



<b>mindray</b>	<b>Document No.</b>	MRSZ/L99N02E	<b>Version</b>	Final
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**INTERNAL COMPLIANCE PROGRAM  
(ICP)  
IN STRATEGIC TRADE COMPLIANCE**

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Version	Creation/Modification	Comment	Edited By	Approved By	Effective Date
V1.0	Creation	Control the Export Business Risk	Xiaobo Sun	Jie Liu	May 2, 2013
V2.0	Modification	Modify due to organization structure change	Xiaobo Sun	Minghe Cheng	Sep 11, 2018

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**INTERNAL COMPLIANCE PROGRAM (ICP) IN STRATEGIC TRADE COMPLIANCE**

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**ANNEXURES**

Annexure 1: Denied Party Data List

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## 1. Corporate Trade Compliance Statement

Shenzhen Mindray Bio-Medical Electronics Co., Ltd. (together with its subsidiaries, branches and representative offices, “Mindray”, the “Company” or “we”) strictly observes national and international trade policies and practices. Our commitment to compliance includes China’s national laws, pertinent global trade compliance policies and practices, and relevant foreign countries’ laws and regulations. Mindray’s robust compliance program helps us mitigate trade risks, build a positive image as a responsible company, and strengthen global partnerships. It increases our competitiveness in international markets, maximizes our long-term potential in advanced medical technology research and development, and expands our possibilities for global markets.

As a leading developer, manufacturer and marketer of medical devices worldwide, we are aware of the imperatives to identify sensitive customers, to distinguish product codes, and to keep abreast of ever-changing compliance standards. We commit to employ an internal compliance program (ICP) to address trade risks. We carefully monitor and regulate employee and partner access to sensitive technologies and data that some individuals or organizations may wish to use for malicious purposes.

Mindray verifies that intermediaries, such as customs brokers, freight forwarders, or shippers, represent no potential risks. We will not engage in business with companies or individuals that present risk.

Mindray maintains a Trade Compliance Committee (TCC) and a Trade Compliance Office (TCO) to ensure ongoing, effective implementation of its internal compliance system. The Trade Compliance Office is led by the Chief Compliance Officer (CCO) and empowered with authority to veto any and all questionable transfers.

Mindray has developed and implements standard operating procedures (SOPs) for trade-related audits, recordkeeping, employee training, and transaction and order screening. We utilize databases within our SAP GTS system for sensitive products, customers, and countries in order to assist employees in performing end-user verification and product classification.

We employ a reward and penalty system to motivate our team to meet our trade compliance goals. We reward Mindray team members who successfully follow our compliance policies and practices and hold legally accountable any employee who violates them.


This commitment to compliance applies to our global organization, including all Mindray subsidiaries and offices.

Mindray leadership will review this Corporate Trade Compliance Statement annually and revise as required.

Shenzhen Mindray Bio-Medical Electronics Co., Ltd.

Cheng Minghe (President)

Signature:

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## 2. Corporate Trade Compliance Policy

Shenzhen Mindray Bio-Medical Electronics Co., Ltd. (together with its subsidiaries, branches and representative offices, “Mindray”, the “Company” or “we”) has a firm commitment to comply fully with all laws and regulations governing the export of its products, services, software, and technical data. The Company strongly opposes the unauthorized transfers of conventional arms, military equipment, related software and technologies, and other similar strategic technologies.


Mindray’s senior management actively ensures that the Company maintains strict internal compliance mechanisms. All Mindray personnel, including direct and indirect employees, that are engaged in export work are required to comply with the policies and procedures outlined in Mindray’s Internal Compliance Program (ICP) and Standard Operating Procedures (SOPs).

To effect adherence to this policy, Mindray has established a structure of export control decision-making bodies. Beyond general assistance from Mindray’s Legal Department (LD), the primary responsibility for overseeing and administering the Company’s ICP is vested in the Trade Compliance Office (TCO).

The TCO collaborates with members from appropriate departments and business units that make the export control decisions. The members are involved with foreign transactions and possess a comprehensive understanding of compliance obligations in all areas. Furthermore, these members provide input to advancing the role of the TCO. Specifically, they ensure that Mindray’s compliance managers follow export control activities, comply with applicable trade controls, and respond to possible trade violations.

Mindray’s CCO is responsible for implementing export control compliance operations on a daily basis. The CCO plays a critical function in Mindray’s ICP. The TCO and LD ensure that Mindray’s ICP fully complies with Chinese, American, and other applicable national and international laws, rules, regulations, requirements, and obligations. Mindray expressly forbids any violations of this Corporate Trade Compliance Policy or its ICP and will enforce a penalty against any employees who commit such violations.

This Corporate Trade Compliance Policy applies to all employees of Mindray. It is continuously reviewed and updated.

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### 3. Trade Compliance Structure and Organization

Mindray is committed to an Internal Compliance Program (ICP) that places responsibilities within certain departments and personnel for developing, implementing, and upholding export control and trade compliance related procedures, practices, and policies. The Mindray TCO directs the development, implementation and management of the ICP.


#### 3.1 The Trade Compliance Committee (TCC) and its Responsibilities

The Trade Compliance Committee (TCC) is a decision-making body on matters related to export control and trade compliance policies and practices. The members of the TCC are leaders in their respective business units, have extensive experience in areas of their responsibilities, and are fully committed to export control compliance. Generally, the TCC provides insight into the ways export controls affect the Company's various business areas and how best to formulate internal compliance policies in order to ensure that these regulations are effective and in line with overall business operations. Specifically, the TCC has the following duties:

- Review and confirm the export control laws, regulations, expectations, and international standards that apply to Mindray transactions;
- Hear reports from the TCO periodically;
- Review Mindray's overall compliance regulations;
- Offer input to the content, development, and periodic revision of the Mindray Corporate Compliance Statement and Corporate Policy;
- Review Mindray's compliance policies, procedures, and guidelines, including:
  - Identify countries subject to export control, including lists of controlled products and customers therein;
  - Approve the items subject to export control, as identified by the TCO's product and technology classifications efforts; and,
  - Determine if controversial potential new customers represent a proliferation concern.
- Consult with subsidiaries in developing internal compliance provisions specific to the subsidiaries' business practices;
- Review findings of internal and external audits and determine which recommendations Mindray should implement; and,
- Review and approve all export control and ICP-related SOPs developed, proposed or coordinated by the TCO.

#### 3.2 The Trade Compliance Office

The Trade Compliance Office consists of high-ranking members from Mindray's Business Units and Enterprise Business Groups (EBGs) who are appointed by the top Mindray executives. The TCO covers most of Mindray's major Business Units, and includes:


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- Legal Department (LD)
- Research & Development (R&D)
- Sales and Service
- Supply Chain
- Procurement
- Financing Management
- Production Center

### 3.3. The Responsibilities of Trade Compliance Office

The TCO is responsible for maintaining Mindray’s compliance policies and ICP. The TCO actively engages in risk management of issues, such as potentially unauthorized transfers and transactions while also devising solutions to issues of trade compliance. The TCO’s duties and responsibilities include but are not limited to:

- Provide compliance guidance and assistance to other departments;
- Conduct research on applicable export control laws, rules, and regulations;
- Review and interpret all applicable export control rules and regulations;
- Communicate important compliance information throughout the company;
- Promote the implementation and execution of ICP system, as well as relevant policies and practices;
- Evaluation and approval for any questionable sales and delivery orders;
- Review and approve products subject to export controls identified by the product and technology classification process;
- Formulate compliance policies for technologies and products to meet differing and evolving circumstances in specific countries (e.g., sanctioned and embargoed countries);
- Review export policies and guidelines for countries subject to export controls, including controlled products and customers list;
- Review with the Trade Compliance Committee sales projects that are potentially risky and/or controversial;
- Monitor and refine the ICP system, as well as provide input regarding the content, development, and revision of the Corporate Compliance Statement
- Develop, update, and implement ICP systems and provide guidance for compliance-focused personnel across the organization;
- Maintain and update records on ICP system related documents, including the ICP manual, templates, audit reports, end-use/end-user statements, ECCN, and De Minimis calculations;
- Consult with all subsidiaries regarding ICP provisions specific to their operators;
- Track compliance risks and provide risk assessment;
- Initiate periodically an internal review and audit of the Company’s ICP system;
- Review findings of internal assessments and external audits, determining which recommendations should be implemented to ensure a robust ICP and proper safeguard;
- Design and update compliance training, delivering training to key export

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control team members and providing all major compliance training materials.

