

mindray 迈瑞



MINDRAY CODE OF BUSINESS CONDUCT AND ETHICS



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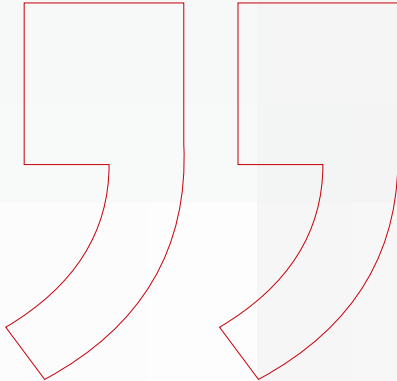
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GENERAL



I P

This Code of Business Conduct and Ethics (the “Code”) sets out the legal and ethical standards for the conduct of employees, officers and directors of Shenzhen Mindray Bio-Medical Electronics Co., Ltd and all of its domestic and overseas subsidiaries, branches and representative offices (the “Company” or “Mindray”). The Company undertakes and requires that all employees, officers, directors, and third parties and individuals conducting business for or on behalf of the Company, maintain the highest standard of honesty and integrity at any time of performing Company business, and comply with any applicable laws and regulations.

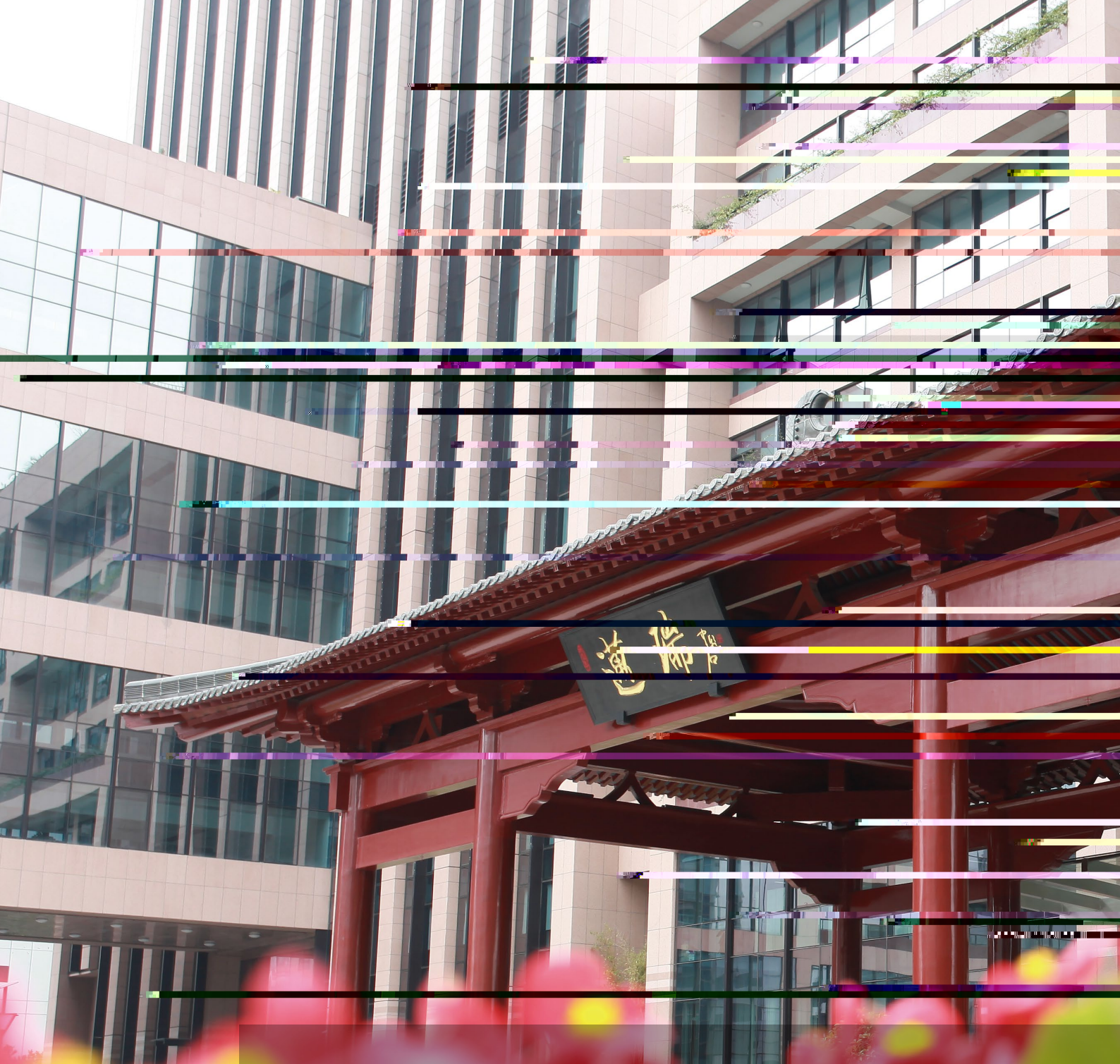
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Scope of administration

