

# **UIH Policy**

## **Whistleblower Protection Policy**

### **1. Introduction**

In order to advocate a corporate culture of integrity, legitimacy and compliance, and to ensure that all employees abide by the laws and regulations as well as rules and policies of the Company, Shanghai United Imaging Healthcare Co., Ltd. and its subsidiaries (individually or collectively referred to as "UIH", the "Company" or "We") encourages and protects its employees, business partners, and other organizations and individuals who reflect and report possible violations of laws and regulations of UIH Personnel through proper channels in timely, objective and comprehensive manner. For this purpose, UIH has formulated and released this Whistleblower Protection Policy (this "Policy").

### **2. Scope**

This Policy applies to the reporting of possible violations of laws and regulations of UIH Personnel. Reflections and reports on possible violations of laws and regulations of business partners of UIH shall be applied with reference to this Policy.

### **3. Definitions**

Under this Policy, a "Whistleblower" refers to any individual or organization that reports the employee or business partners of UIH to the Company for their possible violations of laws and regulations, as well as any individual or organization that truthfully reflects the situation or provides relevant clues and evidence in the course of internal investigations conducted by the Company, "Violations of laws and regulations" referred to this Policy include: UIH Personnel violate the Company's rules and regulations (such as Anti-Corruption Policy, Conflict of Interest Policy, Code of Business Conduct, Confidentiality Policy, Information Security Policies, etc.); Business partners of UIH fail to comply with the codes of conduct they have committed to uphold, as well as UIH Personnel or business partners of UIH violate applicable laws and regulations of the places where the Company locate, where business activities occur and where the Personnel are based.

### **4. Reporting Requirements**

The whistleblower who reflects and reports possible violations of laws and regulations to the Company shall comply with applicable laws and regulations, and shall not infringe on the legitimate rights and interests of any organization or individual (such as commercial secrets or personal information irrelevant to the violations).

The whistleblower shall not use illegal or grossly unethical methods to collect evidence.

The Company opposes reporting with malicious purpose. Malicious purpose include, but are not limited to: the purpose of infringing on the honor, reputation, and interests of UIH, and its partners

and the employees; the purpose of obtaining illegitimate benefits for oneself, other organizations or individuals; the purpose of using the status of "whistleblower" to oppose the normal management or business decisions of superiors or relevant departments of the Company; and so on.

## **5. Protection Mechanism**

### **5.1 Smooth Reporting Channels**

In order to provide whistleblowers with a uniform and proper channel to report violations of laws and regulations, UIH has published a compliance hotline (as follows).

Reporting Email: [UIH\\_Compliance@united-imaging.com](mailto:UIH_Compliance@united-imaging.com)

Reporting Tel: 021-67076619

In order to understand, verify, and investigate the situation, UIH encourages whistleblowers to provide accurate and effective contact information when reporting.

UIH respects the decision of the whistleblower to withhold his/her personal identity (e.g. name, department, organization, etc.) and contact information when reporting violations for the sake of his/her own safety and interests.

### **5.2 Recusal and Confidentiality Requirements**

For the purpose of protecting whistleblowers and ensure the effective conduct of the Company's internal investigation, the Company strictly enforces the provisions of the Internal Investigation Policy regarding the recusal and confidentiality of the investigation.

The direct supervisor of the person under investigation shall proactively recuse himself/herself to avoid any work related to the investigation and conscientiously avoid receiving any information related.

All information about the personnel involved in the investigation, the content and progress of the investigation, and the investigation materials shall be maintained in strict confidence.

### **5.3 The Whistleblower's Rights and Interests Protection**

There shall be no obstruction or retaliation against the whistleblower by any department, employee or business partner of UIH with any action or inaction.

The aforementioned "obstruction" includes, but is not limited to, obstructing the whistleblower from reporting violations to the Legal and Compliance Department (L&C Dept.) of UIH, hindering the whistleblower from cooperating with internal investigation, intimidating the whistleblower and so on.

The aforementioned "retaliation" includes, but is not limited to, increasing work burdens and pressures; obstructing career advancement; reducing income and benefits (including failure to increase amounts duly); and inflicting financial, physical, or mental harm, or attacks on whistleblowers (including but not limited to appropriating, assaulting, abusing, insulting, defaming, etc.); and so on.

If the whistleblower's rights and interests are infringed, they may report to the L&C Dept. The L&C Dept. of UIH shall conduct an investigation then. After investigation, if the situation as reflected does exist, the L&C Dept. shall submit to the Disciplinary Committee to deal with those found responsible.

## **6. Training and Advocacy**

UIH shall strengthen the training and advocacy of the Whistleblower Protection Policy, raise the staff's awareness of the importance of this Policy, and ensure the implementation of measures to protect whistleblowers.

## **7. Annex**

The L&C Dept. of UIH is responsible for the interpretation and revision of this Policy.

The internal investigation conducted by UIH does not substitute for the investigations and actions taken by the competent authorities, and UIH will actively cooperate with these competent authorities in investigating and addressing such violations. Every organization and individual is entitled and obliged to reflect and report the violations to the relevant authorities in accordance with the law.

The interpretation and implementation of this Policy shall not conflict with any provision of laws.