

Responsible Sales & Marketing Policy of Shenzhen Mindray Bio-Medical Electronics Co., Ltd.

1. Purpose

This responsible sales & marketing policy is hereby formulated to ensure that the sales & marketing business conforms to relevant laws and regulations and business ethics, fulfills corporate social responsibilities, helps to enhance the medical technology in China to contribute to human health, and facilitates the sustainable development of the Company.

2. Scope

Applicable to all staff of the company.

3. Establish Sales & Marketing Compliance Teams

“Sales & Marketing Compliance Team” is hereby established to effectively promote the development of responsible sales & marketing with the following responsibilities:

- a. Responsible for the construction, maintenance, overall coordination, planning and implementation of the compliance system in respective business departments.
- b. Carry out compliance trainings, guarantee resource investment in compliance, build and improve the compliance capability of respective business departments, etc.
- c. As the first line of defense, responsible for the approval process and consultation related to compliance in respective business departments.
- d. Participate in and assist with the major compliance work carried out by the Compliance Office as well as the compliance audit and inspection.

4. Organize Trainings

Organize awareness trainings on responsible sales & marketing for all staff and business-related practice trainings on responsible sales & marketing for all staff of the Sales & Marketing Division on a regular basis.

5. Observe Industry Laws and Regulations

While carrying out sales & marketing activities of any forms, the Company must abide by the local laws and regulations applicable to the operation location and industry standards, including but not limited to “Anti-Unfair Competition Law of the People’s Republic of China”, “Advertisement Law of the People’s Republic of China”, “Personal Information Protection Law of the People’s Republic of China”, “General Data Protection Regulation” issued by EU, etc.

6. Abide by Relevant Marketing, Advertising, and Sales Regulations of the Company

It is a requirement of the Company's Code of Business Conduct and Ethics to carry out product sales and marketing activities in an ethical manner. Meanwhile, the Company has also formulated and issued the Guide to Sales and Marketing Activities, making detailed stipulations in this respect. While carrying out sales and marketing activities, the Company must follow relevant sales, marketing, advertising and other regulatory documents formulated by the Company. The relevant contents and methods of sales and marketing activities shall be reviewed and approved by authorized personnel of the Company.

In general, sales and marketing activities shall comply with the following principles:

- a. In marketing activities, interactions between the Company and healthcare professionals shall be aimed at benefiting patients and improving healthcare.
- b. Marketing activities shall promote the appropriate use of the product by presenting the product information objectively.
- c. All marketing materials shall be comprehensive, accurate and supported by product information or scientific literature.
- d. The company's product-related information such as manuals, labels, and brochure used in promotional activities should be consistent with product information approved by local governmental organization. The information should be clear, accurate, and non-misleading, which should be fair and objective to introduce to the public.

7. Disclose Relevant Information Accurately

The Company shall accurately disclose information in accordance with relevant laws and regulations as well as industry standards and guidelines. Meanwhile, the Company shall not falsely report its products, services or prices, or make false or misleading statements about the Company's products, services, performance or track record or its competitors' products, services, performance or track record.

8. Protect Privacy

The Company respects the privacy and personal information protection of its customers, business partners and other related individuals. The Company complies with applicable laws, regulations and stipulations and collects, stores, uses, processes, transmits and deletes personal information in a secure manner. The Company processes personal information only for lawful commercial purposes, and follows the principles of legality, legitimacy, integrity, openness and transparency, not exceeding the necessary limit. The Company protects the confidentiality, completeness and accuracy of all personal information. Employees of the Company who have access to personal information shall handle it in accordance with the above standards. If the Company shares personal information with trusted service providers, business partners or other third parties, the Company will require the third parties to protect the personal information they process on its behalf by signing a contract or other means.

9. Environmental Protection and Social Responsibility

While carrying out specific sales and marketing activities, the Company shall take the initiative to integrate the concept of environmental, social and sustainable development, and implement the group's environment-protection and social responsibility requirements.

10. Responsible Sales & Marketing Audit

The company's internal audit department conducts compliance audits and monitoring on Responsible Sales&Marketing-related content every year to evaluate and determine whether there are internal loopholes and other risks. The department puts forward a "risk warning" and gives suggestions for rectification if any loopholes or risks detected, so as to ensure that the policy requirements are fully implemented.

11. Reporting Channels for Violations

If there is any possible violation in the course of business development, any employees, customers, distributors or suppliers of the Company may report the violation of this policy through relevant channels. Reporting channels are listed as follows:

E-mail: compliance@mindray.com

Tel: +86 755-81888787

Fax: +86 755-26582680-88787

Mailing Address: Supervision Office, Mindray Building, South Keji 12th Road, High-tech Industrial Park, Nanshan District, Shenzhen City, Guangdong Province, China (Zip Code: 518057)