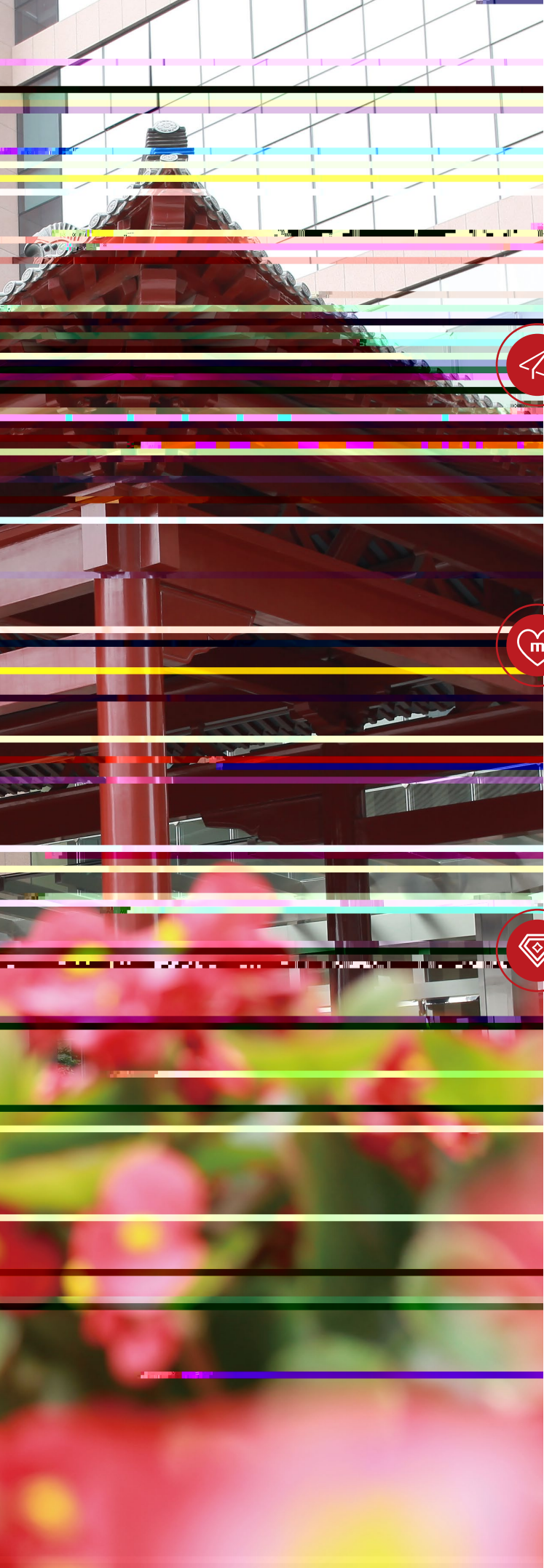
This Code applies to employees, officers and directors of Mindray. This Code also applies to all third-party companies and individuals conducting business for or on behalf of the Company.