### 3.4. Reporting System of the Chief Compliance Officer

To achieve the highest efficacy in reporting and decision-making and to ensure quick resolution of any trade compliance problems, the CCO utilizes a formal reporting system. This system allows Mindray personnel and management to report directly to the CCO and enables the TCC to provide decisions on trade and export control matters.

- The CCO convenes meetings with the Trade Compliance Committee (TCC), reports to all members, and receives their input and insight.
- Personnel and management must abide by the TCC and TCO recommendations and determinations.

### 3.5. Routine Reporting

The CCO updates the TCC members through monthly and quarterly reports that include the following data points:


- Major projects and/or complicated trade matters
- Complicated trade matters are listed in the project reports, and these reports are released in a reasonable amount of time to the relevant staff; and,
- Project reports alert the TCC to potentially complicated trade compliance matters and require them to direct their attention to those respective issues.

### 3.6. Research and Development Department Responsibilities

To ensure the uniform application of compliance procedures, personnel in Research and Development have duties and responsibilities including but not limited to:

- Conduct product technical control checks in operations and monitor trade compliance requirements in trade control workflow;
- Advanced identification of sales projects for sanctioned/embargoed countries that might involve export control issues, and prepare an evaluation of these issues for the TCO for review and either approval or rejection;
- Assist with assessments and audits of trade compliance in development and Implementation;
- Provide risk assessments and warnings for potentially controversial trades and/or projects.



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## 4. Principles of Compliance Training

### 4.1. The Principles of Mindray’s Compliance Training Program

Mindray employs a comprehensive, organization-wide training program for Mindray’s ICP systems and SOPs. This training protocol ensures all Mindray employees are knowledgeable of the constantly changing export controls, sanctions, and other critical regulations. Employees are made aware of the importance of trade controls. The training regimen encourages a culture of compliance to avert the risk of penalties and violations.

### 4.2. Comprehensiveness

Training materials and related information provide general awareness and understanding of ICP systems, as well as legal and technical requirements. Training is offered to new employees during the standard orientation process.

### 4.3. Relevance

Training materials, related information, and the instruction process will emphasize the philosophy and SOPs of the ICP. Broad strategy focuses on the company mission and goals, and the legal and regulatory environment under which it operates (including foreign jurisdictions). Training materials are updated to include recent changes and amendments in all legal and regulatory regimes for strategic trade control, international and national politics, proliferation risks, technology, equipment and materials, and their potential to be used for malicious purposes.

### 4.4. Consistency and Standardization


Training sessions are conducted in the classroom as well as using online, videoconferencing and other information technologies available to all employees. Mindray employees will be required to log onto the Company’s “e-learning” system, and finish both mandatory and optional trade compliance training courses. The system will alert and notify the employee when he/she has not finished a required training.

### 4.5. Quality Control

Mindray’s TCO is principally responsible for ensuring that materials and training sessions conform to strict quality criteria, based on international training and development methodologies and best practices. Trainees will evaluate regularly the training materials and course instructors through a survey, on the basis of which necessary adjustments will be made to improve the quality.

### 4.6. Sustainability

As a fast-growing high technology medical device manufacturer, Mindray employs thousands of employees, many of whom require regular training to ensure company compliance with trade control regulations. Mindray will ensure that its e-learning system is of the highest quality. Furthermore, Mindray employs a “train-the-trainer” system with a cadre of compliance training officers to ensure regularly scheduled

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training. This system allows more extreme global reach for training and ensures that the operation more widely communicates the training.


#### **4.7. Modalities of Mindray’s Trade Compliance Training Program**

Effective trade control compliance training is critical to ICP best practices and supports successful performance and operation, business continuity, and avoidance of penalties and loss of reputation. Human Resources (HR) , with the help from the Trade Compliance Office, handles many aspects of compliance training, including needs assessment, development of training materials and curriculum, selection and preparation of training staff and instructors, implementation of training courses, evaluations and feedback, and record keeping.

The TCO staff will be responsible for the strategic planning and day-to-day operation of the compliance training program, including:

- Conduct initial and periodic needs and competencies assessment for the compliance training within the company;
- Designate and train professional instructors, and / or retain compliance training services from an outside provider;
- Develop and regularly update training and instructional materials and retain all materials for after-training reference;
- Establish and maintain a reference library of relevant supplementary materials available to trainers, instructors, and all employees for self-education, including national legal, regulatory, and procedural documents, relevant international treaties, conventions and agreements, relevant laws and regulations from countries where Mindray conducts, or plans to conduct, business activities or other operations, and other materials;
- Conduct or oversee the implementation of all compliance training offered throughout the company;
- Develop and implement a competency evaluation methodology to monitor benefits and planning and to ensure that employees acquire and retain the necessary knowledge and skills as a result of the training;
- Ensure all training and testing records are kept in accordance with the company recordkeeping procedures;
- Communicate and coordinate compliance training needs and activities with the relevant offices of government agencies, professional and industry associations, international organizations, and research and academic institutions to stay informed of the most recent developments in the international security and proliferation field, and to ensure that compliance training offered at Mindray meets the company’s legal and regulatory obligations; and,
- Stay current on nonproliferation and strategic trade control developments through regular online research and participation in seminars, training programs and conferences offered by outside experts and institutions.

The compliance training curriculum is developed in modular format which meeting needs of Mindray. An introductory module is mandatory for all employees. Intermediate and advanced modules include more details of the relevant legal, policy,

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security and technical components, and are offered as needed.

#### **4.8. Company Senior Management**

Senior management receive an annual briefing with an overview of the trade and technology portfolio, potential for misuse, legal responsibilities under various jurisdictions for trade compliance, including potential liabilities for non-compliance, costs and benefits of an effective trade control policies and procedures, strategies for ensuring compliance and promoting a sustainable and positive corporate compliance culture, resource allocation, and communication of management commitment.

#### **4.9. New Employee Training**

New employees undergo mandatory trade control awareness-building and compliance training upon hire. The curriculum will be customized to meet individual departments focus. Employees will be introduced to Mindray’s history, products, and the Company’s trade control policies and compliance system and their legal responsibility and potential liability for violation or noncompliance.

#### **4.10. Training for Employees Engaged in Import and Export**


All employees engaged in import and export activities attend formal and informal training sessions each year. Objectives are to ensure employees understand the impact and significance of trade control laws and regulations on import and export practices; learn how to safeguard Mindray from a violation and related proliferation risk; and learn Mindray’s internal trade control procedures, to effectively fulfill the internal import and export requirements. The curriculum for employees engaged in import and export is tailored to their region or market, and includes, but is not limited to: Chinese and relevant foreign export control laws, regulations and implementation practices; intangible technology transfers and deemed exports; Mindray’s trade control compliance program, with particular focus on transaction screening tools and procedures, end user / use risk assessment and analysis.

#### **4.11. Training for Compliance Leaders**


Compliance leaders attend at least one export control continuing education program each year of the most comprehensive export control curriculum, including, but not limited to Chinese and relevant foreign trade control laws and regulations; diversion risk and end-use(r) analysis; product and technology classification; intangible technology transfers and deemed exports; global trade control and ICP trends and developments; etc. In addition, they will attend seminars and conferences periodically throughout the year to become aware of global, regional, and industry trade control developments and trends; and to build a network of contacts within government, expert, and industry communities.

#### **4.12. Trade Compliance Office**

The TCO team attends two formal training sessions and six informal training sessions each year to ensure that the TCO fully understands Chinese and global export controls and proliferation challenges, as well as Mindray’s export control ICP, and to enable them to effectively operate the TCO and address day-to-day questions from all

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Mindray employees. The curriculum for TCO staff members should include, but not be limited to Chinese and relevant foreign trade control laws and regulations; diversion risk and end-use(r) assessment; product and technology classification; intangible technology transfers and deemed exports; global trade control and ICP trends and developments; and all aspects of Mindray's ICP.

