

# UIH

## **Anti-bribery and Anti-corruption Policy**

### **Foreword**

Shanghai United Imaging Healthcare Co., Ltd. and its subsidiaries (individually or collectively referred to as "UIH", the "Company" or "We") vigorously advocate and cultivate a corporate culture of dedication, integrity, honesty, and enterprise. UIH is committed to generating legitimate income by continuously creating business value, contributing to society and the market, and rewarding our employees and investors. Any act of corruption and bribery deviates from the culture of UIH, erodes our business value, and harms the interests of both UIH and its stakeholders and therefore, will not be tolerated by the Company.

UIH firmly require **all employees** to abstain from bribery or corrupt practices, comply with laws and regulations, respect business ethics, and pursue personal growth and success through innovation, diligence, and collaboration, thereby generating societal value.

UIH further encourages all our business partners, including but not limited to our customers, suppliers, agents and distributors, to uphold high business ethics and collaborate with us to foster a business environment rooted in integrity and compliance.

Whether you are acting on behalf of the Company or collaborating with us, this policy serves as a guide to help you uphold ethical standards and professional behaviors.

### **Part 1 Management Commitment**

The Anti-bribery and Anti-corruption (hereinafter or collectively referred to as the "ABAC") compliance is one of UIH's fundamental company values, overseen and managed directly by the UIH Board of Directors.

UIH is committed to observing and implementing effective compliance procedures to comply with Chinese, and other global and local anti-corruption and anti-bribery laws applicable to the regions where the Company operates, including but not limited to the Anti-Unfair Competition Law of the People's Republic of China (AUCL), the U.S. Foreign Corrupt Practices Act (FCPA), and the U.K. Bribery Act ("UKBA").

UIH has formulated this Policy based on the applicable laws and the industrial best practice to ensure that the Company complies with the ABAC compliance requirements under the applicable laws. This Policy is binding for all UIH Personnel, who must comply with the stipulations outlined herein. In addition, the Company has provided compliance guidelines to our business partners in accordance with this Policy.

Employees found violating applicable ABAC laws and regulations, or the Company's compliance policies, will be subject to disciplinary action, up to and including termination of employment.

ABAC Compliance is also an essential duty of managers at all levels of UIH. Managers at all levels should cultivate and advocate a culture of compliance, urge their department/team members to accept compliance training, establish and maintain a transparent, open and

smooth working mechanism to prevent corruption, cooperate with and support anti-corruption investigations and audits, and implement disciplinary decisions made by the Company. These aspects are an important part of assessing the performance of managers at all levels of UIH.

## **Part 2 Principles**

The following principles form the basis for the specific requirements outlined in this Policy. Adhering to and upholding these principles will ensure compliance with and implementation of the requirements of this Policy. When collaborating with UIH in various business activities, we encourage our business partners to adhere to at least the same level of these standards, possibly adopting even stricter principles when applicable:

**Integrity** In order to prevent corruption, UIH upholds the utmost integrity standards. Any behavior that violates the principle of integrity will be considered a serious breach of discipline, regardless of whether it constitutes a violation of specific provisions of this Policy or any other regulations of the Company.

**Transparency** UIH actively accepts social supervision, truthfully responds to inquiries made by relevant authorities in accordance with the law and actively cooperates with relevant departments to conduct audits and investigations in accordance with the law. UIH Personnel shall proactively accept the Company's review and supervision of his/her engagement/employment, job performance, reimbursement, and other aspects, and provide all reasonable cooperation. UIH also expects and encourages our business partners to maintain transparency and cooperate with us to conduct necessary assessments and audits.

**Compliance with laws** UIH strictly complies with all laws and regulations related to anti-corruption and anti-bribery, including but not limited to Criminal Law, Anti-Unfair Competition Law, and relevant regulations issued by judicial and administrative departments. When conducting activities on behalf of the Company, UIH Personnel must respect the anti-corruption and anti-bribery provisions of the cooperating party or its superior management department.

**Accountability** UIH will take strict action against anyone who engages in bribery and corruption in accordance with this Policy and other regulations of UIH. Any employee engages in corruption and causes losses to the Company, should compensate the Company; if the corruption involves illegal crimes, the employee should bear legal responsibility.

## **Part 3 Definition and Scope of Bribery and Corruption**

Unless otherwise provided by laws and regulations, this Policy specifically emphasizes that UIH shall not tolerate and will take strict compliant actions against the following Bribery and/or corruption situations and behaviours:

### **3.1 Conflicts of Interest**

Conflicts of Interest refer to the potential contradiction and conflict between an employee's personal interests and the Company's interests that the employee represents or maintains in the performance of his/her duties.

Depending on the different causes of conflicts of interest, we categorize conflicts of interest into the following categories and situations.