Scope of business

all business



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M a C Va



Vision

Better healthcare for all

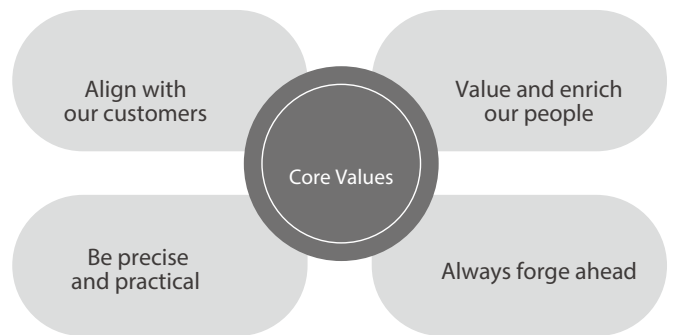


Mission

Advance medical technologies to make healthcare more accessible



Core Values



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The Company is a global enterprise and we must comply with the laws and regulations of the countries or regions where we operate when conducting business. The Company requires that all employees, officers and directors comply with all applicable laws, regulations, and internal rules and guidelines applicable to the company's business, which is essential to ensure that we conduct our business in an ethical manner. In addition, the Company requires all employees, officers and directors to maintain the highest standard of honesty and integrity in the performance of the Company's affairs.

Use good judgment and common sense when complying with the applicable laws, regulations and rules; if in doubt or in case of any uncertainty, please consult with your supervisor or Compliance Office.

If you become aware of any conduct in violation of the laws, regulations or internal Company rules and guidelines, regardless of whether such conduct has been done by the employees, officers, directors or any third party carrying out business for or on behalf of the Company, you have the obligation to immediately report the conduct to your supervisor or the Compliance Office or through the reporting channels mentioned below. For the specific reporting channels, please refer to the Whistleblowing, Consulting and Reporting Procedures of this Code.





The Company insists on conducting business in an honest and ethical manner, and is committed to fair and active competition in the free market, so that customers can maximize their choice of products and services at competitive prices. We also respect the freedom of our customers to independently set their own selling prices, and we do not use the size of our business unfairly to prevent others from competing.



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The Company abides by the highest standards of business conduct and is committed to winning business opportunities through excellent products and services, good reputation and social responsibility. The Company never allows the direct or indirect exertion of undue influence on others by paying or offering bribes of any kind, in order to obtain or retain business or gain a competitive advantage for the Company.

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The Company prohibits all employees, officers and directors from offering hospitalities or giving gifts or other benefits for the purpose of obtaining improper benefits. Subject to applicable laws, the Company permits hospitalities or gifts of insignificant value or provided as a courtesy for legitimate and bona fide business reasons and not for the purpose of obtaining an improper advantage.



The Company has implemented “Anti-corruption Policy” and operating guidelines to provide guidance for its employees, officers and directors on how to understand and comply with relevant anti-corruption and anti-bribery compliance requirements in the process of communicating with government officials, healthcare professionals, other covered individuals and third parties, and to ensure that the Company complies with all applicable anti-corruption and anti-bribery laws and regulations in relevant jurisdictions. All employees, officers and directors of the Company should carefully read and strictly abide by the relevant requirements, ensure that third parties conducting business for or on behalf of the Company understand Company’s standpoint, and urge them to comply with the corresponding provisions of this Code.

Employees, officers and directors of the Company shall not accept bribes or kickbacks and shall not use their power to seek improper treatment or benefits from business partners.



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Money laundering is when individuals or entities transfer funds obtained through criminal activity through the financial system in order to hide traces of their criminal origin, or otherwise conduct transactions that make the origin of the illicit funds appear legitimate. The Company strictly abides by applicable anti-money laundering laws and regulations, does not participate in any money laundering activities, and prohibits its employees from participating in money laundering activities or helping others with money laundering activities.

