



**I-MAB**  
BIOPHARMA  
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# Code of Conduct

January 2022

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Our Code of Conduct is a guide to the responsibilities we share for compliant conduct. It will help you know and apply our requirements for compliant behaviors. While this Code may not offer guidelines for all situations, we can give general guidance to help you in your decision-making. This Code also provides you with resources for asking questions or reporting concerns.

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# LETTER FROM OUR FOUNDER, CHAIRMAN AND ACTING CEO



Dear Colleagues,

As a global innovative biopharmaceutical company, we are operating in a highly regulated and challenging environment, addressing unmet patient needs all the time. All of these require that the core of everything we do shall be based on the fundamental values of honesty, integrity, and ethical conduct.

Everyone of us must work together, make the accurate and compliant personal decision to build up the reputation of I-MAB. We must overcome any difficulties thereof and strive to be just and fair, and do what is right on the job. Our Code of Conduct sets forth our positions, expectations and commitments. It guides us how we carry out our work and clarifies what we must do.

There are simple and practical steps everyone can take to transform our values into behaviors, including:

- Reading and referring to this Code regularly to ensure that you understand our standards for compliance and the applicable laws and regulations;
- Raising questions any time, and reporting any possible violations;
- Understanding and complying with all standards contained in the Code that apply to your work.

Following our Code of Conduct is a top priority for our business and our leadership. These are absolute requirements for working at I-MAB. Thank you for helping us achieve our goals with practical actions and relentlessly upholding the I-MAB values.

Best Regards,

A stylized, handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke at the bottom.

*Dr. Jingwu ZANG*  
Founder, Chairman & Acting CEO



**I-MAB**  
BIOPHARMA  
天 境 生 物

## OUR MISSION

Bring transformational medicines to patients through innovation.

## OUR VISION

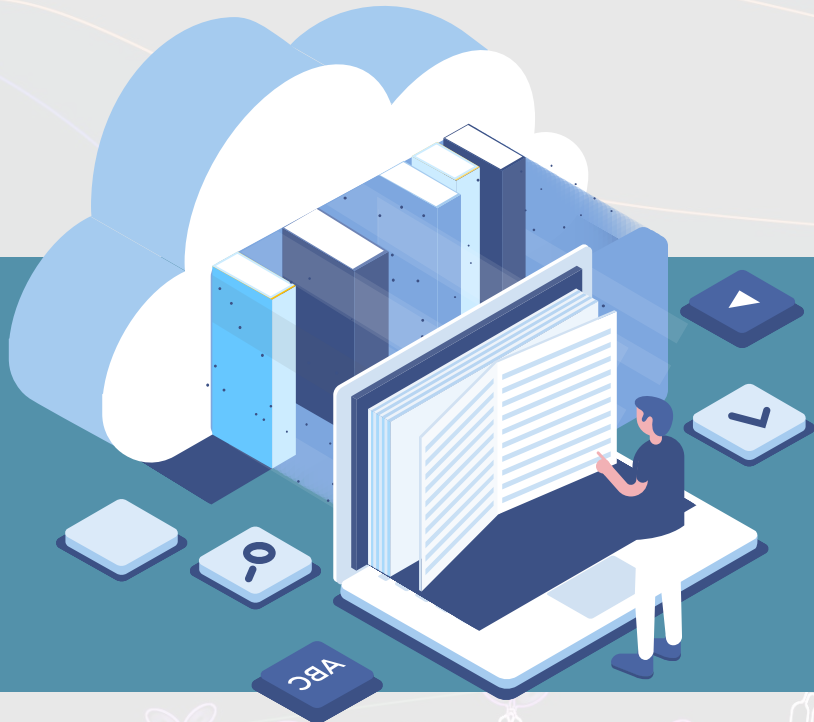
We are passionate about creating transformational therapies through innovation to address unmet medical needs in oncology and autoimmune diseases for patients in China and around the world.

## OUR VALUE

Innovation

Integrity

Resilience



# BUSINESS ETHICS

I-MAB's business activities touch patients, scientists, healthcare professionals, employees, customers and investors. Building trust and sustained business success depends on honest and compliant behavior.