**Direct Benefits:** Employees of the Company have the right to enjoy the legitimate benefits under their contracts with the Company they work for (such as labor contracts, service contracts, etc.). Beyond these benefits, employees should not pursue or participate in their own economic interests during the performance of their duties at the Company, and should not accept or solicit any form of personal benefit from the Company's counterparties, partners, competitors (collectively, "interest-related parties") or personnel of the interest-related parties.

**Transactional Conflict:** If any employees, their relatives, or any companies and corporations in which they have invested, or from which they can benefit (collectively referred to as "UIH affiliated parties"), engage in transactions, cooperation, or other forms of economic dealings (collectively referred to as "Related Transactions") with the Company or any party related to the Company's interests, or if any other similar situations exist, it may constitute a transaction conflict.

**Family and Relatives:** If an employee engages their relatives during the performance of their duties, it may affect the realization or maintenance of the company interests.

**External Part-time Job:** If an employee also works or serves for other companies or corporations ("part-time job"), there may be a conflict in work input between performing their duties for the Company and engaging in part-time job, which may affect their work performance in the Company.

### 3.2 Bribery and Acceptance of Bribes

"**Bribery**" refers to offering or promising any form of benefit (except for those benefits transparently stated in contracts as conditions of the transaction) to any entities or individuals with the intent to obtain or maintain business opportunities, commercial advantages, or influence transactions (hereinafter referred to as "business benefit purposes").

The "entities or individuals" mentioned above include any government departments, enterprises, public institutions, or social organizations, as well as personnel acting on their behalf. These entities and individuals are entrusted to handle relevant matters by the transaction counterparties or can influence transactions based on their authority or influence.

"**Acceptance of Bribes**" refers to soliciting or accepting any form of benefits (except for those benefits transparently stated in contracts as conditions of the transaction) from any entities or individuals, in exchange for facilitating or providing undue business advantages.

The aforementioned "**benefits**" include but are not limited to:

- Cash
- Discounts
- Rebates
- Use of materials, equipment, software or devices
- Favors
- Gifts

- Travel and accommodation
- Research donations
- Sponsorships
- Contracts
- Loans
- Air tickets, Entertainment
- Employment/Hiring

### **3.3 Fraud**

Typical fraudulent behaviours include but are not limited to:

Embezzling company assets through fictitious reimbursement items, inflated expenses, provision of false invoices or provision of false information (such as participants, timelines, etc.);

Evasion of internal processes in contract application and execution (such as contracts not approved by the Legal & Compliance Department, splitting contract amounts, etc.), forgery of performance certificates, fabrication of performance facts, etc. to obtain undue benefits for external third parties;

Forgery of contracts, seals, signatures in the course of work.

## **Part 4 ABAC Compliance Requirements for Relevant Parties**

### **4.1 Acting on behalf of UIH**

#### **4.1.1 Act in the best interest of UIH**

Any parties who act on behalf of UIH, and/or within the authorization issued by UIH, shall always act in the best interest of UIH, and thus should avoid any situation that conflicts, or even appears to conflict, with their responsibilities to UIH.

Acting in the best interest of UIH also means that our business decisions should be based solely on the company interests. A "conflict of interest" occurs if our personal interests make it difficult for us to make objective, fair, and efficient business decisions that maximize company interests. UIH Personnel shall follow the Company's ***Conflict of Interest Policy***, and should proactively and regularly review the connections of investments, networks, and activities involved to avoid any potential conflicts of interest.

To be specific, the situations stipulated in the section of "direct benefits" of this policy directly constitute a serious violation and thus are strictly prohibited and should be avoided. Other than, most other conflicts of interest do not directly or necessarily constitute a serious violation. However, UIH employee should timely, completely, and truthfully disclose any actual or potential conflicts of interest (if any) to the Company regardless of whether the conflict of interest actually influences our business decisions and wait for guidance from the

Company on how to proceed.

If any UIH employee has a conflict of interest but does not disclose it in a timely manner, or if the disclosed information is incomplete or untrue, it constitutes a serious violation.

When UIH employee disclose conflicts of interest, they should report the relevant situation to the head of their department, the Human Resources Department, and the Legal & Compliance Department.

The Company will regularly collect conflict of interest information from UIH employee. Regardless of whether there is a conflict of interest, UIH employees should fill in the information truthfully and submit it on time.

#### **4.1.2 Do Not Offer or Accept Bribes**

We are committed to maintaining transparency and integrity in all our operations to foster a fair and equitable business environment. "Do Not Offer or Accept Bribes" is a fundamental rule in this policy.

Any parties who act on behalf of UIH, and/or within the authorization issued by UIH, should always act in honesty and integrity in all business dealings and interactions, and any bribery attempts, whether offered to or by them, are strictly prohibited.

