

# **The United Laboratories Employees' Code of Integrity and Self-Discipline**

The United Laboratories International Holdings Limited (Stock Code: 3933.HK) (“TUL”, the “Group”, “we”) has formulated this Code to effectively strengthen employee integrity and professional ethics, enhance awareness of integrity and self-discipline among all staff, and foster a healthy business environment. This Code is established in accordance with relevant national laws and regulations and in consideration of the Group’s specific circumstances.

## **1. Code of Conduct for Integrity and Ethical Practices**

All employees must faithfully safeguard the interests of the Group, act with integrity, and remain dedicated to their duties. It is strictly prohibited to use one’s authority or job position for personal gain. The following behaviors are forbidden:

- (1) Accepting or soliciting any form of benefit or transfer of benefit (such as cash, securities, shopping cards, payment vouchers, or other valuables) from businesses or individuals that have a business relationship with the Group;
- (2) Having expenses reimbursed by, or directly paid for by, companies that do business with the Group;
- (3) Investing in or establishing companies in the name of the employee or their spouse that compete with the Group’s business;
- (4) Accepting benefits or preferential treatment from business partners on behalf of the employee, their spouse, children, or other relatives;
- (5) Embezzling, stealing, defrauding, or otherwise misappropriating Group property by taking advantage of one’s position, such as falsifying expenses and misusing funds;
- (6) Using the Group’s business channels, intellectual property, or other resources to engage in profit-seeking activities for oneself or others;
- (7) Instructing, coercing, or directing others to engage in illegal activities or violate Group policies and regulations;
- (8) Accepting or soliciting bribes, or engaging in other activities that may compromise the fairness and integrity of one’s job responsibilities;
- (9) Using Group assets under a personal or third-party name to register companies, invest in shares, purchase stocks, purchase real estate, or engage in other

commercial activities in China or abroad (unless approved by the Board of Directors);

(10) Any other conduct that seeks personal gain at the expense of the Group's interests.

## **2. Registration and Reporting**

When actions do not compromise objectivity or fairness in work, or when refusal would be considered impolite or inappropriate, employees must promptly report to their direct supervisor and follow the required reporting procedures in the following cases:

- (1) Giving or receiving small gifts or local specialties with a market value of less than RMB 200, as part of commercial etiquette.
- (2) Providing or accepting reasonable expenses related to business hospitality, such as meals, accommodations, and transportation, that are necessary for the execution of cooperative work.

If it is not possible to decline gifts or items, the employee must report the receipt to their immediate supervisor within two working days and submit the items to the administrative department of their respective business unit for centralized registration and safekeeping.

Employees must report in advance to their direct supervisor if they are required to attend business banquets, public ceremonies, or networking events hosted by business partners or individuals with business dealings with the Group. Attendance is only permitted after approval. After the event, the employee must submit a written report detailing the date, location, expenses, and other relevant information to the administrative department for record-keeping.

If an employee's immediate or extended family member establishes a company that has business dealings or competes with the Group, the employee must proactively report this to the Group's Administrative Department.

Employees who hold external positions, part-time roles, or receive compensation from companies outside the Group must provide proof that there is no conflict of interest with the Group and obtain approval from the Human Resources Department or Administrative Department of the Group.

## **3. Supervision Mechanism**

The Group has established a whistleblowing system and encourages real-name whistleblowing. Any employee may report violations of integrity observed during business activities. The Group will maintain strict confidentiality for whistleblowers.

An employee's conduct regarding integrity will serve as an important basis for assessment, appointment, and promotion, managed by the relevant HR or administrative department.

To foster integrity from the source and prevent violations of discipline and law, this Code, upon taking effect, will automatically become part of each subsidiary's *Employee Handbook*. All employees are required to study and fully comply with this Code.

#### **4. Penalties**

Employees who violate any of the above provisions and are found in breach after investigation will be subject to disciplinary actions based on the severity of the violation, including “warning”, “demerit”, or “termination of employment” in accordance with Group regulations. All illicit gains, including cash, securities, shopping cards, vouchers, and other items, must be returned or replaced with cash of equivalent value by the violator.

If an employee's violation constitutes a criminal offense or meets the threshold for criminal investigation under national laws and regulations, the Group will transfer the case to judicial authorities in accordance with legal procedures and pursue criminal liability of the person involved.

#### **5. Supplementary Provisions**

This Code applies to all employees of The United Laboratories International Holdings Limited and its subsidiaries.

The Group's Supervision Department holds the final right of interpretation.

This Code was issued by the Group's Audit and Legal Affairs Centre and came into effect on April 30, 2019. It was subsequently revised by the Group's Supervision Department and reissued on April 21, 2025, with immediate effect.