Excerpt from The United Laboratories' Compliance Promotion Guidelines

Purpose

1. The United Laboratories International Holdings Limited (Stock Code: 3933.HK) ("TUL", the "Group", or "we") has formulated these Compliance Promotion Guidelines (the "Guidelines") in accordance with relevant laws and regulations, including the *Pharmaceutical Administration Law of the People's Republic of China*, its *Implementation Regulations*, *the Anti-Unfair Competition Law*, *the Advertising Law*, and the *Interim Provisions on the Prohibition of Commercial Bribery*, as well as national requirements related to credit evaluation in pharmaceutical procurement. This Policy also takes into account the Group's actual operations and is intended to strengthen compliance management, enhance employees' awareness of compliance, and standardize professional conduct.
2. The Guidelines apply to all personnel who undertake sales or promotional duties on behalf of the Group, whether or not they are directly employed by the Group. The Guidelines serve as a general code of conduct and provide behavioral standards for such personnel. All individuals must study and comply with the Guidelines, and follow laws, industry codes, internal Group policies, and professional ethics relevant to their roles.
3. "Compliance" refers to the alignment of the Group's business operations and employees' professional conduct with applicable laws, regulatory requirements, industry standards, Group bylaws, and internal policies.

Job Responsibilities

1. Medical representatives conducting academic and after-sales activities must comply with national laws and regulations, including:

(1) Developing product promotion plans and strategies.

(2) Sharing information on pharmaceutical products and assisting medical professionals in rational drug use.

(3) Organizing academic meetings and providing scholarly materials.

(4) Collecting and reporting clinical drug usage and hospital demand data.

2. With the consent of healthcare institutions, medical representatives may engage in the following job-related communications:

(1) Communicating via the internet, teleconferencing, or in-person visits to medical institutions.

(2) Providing academic materials and technical consultation to physicians.

(3) Demonstrating the use of pharmaceuticals or medical devices to prescribing physicians.

3. The following actions are strictly prohibited:

(1) Selling drugs at venues not approved by regulatory authorities (e.g., exhibitions or promotional events).

(2) Selling, storing, or transporting drugs in violation of the *Good Supply Practice for Pharmaceutical Products (GSP)* standards—e.g., storing products in offices or delivering them directly to retail terminals.

(3) Reselling products or samples, or falsifying distribution records.

(4) Handling payments or commercial invoices as a medical representative.

(5) Directly providing donations, sponsorships, or financial assistance to departments or individuals within healthcare institutions.

(6) Interfering with physicians' prescribing decisions, exaggerating or misleading about drug efficacy, or concealing known adverse reactions or doctor-reported adverse reactions.

(7) Any non-medical representative personnel engaging in or participating in academic visits or exchanges as defined in points 4 and 5 above.

Training, Inspection and Evaluation

1. All sales and promotional personnel (hereinafter referred to as "staff") must undergo compliance training and adhere to the Group's compliance policies. The Compliance Department is responsible for conducting training (both online and offline) and managing training records.
2. The Compliance Department will inspect whether staff promotional activities adhere to compliance systems and standards. Checks will follow the Group's internal compliance audit protocols and inspection checklists, focusing on routine practices and key compliance elements.
3. Compliance performance will be used as an evaluation criterion in employee assessments. For medical representatives found guilty of commercial bribery or other illegal acts, the Group may impose penalties including disqualification from awards, promotion restrictions, demotion, or termination. Violations of laws or the Guidelines that result in administrative or criminal penalties, or

cause financial or reputational damage to the Group, may result in termination of employment. The responsible party may be held liable for damages and compensation. Furthermore, the individual's representative registration may be revoked, and the reason for removal will be reported and publicly disclosed via the relevant registry platform.