The Company only maintains business relationships with customers, partners and other third parties who are reputable, law-abiding and funded from legitimate sources. The Company takes appropriate measures to verify the identity, economic background, and source of payment of its customers, business partners and other third parties to ensure that their source of funds is legitimate.

Any employee who becomes aware of suspected money laundering or unusual transactions should immediately report it to their supervisor or the Compliance Office or the reporting channels mentioned below. For the specific reporting channels, please refer to the Whistleblowing, Consulting and Reporting Procedures of this Code.



C a E C a Sa La a R a

The Company complies with any export control and sanctions laws and regulations in relation to products, software, technology and services.

- The Company employs an internal compliance system to address export control and sanctions risks.
- The Company has developed and implemented standard operating procedures for transaction and order screening, trade-related audits, record keeping, and employee training.
- The Company employs internal systems to help employees perform end-user and end-use verification and product classification for sensitive products, customers and countries.

Company employees, officers and directors should be aware of and abide by the Company's "Trade Compliance Management Policy" and the policies and procedures listed in its standard operating procedures. If you are unsure whether the Company's export activity poses a potential risk of export control and sanctions violations, you should consult the Compliance Office before engaging in that activity.



Privacy and Data Protection

If the Company shares personal information with its trusted service providers, partners or other third parties, the Company will do so only if it has the legal basis to do so and shall contract or otherwise require these third parties to protect the personal information it processes on the Company's behalf.

- The Company respects the privacy and personal information protection of the Company's customers, employees, business partners and other relevant individuals.
- The Company follows applicable laws, regulations and rules to process (including the collection, storage, use, processing, transmission, provision, disclosure and deletion, etc.) personal information in a secure manner.
- The Company only processes personal information for legitimate business purposes, and follows the principles of legality, legitimacy, integrity, openness and transparency, and does not exceed the necessary limit.
- The Company protects the confidentiality, integrity, and availability of all personal information. Employees of the Company who have access to personal information shall process personal information in accordance with the above standards.

Product Safety, Quality Assurance

The Company stands for high-quality products and services. The Company has established a comprehensive quality management system and process that runs through R&D, procurement, manufacturing, and service to ensure comprehensive product quality throughout the entire process.

The Company strictly complies with laws and regulations, international and national standards as well as Company's quality policies and management procedures on product quality, safety and performance requirements. To fully comply with regulatory requirements, the Company maintains and improves the effectiveness of its quality management system and continuously improves its products, services and processes to achieve outstanding customer satisfaction.