It is strictly prohibited to provide benefits (regardless of form) to the counterparties of the transaction, or any other entity or individual who may have influence over the transaction for the purpose of selling UIH's products. If a legally permissible sale discount is offered to a counterparty that purchases the product with a free product or service or cash back, it shall be set forth in the sales contract.

Specific requirements for interactions with Healthcare Organizations and Healthcare Professionals (collectively referred to as "HCO" and "HCP") are detailed in the *Code of Business Conduct*. UIH personnel must strictly adhere to the Company's *Code of Business Conduct* when engaging in business practices involving HCOs and HCPs.

#### **4.1.3 Never defraud and always maintain accurate records**

Fraudulent behaviors constitute serious violations of UIH policies and may result in severe consequences, including damage to UIH's business reputation and the imposition of criminal and/or civil fines and penalties. Any parties acting on behalf of UIH, or within the authorization issued by UIH, must not engage in any fraudulent practices, including but not limited to those listed in the "Fraud" section of Part 3 of this policy.

The use of counterfeit seals, forgery or alteration of eligibility documents, collusion in bidding, unauthorized or over-authorized sales methods are strictly prohibited in the sale of products.

Furthermore, false, outdated, or misleading records can also damage UIH's reputation and lead to regulatory penalties. We are all obligated to adhere to UIH's internal control procedures and to maintain complete, accurate, and truthful records in books, statements, and accounting entries. Actions such as altering or destroying relevant records, fabricating expense claims, or providing forged invoices are serious violations and are strictly prohibited.

## **4.2 Collaborating with UIH**

UIH is committed to integrity, honesty, and fair marketing activities and is devoted to working with and supporting our business partners (including but not limited to our customers, suppliers, distributors and other entities who have business engagement with us) to achieve the same objectives. We place immense value on our dependable relationships with our business partners. In order to implement industry best practices, UIH has set forth following requirements and applicable compliance documentation (including but not limited to Ethics and Compliance for Supplier, Distributor Code of Ethics) as expectations of the highest ethical standards in every aspect of our business partners' dealing with their customers, business partners, and government authorities.

UIH has various kinds of business partners, including, without limitation, suppliers, distributors, contractors, manufacturers, vendors, consultants, customers, agents, public and private hospitals, universities and institutions as well as non-governmental organisations.

According to our common business practice, this Policy outlines compliance requirements and expectations for scenarios in which we collaborate with the following parties:

### **4.2.1 Our customers**

UIH is committed to providing advanced technologies, products and services to global Healthcare Organizations and Healthcare Professionals (collectively, "HCO" and "HCP"), we fully respect the professional norms, ethical standards, management regulations and codes of conduct that HCO/HCP uphold.

We kindly ask our customers to reject any forms of potential bribes that UIH (or anyone acting on behalf of UIH) may offer and monitor our business conduct throughout the collaboration with UIH and our representatives.

We also encourage our customers to report any possible misconduct or potential violations of UIH that you may discover during our collaboration.

### **4.2.2 Our suppliers**

UIH compliance system needs to be jointly maintained by suppliers. For continued cooperation with suppliers, we hope that suppliers cooperated with UIH and adhere to UIH management system and compliance requirements. Supplier must comply with all applicable laws, regulations, rules, orders, requirement and policies, and is advised to take systematic measures and internal control to ensure related aspects of its business conform to these laws and regulations.

To be specific, suppliers must observe global and local anti-corruption and anti-bribery laws applicable to the regions where it operates, prohibit any actions of bribery and fraud, and maintain correct and truthful books, records, and accounts in relation to UIH business. Suppliers shall report to UIH hotline immediately of any potential and existing conflicts of interest and shall take action to resolve the conflict.

UIH will conduct pre-contract due diligence assessment and after-contract audits on our suppliers where necessary. Suppliers are expected to support such measures and cooperate

fully with UIH in facilitating reasonable assessments and audits, which may include, but are not limited to, on-site visits, management reviews, and providing access to books and records related to UIH business.

It's mandatory for all suppliers to accept, acknowledge and sign *Ethics and Compliance for Supplier* of UIH prior to formalizing any business relationship with us.

### **4.2.3 Our distributors**

UIH establishes a well-around channel management system for distributors, including pre-abroad due diligence, deal approval procedures and business risk evaluation. Distributors assume an important function in our global footprint and shall execute the same duty of care and loyalty as prudent agents.

UIH works with various categories of distributors across different regions worldwide. Distributors must operate and obey in full compliance with laws, rules and regulations applicable to the regions where it operates. All distributors are required to operate strictly within the authorization scope provided by UIH, which is typically clearly defined in the contracts, agreements, or other legal documents established between UIH and the distributors. Any unauthorized actions, exceeding of authorization, or over-commitment are strictly prohibited.

