

Hong Kong Exchanges and Clearing Limited and The Stock Exchange of Hong Kong Limited take no responsibility for the contents of this announcement or its representation as to its accuracy or completeness and expressly disclaim any liability whatsoever for any loss howsoever arising from or in reliance upon the whole or any part of the contents of this announcement.



Hepalink

HEPALINK PHARMACEUTICAL GROUP CO., LTD.
(深圳市海普瑞藥業集團股份有限公司)

(A joint stock company incorporated in the People's Republic of China with limited liability)

(注册编号 : 9989)

INSIDE INFORMATION ANNOUNCEMENT RESULTS OF INDEPENDENT THIRD PARTY INVESTIGATION

This announcement is made by Shenzhen Hepalink Pharmaceutical Group Co., Ltd. (the "Company") pursuant to the independent financial audit report of the Independent Director of the Board of Directors (Chapter 571 of the Law of the People's Republic of China) and Rule 13.09(2)(a) of the Rules Governing the Listing of Securities of The Stock Exchange of Hong Kong Limited.

FORMATION OF SPECIAL INVESTIGATION GROUP

Reference is made to the telecommunication records disclosed in the independent financial audit report of the Company dated 15 January 2024, 30 January 2024 and 15 March 2024 (the "Financial Information").

The Company established an independent investigation group (the "Special Investigation Group") on 30 January 2024. The Special Investigation Group, led by the Company's independent non-executive director, engaged an external audit firm as the independent investigation team (the "Independent Third Party") to conduct an independent financial investigation, collaborate with an external audit firm, and the Telecommunication Records Investigation Committee established by the Company's wholly-owned subsidiary Tech Pharma Italia S.R.L. ("Tech Pharma Italia") (the "Investigation Committee").

On 26 March 2024, the Investigation Team delivered the investigation report to the Special Investigation Group (the RIG). The elements of the investigation are as follows:

I. BACKGROUND OF THE INVESTIGATION

According to the information received from the Commission dated 15 January 2024, Techdata Italia received a confidential business information disclosure from a reliable telecom fraud investigator, which was estimated to be approximately 11.7 million euros. After the Telecom Fraud Case, the Commission requested the Italian license of the Shenzhen Municipal Public Security Bureau of the Commission's legal risk management team, hired a law firm and established the Special Investigation Group led by the Commission's deputy director - executive director, which engaged the Investigation Team to conduct the investigation in collaboration with a dedicated technical law firm.

II. SCOPE OF THE INVESTIGATION

The Investigation will cover the following categories:

1. Obtain and investigate the element of communication records, including communication records with legal bodies and communication records related to the Telecom Fraud Case; the license related management case of the Commission and Techdata Italia; basic information of the commission investigator (such as organization, contact details, etc.); and the activities of communication related to the Telecom Fraud Case, including but not limited to (1) specific bank account information and their activities records; (2) record of financial ledger; (3) actual record of electronic payment and ledger information; (4) relevant external investigation report regarding the Telecom Fraud Case; (5) the Commission's badmote element communication records; and (6) the deleted evidence of the Telecom Fraud Case to rectify the situation;
2. Conducting the investigation with the element of the Commission and Techdata Italia has received the Telecom Fraud Case to determine a detailed description of the Telecom Fraud Case's specific, including the background, chronological sequence, cause and effect of the Telecom Fraud Case to all the elements and the behavior of the participants;