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## 5. Classification

Mindray’s classification system is designed to determine which items are subject to export controls as well as the classification code for the technology or product, component, or software. The classification system for China contains internationally accepted control lists. Mindray integrates this national classification system with internationally accepted standards and internationally accepted national standards as the basis for product and technology classification.

### 5.1. Classification Framework: Control Lists and National Codes

In consideration of the following five multilateral export control regimes (MECRS):

- Australia Group (AG), covering chemical and biological weapon related exports;
- Missile Technology Control Regime (MTCR), covering missile-related exports;
- Nuclear Supplier Group (NSG), covering nuclear and nuclear related dual-use exports;
- Wassenaar Arrangement (WA), covering conventional weapons and exports; and,
- Zangger Committee (ZC), covering nuclear related exports.

Mindray uses the following classification systems to address the scope of its global businesses:

- China's Harmonized Tariff Codes;
- Hong Kong Special Administrative Region's (HKSAR) Control Lists;
- U.S. Export Control Classification Number (ECCN); and,
- U.S. De Minimis requirements.
- European Union's Control Lists;
- Japan's Control lists;


### 5.2. Product Classification Categories

Mindray’s SOPs consider all imported and exported products and related components which are subject to export control classification. These procedures require a determination of the classification code for all products and technologies. Products requiring export control classification include:

#### 5.2.1. Procured Components

Outsourced components, specifically parts, software, and modular pieces. Classification of procured components is necessary when these products are exported from the country of origin, or when they are transported through intermediary countries.

Mindray provides a survey form to the supplier or the manufacturer to obtain technical characteristics of the part for classification requests. The survey form contains information required in acquiring the ECCN, Commodity Classification Automated Tracking System (CCATS) Numbers, and CCATS file requests. Mindray contacts different resources to make requests to relevant government authorities.

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### 5.2.2. Manufactured Components

Items researched, developed, and manufactured by Mindray. These may include procured components embedded in Mindray's products.

### 5.2.3. Internal semifinished products

Require no classification; when these products are subject to import or export activities, the Company requires the products to be classified.

### 5.3. Classification Teams

The CCO has overall responsibility for the classification procedures for research, manufacture, and procurement. The CCO is assisted by representatives from the TCO, the Research and Development Department. The Procurement Department are responsible for obtaining product classification information from suppliers.

### 5.4. Classification Process

Mindray classifies technologies and products through a pre-transaction review procedure. The classification teams obtain technical specifications from suppliers and design engineers to assist with the classification process; it also includes a self-classification method through which team members make requests to either the original manufacturer or to the relevant government authorities for classification information. The self-classification reports are archived in a project document management system by TCO.

The team reviews documents to ensure that they are correct. The classification process is completed and verified before the products are shipped to market.

The CCO is responsible for the self-classification system. Self-classification involves requests to the original manufacturer and to relevant government authorities. The entities involved with self-classification include:


- Research and Development Department(R&D);
- Trade Compliance Office

Items that do not fall in a self-classification category must be submitted to the proper governmental authorities for classification. Items subject to the U.S. Export Administration Regulations (EAR) require an Export Control Classification Number (ECCN) from the Bureau of Industry and Security (BIS) of the U.S. Department of Commerce. Items conforming to the U.S. Code of Federal Regulations sections 740.17.b (2). 740.17.b (3) and 742.1S.b (3) must be classified through BIS. The CCO is responsible for overseeing this process and ensuring that the items meet the appropriate specification standards.

### 5.5 Encryption


Encrypted information is integrated confirm that all of the products meet standards established by Mindray and all associated classification requirements. The following steps guide Mindray's evaluation process for all U.S. encryption classification requirements:

- Determine whether the software or technology qualifies as publicly available and, therefore, is outside the scope of the U.S. EAR;

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- If not, determine whether software or technology is outside the scope of controls for any of the following reasons:
  - The items were automatically transferred from ITAR to EAR jurisdiction under prior rules and are excluded from controls due to their limited encryption functionality;
  - The items were already under Commerce Control List due to a prior case-by-case jurisdictional transfer; or
  - The items were released from controls because they qualify for the 56/512-bit encryption or 64-bit mass market exceptions.
- If not, determine whether the software or technology qualifies for License Exception TSU or ENC:
  - License Exception TSU, which covers "unrestricted" encryption source code and publicly available object code compiled from such source code.
  - License Exception ENC, which covers the export of:
    - Unlimited strength encryption products to any end-users in the US+8 countries or to any non-government end-users elsewhere; or
    - "Retail" encryption items (of any strength) to all end-users (except, of course, to those in embargoed / terrorist countries).
- If not, determine whether an Encryption Licensing Arrangement is available for a specific class of end-users (e.g., sales of "non-retail" encryption items to a group of government entities), or whether an individual license is available on a case-by-case basis.

The TCO maintains the final classification data in the SAP GTS system, and identifies which sensitive items could be subject for sale and which items could not be subject for sale. TCO will periodically updates additional procurement and / or best practices information.


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## 6 Database Systems

Mindray’s SAP GTS system utilizes a third-party automated screening database provided by OCR, Inc. Export transactions can be monitored automatically, with export boycott and embargo lists. Automated screening of denied parties and entities allows Mindray to check business partners’ addresses (such as the consignee) automatically against the sanctioned party lists before goods are exported. This database is a system-independent solution that performs, logs verification checks, and the system is fully integrated into Mindray’s ERP system. The system will notify users and block transactions if a denied entity is found during the transaction screening process.

The controlled lists could be found in the Annexure 1 to the ICP.



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## 7. Project and Order Screening

Mindray’s Trade Compliance Office (TCO) conducts a thorough project review before engaging in a business transaction. The Company completes contract reviews to assess the trade and all possible trade risks using compliance standards. Contract reviews for export control standards include evaluating potential customers, end-users, end-uses, products for export, and final destinations. Mindray conducts a systematic review at the outset of any potential trade and continues to perform reviews throughout the transaction.

### 7.1. Project Review Process

Generally Mindray divides projects into stages of:

- Initiation
- Bidding
- Contracting
- Performance

To initiate a project, the TCO conducts methodical reviews of the customers, end-users, and end-use in order to confirm that the business transactions do not include prohibited transaction parties or end-use/end-user, or both.

In bidding stage, a complete review of all potential exports shall be conducted, specifically the technologies and services. If an export or a re-export license is required, a request for a license application is submitted to the TCO. The TCO holds authority to apply for an export or a re-export license.


Relevant government authorities issue or deny a license. If the license is denied, Mindray suspends the project and informs the customer the project is on temporary hold pending further investigation. Mindray explores the reason for the denial. Mindray may ask the customer to supply more information. If the license is denied, Mindray terminates the contract and informs the potential customer of the decision to terminate the contract. Records of these types of transactions are retained in a database for future reference.

At the point of contracting, the project manager, product manager, TCO, or other relevant persons involved in the business review of a specific product ensure the contract, the product and service descriptions on which both parties have to agree match the approved documents for export or re-export. They provide verification and authorize that the project is fully trade compliant with all relevant export control rules and regulations.

At performance, a logistic manager investigate the consignees, carriers, delivery and service teams in order to guarantee that no unauthorized activities take place during the project’s final stages.

### 7.2 Order Screening

Mindray’s SOPs for their Internal Compliance Program (ICP) provide a reliable method to screen routinely all transactions and orders. These SOPs identify inquiries from suspect customers, prevent involvement with sanctioned entities, and make responsible, informed assessments of transactions and orders. They ensure only legitimate and authorized transactions and orders are fulfilled.

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Mindray avoids potential conflict of interests between trade control compliance and the pursuit of profit in two ways:

- Mindray ensures that the process of vetting customers and enquiries regarding trade control matters is dealt with independently from the sales and market departments;
- Mindray seeks to make continuous improvements in its comprehensive transactions and orders screening system.

### 7.2.1 General Sequence of Order Screening

Mindray follows a specific sequence of transaction and order screenings. Transaction and order screenings begin with customer and end-use screening. The screening of transactions/ orders/ enquiries is done before a contract to supply technologies has been finalized. Screening of transactions and orders include:

- Product screening (determining whether or not the item is a controlled item);
- Customer and end-user screening (determining the legitimacy of the customer and the end-user);
- End-use screening (determining the authenticity of the stated end- use of the item and ensuring it will not be used for illicit purposes); and,
- Transaction screening (viewing the transaction as a whole in order to make a judgment regarding its legitimacy).