Acting in compliance involves making the right choices in line with I-MAB's Corporate policies and procedures, it also means conducting the Company's business in compliance with the spirit and letter of applicable laws and regulations.

This code applies to all the Company employees (including part-time worker) , vendors, contractors and any other third parties interacting with I-MAB.

The Environment, Society and Governance Committee (ESG) plays a ethical oversighting role and regularly reviews business conduct in practice. Functional departments are responsible for the execution and fulfilling the periodical reporting obligation to the Committee.

# BUSINESS ETHICS

## **Corporate Policy Reference:**

COR-POL-001 Anti-Bribery & Anti-Corruption and Anti-Money Laundering Policy

“Public Official” includes but not limited to:

- Doctors and healthcare professionals working for public hospitals or universities;
- Public health officials;
- Customs and importation officials;
- Healthcare regulators;
- Officials responsible for clinical trial approvals and market authorizations;
- Officials responsible for product pricing;
- Officials responsible for product reimbursement; and
- Officials responsible for placement of products on hospital formularies.

## **▶ Anti-Bribery & Anti-Corruption and Anti-Money Laundering**

I-MAB does not tolerate bribery or any form of corruption. In fact, It is the policy of I-MAB to conduct its business in a manner consistent with all relevant laws in the jurisdictions where the Company does business, including all applicable anti-bribery and anti-corruption laws (or “ABAC Laws”) and anti-money laundering laws and regulations (or “AML Laws”) which also includes economic sanctions and export control laws and regulations (“Trade Controls Laws”), including those imposed by PRC, USA and other countries or regions.

You must not give or receive bribes or engage in other corrupt practices. It is prohibited to offer, promise to transfer a Bribe to a Public Official (or to any other individual or any Third Party at the request, or with the consent, of a Public Official, such as the Public Official’s close family members or close business associates) in order to influence a Public Official and to obtain or retain business or a business advantage. Bribing a Public Official is a serious offence and carries particular reputational and legal risks. You should note, however, that all Bribery, not just of Public Officials, is prohibited by the Company.

I-MAB also prohibits facilitation payments, which are small value payments made to a Public Official, in order to secure or speed up the performance of a routine or expected governmental action to which the payer is entitled. All the employees are expressly prohibited from offering, promising, accepting, giving, soliciting, receiving or authorizing, a bribe or facilitation payment.

I-MAB has set up a system of financial and accounting procedures, including systematic internal controls to maintain accurate and transparent books and records.

# BUSINESS ETHICS

## ▶ Anti-Bribery & Anti-Corruption and Anti-Money Laundering

### Corporate Policy Reference:

COR-POL-003 Third Party Due Diligence Review Policy

COR-POL-010 Healthcare Compliance Policy

I-MAB and individual personnel involved in the matter may be held liable for a bribe given or offered on I-MAB's behalf by a third party. Therefore, all the employees must take reasonable precautions to ensure that all third parties they engage have solid qualifications, charge customary fees, have no apparent conflicts of interest, and are willing to sign a written contract that includes a statement that they will not make payments prohibited by law. Third parties include suppliers, agents, brokers, consultants, and other business partners. All the employees should exercise due care in selecting such business partners to ensure they are reputable, honest, and qualified for their roles, and in monitoring their activity once selected. I-MAB has adopted mandatory due diligence procedures for certain third-party intermediaries.

I-MAB requires the employees to conduct a reasonable level of due diligence on all Counterparties and proposed transactions in order to detect risks associated with AML or Trade Controls Laws.

Prior to beginning a relationship with a new Counterparty (e.g., customers, suppliers, other business partners), Procurement Department will conduct due diligence checks on the Counterparty to identify the potential involvement of (i) Trade Controls Targets; (ii) Embargoed Territories; and (iii) Red flags of illegal or other illicit activities.

Prior to entering into any transactions with new or existing Counterparties, the Company will screen the names of any guarantors, intermediaries, or banks involved in the proposed transactions against all applicable Trade Control Lists.

