

## The United Laboratories Compliance Incident Reporting Policy

The United Laboratories International Holdings Limited (Stock Code: 3933.HK) (“TUL”, the “Group”, “we”) has established this policy to standardize the compliance risk management process, ensure the proper handling of all compliance risk events identified or encountered by employees in the course of their work, and reduce adverse consequences resulting from untimely responses or inadequate handling of related issues.

### 1. Scope of Application

This policy applies to the Group, including all its wholly-owned and majority-controlled subsidiaries. It covers all compliance incidents that occur internally or during external cooperation and involve violations of national laws and regulations, as well as breaches of the Group’s compliance policies. Such incidents must be reported in accordance with regulations to the responsible supervisors and relevant departments. The appropriate departments will then handle the incident, conduct follow-up actions, and report the results.

### 2. Reporting Parties and Methods

The reporting parties include department and regional heads. There are two types of reporting methods: real-time reporting and periodic reporting.

**Real-time Reporting:** Upon the occurrence of a compliance incident, the respective department or regional head, or a designated responsible person, must promptly submit and report relevant information about the incident.

**Periodic Reporting:** The departments mentioned above are required to compile and report summaries of compliance incidents on a quarterly or annual basis as required by the Compliance Department.

### 3. Compliance Incidents That Must Be Reported

The following types of incidents must be reported:

(1) **Anti-Corruption Violations (including Bribery and Commercial Bribery):** This includes, but is not limited to, being requested by relevant authorities to provide evidence, or being involved as a party or witness in an investigation.

(2) **Antitrust Issues:** This includes, but is not limited to, receiving an “*Notification of Antitrust Case Investigation by the Administration for Market Regulation*” from the Administration for Market Regulation or being involved in investigations related to pricing issues.

(3) Violations of Pharmaceutical Laws and Regulations: Such as issues related to qualifications, or non-compliance with pharmaceutical business and distribution requirements.

(4) Violations of Advertising Laws or Infringement of Third-party Rights: For example, receiving investigation notices from the Administration for Market Regulation, complaints or reports of advertising violations, or third-party infringement notices.

(5) Violations of Other Administrative or Criminal Laws and Regulations: Including incidents such as suspected issuance of false invoices, which may cause or potentially cause damage to the Group's assets or reputation.

#### **4. Report Content**

The compliance incident report must clearly include the following information:

(1) Source of the Compliance Incident or Clue: Indicate how the issue was discovered or reported.

(2) Description of the Compliance Incident: Include details such as the time and location of occurrence, facts of the issue, root cause, nature of the incident, and the organizations and personnel involved.

(3) Risk of Loss or Impact: Describe both actual and potential impacts or losses caused by the incident.

(4) Measures Taken: Include any remedial or corrective actions already implemented.

(5) Supporting Evidence and Materials: Provide complete evidence related to the incident, including external materials already obtained by the reporter and any additional materials that need to be provided. This should also include explanations regarding how the evidence was obtained, its authenticity, validity, and relevance.

#### **5. Handling Procedure**

(1) Each department or region must submit a report through the OA (Office Automation) system within three days of discovering or becoming aware of a compliance incident or specific clue.

(2) Upon confirmation by the department or regional head, the case will be transferred to the Legal Affairs Centre for handling. The Legal Affairs Centre will formulate and communicate a response plan, and coordinate follow-up actions such as investigation, loss assessment, responsibility determination, and accountability or corrective measures. If necessary (for significant or complex events), the situation and progress must be reported to the Chairman.

(3) During the incident handling process, the Compliance Department will coordinate with relevant departments to provide necessary documentation and support. If required, external consultants or third-party agencies may be engaged to assist with compliance-related consultations.

## **6. Outcome and Disciplinary Actions**

Based on the severity of the incident, the Legal Affairs Centre may recommend one or more of the following disciplinary actions for employees involved in reported compliance violations. The outcome must be communicated to the employee and recorded in their personnel file:

(1) Warning or Demerit. If an employee receives two demerits within five years, the Group reserves the right to terminate the employment contract.

(2) Reduction in compensation or change in job level as appropriate.

(3) If the employee is deemed no longer suitable for their current role, a reassignment may be made.

(4) In the above cases, the employee and their directly responsible supervisor must complete compliance training and pass a compliance assessment before resuming their duties.

(5) In serious cases that have caused or could potentially cause significant harm to the Group, the Group may terminate the employment accordingly.

(6) If any illegal or criminal activities are identified, the case shall be transferred to public security or other judicial authorities for handling.

## **7. Rights and Obligations**

(1) All personnel involved in handling compliance incidents must maintain confidentiality regarding all information obtained during the process (including external notifications and the progress of the incident) and must not disclose such information to unrelated parties.

(2) Relevant personnel in each department or region must promptly fulfill their duty to report incidents after they occur. It is strictly prohibited to conceal, falsify, delay, distort facts, or refuse to provide relevant information or materials.

(3) Relevant personnel in each department or region must cooperate with the Legal Affairs Centre's compliance inspections and guidance. Any compliance rectification recommendations must be promptly addressed by formulating and implementing corrective measures and providing timely feedback on the results.

(4) Employees must exercise due diligence and proactively ensure compliance within the scope of their duties. They shall bear direct responsibility for any compliance risks or losses arising from violations of applicable laws, regulations, policies, or internal rules.

#### **8. Effective Date**

This policy shall take effect from the date of its issuance.