When acting on behalf of UIH, distributors must adhere to this *ABAC Policy*, *Conflict of Interest Policy*, *Code of Business Conduct of UIH* and the Distributor Code of Ethics, which they accepted, acknowledged, and signed upon entering into a distribution relationship with UIH. Distributors are encouraged to communicate UIH compliance policies to, and make UIH compliance policies understood by their employees, officers, consultants, agents, affiliates and temporary workers in equal manners.

To be specific, distributors are prohibited from any violation of UIH compliance requirements, including but not limited to, offer, provision, promise or acceptance of a bribes, the act or intent of cheating, tricking, stealing, deceiving, misrepresenting and lying for personal or professional advantage, any fraudulent or dishonest behaviour.

Conflict of Interest shall be avoided at all times. Distributors are required to evaluate whether no current or prior conflict of interest exists prior to entering into any agreements with UIH.

Prior to any cooperation, the Distributor agrees to furnish UIH with all documentation that UIH deems necessary to determine its suitability, eligibility and trustworthiness.

The distributor shall keep accurate and make available to UIH, in case of any audits, all books, records and accounts in connection with its performance under the distribution contract with UIH.

### **4.3 Public Supervision**

UIH embraces public monitoring and actively accepts social supervision, encouraging external reports on any suspected corruption or bribery related to UIH activities.

### **4.4 “Blush Test”**

All of our business conduct and job performance activities are governed by the above principals and requirements. If we are uncertain whether an action is compliant, we can use the "Blush Test" for self-assessment— Would this action or decision cause you to blush or feel embarrassed if it were widely known by department heads or colleagues, or disclosed in a public domain?

If the answer is yes, it likely suggests that the action or decision might be inappropriate and we should proactively seek guidance.

## **Part 5 ABAC Training Programs**

### **5.1 Training for UIH Personnel**

UIH invests in comprehensive training programs tailored to different roles within the organization to reinforce the importance of Anti-bribery and Anti-corruption (ABAC) compliance.

For all employees (including individuals who have entered into labor/service contracts with UIH, third-party dispatched personnel, employees of service/labor outsourcing companies, interns, temporary workers, and all other individuals who fulfill specific job responsibilities within UIH), UIH will provide ABAC compliance training upon onboarding and annually thereafter. The training will cover the following topics, including but not limited to:

- The importance of Anti-bribery and Anti-corruption
- Introduction to applicable ABAC laws and regulations
- ABAC Compliance policies of UIH and specific requirements
- Compliance requirements for business conduct
- Handling of violations

For employees in critical roles, the Company will conduct regular and irregular multi-subject training sessions every year. In addition to the aforementioned training content, these sessions will also cover specific compliance processes, professional compliance guidelines, and identification and alerts for “red flags” in business.

UIH Personnel should participate in compliance training organized by the Company and participate in compliance assessments.

Any UIH Personnel who, without justifiable reasons, do not participate in compliance training, or do not pass the compliance assessment, or violate the training and assessment disciplines, the Company may require him/her to suspend work and receive compliance education.

Leaders and managers at all levels of UIH should support and urge their department staff to participate in compliance training and assessments.

### **5.2 Training for our business partners**

UIH extends its commitment to high compliance standards to its business partners.

For instance, UIH will conduct at least annual compliance training for our distributors in



every region. The training will cover key aspects of ABAC compliance and business conduct compliance, including but not limited to the following topics:

- The significance of Anti-bribery and Anti-corruption
- Introduction to applicable ABAC laws and regulations
- ABAC Compliance policies of UIH
- Handling of non-compliance

Distributors in each region are required to participate in at least one UIH compliance training session each year and are obliged to make an ABAC compliance commitment by signing the necessary documents.

## **Part 6 Whistleblowing Channel**

UIH encourages reporting any bribery and corruption of UIH through the Company's Compliance Hotline (UIH\_Compliance@united-imaging.com) , deals with it based on the principles of good faith, fairness and impartiality, keeps the report information strictly confidential, and will conduct investigations in accordance with the Company's Internal Investigation Policy.

All UIH Personnel have an obligation to actively cooperate with internal investigations, including accepting interviews, stating and answering truthfully, providing materials and information, executing instructions, etc.

UIH prohibits any form of retaliation against units/personnel who report corrupt practices, conduct internal investigations, or make (participate in) decisions on anti-corruption disciplinary actions. The aforementioned "retaliation" includes any actions (including acts and omissions) that may affect the physical and mental health or economic interests of others, such as wage treatment, work evaluation, work cooperation, job rank, psychological pressure, mental attack, etc.

## **Part 7 Disciplinary Actions**

Any behavior that violates this Policy and other rules and regulations related to anti-bribery and anti-corruption (whether it violates substantive or procedural regulations) constitutes major violation under the Employee Handbook or serious breach of contract under the distribution/supplier contract. UIH has the right to unilaterally exercise relevant rights (such as dismissing employees, terminating contracts, etc.) in accordance with relevant agreements (such as labor contracts, distribution contract).