# BUSINESS ETHICS

## Corporate Policy Reference:

COR-POL-001 Anti-Bribery & Anti-Corruption and Anti-Money Laundering Policy

“Gift” means Anything of Value (no matter how small) that is given or received in connection with the Company’s business, for example, low-value reminder items. It also includes any item given during festivals and other occasions, such as Chinese New Year.

“Hospitality” means all social entertainment and/or hosting in connection with the Company’s business. It includes invitations to lectures, conferences, trade shows, sporting events and concerts or their equivalent (plus any accommodation, meals, and/or travel provided in connection with such invitation), as well as lunches, dinners, karaoke, and other outings etc.

## ▶ Gifts and Hospitality

Giving and receiving a Gift and Hospitality in the ordinary course of the Company’s business is generally permitted provided that: it is given in accordance with this Code; it is not provided for an improper purpose; and, the nature, style and tone of such Gift or Hospitality is reasonable in the circumstances and could not be perceived as lavish, disproportionate or inappropriate. When considering giving and receiving a Gift or Hospitality, please take into account all relevant positions of the Employee Handbook and the Company’s Delegation of Authority.

The following principles must be met for all Gifts and Hospitality:

- It is not made in explicit or implicit exchange for favors or benefits;
- It complies with all relevant local laws;
- It does not include cash or a cash equivalent (e.g., cash cards, shopping gift cards, jewelry, etc.);
- It is given openly, not secretly, and does not give rise to a perceived, potential or actual conflict of interest;
- It could not be perceived as bringing the Company into disrepute;
- A Company employee must be present for any Hospitality provided.

You must obtain pre-approval from Compliance Department before giving Gifts and/or Hospitality of any value to any Third Party. You must ensure that: (1) the requirements of this Code and the Corporate Policies are met, and (2) you submit to the Company supporting materials in relation to the Gifts and Hospitality to enable a systematic maintenance of all Gifts and Hospitality records. As a general guideline, providing reminder items such as coffee mugs, calendars or notebooks etc. to Public Officials may be permitted subject to pre-approval discussed above and special circumstances such as prohibitions under the internal policies of the relevant Government Authorities.



# BUSINESS ETHICS

## ▶ Charitable Contributions

- Charitable Contributions made on behalf of the Company must be reviewed by the Legal Department and approved by the Founder, Chairman and Acting CEO.
- Any such contributions must not be made for the purpose of obtaining any improper advantage or favor.
- Charitable Contributions directly made to any individuals are prohibited.
- Charity organizations seeking donations and/or sponsorship are subject to appropriate ABAC due diligence procedure.
- Any Charitable Contributions must be accurately recorded by the Company in accordance with the Company's expense reporting and internal accounting requirements.

## ▶ Political Donations

The Company does not engage in Political Donations and the employees are strictly prohibited from making Political Donations on behalf of the Company.

A stylized illustration of a microscope on the left and two laboratory flasks on the right, set against a green background. The background is decorated with faint, light-colored icons of lightbulbs and thought bubbles. The text 'RESPONSIBLE R&D ACTIVITIES' is written in white, bold, uppercase letters on the right side of the green background.

## RESPONSIBLE R&D ACTIVITIES

I-MAB's R&D activities is vital to our innovations. We are committed to protecting the clinical trial subjects' safety, and uphold the highest ethical, medical and scientific standards in the Company's research and clinical development activities. Compliance with relevant laws and regulations in our R&D activities is the bottom line for I-MAB.

# RESPONSIBLE R&D ACTIVITIES

## ▶ Following Research Protocols

Research is at the heart of all medical advances. I-MAB's research is not only scientifically beneficial but also upholds the ethical principles of research. We will not tolerate research misconduct of any conduct, including:

- Fabrication - making up data or results and recording or reporting the fabricated information;
- Falsification - manipulating research materials, equipment, or processes, or changing or omitting data or results to misrepresent the research;
- Plagiarism – using another person's ideas, processes, results, or words without appropriate authorizations.