3. CNDCTG... che... ecti... d... cial data... al i, cl... g: 1) data... al i... Techd... Ital... '... cial data d... g the ele... t... e... gati... timef... ame; 2) data... al i... b... k acc... t... t... a... ct... associated with the Telec... m... F... a... d... cid... t; 3) ... al t... a... ct... d... g the e... i... d... f... m... l... J... e... 2023 t... 31 Decembe... 2023, id... t... if... d... ex... am... e... d... ch... i... eg... la... t... a... ct... the b... k acc... t... f... d... f... Techd... Ital... f... m... a... i... e... ecti... e... (... ch... a... the id... t... itie... f... the... a... m... t... c... n... te... a... tie... ,... d... the time... d... am... t... f... the t... a... ct...); 4) am... t... g... a... m... t... made b... Techd... Ital... d... g the e... i... d... f... m... l... J... e... 2023 t... 31 Decembe... 2023... d... e... ie... g... thei... che... d... t... g... d... c... m... t... ,... cl... d... g... b... t... t... limited t... a... al... ec... d... ,... ice... d... c... t... act... ;
4. CNDCTG... backg... d... check... all... a... tie... l... ed... the Telec... m... F... a... d... cid... t, cl... d... g... b... t... t... limited t... the... a... ee... d... thei... c... m... d... egi... t... ai... f... mati... di... ect... hi... a... t... m... t... t... id... t... if... d... t... t... ial... elati... hi... bet... ee... them... d... the m... a... g... em... t... d... /... em... l... ee... f... Techd... Ital... ; additi... all... ,... b... lic... ea... che... e... e... c... d... ct... ed... the... ame... f... the email d... ma... ed b... the... ect... f... the Telec... m... F... a... d... cid... t;... d...
5. CNDCTG... elect... ic... f... ic... the C... m... d... '... email acc... t... ,... k... c... m... te... ,... d... k... m... bile... de... ice... f... the Techd... Ital... e... el... elated... t... the Telec... m... F... a... d... cid... t, ... d... the ele... t... e... al... c... mm... icati... ec... d... ,... ch... f... ic... acti... itie... cl... de... 1) c... eat... g... elect... ic... f... ic... data... mi... g... d... back... ;... d... 2) ext... act... g... f... mati... . Li... t... f... ke... d... ha... be... ee... a... ed... ,... d... a... f... ic... e... ie... f... the id... t... ifi... ed... d... c... m... t... ha... be... c... d... ct... ed... af... e... a... l... g... the... e... ke... d... y... a... ea... ch.

III. KEY FINDINGS OF THE INVESTIGATION

(1) C... T... F... I

Acc... d... g... t... the... te... ie... ith... the... m... a... g... em... t... d... ec... e... ed... IT... data... the... ge... e... al... m... a... g... e... f... Techd... Ital... e... ce... i... ed... d... email... 13 Decembe... 2023... f... m... a... f... a... d... ect... h... et... ded... t... be... hi... e... i... . The... ect... e... e... ed... him... t... a... i... t... a... c... fid... t... ial... ac... i... iti... (the... A...)... d... ma... i... tal... t... ict... c... fid... t... ial... it... t... e... t... f... mati... leakage. F... m... 13 Decembe... 2023... t... 3... J... a... 2024... he... ce... i... ed... m... li... le... d... f... ted... t... ct... i... f... m... the... ect... d... a... d... a... ged... a... a... m... t... f... a... x... imat... el... 11.7 milli... e... ith... t... ee... k... g... the... a... al... f... y... f... m... g... d... e... el... e... the... C... m... d... (the... P...).

After the release of the general management, it was determined that he did not disclose the Payment to the affected bank. The fact that the Accountant should be kept strictly confidential and that information leakage could indicate the extent of the market. On 13 December 2023, the project allocated the general management to a confidential agreement and directed him to handle the Payment and keep it confidential until the Accountant was notified. During the aforementioned period, the general management took immediate action to see if the project's identity had been detected and flagged.

The Investigation Team identified the main cause of the failure of the management of Tech Digital and the Company to detect the abnormality and take a timely measure:

- (i) the finance management of Tech Digital had limited bank account management authority and was unable to check the bank account balance after the general management removed the USB-key;
- (ii) the Company's head office could not obtain the account balance from the local staff by emailing the relevant information once a week and the last working day of each month.

During the investigation, the Investigation Team traced the elements of the case back to the Telecom Fraud Center (the PCC). The Investigation Team conducted background checks on the Payment to the management team in line with the Company's employment, finding the relevant information. The Investigation Team also reached out electronically for key information about the Payment to the management team, but failed to obtain data about them, their staff, except for their names and a general idea of the management details and communication related to the Telecom Fraud Center. Based on the digital forensic work of the Investigation Team, connections were found between the Telecom Fraud Center and the digital assets associated with Tech Digital, the employees of the Company.

