

**SUZHOU XINRONG BEST MEDICAL INSTRUMENT CO., LTD.  
ANTI-CORRUPTION PROGRAM**

苏州欣荣博尔特医疗器械有限公司  
反腐败政策

**Suzhou Xinrong Best Medical Instrument Co., Ltd.**

苏州欣荣博尔特医疗器械有限公司

**TONE AT THE TOP**

**来自高层的声音**

Dear Colleagues, / 亲爱的同事们,

At Suzhou Xinrong Best Medical Instrument Co., Ltd. (the “Company”), we are committed to the highest standards of integrity and ethical business conduct. As part of that commitment, we have adopted an Anti-Corruption Program which makes clear that we will strictly comply with all applicable anti-corruption laws. This includes, but is not limited to, the People’s Republic of China Criminal Law (“PRC Criminal Law”) and the People’s Republic of China Anti-Unfair Competition Law (“PRC Anti-Unfair Competition Law”), the Foreign Corrupt Practices Act (“FCPA”), the United Kingdom Bribery Act (“U.K. Bribery Act”), and anti-bribery legislation enacted by each signing country in accordance with the Organization for Economic Co-operation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (“OECD Convention”). / 苏州欣荣博尔特医疗器械有限公司 (“公司”) 决心遵守最高标准的商业行为准则。为此, 公司制定了一项反腐败政策, 该政策明确规定: 我们将严格遵守适用于我们的所有反腐败法律包括但不限于《中华人民共和国刑法》 (“中国刑法”) 以及《中华人民共和国反不正当竞争法》 (“中国反不正当竞争法”)、美国《反海外腐败法》 (“FCPA”)、《英国反贿赂法》 (“英国反贿赂法”)、以及各国根据《经济合作与发展组织禁止在国际商业交易中贿赂外国公职人员公约》 (“经合组织公约”) 所制定的反腐败立法。

Under those laws and the Company policy, it is strictly prohibited for any employee of the Company, or any individual or entity working on the Company’s behalf (including representatives, agents, consultants, distributors and those employed by or working on behalf of international subsidiaries or international affiliates), to attempt to induce anyone unlawfully for the benefit of the Company. / 依据这些法律以及公司的政策, 公司的所有员工和代表公司行事的任何个人和单位 (包括代表、代理人、顾问、分销商以及为公司的国际子公司或关联公司所雇用或代表其进行工作的人员) 都绝对不允许试图通过非法手段诱导他人为公司从中获利。

The Company’s compliance policies prohibit any employee, subcontractor, representative, agent, consultant, or distributor, from offering, paying, promising to pay, accepting, agreeing to accept, or authorizing the payment of, any money or anything of value, directly or indirectly, to (or from) anyone, in order to secure an improper advantage or induce conduct that amounts to a breach of an expectation that a person will act in good faith, impartially, or in accordance with a position of trust. These types of payments are in violation of our policies and will not be tolerated. / 公司的合规政策禁止任何员工、分包商、代表、代理人、顾问或分销商直接或间接地向 (或自) 任何人提议、支付、承诺支付、接

受、同意接受、或者授权支付任何金钱或任何有价值的东西，以获取不正当的优势或者诱使其做出任何违法或违反其法定义务的行为。这些支付行为违反了我们的政策，为我们的政策所不容。

You are required to read the attached Anti-Corruption and Business Conduct Policy and abide by its terms. Through this Policy, the Company will actively and closely monitor the adherence of all of its employees, agents, consultants, distributors, and intermediaries worldwide to the PRC Criminal Law, PRC Anti-Unfair Competition Law, the FCPA, the U.K. Bribery Act, and all other international and PRC anti-corruption laws. While the FCPA is a United States statute, and the U.K. Bribery Act is a United Kingdom statute, they apply to the Company's business activities globally. / 请务必阅读附后的《反腐败和业务行为政策》并遵守其条款。通过该政策，公司将积极和密切地监督全球范围内的所有员工、代理人、顾问、分销商、以及中介机构对中国刑法、中国反不正当竞争法、FCPA、英国反贿赂法以及所有其他国际及中国的反腐败法律的遵守。尽管FCPA是美国的法律而英国反贿赂法是英国的法律，然而它们均适用于公司在全球的业务活动。

In addition, in an effort to ensure that our policies and procedures are "state of the art," we will be undertaking to develop and implement anti-corruption procedures and training around the globe. / 另外，为了确保我们的政策与程序处于最高标准，我们将承诺在全球范围内开发并实施有关反腐败程序并进行培训。

As new procedures are being implemented, it is important that you keep in close contact with the Compliance Office and strictly follow the relevant workflow procedures before providing anything of value to an individual employed by a government sponsored system or facility. / 重要的是，由于新程序的实施，你们在向政府系统或机构的雇员提供任何有价值的东西之前，都必须和合规办公室密切沟通并严格遵循相关的工作流审批流程。

The Company has set up the following helpline: 0512-58950020-8859 and e-mailbox: [compliance@xrmed.com](mailto:compliance@xrmed.com). Rest assured that employees will not be subject to reprisals for reporting information about potential problems. / 公司已经设立了以下免费协助专线 0512-58950020-8859 和电子邮箱：[compliance@xrmed.com](mailto:compliance@xrmed.com)。请您放心，员工不会因报告有关潜在问题的信息而遭到报复。

If you have any further questions or concerns, as always, please feel free to contact the Compliance Office (Tel: 0512-58950020-8859). Thank you for your commitment to this policy. / 如果您还有其他任何的疑问或担心，请如常与合规办公室联系（电话号码：0512-58950020-8859）。感谢您对该政策的支持。

---

SUZHOU XINRONG BEST MEDICAL INSTRUMENT CO., LTD.

CEO: CHRISTINE (YU) ZHANG

苏州欣荣博尔特医疗器械有限公司

首席执行官：张宇