

UIH

Responsible Sales and Marketing Policy

1. Introduction

Shanghai United Imaging Healthcare Co., Ltd. and its subsidiaries (individually or collectively referred to as "UIH", the "Company" or "We") are dedicated to provide advanced technologies, products and services to global Healthcare Organizations and Healthcare Professionals, promote development of healthcare, help patients obtain timely, accurate, safe and effective diagnosis and treatment to enhance their well-being. Based on the mission and values of UIH, also to ensure business activities of UIH comply with the requirements of applicable laws and regulations, we adhere to the business philosophy of legitimacy, compliance and honesty and integrity, and insist on high ethical standards in conducting our business to be responsible to our customers, patients, investors and the society.

2. Scope

This Policy applies to Shanghai United Imaging Healthcare Co., Ltd. (“UIH”) and its subsidiaries (collectively referred to as "the Company"). Third-party organizations (such as distributors, agents, service providers, etc.) participate in the Company's operations on behalf of UIH shall also comply with this Policy.

UIH's sales and marketing personnel and third-party personnel acting on behalf of UIH or participating in the Company's operations, including, but not limited to directors, supervisors, executives, full-time employees, dispatched personnel, part-time employees, temporary workers and consultants (collectively referred to as "Personnel"), shall comply with this Policy.

3. Principles

All sales and marketing should ensure compliance, legitimacy, honesty and truthfulness. All sales and marketing communication content should be produced with due social and professional responsibility and in accordance with generally accepted principles of fair competition in business. Sales and marketing should not offend public order and good morals of countries and local cultures. Sales and marketing should not exploit customers' trust or take advantage of patients' lack of experience or expertise. Relevant factors that could potentially affect patient interests should be considered appropriately, in a timely manner, and addressed correctly.

Sales and marketing communication content should be ensured to be truthful and accurate. Sales and marketing should not be misleading in any manner (such as by implication, omission, ambiguity, exaggeration, etc.), whether directly or indirectly.

4. Comply with Law

Sales and marketing shall comply with the laws and regulations, industry standards and regulatory provisions, applicable to the Company's domicile and location of business operations, including but not limited to:

Comply with medical device regulatory laws and regulations as well as regulatory provisions for clinical trials, production, operation and other activities of medical devices to ensure that the products and services are safe and effective;

Comply with Anti-Unfair Competition Law, Anti-Monopoly Law, Anti-Corruption Law, Advertising Law, and other laws and regulations, which maintain the market competition order. Follow the general code of business conduct within the industry, and create and deliver value through fair, legitimate, legal and compliant business activities;

Comply with laws and regulations on data security, network security, personal information data protection, etc., safeguard the trade secrets and information security of business partners and customers, and protect the privacy of individuals (e.g., employees, healthcare professionals, and patients);

Comply with laws and regulations on trade and import/export control.

5. Business Ethics

Based on the mission and values of UIH, in order to ensure that UIH's business activities comply with the requirements of laws and regulations, UIH regulates its own business behaviors with high ethical standards, and formulates and implements a code of business conduct to ensure that the purpose of sales and marketing is legitimate and lawful, and that the sales and marketing are appropriate and moderate.

UIH insists on value marketing, oriented on creating and delivering value, and abstains from corrupt practices. It is prohibited for UIH Personnel to offer or promise improper benefits to healthcare organizations, healthcare professionals, who may have influence over the transaction for the purpose of selling UIH's products or services.

Third parties conducting activities on behalf of or for the benefit of UIH should follow UIH's compliance requirements. Third parties shall not offer or promise to offer any form of improper benefits to any employee of any government department, business, institution or social organization for the purpose of obtaining or maintaining business.

6. Promotion and Publicity

UIH complies with the laws and regulations on medical device promotion and advertising. In publicity and promotion, the function, quality, use or other information of products and services are clearly, accurately, objectively and truthfully described, and are consistent with the latest and valid scientific research, test data and clinical practice.

In publicity and promotion, the marketing promotional documents (hereafter "MPD", including but not limited to Data sheets, Brochure and Website, all containing pictures and images, videos, text descriptions, index claims, etc.) of the Company's products should ensure that the name of the product is exactly consistent with the name on the product registration certificate, and the terms used for the introduction of the intended use, safety, functionality and performance indicators, use,

quality, and specifications of the product or service should be consistent with the corresponding approved registration certificate or registration filing voucher, and the materials registered or filed. Marketing promotional materials should not contain or imply features that the device does not have or performance parameters that cannot be achieved.

The safety and effectiveness of production/function cannot be promoted if it has no market approval or regulatory registration yet, and the regulatory status of the product/function should be specified in MPD.

The content of MPD should be straightforward, professional, prohibit unfair competition, and should be generated on the basis of effective data.

If promotional content in MPD involves scientific results, statistical data, survey outcomes, abstracts, data, quotations, etc., these materials must meet the requirements of being truthful and accurate, fully cited (i.e., not taken out of context), clearly sourced, and include the relevant time period (if applicable).

Publicity and promotion activities should obtain administrative approval from local regulatory and law enforcement authorities, if required by local laws and regulations.

All publicity materials of the Company shall first conduct self-inspection in accordance with the "UIH Publicity Compliance Self-Inspection Table", which is designed to help business departments identify the publicity compliance risks of public materials, and can be used as a guideline tool or learning material for reference. The Self-Inspection Table contains common publicity compliance assessment opinions, and business departments should confirm or adjust in advance according to the "key points for judgment" and "Handling Opinions" in the table when producing publicity materials.

The Company has established a promotional material review mechanism and a market promotion document control process. According to the company's "Marketing Promotional Document Control Process" the editing, review, release, and archiving processes of all marketing promotional documents intended for external publicity (including but not limited to Data sheets, Brochure and Website, all containing pictures and images, videos, text descriptions, index claims, etc.) are subject to this control process.

7. Privacy Protection

UIH is committed to safeguarding the privacy and information security of all stakeholders and enhancing the trust of customers and business partners. UIH continuously optimizes its own data security management practices and establishes a sound privacy and information security protection mechanism to fully protect the rights and interests of customers and patients.

UIH personnel shall strictly comply with the requirements of various management systems and policies, and shall only collect, store, use and transmit privacy data when necessary and based on legitimate and proper purposes, and establish corresponding technical, organizational and management measures based on best practices within the industry to ensure the full and comprehensive protection of customers' and patients' privacy data.

8. Training

UIH conducts ongoing employee education and training to communicate responsible sales and marketing awareness to all sales and marketing employees, employees in key positions involved in

external communications, and third party personnel. UIH employees and third party personnel shall implement the specific requirements of Responsible Sales and marketing in all business activities.

9. Reporting and Whistleblower Protection

UIH is subject to internal audit and social supervision. UIH encourages the reporting of any corruption and irregularities involving UIH personnel through the UIH Compliance Hotline (UIH_Compliance@united-imaging.com), and will conduct investigations accordingly. Any UIH personnel is obliged to actively cooperate with internal investigations, including being interviewed, making truthful statements and answers, providing information, and carrying out instructions.

UIH prohibits any form of retaliation against units/personnel who report violations, conduct internal investigations, or make (participate in) decisions on 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.

10. Appendix

This policy is subject to interpretation and revision by the Legal&Compliance Department of UIH.