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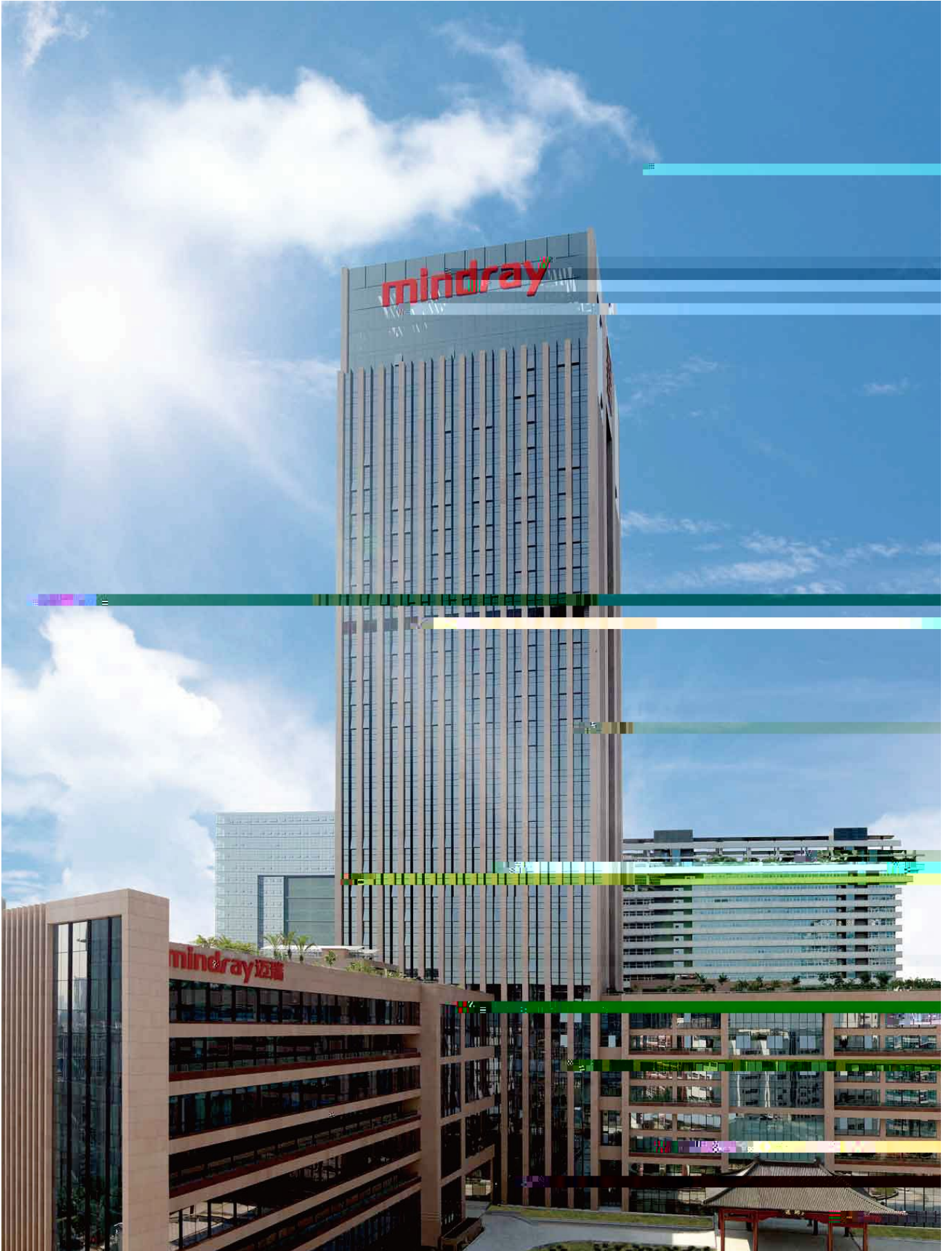
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The Company complies with all laws and regulations applicable to the promotion, marketing and sale of products in the countries in which it operates.

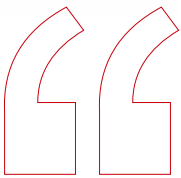
In promotional activities, the purpose of the Company's interactions with healthcare professionals should be to benefit patients and improve medical standards. The Company's promotional activities should promote the appropriate use of the product by objectively presenting product information. The content of all Company promotional materials should be comprehensive, accurate, and supported by a solid basis in product information or scientific literature.

The company complies with any applicable modern anti-slavery laws and strives to prevent modern slavery and human trafficking from occurring in business operations and supply chains. The company is committed to avoiding any form of forced labor or child labor in its business. The company requires its suppliers to meet the same standards.



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E



Equal Job Opportunities

The Company provides equal job opportunities, and all recruitment and employment decisions are based on the Company's development needs, job standards, and employees' character and working ability. The Company is committed to not discriminating people on the basis of their race, color, age, gender, sexual orientation, gender identity and gender expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, or marital status, in hiring and employment practices such as salary, promotions, rewards, and training opportunities.