Mindray has adopted a policy declining any transaction, which the CCO believe involves a risk that the controlled technologies will be used in or diverted to a military or WMD-related end-use. Mindray declines any transaction that may involve goods not controlled by China, US, or other relevant authorities if it may contribute to unauthorized and questionable end-uses.

Mindray employs SOPs to screen all transactions and orders in accordance with the principles described in the following section. Mindray utilizes an automated transaction screening module embedded within their ERP system known as SAP GTS. This automated SAP GTS module:


- Incorporates denied party screening lists;
- Screens against and blocks transactions registered against uploaded denied party lists;
- Allows Mindray to view all blocked business partners during transaction screening; and
- Provides Mindray with information on the legal basis for the screening, the boycott lists used for the screening, the business partners that were screened, the screening date, the validity period of the screening and the persons who performed the check.

### 7.2.2 Screening Transport Facilitators and Transit / Transshipment States

Mindray subjects transport facilitators to screening procedures. Transport facilitators are vetted by the Logistics Departments in coordination with the TCO.

### 7.2.3 The “End-to-End” Process

Mindray’s transaction and order screening involves an “end-to-end” process. If the

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screening process reveals anything suspicious, the CCO must temporarily suspend the project.

### 7.3 Comprehensive Screening

Mindray screens new customers as well as established clients and end-users regardless of the product types and end-uses associated with those transactions. Mindray takes extra precaution with transactions involving sensitive countries and transactions that may involve potential export control violations.

### 7.4 Sensitive Countries

Mindray’s transaction and order screening process involves stringent screening of end-uses for transactions concerning sensitive countries. Mindray screens certain orders bound for embargoed/ sanctioned countries as defined by the United Nations (UN) (sanctions and embargo lists), European Union (EU), and U.S. Department of Commerce, including the BIS and the Office of Foreign Assets Control (OFAC).

Per the U.S. Export Administration Regulations Part 746, Mindray classifies the following five countries as embargoed / sanction countries and, as a result, enacts a stringent screening process for export control purposes:

1. Cuba
2. Iran
3. North Korea
4. North Sudan
5. Syria


Mindray’s SOPs call for more diligent precautions when dealing with sensitive countries.

### 7.5. Centralized and Comprehensive Filing

Mindray understands that international best practices recommend that upon receipt of an initial query, Mindray should open a specially designated file containing all of the documents relating to that potential order.

### 7.6. Additional Steps

Mindray takes additional steps to screen end-uses more comprehensively. These steps include further training nonproliferation, STC, and ICP training for sales and project staff. The CCO institutes SOPs requiring sales staff to enquire about the end-uses of any dual-use products, regardless of the proposed destination country with a focus on military end use. If the proposed transactions appear suspicious or problematic, the CCO requires the sales managers to temporarily suspend the transaction until further review.

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## 8. Contractual Clauses and Regulatory Review

Review of the sale or distribution agreement includes trade compliance terms such as export control guidance and specific best practice clauses. The TCO and LD perform contract reviews. The TCO is also part of the contract and license review process, providing guidance to the legal counsel on how to conduct the export control review. Customers and distributors are required to comply with all applicable export control conventions, laws, and regulations.

### 8.1 Compliance with All Applicable Export Control Laws

Mindray’s customers will comply with and will ensure that their affiliates also will comply with all applicable national export control laws and regulations, United Nations Security Council resolutions and international regimes to which all products / services supplied under the Agreement are subject. Mindray’s TCO is tasked with the responsibility for monitoring the customers’ compliance with national, regional, and international strategic trade control requirements. The TCO works closely with these regional export control teams to ensure that the teams are in full compliance. This is done through training, periodic conferences, and periodic reports. If Mindray discovers that a customer violates the contract (e.g., it fails to monitor or enforce compliance in the affiliates), Mindray would enforce its rights delineated in the contract. The customers give the information regarding compliance with all applicable export control laws to the project or business manager.

### 8.2 End Use

Mindray customers must ensure that technologies and services are for civilian end-use only. Mindray’s customers must certify that technologies are not for military or terroristic end-use. Furthermore, customers must certify that technologies will not be sold, transferred, or made available by it or any of its affiliates, directly or indirectly, for military and / or terroristic end-user or end-use. Customers must certify that technologies will not be sold, transferred or made available by it or any of its affiliates, directly or indirectly, for end-use or end-users explicitly prohibited and / or restricted by national and international export control rules, regulations, and laws, especially those pertaining to nuclear, biological, and / or chemical weapons and their respective delivery systems and that these exports and / or transfers are not for terroristic end-use and / or end-users. Customers must provide the information regarding compliance with all applicable export control laws to the project or business manager.


### 8.3 Exemption Clause

The definition of either “Exemption Clause” or “Force Majeure” includes “embargo or requisition (acts of government), including non-availability or delay of an export license for the technologies and / or services or any part thereof.

### 8.4 Regulatory Reviews


The TCO conducts ongoing regulatory reviews as a part of the Company’s strategic trade control system, including:

- Mindray conducts ongoing analysis of all relevant U.S. strategic trade control

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laws, regulations, and rules. The analysis includes an ongoing assessment of the laws promulgated by the U.S. Congress, as well as the regulations passed by the U.S. Department of State, the Department of Commerce, the Department of Commerce’s Bureau of Industry and Security (BIS), the Department of Treasury’s Office of Foreign Assets Control (OFAC), and any relevant Executive Orders (EO). Mindray monitors updates to Export Administration Regulations (EAR);

- Mindray closely monitors the Strategic Commodities Control List of the Hong Kong Special Administrative Region and any relevant updates;
- Mindray analyzes the strategic trade control laws, regulations, and rules of other countries or regions in which Mindray conducts business, such as the European Union, India, Brazil, and Mexico;
- Mindray closely monitors laws, regulations, and rules enacted against embargoed / sanctioned countries. This monitoring includes evolving sanctions enacted against the 14 countries sanctions by the United Nations, the European Union and the United States. Mindray particularly monitors the UN Security Council resolutions and the Executive Orders issued by the U.S. president;
- Mindray conducts ongoing analysis on sanction law, regulations, and rules with a particular focus on Iran, Syria, North Korea, North Sudan, and Cuba. The regulations that Mindray closely monitors include:
  - The Comprehensive Iran Sanctions, Accountability and Divestment Act (CISADA).
  - Iran, North Korea, and Syria Nonproliferation Act Sanctions (INKSNA), which provides for penalties on entities and individuals for the transfer to or acquisition from Iran since January 1, 1999, the transfer to or acquisition from Syria since January 1, 2006, or the transfer to or acquisition from North Korea since January 1, 2006, of equipment and technology controlled under multilateral control lists specifically the Missile Technology Control Regime, Australia Group, Chemical Weapons Convention, Nuclear Suppliers Group, and the Wassenaar Arrangement.
  - International Emergency Economic Powers Act (IEEPA), which authorizes the U.S. President to regulate commerce after declaring a national emergency in response to foreign threats to the United States.
  - The Cuban Liberty and Democratic Solidarity (LIBERTAD) Act of 1996, which strengthens and continues the US embargo against Cuba.

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## 9. Supplier and Distributor Management

Mindray takes responsibility for ensuring that controlled items are not transferred to unauthorized end-users, or for unauthorized end-uses, through its supply and distribution chain. Mindray forms relationships with their partners on the following principles:

- All Mindray suppliers and distributors must develop and implement an export control ICP system similar to that employed at Mindray; and
- All current and future suppliers and distributors must undergo thorough screening by Mindray’s TCO.

Mindray will only work with reputable and responsible partners. Mindray conducts initial and periodic due diligence screenings of all current and future suppliers and distributors to validate their credentials and ensure they are not, and have never been, directly or indirectly involved in proliferation-related activities. The screenings are conducted using the following methods:


- Open source research conducted by TCO personnel prior to engaging a new company in a partnership agreement or contract as well as throughout the duration of that relationship;
- Screening the company against all existing restricted party lists uploaded within their GTS system and available from the PRC government, other governments, and international organizations; and
- Requesting company compliance records as part of the screening procedure, and official clarifications in the event of documented incidences of non-compliance.