(2) **INTERNATIONAL COOPERATION TO FIND**

After the Telecom Fraud Center, the Company took a series of measures to identify the relevant case. The Company collaborated with bank to facilitate the release of bank account balance and control the USB-key. The Company's IT department also examined and analyzed the Company's confidential information security risks and capabilities, and implemented full-scale measures to strengthen email security.

After reviewing the Report, the Special Investigation Group found the content to be detailed and meticulous, accurately reflecting the course of the Telecom Fraud incident. The Special Investigation Group recommended the board of directors of the CMA (the Board) to adopt the findings of the Report and act in accordance with the recommendations of the Report. At the same time, the CMA initiated action in accordance with the recommendations, to effectively eliminate the impact of the Telecom Fraud incident and effectively safeguard the interests of the CMA and its shareholders.

I. OPINIONS OF THE BOARD

After reviewing the Report and the recommendations of the Special Investigation Group, the Board of the CMA is convinced that the CMA has initiated effective measures to limit the possible measures that the CMA has initiated early, including:

1. Examining the business process with the domestic and foreign subsidiaries of the CMA (the Group) to identify major risks; date and place the relevant control matrix of the CMA and its subsidiaries; based on the results of the risk assessment, find the deficiencies and the key risks, business process and business process flow control; based on the business process and risk assessment results, combined with the financial statement, find the control measures at both the CMA level and the business process level, and establish the relevant control matrix;
2. Reviewing relevant external and internal management and internal control, and take effective measures to identify and control risks; review the effectiveness of internal control system; effectively improve the business process of the CMA; improve the health and sustainability of the CMA; improve the adaptability of all domestic and foreign employees to the new market environment;
3. Identify the CMA's audit and flight risks and relevant control

4. St ǎ gthe ǎ g the cǎ t alized mǎ agemǎ t f fǎ d ǎ d im ǎ g the efficiǎ c f. tilizatiǎ f fǎ d ; t ictl im lemǎ ǎ g the fǎ d mǎ agemǎ t tem f the G . t achie e cǎ t alized mǎ agemǎ t f the ǎ teǎ al fǎ d f the C m ǎ ǎ d it . b idia ie ; cǎ tǎ . l ǎ hǎ cǎ g ǎ d im ǎ g the mea . e f cǎ t alized mǎ agemǎ t f ǎ teǎ al fǎ d ; ca ǎ g . t eg. la ǎ ectiǎ ǎ d . e i iǎ , ǎ f cǎ g t ict liabilit f l . e , m tl idǎ tif ǎ g ǎ blem ǎ d achie ǎ g cǎ tǎ . im emǎ t th ǎ gh mea . e ch a eg. la ǎ ectiǎ , ke tǎ ectiǎ , ǎ a dit . e i iǎ ; ǎ d

5. Afte detem ǎ g the e ǎ ǎ ibilitie f the e ǎ ǎ tǎ di id al th ǎ gh the e . lt f the ǎ etigatiǎ , g e f the ca e ǎ ed ith the lice, ǎ d the a ǎ ciated acti tie , the C m ǎ ill ǎ itiate ǎ ǎ teǎ al acc ǎ tabilit ced . et h ld the ele ǎ tǎ di id al t ictl acc ǎ table. Sh . ld it be fǎ d that ǎ f the ǎ l ed em l ee ha e i lated ǎ la eg latiǎ , the C m ǎ ill tǎ fe . ch ǎ di id al t the a ǎ ciate j. dicial a th itie ǎ d ide c . e atiǎ ; ǎ ǎ tǎ ce he e g ǎ egliǎ ce i e tabli hed, the C m ǎ ill ǎ f ce tǎ gǎ t di ci ǎ a mea . e agǎ t the ffǎ dǎ gǎ di id al .

S ǎ C ǎ ǎ ǎ
 B . S ǎ C ǎ C ǎ
 S H P ǎ G C ., L .
 L L
 Chairman

Shǎ zhǎ , the PRC
 Ma ch 28, 2024

As at the date of this announcement, the executive directors of the Company are Mr. Li Li, Ms. Li Tan, Mr. Shan Yu and Mr. Zhang Ping; and the independent non-executive directors of the Company are Dr. Lu Chuan, Mr. Huang Peng and Mr. Yi Ming.