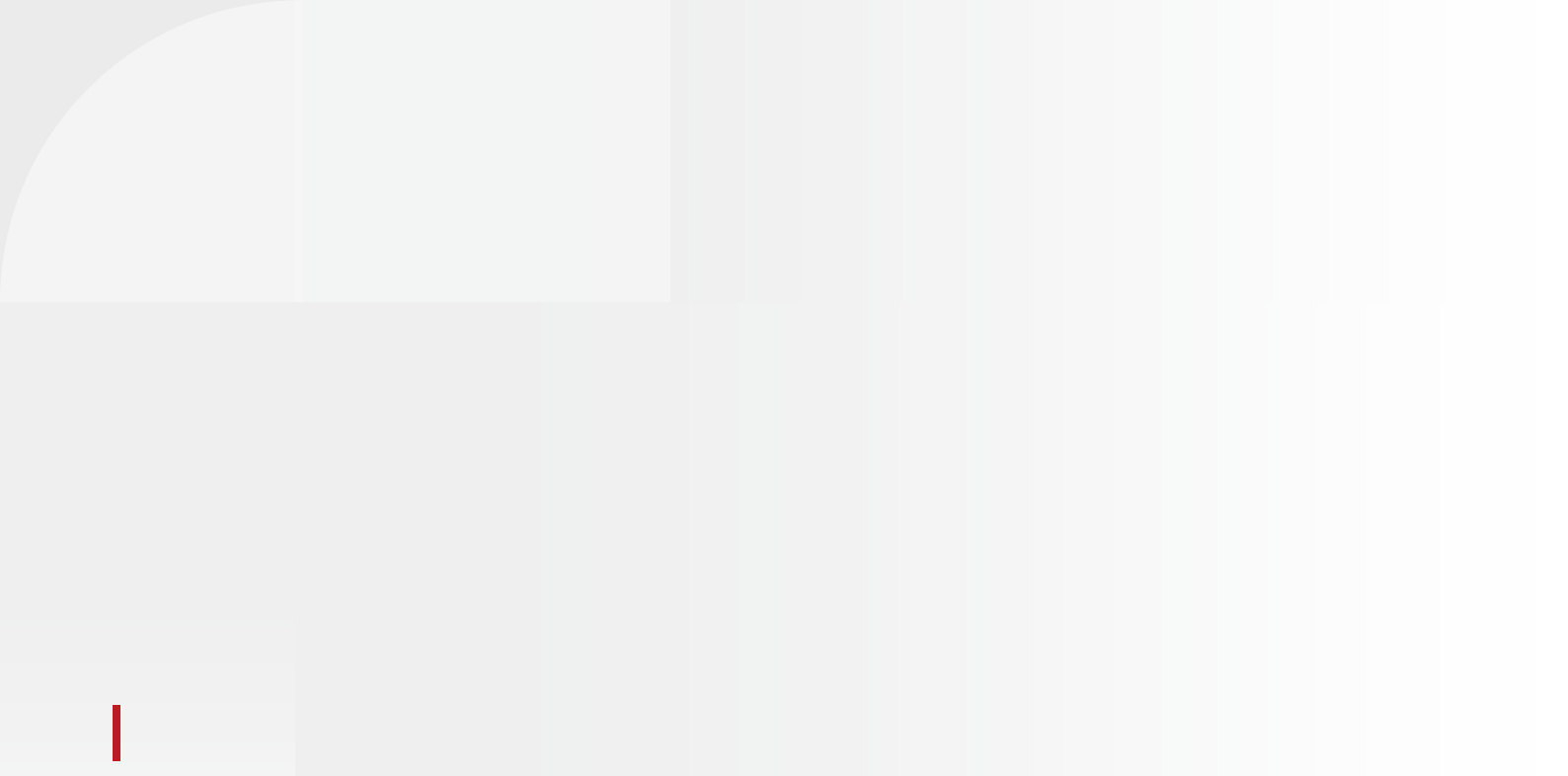


H a a Sa W E

The Company is committed to providing a healthy and safe working environment for all employees. The Company strictly complies with all environmental, health and safety laws that apply to the Company's business, and strictly follows safe work practices to ensure a safe workplace and prevent employee harm. The Company will not tolerate any harsh or inhumane treatment of employees or individuals, including any form of harassment, such as sexual harassment, sexual abuse, bullying, corporal punishment, mental or physical coercion, or verbal violence. The Company establishes a career development channel for employees and provides good training opportunities to improve employees' professional ability.