Mindray encourages suppliers and distributors to establish and maintain an internal compliance system that is equal in its effectiveness and comprehensiveness to Mindray.

Mindray expects suppliers and distributors to conduct item, country screenings, and transaction screenings that use the tools, approaches and procedures identical to or very similar to Mindray’s methods. These may include item and country decision tables, transaction screening matrices, red flag indicators, restricted party lists, and other risk management tools.

Mindray, or its designated agent, will evaluate and audit periodically its supplier and distributor ICP policies, tools, and practices, and will require revisions and changes when necessary. Mindray will demand investigatory and corrective actions in cases of noncompliance or other violations, and take punitive measures against the violating company ranging from warning, to severance of partnership/contractual relationship, and etc.

The CCO will be responsible for managing and monitoring the policies and practices of Mindray’s suppliers and distributors related to trade control.

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## 10. Information Technology and Management Safeguards

Mindray realizes that Internal Compliance Programs (ICP) include restrictions on transfers of dual-use technologies, software, know-how, and information. Mindray is establishing SOPs governing how employees should handle sensitive technologies throughout the course of their work. It also is employing SOPs to guard against transfer of sensitive technologies at trade shows and conferences. Mindray is also regulating technology transfers and deemed exports in overseas subsidiaries and foreign branches. Finally, Mindray is enacting special policies and procedures for foreign employees who work with controlled technologies.

### 10.1. Intangible Technology Transfers (ITT) and Deemed Exports

Mindray's SOPs restrict the export or transfer of intangible technologies (ITT) and deemed exports. Mindray defines ITT, deemed exports, and controlled technologies and technology transfers to be transparent about the correct procedures for the transfer of sensitive technologies.


- Intangible Technology Transfers (ITT): An intangible export occurs when dual-use software, technology, knowledge, and information are transmitted via telephone, fax, e-mail, Internet website, or some other intangible mechanism to a recipient or end-user, or both in another country.
- Deemed Exports: A deemed export occurs when a national of one country shares controlled software, technology, information, or knowledge with a national of another country, even if the recipient is in the origin party's country at the time of the export. Mindray employs SOPs to guard against such occurrences.
- Controlled Technologies: These include but are not limited to instructions (written or recorded), working knowledge, design drawings, models, operational manuals, skills training, and parts catalogues.
- Technology Transfers: The transfer of the controlled technologies cover all forms of transfer, including telephone, fax, email, internet website or other intangible mechanism to a recipient or end-user located in another country.

### 10.2. Technology Control Plan (TCP)

Mindray exercises caution regarding the transfer of sensitive technologies and information, and implements relevant safeguards to prevent any unauthorized transfers. Safeguards are articulated in Mindray's SOPs. The SOPs consists of how employees handle sensitive technologies and how they should guard against the transfer of sensitive technologies. Mindray is integrating a more comprehensive "Technology Control Plan" (TCP) into the Company's ICP system. The TCP outlines company-wide SOPs guarding against the unauthorized transfer of sensitive technologies. This combined program includes a physical security plan, an information security plan, and a personnel-screening procedures plan.

#### 10.2.1. Physical Security Plan

**Limiting Access:** Mindray has instituted SOPs aimed at limiting physical access to sensitive technologies and information. Only authorized personnel have access to Security Area (where confidential information is stored). Mindray limits access of

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foreign national company employees, customers, and visitors to certain facilities as well as controlled technologies and information.

Mindray has access controls in place to validate the positive identification of all employees, visitors, service providers and vendors at all points of entry. Access gates have security personnel on duty at all times. Mindray has perimeter fencing surrounding cargo handling and storage facilities. Mindray’s facility entrance and exit gates are monitored by security personnel. All Mindray’s windows, gates, and fences are secured with locking devices and adequately lit for the interior and exterior of the facility, especially for entrances, exits, cargo handling/storage areas, fence lines, and parking lots. Mindray has video surveillance cameras set-up to monitor the premises.


### 10.2.2. Information Security Plan

- **Firewall System:** Mindray has established a company-wide Firewall System that limits employees' access to the controlled technologies.
- **Classification System:** Mindray is engaged in an ongoing effort to classify all its technologies according to China's classification system, EU standards, and U.S. Export Control Classification Numbers (ECCN).
- **Notification System:** To mitigate and prevent unauthorized transfers, Mindray’s SOPs include notifying relevant personnel of all products and associated technologies subject to ITT and deemed controls.
- **Determination System:** Mindray’s SOP for uncertainty of the classification of technologies and goods calls for employees to raise any concerns about a particular sensitive technology. The TCO will then review the technology to make a determination whether it would be subject to controls. If so, the TCO would obtain the classification determination from the appropriate domestic or foreign government authority.
- **Subsidiaries and Branch Offices:** The TCO will assist subsidiaries in developing internal compliance programs tailored to the subsidiaries' particular business practices. Mindray has established broad procedures regarding subsidiaries and branch offices. Mindray will provide instructions and guidance for ICP to all other affiliates.
- **Foreign Nationals:** Mindray has established SOPs to prevent the unauthorized transfer of sensitive technologies and information to foreign nationals.
- **Recordkeeping:** Mindray SOPs require employees to document all the interactions with foreign nationals, employees, customers, and visitors. Mindray requires all employees retain records of export-related documents involving foreign national employees, customers, and visitors.
- **Personnel and Information Access:** Mindray vets foreign nationals who seek employment with the company through the Human Resources Department(HR). HR is responsible for screening the foreign nationals.

### 10.3. Information Technology System

Mindray has installed a SAP GTS system across their ERP system to automate trade compliance requirements across a centralized IT platform. Mindray’s standard operating procedures are incorporated into the ERP through their SAP GTS system; including embargoed countries, SPL and screening. All Mindray facilities operate on



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the SAP ERP system. Mindray has an automated order processing system that incorporates aspects of the trade compliance process to include an ERP system to process the orders and delivery notes. New customers and distributors are screened through denied and sanctioned parties lists utilizing the SPL screening through an OCR database. Mindray's SAP GTS systems store records of refused orders, licenses, or track suspicious orders, customers, or distributors.

Mindray has policies and procedures to provide IT security training to all employees and the IT and Information Security Department make the policies, send instructions to the employees, and check for violations.

Mindray has a system in place to monitor and identify abuse, improper access, tampering or altering of business data to include incorporating SOD (segregation of duties) and access control.

Related IT records, to include classification designations, are stored for a minimum of 5 years through a GTS module. Multi-factor authentication procedures are incorporated into Mindray's systems to include Role Based Access Controls (RBACs) and Application Access Controls (AACs) to prevent unauthorized access and traffic. Mindray's systems incorporate data back and disaster recovery plans. Mindray's IT policies incorporate procedures for monitoring regulated data hosted on servers residing across multiple foreign sites through an integrated ERP system.

### 10.3.1 Intranet

It is important that both the wider business and key personnel responsible for driving trade compliance including those in Mindray's distributor and agent network know where to go for trade compliance information. Mindray is implementing a process to first document all procedures and information and then to load the related materials onto the company's existing intranet site. Building on what Mindray has already created, will ensure maximum accessibility and awareness by all staff and distributors. The intranet page will provide a platform to display documented policies and procedures, training materials (including on-line training modules) and knowledge management regarding end-users and product classifications. Different user profiles can be created to control the data maintained on this site and access to more sensitive data.

### 10.3.2. Personnel


The intranet provides a list of its personnel, their respective ICP responsibilities, and their contact information.

### 10.3.3. Classification Information

The intranet makes readily available information on classification. The information includes export control and trade-related classification of Mindray's technologies and products.

## 10.4. External Web Site


Mindray's external website provides comprehensive information about corporate governance, and trade compliance policies and practices. This information includes trade compliance policy statements, contact information for the TCO, and

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classification information of technologies and products.

The website offers information on reporting violations through an internal hotline. Mindray has established communication channels for employees, vendors, agents, and other stakeholders to report behaviors that can be harmful. Mindray employees can report a possible violation by contacting international offices via telephone, mailing address, or email. This information is located at the following website:

<http://www.mindray.com/en/HotLine.html>

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## 11. Documents and Recordkeeping

Mindray employs a comprehensive document and recordkeeping system. This system integrates record management into the business processes, ensuring critical support for the Company's mission and a sound, accurate method for storing and accessing necessary records. Mindray considers it essential to not only establish responsibilities and standards for recordkeeping, but also to emphasize that records are a company asset that are an integral component of Mindray's business.


