company's Chief Financial Officer.

Violations of securities laws are taken very seriously. If you are uncertain about the implications of a purchase or sale of any BeOne or other company securities by virtue of your service relationship with the Company, you should consult with the Insider Trading Compliance Officer before entering any such transaction. For more information regarding trading in Company securities, please refer to BeOne's <u>Insider Trading Policy</u> and the <u>Trading Procedures</u>.



#### **Privacy and Data Protection**

The majority of countries have adopted strict privacy and data protection laws ("Privacy Laws") governing the collection, use, and sharing of individuals' personal data. These Privacy Laws generally apply to personal data from various sources, including but not limited to patients, clinical trial subjects, vendors, Healthcare Professionals, visitors to our websites, and Company Personnel. Personal data, also known as personal identifiable information, is any information that directly or indirectly relates to an identified or identifiable individual.

BeOne is committed to protecting the privacy and security of all personal data, including sensitive health information, which comes into our possession in compliance with applicable laws. All Company Personnel are expected to ensure that personal data is collected, transmitted, stored, and used only in accordance with applicable laws, the Global Privacy and Data Protection Policy, and other applicable company policies. Personal data must also be processed only using Company-approved systems, as required by the notices we provided and/or the consents we collected.

In addition to Privacy Laws, data may also be subject to other strict regulations related to national security or public safety. These can include restrictions on the bulk transfer of sensitive data to certain jurisdictions, and the transfer of important data to countries where transfer is restricted by law. Company Personnel should always follow the Company's relevant guidance or consult with the Privacy and Data Ethics Office before transferring such sensitive data to or allowing access by individuals outside of the data's country of origin.

In our commitment to upholding privacy and data protection, we also embrace broader data ethics principles, such as fairness, transparency, accountability, and respect for individuals' rights in all our data processing activities.

For further information regarding privacy and data protection requirements, please refer to BeOne *privacy and data protection policies and procedures* or contact the Privacy and Data Ethics Office in the Legal and Compliance Department.

#### **Scientific Integrity**

We are committed to conducting our research and development operations in accordance with applicable laws and regulations and internationally recognized quality standards, such as those for Good Laboratory Practice (GLP) and Good Clinical Practice (GCP). We uphold the integrity of the Company's research and clinical development activities by ensuring that all pre-clinical and clinical development is conducted in accordance with the highest ethical, medical, and scientific standards.

Scientific misconduct in all of its possible forms is strictly prohibited. Examples of scientific misconduct include, but are not limited to, fabrication, falsification, or plagiarism in proposing, conducting, or reporting research, disregarding the intellectual contributions and property of others, impeding the progress of research, and corrupting scientific records.





We seek to provide transparency in all of our research and development results and outcomes, whether positive or negative. In doing so, we strive to advance scientific knowledge, enhance patient care, and preserve the trust of our stakeholders.

#### Social Media

"Social Media" generally refers to digitally published information and online content including, but not limited to, websites and applications for social networking and other forms of online communication. Only authorized Company Personnel may speak on behalf of the Company, and all Social Media activity must comply with our Code, Company policies, and applicable laws and regulations. Company Personnel must avoid sharing confidential information, combining personal and business content, or posting material that could harm BeOne's reputation. All posted content should always be truthful, accurate, respectful, and consistent with our values. Furthermore, applicable laws, regulations, industry codes, and enforcement vary from country to country, so please refer to the regional or country-specific guidelines or consult the Corporate Affairs or Legal and Compliance Department.

When you refer to BeOne in social media, remember that such communications can be interpreted by external audiences, including regulators, as official statements on the Company's behalf.

For further information regarding social media use, please refer to the BeOne <u>Personal Social Media Policy</u> and/or consult with the Corporate Affairs Department.

## Media, Investor, or Other Public Inquiries

BeOne is committed to delivering accurate and reliable information to the media, financial analysts, investors, and other members of the public. This information should be disclosed only through Company-approved channels to ensure that all those with an interest in the Company receive equal access to information.

All inquiries or calls from investors should be referred to the Investor Relations Department, and all inquiries or calls from the media or others should be referred to the Corporate Affairs Department.

We have designated specified individuals in these departments, as well as certain Company Officers, as our official spokespersons for the Company. Unless specifically authorized by the Investor Relations Department or Corporate Affairs Department, these designees are the only Company Personnel who may communicate with the media, investors or others on behalf of the Company.

If a reporter contacts me about basic information on BeOne, may I provide brief answers?



No. Even simple questions must be forwarded to our Corporate
Affairs Department to ensure that all relevant facts are provided in an accurate and consistent manner. This also helps ensure that potential material information is publicly disclosed according to Company plans and in compliance with applicable securities laws.



## Cooperating with Government Investigations

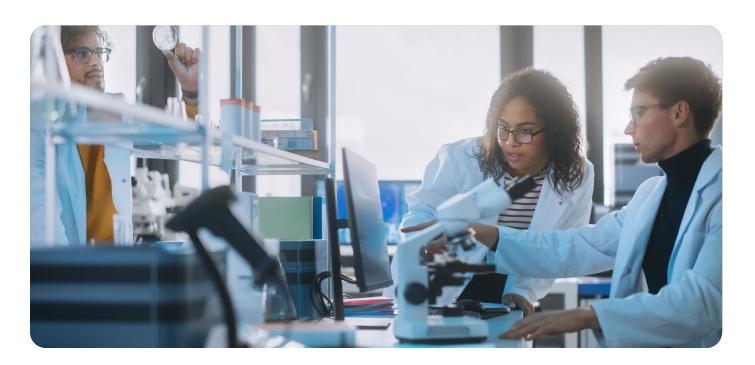
BeOne is committed to cooperating with all lawful government requests for information relating to the Company or its operations. This commitment does not limit the Company's efforts to protect and defend its interests and rights afforded under law. If you are presented with a government agency request for information or access to Company facilities, documents, or assets, immediately notify the Regulatory Affairs Department or the Legal and Compliance Department before proceeding or speaking with anyone from the requesting agency. Nothing in this Code of Conduct is intended to inappropriately interfere with any lawful government investigation.

#### Code Dissemination, Amendments, and Waivers

The Company will distribute the Code to all Company Personnel and make it available on the Company's website. All Company Personnel must acknowledge that they have read and understand the Code and that they will comply with it. Violation of the Code may result in discipline, up to and including termination of employment.

BeOne reserves the right to amend or alter the Code at any time and for any reason, provided that any amendment shall be publicly disclosed to the extent and in the manner required by applicable legal and regulatory requirements. The Company's Board of Directors must approve any material amendment to the Code.

Any waiver of the Code for BeOne's Directors or Executive Officers may be made only by the Company's Board of Directors or a Board Committee and shall be promptly disclosed, along with the reasons supporting such waiver, to the extent and in the manner required by applicable legal and regulatory requirements.







BeOne Code of Conduct Effective September 2025