P I R a E

The Company respects and protects the legitimate rights and interests of every employee, fully complies with all applicable labor and employment related laws and regulations, and does not allow any behavior that infringes the legitimate rights and interests of employees to occur.



All corporate books, records and accounts shall be prepared in accordance with all applicable regulations and standards and shall accurately reflect the transactions for which they are recorded. The Company's financial statements should comply with generally accepted accounting principles and the Company's accounting policies. No undisclosed or unrecorded accounts or funds shall be established and no false or misleading entries shall be made in the Company's books or records for any reason. Do not use Company funds or other Company property without proof.

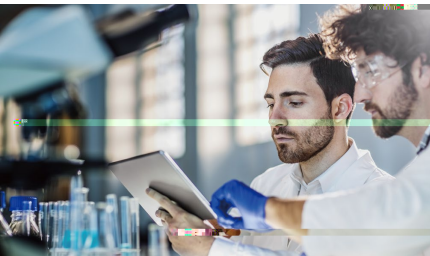
The Company will only provide reimbursement for goods, services or other expenses based on relevant invoices or receipts issued by third parties. Except for normal and customary small cash outlay needs, cash transactions involving the Company's business must be avoided.

As a global company, Mindray is committed to

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Employees, officers and directors shall reasonably use and do their best to protect Company assets. The use of the Company's assets and services must be limited to the performance of the Company's legitimate business needs and not be for the benefit of yourself or anyone else.



Patent innovation and technological upgrades are the lifeblood of medical device companies. The Company's assets include tangible assets as well as intangible assets (such as copyrights, patents, trademarks, trade secrets, proprietary information, etc.). The Company's intellectual property is an important asset for its competitive advantage. All Company employees must protect these assets.

U S a M a

Company employees, officers and directors must comply with all Company policies when using social media and related Company content and resources. The use of social media for internal and external communications related to job responsibilities must be conducted in a responsible manner, be respectful of others, and bear in mind that personal actions affect how others perceive the Company's position as represented by the employee.



N I T a

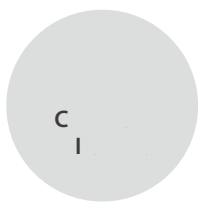
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Employees, officers and directors may, as a result of their day-to-day duties, have access to insider information about the Company or its suppliers, customers or other third parties. Insider information refers to non-public information that has a material impact on the Company's operations, finances, or the trading price of the Company's securities and derivatives, including material events that may have a greater impact on the Company's stock or bond trading prices. In possession of such insider information, Company employees, officers and directors cannot buy or sell the stock of the Company or business partner and cannot provide anyone with insider information or advise anyone to buy or sell stock of the Company or business partner based on insider information.

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Without permission and authorization, no department, employee or person with insider information shall publicize or release the Company's non-public business information in any form or in any name, and shall not release the Company's non-public business information to the news, media or other relevant entities.

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A conflict of interest is a situation in which personal interests or actions may adversely affect the interests of the Company.



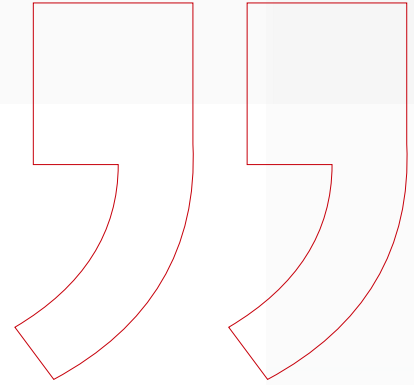
A conflict of interest arises when a Company employee, officer or director takes actions or has an interest that makes it difficult for them to objectively, fairly and effectively perform their duties or responsibilities as assigned by the Company. Conflicts of interest may manifest as kinship or interests between employees, officers, directors and the Company's competitors, suppliers, customers, etc., or that between employees, officers, and directors.