Presently, Mindray's TCO oversees maintenance of Mindray's export control-related documents in conjunction with the IT Department's recordkeeping storage through the Company's SAP GTS systems. All records are kept for at least a five-year period.

Mindray conforms with EAR part 762 recordkeeping requirements. The TCO is also developing policies to govern maintenance of records of certain communications with foreign nationals and of certain communications with foreign governments, especially that of the U.S.

### 11.1. Documents and Recordkeeping Rules and Regulations

The TCO institutes recordkeeping policies and regulations for maintaining and preserving Mindray's export control-related documentations. The TCO oversight for recordkeeping includes but is not limited to:

- Designate the department responsible for maintaining and preserving eventually all export control-related documentation in accordance with the policies discussed hereinafter, and identify the designated department or office on the Company's intranet;
- Ensure records for all transactions carried out under government strategic trade and technology authorization are readily available and that sufficient storage capacity exists to support records management;
- Determine the physical location where all export control-related documents and records are to be stored;
- Ensure records are in a logical and traceable sequence and can be accessed from a variety of field searches;
- Mandate all export control related documents be retained for five (5) years from the date received in the department responsible for export control recordkeeping;
- Create ongoing training and awareness programs to ensure and promote the effective capture, retrieval, and management of records;
- Establish filing procedures for export control-related documentations, including but not limited to:
  - Determine appropriate file organization system (e.g., alphabetical by customer or sequentially by transaction number);
  - Mandate all documents be file stamped upon receipt by the recordkeeping department or office;
  - Determine appropriate method of preserving all export control-related documentation (e.g., electronic, hard copy, audio, etc.);
  - Manage the risk of losing records by ensuring the integrity of physical storage; and,
  - Establish off-site filing and destruction procedures for documentation and

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records that has been maintained for five (5) years or more.

### 11.2. Transaction Records Information


The TCO is tasked with the responsibility of mandating that the transaction records include the following information:

- Name and address of customer;
- Name and address of freight forwarding agents / transporters;
- Name and address of the broker or agent, if used;
- Name and address of distributor;
- Method of payment for the goods or activities; and bank transaction details;
- Controlled goods and / or activities and services transferred;
- Dates of the various approvals of the relevant government control authorities and related activities;
- Date of transfer;
- Route and mode of transport of controlled goods from premises to the distributor / broker / end-user;
- Route and mode of transport of controlled goods from borders of country of export to the foreign transporters / distributor / broker / end-user including all ports of transshipment;
- Relevant control authorities registration number(s) and permits issued;
- All relevant documentation, including the contract, between the business and national and / or foreign clients regarding the transfer of controlled goods and activities;
- Authorizations from foreign customers such as import permits and End-Use and End-User Certificates;
- Re-export requirements (local and foreign) of foreign products, system, subsystem or component, contained or integrated into a local product; and,
- Any additional information required by the relevant transaction authorization, law, or regulation.


### 11.3. Recordkeeping Departments and Record Maintenance

Trade compliance documents and records are maintained by different Recordkeeping Departments correspondingly for a period of at least five (5) years. The records will consist of the following information:

- Commodity Jurisdiction Letters (if exporting to the United States);
- Advisory Opinion letters (if exporting to the United States);
- The export license including any and all documents submitted in support of, or in relation to, an export license application. This includes:
  - All support documentation for license applications;
  - Memoranda, notes, correspondence;
  - Contracts;
  - Invitations to bid;
  - Pro forma invoices;
  - Books of account;
  - Financial records;

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- Restrictive trade practice or boycott documents and reports;
- Application for International Import Certificate;
- Import or end-user certificate;
- Statement by ultimate consignee and purchaser;
- Delivery verification certificate or similar evidence of delivery;
- Shipper's Export Declaration and/or Automated Export System documentation;
- Air waybill, bill of lading, dock receipt or a short form bill of lading issued by any carrier and any other export clearance documents;
- Customer's purchase order;
- Packing list;
- Commercial invoice (with the destination control statement);
- Credit letters;
- Certificates of origin;
- Written acceptance of conditions by end-user, if a license is required.
- Key management infrastructure (KMI) classification requests and reports.
- Encryption commodities and software (ENC) review and classification requests and reports;
- Wassenaar reports of certain commodities, software, and technology controlled under the Wassenaar Arrangement as outlined in Part 743 of the Export Administration Regulations;
  - Deemed Export Technology Control Plans;
  - Special Comprehensive License Internal Control Programs;
  - Advance notifications and annual reports of all exports of Schedule 1 Chemicals;
  - Records pertaining to transactions involving restrictive trade practices or boycotts described in Part 760 of the Export Administration Regulations.
  - Power of attorney or other written authorization for an agent to perform certain specified acts on behalf of the exporter, principal party, or foreign principal party;
  - Voluntary self-disclosure statements;
  - Records of transactions involving exports under any of the License Exceptions outlined in Part 740 of the Export Administration Regulations;
  - Additional records for any items exported or reexported pursuant to License Exception RPL (Section 740.10) to repair or service previously legally exported or reexported items controlled under ECCNs 2A983 and 2D983. For such export or reexport, the following information must be maintained:
    - A description of the equipment replaced, repaired, or serviced;
    - The type of repair or service;
    - Certification of the destruction or return of equipment replaced;
    - Location of the equipment replaced, repaired, or serviced;
    - The name and address of who received the items for replacement, repair, or service;
    - Quantity of items shipped; and


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- Country of ultimate destination.

#### **11.4. Trade Compliance Office and Recordkeeping**

The TCO will maintain and keep the following documents:

- Complete set of documents regarding ICP export control process and appointment;
- Export audit form;
- Statements of end user and ultimate purpose of products made by customers;
- Quantity and number of rejected orders;
- Correspondences with customers regarding export control (e.g., email and meeting minutes);
- All internal assessment and audit reports of import and export control maturity;
- Proposals made by the Compliance Office and records of decisions made by the Trade Compliance Committee; and,
- Prepare and maintain all records associated with projects that may carry some potential risk and track these projects' entire cycle.

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## 12. Internal Assessment and Audit

To protect the integrity of the ICP, Mindray ensures that operational compliance procedures reflect the Company's SOPs and that these procedures are consistent with government export regulations. To assess the effectiveness of the ICP, Mindray audits all elements of the program, including the audit process itself. Internal and external audits and assessments enable the TCO to measure the effectiveness of the ICP, identify aspects of the system that require improvement or revisions, and detect and respond to accidental violations of applicable export controls.

Mindray's Internal Audit Department (IAD) carries out a routine risk assessment annually according to the internal working plan of IAD. The results of these annual assessments are reported in an Annual Performance Evaluation and through press releases as needed. An external audit will be conducted upon the IAD's investigation of a potential serious breach. Outside consultants may also attend quarterly meetings of the Board of Directors and IAD to request explanation from the IAD concerning potential risks and internal controls.


### 12.1. Internal Audit Guidelines

There are three core purposes of conducting regular audits / assessments of the Mindray ICP:

- Evaluate the degree to which compliance procedures and policy are being implemented;
- Identify and assess ICP deficiencies and propose correction action; and,
- Determine if any inadvertent violations have occurred.

The internal auditing shall be conducted according to the following guidelines:

- Audit teams should include individuals with a working knowledge of export controls;
- Audit reviews should be conducted by individuals not involved in the daily operations of the company's business and trade;
- Audits should be conducted annually on a regular basis, and also on an irregular basis as needed;
- Regularly scheduled audits should take place at all Company locations;
- Traders should develop and use checklists as part of internal reviews and audits that includes inquiries such as:
  - Are personnel records up-to-date?
  - Does staff have access to relevant laws and guidance?
  - Are product classifications up-to-date?
  - Is customer and end-use information getting passed along in a timely fashion?
  - Is the procedure for license applications working well?
  - Are logistics and other trade departments properly following ICP procedures on shipment verifications?
  - Are all necessary documents well-organized and easily accessible?
  - Are improvement plans developed in response to audit recommendations?

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- Copies of findings should be distributed to appropriate personnel and corrective actions for any deficiencies found should occur in a timely fashion;
- The CCO and the auditor should maintain all records relating to an audit or internal review.

