

深圳迈瑞生物医疗电子股份有限公司

营销系统文件

SHENZHEN MINDRAY BIOMEDICAL ELECTRONICS CO., LTD

SALES&MARKETING DOCUMENT

签发 Issuer: Li Zaiwen

编号 No.: SR-2209-009

深圳迈瑞生物医疗电子股份有限公司负责任营销政策

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

1 目的

Purpose

为确保营销业务符合相关法律法规以及商业道德，展现公司的社会责任，提高中国医疗技术水平，真正造福人类健康，保障公司的可持续发展，特制定本负责任营销政策。

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 适用范围

Scope

本政策适用于公司全体员工。

Applicable to all staff of the company.

3 成立营销系统合规小组

Establish Sales & Marketing Compliance Teams

为加强负责任营销工作的有效开展，营销系统特成立“营销系统合规管理小组”，主要职责如下：

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

- 负责所在业务部门的合规体系建设和维护、整体统筹规划和实施。
Responsible for the construction, maintenance, overall coordination, planning and implementation of the compliance system in respective business departments.
- 开展合规培训，确保合规资源投入，建设和提升所在业务部门的合规能力等。
Carry out compliance trainings, guarantee resource investment in compliance, build and improve the compliance capability of respective business departments, etc.
- 作为第一道防线，受理所在业务部门关于合规工作的审批流程和咨询。
As the first line of defense, responsible for the approval process and consultation related to compliance in respective business departments.
- 参与并配合合规办开展重大合规工作，配合合规审计和稽查。
Participate in and assist with the major compliance work carried out by the Compliance Office as well as the compliance audit and inspection.

4 组织培训

Organize Trainings

拟制部门 Originating Department: 产品线与客户线运营管理部 Product Line and Customer Line Operation

Management Department 拟制人 Author: 赵立刚 Zhao Ligang 审核 Approver: 武艳辉 Wu Yanhui

发送至 To: 营销系统全体 All staff of Sales & Marketing Division

公司面向全体员工组织负责任营销的意识培训，并且针对全体营销人员定期开展业务相关的负责任营销实务培训。

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 遵守行业法律法规

Observe Industry Laws and Regulations

公司开展的任何形式的营销活动，必须遵守运营所在地适用的法律法规要求与行业准则，包括但不限于《中华人民共和国反不正当竞争法》、《中华人民共和国广告法》、《中华人民共和国个人信息保护法》、欧盟《通用数据保护条例》等。

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 遵守公司相关的营销、广告和销售制度

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

以符合道德标准的方式从事对公司产品的销售与推广活动是公司《业务行为与道德守则》的要求，同时，公司还制定、发布了《销售与推广行为指南》在这个方面做出了详细规定。公司在开展各项营销活动时，必须按照公司制定的相关营销、广告等制度文件执行。营销活动中的相关内容和方式须由公司授权人员进行审核和批准。

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.

总体而言，销售与推广活动应符合以下原则：

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

- a. 在推广活动中，公司与医疗卫生专业人士交流互动的目的应是造福患者和提高医疗水平。
In marketing activities, interactions between the Company and healthcare professionals shall be aimed at benefiting patients and improving healthcare.
- b. 推广活动应通过客观地介绍产品信息以促进产品的适当使用。
Marketing activities shall promote the appropriate use of the product by presenting the product information objectively.
- c. 所有推广材料的内容须全面、准确，并具有产品信息或科学文献方面的坚实依据。
All marketing materials shall be comprehensive, accurate and supported by product information or scientific literature.
- d. 在推广活动中采用的本公司产品相关的说明书、标签及彩页等产品相关信息应与地方政府机构批准的产品信息一致，信息应清楚、准确、不具误导性，具应以公正和客观的方式介绍。

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 准确披露相关信息

Disclose Relevant Information Accurately

公司应按照相应的法律法规以及行业标准和指南的要求准确披露信息。同时，公司不得虚报其产品、服务或价格；不得就公司产品、服务、表现或业绩记录做出虚假或误导性陈述；或就公司竞争对手的产品、服务、表现或业绩记录做出虚假或误导性陈述。

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 保护隐私 Protect Privacy

公司尊重公司的客户、业务合作伙伴和其他相关个人的隐私和个人信息保护。公司遵循适用的法律、法规及规定，以安全方式收集、存储、使用、加工、传输和删除个人信息。公司仅出于合法商业目的处理个人信息，且遵循合法、正当、诚信、公开、透明的原则，不超过必要的限度。公司保护所有个人信息的机密性、完整性和准确性。公司有权限访问个人信息的员工应按照上述标准处理个人信息。如果公司将个人信息与信任的服务提供商、合作伙伴或其他第三方共享，公司将通过签订合同或其他方式要求这些第三方保护其代表公司处理的个人信息。

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 环境保护与社会责任 Environmental Protection and Social Responsibility

公司在开展具体营销业务时，主动融入环境、社会及可持续发展理念，落实集团环境保护及社会责任要求

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 负责任营销审计 Responsible Sales & Marketing Audit

公司内部审计部每年度针对负责任营销相关内容开展合规审计与监控，评估及确定是否存在内部漏洞及其他风险，如存在一定风险或管理不完善之处，审计部门人员需及时向存在风险的部门提出“风险警示”并给出整改建议，确保公司负责任营销政策要求全面落实。

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 违规举报通道 Reporting Channels for Violations

如在业务开展过程中，涉及到有可能违规的行为，任何公司员工、客户、渠道商或供应商等均可通过相关渠道举报违反本政策的行为。具体举报方式如下：

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:

举报邮箱: compliance@mindray.com

E-mail: compliance@mindray.com

举报电话: +86 755-81888787

Tel: +86 755-81888787

举报传真: +86 755-26582680-88787

Fax: +86 755-26582680-88787

邮寄地址: 中国广东深圳南山区高新技术园区科技南十二路迈瑞大厦监察部 (邮编 518057)
Mailing Address: Supervision Office, Mindray Building, South Keji 12th Road, High-tech Industrial Park, Nanshan District, Shenzhen City, Guangdong Province, China (Zip Code: 518057)