## ▶ Protecting Animal Welfare

I-MAB is committed to ensuring compliance with the Animal Welfare Act and other applicable regulations and standards that involve the humane care of animals. Laboratory animals are only used when scientifically necessary, enabling us to make advancements and discoveries that otherwise would not be achieved. The principles of replacement, reduction, and refinement are carefully applied when research involves animals.

# RESPONSIBLE R&D ACTIVITIES

## ▶ Good Operation Practice

We are committed to conducting a clinical trial that is scientifically valid and has an appropriate benefit-risk profile, adequate informed consent, and adequate oversight. Our clinical research activities are in conformance with globally accepted principles. These principles include the Nuremberg Code, Belmont Report, Declaration of Helsinki, and the consensus of the global medical-ethics community. We follow the appropriate procedures for obtaining informed consent so that each participant understands the nature and purpose of the research before giving consent.

In our research, manufacturing and operations, I-MAB adheres to sound quality principles, including activities in our research labs, clinical trial sites, manufacturing sites and business partners' premises. This means that we comply with all the regulations and guidelines applicable to Good Laboratory Practice (GLP), Good Manufacturing Practices (GMP), Good Clinical Practice (GCP) and Good Pharmacovigilance Practice (GVP), collectively referred to as "GxP". All the employees engaged in related activities must be fully aware of their relevant GxP responsibilities.

# RESPONSIBLE R&D ACTIVITIES

**Corporate Policy Reference:**

PV-SOP-001 Medical Safety Council Charter

PV-SOP-002 Safety Management Team Charter

## ▶ Safety Monitoring and Adverse Event Reporting

I-MAB always puts patient safety as our number one priority. Our business hinges on our ability to provide high quality, safe products that improve patient health. The Company always executes the duty of reporting safety information to the FDA, NMPA and other regulatory authorities appropriately and in a timely fashion. Each of us is responsible for reporting information on the safety, quality or performance of I-MAB products, to ensure that we meet the highest levels of safety and quality standards as well as meeting our regulatory obligations.

We are ethically and legally obligated to track and report any adverse events or product quality complaints associated with our products. While all therapies can have possible adverse events, we are vigilant in our efforts to provide regulators, healthcare professionals, patients and their caregivers with accurate and timely information to promote the safe and effective use of our therapies.

# RESPONSIBLE R&D ACTIVITIES

## ▶ Environmental, Health and Safety

**Corporate Policy Reference:**

Emergency Plan for Safety Incidents

Code of Practice for Laboratories

I-MAB complies with Environmental, Health and Safety (“EHS”) legal and regulatory requirements not only for the safety and protection of all the employees, but also for the local communities in which we operate. We are committed to maintaining safe workplaces, reducing the environmental impact of our operations and encouraging environmentally sustainable business operations. This also applies to our suppliers and business partners who acknowledge our standards and commitments.

All the employees are responsible for adhering to EHS requirements and for taking the necessary precautions to protect themselves and their colleagues. This includes identifying any unsafe workplace practices and conditions and reporting all accidents and security emergencies to the local office manager or EHS representative.



## PUBLIC RELATIONS, INTELLECTUAL PROPERTY AND DATA PROTECTION

Timely and accurate communication with employees, business partners, investors and the public is a key principle for I-MAB.

I-MAB protects its Intellectual Property (“IP”) to prevent knowledge or ideas from being diminished, stolen, or misused. We protect our own IP and prohibit infringing or misappropriating the IP rights of others.

# PUBLIC RELATIONS

## Corporate Policy Reference:

COR-POL-004 External Communications Policy

COR-POL-005 Data Publication Policy

## ▶ Media Relations

Our reputation hinges on the provision of timely, accurate and consistent information. We should ensure the information delivered is objective, complete, balanced, ethical and factual. Do not respond to inquiries from any external media on behalf of I-MAB unless you are authorized.

**Media Communications** – Corporate Communications Department builds up a communication channel between the Company and the media, establishes harmonious media relations, and ensures that the media communications go in a well-organized manner. If you receive any media communication request, unless you are authorized to speak to the media on behalf of the Company, please transfer the media request to Corporate Communications immediately.