### 12.2. Internal Audits / Assessments Reports

Both internal and external audit reports are composed of the following sections and actions:

- Contents
  - Executive Summary: Purpose, Methodology, Key Findings;
  - Findings and Recommendations: Organized in Priority Order; and,
  - Appendices: Interview List, Document List, Process Charts. □
- Actions
  - Conduct post-audit briefing for affected business units to discuss audit findings and recommendations and in order to register inaccuracies and/or clarifications;
  - Obtain commitment from business units for corrective action included in audit report;
  - Brief executive management on audit findings and recommendations; and,
  - Track and ensure corrective actions within the specified period of time.

### 12.3. Trade Compliance Office Audit / Assessment


Mindray’s Internal Audit Department (IAD) conducts a full risk assessment once a year. If management discovers any breach of procedure, management may request the IAD to conduct a specific risk test.

Risk levels are evaluated by the IAD in terms of risk assessments and risk tests. If the IAD determines that a risk level is high, an internal audit will be triggered and a corresponding report created for senior management, the audited business units, and the Audit Committee. This report will offer conclusions and suggestions for taking corrective action to minimize the risk.


The TCO also conducts focused assessments frequently. These assessments are conducted when necessary, specifically if a problem is detected in the course of business transactions. Similarly, if major changes are made to the ICP processes or policies, an assessment is conducted after implementation in order to ensure the new processes work properly and the new policies are implemented accordingly. Internal audits and assessments are conducted in accordance with, but not limited to, the following guidelines:

- Review the Corporate Trade Compliance Statement with Export Control Regulations and determine if it continues to reflect Mindray’s current business and legal circumstances and export-control obligations;
- Evaluate Mindray’s current ICP organization and structure and determine if lines of accountability and responsibility are transparent, logical, and fit seamlessly into Mindray’s overall business operations;
- Examine the personnel of each department engaged in product, service, and



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- technical sales for compliance with the export control regulations and guidelines;
- Assess the transaction records and determine that relevant personnel properly identified destinations, customer identities, product classifications, end-uses, end-users, and countries or political entities through which the shipment would transit or transship en route to its final destination;
- Observe procurement, sales, and order processing personnel during a designated period to ensure that they perform their responsibilities in accordance with export control rules and guidelines;
- Check product classification procedures and records and ensure that Mindray products are properly classified in accordance with applicable commodity classification systems, including those of the People’s Republic of China, the United States, and other countries that are applicable to Mindray’s business;
- Conduct spot checks of a given quantity of orders and documents over a past period of time to ensure that the documents are properly kept as required;
- Determine if Mindray information platforms, including the intranet and any company publications, convey all necessary export control information to Mindray employees. If not, determine how to modify the information platforms to make them more informative for employees;
- Evaluate training and instructional curricula and ensure that it is up to date, reflects Mindray’s current business practices and circumstances, and incorporates all applicable export control requirements and standards;
- Assess employee evaluations and opinions of export control training and instructional activities and determine if Mindray should revise the curricula to better achieve its objectives and increase employee learning potential; □
- Interview employees in order to evaluate whether or not they have developed full awareness of export control rules and regulations and the acquired requisite knowledge;
- Review past transactions and evaluate suspicious order patterns for strategic products, destinations, end-uses, and / or end-users that Mindray should address or be wary of in future dealings with identified, relevant customers and / or end-users;
- Review the transaction records and other stored documents to determine if any accidental export control violations have occurred. Identify cause of any violation and determine the necessary course of action to correct the deficiency and / or failure within the ICP system to ensure that type of violation never occurs again. Consult with ICP officials and senior management and determine the appropriate course of action with respect to disclosing the violation to the proper authorities; and,
- At the conclusion of the audit / assessment, determine if elements of the Mindray ICP require improvement and / or modification. Formulate a list of actionable recommendations that senior management should use to revise the ICP to improve its effectiveness and / or efficiency.

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### **13. Supplementary Provisions**

#### **13.1 Conflict and Avoidance**

In case of any discrepancy between this ICP and any other Mindray policy, rule or regulation, this ICP shall prevail.

#### **13.2 Interpretation**

Trade Compliance Office shall be responsible for interpretation in case of any and all disputes, controversies and differences that may arise out of or in connection with the performance of this ICP.

#### **13.3 Effective Date**

This ICP shall take effect from the date of issuance.

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## ANNEXTURES

### ANNEXURE 1: DENIED PARTY DATA LIST

Country	Type	Agencies	Category	Description
<b>US Lists – Trade Embargo/Sanctions Lists</b>				
US	DOS - DBL (DOS Debarred List)	DOS	DBL	Debarred List
		DOS	FTO	Foreign Terrorist Organization
		DOS	SDT	Specially Designated Terrorist
		DOS	TEL	Terrorist Exclusion List
		DOS	INPA	Iran and Syria Nuclear Proliferation Act
		DOS	CBWS	Chemical and Biological Weapons List
		DOS	INKSNA	Iran, Syria, North Korea Nuclear Proliferation Act
		DOS	ISNPA	Iran, North Korea, and Syria Nonproliferation Act
		DOS	ISA	Iran Sanction Act
		DOS	SDGT	Specially Designated Global Terrorist
		DOS	NPWMD	Nuclear Proliferation – Weapons of Mass Destruction
US	DOC - DEN (BIS Denied Parties List)	DOC	DE N	Denial Order (Cannot do business)
		DOC	ENT	Entity List (Need export license)
		DOC	UE U	Unverified End Use List (Need to be more diligent)
US	Dept. of Treasury (Office of Foreign Assets Control)	OFA C	BAL KANS	Balkans
		OFA C	BEL AR US	Belarus
		OFA C	BU RMA	Burma
		OFA C	BPI-LIB YA	Blocked Pending Investigation - Libya

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OFA C	<b>BPI- PA</b>	Blocked Pending Investigation – US Patriotic Act.
OFA C	<b>BPI- SDN T</b>	Blocked Pending Investigation – SDNT
OFA C	<b>BPI- SDN TK</b>	Blocked Pending Investigation - SDNTK
OFA C	<b>CO TED</b>	Ivory Coast (Cote D Ivoire)
OFA C	<b>CU BA</b>	Cuba
OFA C	<b>DA RFU R</b>	Darfur Sanctions Regulations
OFA C	<b>DR CO NG O</b>	Democratic Republic of the Congo Sanctions Regulations
OFA C	<b>FRY K</b>	Federal Republic of Yugoslavia - Kosovo
OFA C	<b>FRY S&amp; M</b>	Federal Republic of Yugoslavia - Serbia & Montenegro
OFA C	<b>FTO</b>	Foreign Terrorist Organization
OFA C	<b>IRA N-H R</b>	Iran Human Rights sanctions
OFA C	<b>IRA Q</b>	Iraq
OFA C	<b>IRA Q3</b>	Iraq3
OFA C	<b>IRG C</b>	Islamic Revolutionary Guard Corps Sanctions
OFA C	<b>JAD E</b>	Tom Lantos Block Burmese JADE (Junta's Anti-Democratic Efforts) (JADE Act)
OFA C	<b>LEB AN ON</b>	Lebanon
OFA C	<b>LIB ERI A</b>	Liberia
OFA	<b>LIB</b>	Libya2

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		C	YA2	
		OFA C	NP WM D	Nuclear Proliferation – Weapons of Mass Destruction
		OFA C	NS- PLC	Non-SDN – Palestinian Legislative Council List
		OFA C	SRB H	Serbia - Bosnia & Herzegovina
		OFA C	SDG T	Specially Designated Global Terrorist
		OFA C	SDT	Specially Designated Terrorist
		OFA C	SDN	Specially Designated Nationals
		OFA C	SDN T	Specially Designated Narcotic Traders
		OFA C	SDN TK	Specially Designated Narcotic Traders - Kingpins
		OFA C	SO MA LIA	Somalia Sanctions
		OFA C	SUD AN	Sudan
		OFA C	SYR IA	Syria
		OFA C	TC O	Transnational Criminal Organizations
		OFA C	UNI TA	Unita
		OFA C	VES SEL	All Ships and Vessels.
		OFA C	WM DT C	Weapons of Mass Destruction Trade Control Regulations.
		OFA C	HE U	Highly Enriched Uranium.
		OFA C	ZIM BAB WE	Zimbabwe
		OCC	PM LC	Primary Money Laundering Concerns Under Office of the Comptroller of the Currency (OCC)
<b>Country Embargoes &amp; Restrictions Lists</b>				
<b>International</b>	<b>ABL</b> (Anti-Bo	US- Dept	<b>ABL</b>	Bureau of Industry and Security Anti-Boycott Lists