The Audit Committee will evaluate any question or complaint received and authorize relevant personnel to investigate the truthfulness and specificity of the question or complaint as permitted by law.

The Company provides its employee, officers, directors and third parties it may do business with a group reporting system. No employee, officer or director of the Company shall be treated unfairly, disciplined, fired, demoted, suspended, threatened, harassed or in any other way discriminated or retaliated against for reporting any improper or illegal conduct by an employee unless it is determined that he or she knowingly made a false report.

S a P



I C V a C

All employees, officers and directors must be familiar with the requirements in this Code and the relevant Company rules and regulations. In all applicable circumstances, business activities should be carried out with reference to the requirements of this Code and the relevant rules and regulations of the Company. Breach of this Code can have serious consequences for the Company. Any violation of this code will be punished in accordance with the company's "Labor Discipline Management Policy" or other applicable policies and regulations. If the situation is serious, the company will hold them legally responsible.

All third-party enterprises and individuals conducting business for or on behalf of the company shall comply with the requirements of this Code. Any violation of this code may result in cessation of cooperation, termination of employment, or other consequences.


I W , C a R P


This Code establishes a code of conduct for the Company's employees, officers, and directors, but cannot cover all the matters that may be encountered in your day-to-day work. If you are not sure how to apply or interpret the relevant content of this Code, or if you have any other questions, please speak up, you can either consult your supervisor or the Compliance Office.


If you suspect or have evidence of any violation of this Code, please report it through the relevant channels of the Company in a timely manner. You can report publicly, confidentially or even anonymously.

You can report suspected violations through the following channels:

R e p o r t i n g C h a n n e l s


 **Address** : Supervision Office, Mindray Building, Keji 12th Road South, High-tech Industrial Park, Nanshan, Shenzhen, 518057, P.R. China

 **Telephone** : +86 755 81888787
: +86 755 26582680-88787

 **Email** : compliance@mindray.com

R e p o r t i n g C h a n n e l s

 **Website** : 24 hours a day, 7 days a week, 365 days a year
: <https://mindray.ethicspoint.com>

 **Hotline** :
The Company has engaged a third-party vendor to provide a "whistle blower hotline" of operations. These telephone lines are dedicated, toll-free phone lines that are available to you 24 hours a day throughout the year. It is answered by professionals in local language. Your concerns will be collected and reported to the Company with all information in strict confidence.

<http://www.business.att.com/bt/access.jsp>

- (a) Go to website with information about access codes: <http://www.business.att.com/bt/access.jsp>
- (b) Find access code: To get a dialing code for a country, click on the first letter of the country name
- (c) Dial access code of your country
- (d) Wait for AT&T tone or operator
- (e) Enter or say: 8666145859
- (f) Follow instructions and file a report

P **W**

The Company is committed to an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable, without fear of retaliation, in approaching your supervisor, Supervision Office or reporting a matter through the Company reporting channels in instances where you believe violations of company policies, regulations or standards have occurred. The Company strictly prohibits retaliation against anyone who raises a concern about this Code, reports a violation, or provides information in an investigation. Violations of this prohibition are considered violations of this Code. If you believe that you or someone else has been retaliated against for raising a concern, reporting a violation, or providing information in an investigation, please contact the Supervision Office immediately or use the Company reporting channels.

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The topics under the Code are further elaborated and the implementation rules are clarified by the related system documents mentioned in the Code. In case of any conflict between the Code or related system documents and other company policies or documents, the Code and related system documents prevail in principle and the Compliance Office is responsible for final interpretation.

E

This Code shall take effect as of the date of approval.