**Delivering Speech and Publishing Paper** – I-MAB acknowledges the importance of publishing the results of R&D activities in order to obtain recognition within the scientific community and to advance the state of scientific knowledge. All the proposed publications related to the work performed with I-MAB or I-MAB collaborations, in written or oral form, shall be approved by the Science Committee, or Joint Steering Committee (with the collaborating business partners) if applicable.

**Financial Disclosure** – Any external communication with respect to the financial or other relevant confidential information of the Company must be approved by the CFO.



# PUBLIC RELATIONS

**Corporate Policy Reference:**

COR-POL-007 Use of External Media Policy

## ▶ Social Media

Social media, such as Twitter, LinkedIn, WeChat and Weibo bring opportunities to build conversations and communities, but it also brings risks.

All the I-MAB employees must engage in social networking conduct in a cautious and careful manner. For example, only Corporate Communications may represent the Company in social media. In addition, employees may not engage in social media postings that are inconsistent with Company confidentiality policies. The use of any social network, blog or public website to post non-public information related to the Company is prohibited without the Company's authorization.

# INTELLECTUAL PROPERTY AND DATA PROTECTION

**Corporate Policy Reference:**

[COR-POL-002 IP and Data Protection Policy](#)

[COR-POL-009 Data Management Policy](#)

## Intellectual Property

All I-MAB employees must protect the value of the IP of the Company and its business partners by protecting their confidentiality and safeguarding them from theft or misuse. These include:

- All the employees shall not copy, distribute, or modify copyrighted materials without permission from the copyright owner or its authorized agent;
- All the employees shall use only properly licensed software in connection with the Company's business;
- All the employees shall properly acknowledge and use I-MAB trademarks and follow the Public Relations requirements of our brand resources; and
- All the employees shall maintain the secrecy of innovations for which the Company will seek or is seeking patent or trade secret protection.

# INTELLECTUAL PROPERTY AND DATA PROTECTION

## Confidentiality

No employee shall duplicate, disclose, or divulge any confidential or proprietary information concerning the Company that is acquired as a result of employment or contractual engagement with the Company or its business partners, unless the employee has the express written permission from the relevant business partners or Founder, Chairman and Acting CEO of the Company. You must:

- Be careful when speaking or handling Confidential or Proprietary information in public places such as airports, restaurants, or through various public communication channels, such as social media;
- Be careful when using mobile devices or systems;
- Not share Confidential or Proprietary information outside the Company unless the third party has signed a Confidentiality Agreement approved by the Legal Department;
- Double check content and addresses on letters, packages, emails, and fax numbers prior to sending Confidential or Proprietary information.

Upon discovery, immediately report any misdirected fax, email, mail package containing Confidential or Proprietary information, or other inadvertent disclosure, to your manager and Compliance Department. Then, take steps to retrieve the information or have it deleted or destroyed by the recipient.

If you leave I-MAB, you must hand over all reports, information, and other materials relating to I-MAB pipelines and research projects to your successor or line manager. The Company prohibits you from copying, preserving, falsifying, deleting without authorization, transferring, or sending relevant reports, information, document materials or processes for your personal or other benefit. This prohibition shall continue after you leave the employment of the Company.