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	ycott Countries)	of TREAS		
<b>International</b>	<b>EPCI</b> (Enhanced Proliferation Control Initiative from BIS)	BIS	<b>EPCI</b>	Enhanced Proliferation Control Initiative from BIS
<b>International</b>	<b>NCC</b> (Non-Co-operative Countries)	FATF	<b>NCCT</b>	Non-co-operative Countries and Territories (NCCT's) under Financial Action Task Force on Money Laundering.
<b>GSA Procurement List</b>				
<b>US</b>	<b>GSA</b> (General Services Administration)	All Federal Agencies		Procurement, Non-Procurement and Reciprocal Lists of parties excluded from Federal and State contracts.
<b>US &amp; International Law Enforcement Agency</b>				
<b>US</b>	<b>DOD</b> (US Department of Defense)	US-DO D	<b>NCIS-MW</b>	Naval Criminal Investigative Service Most Wanted List
		US-DO D	<b>NCIS-MP</b>	Naval Criminal Investigative Service Missing Persons List
<b>US</b>	<b>DOJ</b> (US-Department of Justice)	US-DOJ	<b>FBI CA</b>	FBI Most Wanted
		US-DOJ	<b>FBI MW</b>	FBI Crime Alert
		US-DOJ	<b>FBI MW T</b>	FBI Most Wanted Terrorist
		US-DOJ	<b>FBI SI</b>	FBI Seeking Information of individuals for War on Terrorism.
		US-DOJ	<b>IRA QMW</b>	Iraqi Most Wanted
		US-DOJ	<b>US MS-MW</b>	United States Marshals Service Most Wanted List

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		US-DOJ	<b>US MS-MFC</b>	United States Marshals Service Major Fugitive Cases List
<b>Financial &amp; Anti-Money Laundering Lists</b>				
<b>US</b>	<b>CPL</b> (Political Parties and their Leaders)	US-CIA	<b>PEP</b>	US Politically Exposed Persons List for Corrupt Practices
<b>US</b>	<b>Dept. of Treasury</b> (US Unauthorized Bank File)	US-Dept. of TREAS	<b>UBF</b>	Dept. of Treasury - U.S. Regulatory Unauthorized Bank File
<b>US</b>	<b>FRB</b> (Federal Reserve Bank)	FRB	<b>FRB</b>	Federal Reserve Bank List
<b>US</b>	<b>COS</b> (Chief of State of Foreign Governments)	US-CIA	<b>COS</b>	Central Intelligence Agency - Chief of State List.
<b>US</b>	<b>OECD</b> (List of Unco-operative Tax Havens)	OECD	<b>THL</b>	Organization for Economic Co-operation and Development Tax Haven List
<b>Health &amp; Human Services Debarments and Exclusions</b>				
<b>US</b>	<b>FDA</b> (Food and Drug Administration)	FDA	<b>ICE CI</b>	FDA Debarment List (Inspections, Compliance, Enforcement, and Criminal Investigations)
		FDA	<b>CI-NID POE</b>	All clinical investigators who have received a Notice of Initiation of Disqualification Proceedings and Opportunity to Explain (NIDPOE) since 1998 are listed.
		FDA	<b>CI-DIS</b>	All clinical investigators who have been disqualified or totally restricted.
		FDA	<b>CI-POR</b>	All clinical investigators who have received a Presiding Officer Report.

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		FDA	<b>CI-RES</b>	All clinical investigators who have agreed to certain restrictions with respect to their conduct of clinical investigations.
		FDA	<b>CI-AA L</b>	All clinical investigators who, under regulations in effect until 1987, have provided FDA with adequate assurances of their future compliance with requirements applicable to the use of investigational drugs and biologics.
<b>US</b>	<b>OIG</b> (Office of the Inspector General)	HHS	<b>LEIE</b>	List of Excluded Individuals and Entities (LEIE)
<b>International Lists</b>				
<b>Australia</b>	<b>ADF</b> (Australian Department of Foreign Affairs and Trade)	AU	<b>DFA T</b>	Australian Government - Department of Foreign Affairs and Trade.
<b>Japan</b>	<b>JPC</b> (Japanese Proliferation Concerns)	JP	<b>ME TI</b>	Ministry of Economy, Trade & Industry
<b>Singapore</b>	<b>MAS</b> (Monetary Authority of Singapore)	SG	<b>SG-MA S</b>	Monetary Authority of Singapore Anti-Terrorism Schedule
<b>Germany</b>	<b>BAFA</b> (Federal Office of Economics and Export Control – Germany)	FOE EC	<b>CE</b>	Country Embargo – Federal Office of Economics and Export Control – BAFA Germany
<b>UN/</b>	<b>BES</b>	EU,	<b>FOL</b>	EU/UK/UN Bank of England Sanctions



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<b>UK/ EU</b>	(UN/EU/ Bank of England Sanction s)	UK, UN		
		UK- DTI	<b>CPL</b>	UK Department of Trade and Agency – Counter Proliferation List
		EU, UK, UN	<b>AL- QAI DA</b>	Bank of England Sanctions – Al-Qaida
		EU, UK, UN	<b>BU RM A</b>	Burma (Myanmar) HM Treasury Sanctions
		EU, UK, UN	<b>CO MO ROS</b>	Comoros HM Treasury Sanctions
		EU, UK, UN	<b>CO NG O</b>	Bank of England Sanctions – Congo
		EU, UK, UN	<b>DEB AR</b>	Entire country debarment by UK-BIS
		EU, UK, UN	<b>DPR K</b>	North Korea HM Treasury Sanctions
		EU, UK, UN	<b>EG YPT</b>	Egypt HM Treasury Sanctions
		EU, UK, UN	<b>GUI NE A</b>	Guinea HM Treasury Sanctions
		EU, UK, UN	<b>IRA N</b>	Iran HM Treasury Sanctions
		EU, UK, UN	<b>IRA Q</b>	Bank of England Sanctions – Iraq
		EU, UK, UN	<b>IVO RY CO AST</b>	Bank of England Sanctions – Ivory Coast
		EU, UK, UN	<b>KO RE A</b>	Korea HM Treasury Sanctions
		EU, UK, UN	<b>LIB ERI A</b>	Bank of England Sanctions – Liberia
		EU,	<b>MY</b>	Myanmar HM Treasury Sanctions

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		UK, UN	AN MA R	
		EU, UK, UN	SO MA LIA	Somalia HM Treasury Sanctions
		EU, UK, UN	TAL IBA N	Taliban HM Treasury Sanctions
		EU, UK, UN	TER RO RIS M	Terrorism HM Treasury Sanctions
		EU, UK, UN	TU NISI A	Tunisia HM Treasury Sanctions
		EU, UK, UN	ZIM BAB WE	Bank of England Sanctions - Zimbabwe
<b>Canada</b>	<b>CFI</b> (Canadian Financial Sanctions)	CA	FOL	Canadian Office of the Superintendent of Financial Institutions
		CA	Al-Qaida	Financial Sanctions Regime
		CA	EGYPT-PEP	Egypt - Politically Exposed Foreign Persons
		CA	TUNISIA-PEP	Tunisia - Politically Exposed Foreign Persons
		CA	UNAS	United Nations Act Sanctions
		CA	ZIMBABWE	Zimbabwe - Canadian Economic Sanctions
		CA	ACL	Canada's Area Control List
	<b>RCMP</b> (Royal Canadian Mounted Police)	CA	WANTED	Royal Canadian Mounted Police Wanted List
<b>Internal</b>	<b>IPL</b>	Inter	<b>INT</b>	Interpol most wanted

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<b>International</b>	(Interpol Most Wanted)	pol	<b>MW</b>	
<b>International</b>	<b>WBD</b> (World Bank Denied Parties)	WB K	<b>IEF</b>	World Bank List of Ineligible Firms