# INTELLECTUAL PROPERTY AND DATA PROTECTION

## Corporate Policy Reference:

COR-POL-002 IP and Data Protection Policy

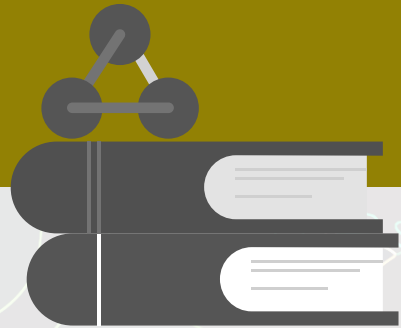
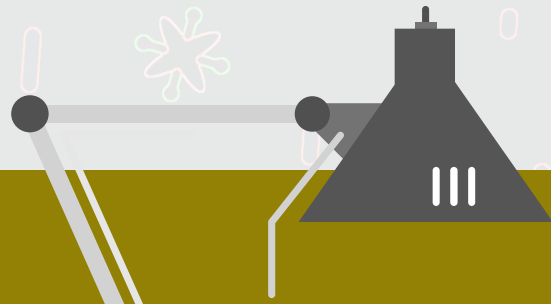
“Personal Identifiable Information” is any information (i) that identifies, or when used in combination with other information identifies, an individual, or (ii) from which identification or contact of an individual can be derived. Personal Identifiable Information include an individual’s name, home address, phone number(s), e-mail address, ID or social security number, information about health, race, religious beliefs etc. Personal Identifiable Information can be in any media or format, including computerized or electronic records, and paper documents.

## ▶ Personal Identifiable Information

All I-MAB employees are expected to protect and safeguard the Personal Identifiable Information to which they have access in the performance of their duties, respect the confidentiality of such Personal Identifiable Information, refrain from any conduct that may jeopardize the privacy or security of such Personal Identifiable Information, and comply with Company policies and procedures on the proper processing, collection, use, handling, and storage of Personal Identifiable Information in accordance with all applicable laws and regulations.

Each of our employee shall:

- Protect and process Personal Information to which you have access in accordance with our IP and Data Protection Policies;
- Avoid the use of patient’s Personal Identifiable Information wherever possible, or, in circumstances where the patient’s Personal Identifiable Information is used by I-MAB, obtain the patient’s informed and express prior consent;
- Meet any extra standards required by contract, Delegation Agreement, or Data Transfer Agreement;
- Not disclose Personal Identifiable Information to a third party without appropriate authorization;
- Report immediately to Quality Assurance and Compliance Department if you become aware of a privacy incident related to Personal Identifiable Information; and
- If Personal Identifiable Information is to be transferred outside of any country, check to determine the necessity of a cross-border data transfer agreement.



## WORKPLACE & ASSETS

We are firmly committed to providing equal opportunity and a positive working environment

Appropriate use of our assets is required and we must take reasonable steps to protect assets against theft and misuse.

# WORKPLACE

## Corporate Policy Reference:

Outside Employment and Business Activities

Policy

## ▶ Conflicts of Interest

A personal conflict of interest is a situation in which a Relevant Individual's personal interests (or the interests of a close family member) are at odds with, or appear to be at odds with, the Relevant Individual's duties to the Company and/or its business partners. Employees and Directors must disclose and obtain approval from the Board of Directors of the Company (the "Board") for all outside employment and business activities before acceptance of any such positions or engaging in any outside employment or business activities. Conflict of interest situations may include but not limited to:

- Service as an officer, director, employee, agent, representative or advisor to any I-MAB competitor, customer or supplier;
- Holding any financial interest in a company that is a competitor, customer or supplier to I-MAB;
- Consulting/professional advising activities for other organizations or institutions.

No employee may hold any ownership interest in a privately held company that is a competitor, customer or supplier to I-MAB. An employee may hold up to 1% ownership interest in a publicly traded company that is in competition with I-MAB. If the employee's ownership interest in such publicly traded company increases to more than 1%, the employee must immediately report such ownership to the Chief Compliance Officer.

If you believe you have a conflict of interest with respect to the Company, please contact Compliance Department.

# WORKPLACE

## ▶ Diversity and Inclusiveness

I-MAB values a diverse and inclusive working culture. We are firmly committed to providing equal opportunity and a positive working environment in all aspects of employment, regardless of race, gender, ethnicity, religion, national origin, sexual orientation, age, disability or medical condition or any other legally protected status or characteristics.

## ▶ Discrimination and Harassment

I-MAB 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. 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. Each of the employees is required to report any discrimination or harassment they may witness or experience in the workplace using the reporting procedures provided in this Code.

# ASSETS

**Corporate Policy Reference:**

IT-SOP-003 Information Technology Policy

## Information Technology Assets

I-MAB provides its employees a wide range of information technology assets to help them work effectively. You must take reasonable steps to protect I-MAB's assets against theft and misuse. I-MAB's assets and systems are granted for use as a business tool and must be used productively and for business purposes. I-MAB's assets and systems must be used in compliance with applicable policies and procedures and may not be used to:

- Violate any I-MAB policy and procedure;
- Engage in illegal, fraudulent, or malicious conduct;
- View, send, receive, or store offensive, obscene, or defamatory materials;
- Harass other individuals; or
- Any activities irrelevant to work, for example, chatting, playing computer games, reading novels etc.
- Breach of confidentiality.

To protect the security of the information management environment, I-MAB reserves the right to restrict personal use of e-mail and Internet services. Such restrictions include website restrictions, size and type of files (for example, photos, music or video), or the dissemination of spam messages.

All software used on the Company computer must be legal, licensed and in compliance with I-MAB Standard. The employees are prohibited from installing any non-compliant software without the authorization of IT Department, IT Department conducts regular monitoring on the status of all software.



# ASSETS

**Corporate Policy Reference:**

[FIN-SOP-007- Assets Management Policy](#)

## **Protecting Tangible Assets**

All the employees must actively participate in helping to ensure the protection of our tangible assets. Tangible assets are ones that have a physical form, such as office equipment, laboratory equipment and products etc. Every employee should be aware that the Company's tangible assets may not be taken without appropriate approvals. Theft of the Company's property, including the Company's products, equipment, facilities etc., is a serious violation of the Company Policy and can be subject to criminal prosecution. You must:

- Keep tangible assets within your control secure at all times. Employees who remove or transport tangible assets outside of Company's premise must return such assets as soon as possible;
- For tangible assets that are not located in the Company's premises for long term, the status of these assets shall be recorded, tracked and counted periodically;
- In instances of theft or damage of tangible assets, immediately report such incidents to Finance and Legal Department and to your line manager.



# CORPORATE GOVERNANCE

I-MAB is committed to corporate responsibility and accountability, and appropriate fiscal oversight, including accurate and timely financial reporting.

Violations of securities laws are taken seriously by I-MAB.

# CORPORATE GOVERNANCE

## Books and Records

We use a system of internal financial controls to help protect Company assets and help to ensure the accuracy of financial records and reports. You must follow all financial policies and procedures, including expense reporting. Effective management of Company records is essential to meet business needs and satisfy applicable legal requirements. Therefore, I-MAB requires that the Company records must be:

- Retained for as long as required by law, applicable record retentions policy, or applicable contract;
- Destroyed in accordance with applicable record retentions policy; and
- Protected from destruction when a “legal hold notice” has been issued.

In the event of litigation, investigation, audit, or examination initiated by I-MAB, I-MAB’s business partner or any government agency, all documents must be retained that relate to the matter under review. Any employee who destroys, alters, or conceals a record or document, or attempts to do so, with the intent to impair its use or availability for use in an official proceeding could face discipline or even legal action.

Our Company 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 deviation from these standards has a responsibility to promptly report this information using the reporting procedures provided in this Code.

# CORPORATE GOVERNANCE

## Corporate Policy Reference:

[COR-POL-006 Insider Trading Policy](#)

[COR-POL-008 Related Party Transactions Policy](#)

## Securities Trading

All I-MAB employees are prohibited from buying, selling or engaging in any transaction with respect to securities (e.g., shares, ADSs, options, Restricted Stock Units or derivatives) of I-MAB or any other business partners with whom I-MAB conducts business or exchanges confidential information while in possession of Material and non-public information. This restriction applies to all securities markets where I-MAB securities are traded (e.g., the NASDAQ Stock Market and the Stock Exchange of Hong Kong). “Material information” is any information that a reasonable investor could consider important in making an investment decision, including but not limited to: financial performance, potential mergers or acquisitions, major litigations, strategic plans, important personnel changes, clinical trial results and regulatory guidance or actions.

Those in possession of Material and non-public information must refrain from buying or selling relevant securities until market close after the first full trading day following public disclosure of that information. The trading restrictions based on Material and non-public information apply no matter how you acquired the information. These restrictions still apply after the termination of your employment with I-MAB. If you make such a disclosure of Material and non-public information, you can be punished even if you have no financial gain.

Violations of securities laws are taken seriously. If you are uncertain about the implications of a purchase or sale of any I-MAB or other company securities by virtue of your service relationship with the Company, you should consult with the CFO before entering any such transaction.

# REPORTING CONCERNS

## Corporate Policy Reference:

[COR-POL-011 Complaint Management Policy](#)

You may liaise with the Compliance Department to report any concerns. We treat all communications seriously and with courtesy and discretion. Issues will be appropriately investigated and needed corrective action taken.

## Contact Compliance Department



E-mail:

[Compliance@i-mabbiopharma.com](mailto:Compliance@i-mabbiopharma.com)



Office Phone

[+86 21 6057 5715](tel:+862160575715)

All I-MAB employees have an obligation to act following the Company policies and procedures and help protect the integrity and reputation of the Company. You must report any perceived violations of our standards where the interest of the Company or the safety of the assets are at stake. You can consult your line manager as the most immediate resource for any matter related to this Code. Alternatively, you may also seek guidance or report a concern to any other management team, Human Resources Department, Finance Department, Compliance Department or Legal Department.



## Investigation Process

I-MAB takes violations of applicable laws and regulations, the Code, and Company policies and procedures seriously. The Compliance Department will promptly and thoroughly investigate all reports of suspected misconduct, collaborating with other departments as necessary. All the employees are expected to cooperate fully with any investigation.



## Non-Retaliation

I-MAB 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); reduction in compensation; demotion; threats; suspension; or termination. Reports of suspected retaliation should be made promptly to the Compliance Department. Management provides assurance that the whistleblowers will not be unfairly treated. Internal employee will not be dismissed, demoted or wage-cut for reporting any non-compliant incident in good faith. Business partners will not be shut down or penalty charged as the punishment for reporting any non-compliant incident in good faith.

To protect the whistleblower identity and personal legitimate right, Company has set up strict confidentiality rules and procedures to safeguard the personal identity and relevant clues during the whole processes from case opening and information enrolling, to documentation and internal investigation.

# MANAGER'S RESPONSIBILITY

As a leader, the manager has a special responsibility for setting the culture and the work environment for the team. The way the manager makes decisions, and handle concerns, different opinions, and even bad news, will profoundly influence the trust building with team, customers and stakeholders.

In term of practicing the Code of Conduct, the manager should not only be the role model, but also empower the team to put theories into practice.

Take these simple steps to build a culture of trust and integrity on your team:

- Communicate regularly with your team and be clear about your expectation on integrity;
- Lead by example and uphold higher ethical standard in daily work;
- Ensure all your team members know how to do the right thing;
- Be a good listener when concerns or doubts are escalated.

## CONCLUSION

Each of our employees has an obligation to practice good business ethics. This Code may not cover all the rules and regulations that apply to every situation, however, the values and requirements summarized here can help you make the right decision. Each of us is expected to behave in compliance even the reference of a specific Company policy is not available. No illegal or unethical act can be justified by an order from the higher management or a third party.

Violation of this Code and any Company standards or policies may result in disciplinary action that could include dismissal and / or legal action.

Business Conduct trainings are organized annually to enhance internal and external ethical behavior as well as mindset by attendees, which include but not limit to all the employees, vendors, contractors, business partners and etc.

**This document may change from time to time.** To view the most current version, please visit [www.i-mabbiopharma.com](http://www.i-mabbiopharma.com) or email the Compliance Department for a copy at [compliance@i-mabbiopharma.com](mailto:compliance@i-mabbiopharma.com).

Though this Code of Conduct is not an employment contract between I-MAB and its employees, violation of this Code and any Company standards or policies may result in disciplinary action that could include dismissal and / or legal action.

Other I-MAB documents, such as policies, employee handbooks, or employment contracts, may cover the responsibilities required in this Code in more details. If there is a conflict between standards, the more restrictive standard applies.