

 Title: MicroPort Orthopedics Inc. Global Anti-Bribery Policy	Document Owner/Dept. Name: Corporate Compliance Effective Date: September 29, 2023 Status: Issued	Document Number: CMPL0010 Document Type: Policy Revised: Issued Date: August 10, 2023 Note: This is not a QMS document
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Global Anti-Bribery Policy

1. Purpose and Scope

MicroPort Orthopedics Inc. (MicroPort) is committed to acting ethically and in full compliance with applicable anti-bribery laws and regulations in the locations where MicroPort and its affiliates operate.

This policy applies to all MicroPort employees (full-time, part-time, and temporary), executive officers, members of the Board of Directors, independent contractors, consultants, sales agents, distributors, distributor employees, sub-distributors and all others performing services on behalf of MicroPort, wherever located (hereinafter collectively referred to as “Representatives”).

The purpose of this policy is to establish corporate requirements regarding global anti-bribery laws and to ensure that all Representatives of MicroPort understand and adhere to the requirements when interacting with a third party. Failure to comply with anti-bribery laws could lead to criminal and civil penalties for MicroPort and its Representatives.

2. Definitions

Anything of Value – Anything of value is broadly defined and includes, but is not limited to, cash payments, gifts (regardless of market value), business entertainment/hospitality, sponsored travel, political contributions, and charitable donations.

Bribery - A bribe is the direct or indirect offer to give or receive anything of value to a Government Official or commercial person or entity, with the intent to corruptly influence that official, person, or entity to award new business, continue existing business or to gain any improper advantage.

Facilitation Payment – A small sum of money paid to a Government Official, usually a low-level official to expedite routine and nondiscretionary activities, such as obtaining a visa or installing electrical service. Facilitation Payments are considered bribes under certain laws, including the UK Bribery Act, therefore, MicroPort does not allow Facilitation Payments.

Government Official - For purposes of this policy, a Government Official includes: (i) any government or government agency, ministry, or department official or employee (at any level); (ii) anyone working on behalf of the government, regardless of rank or position; (iii) an executive officials or employees of a wholly or partially government-owned enterprise/ organization, including physicians employed at public hospitals; (iv) any political party official; (v) candidates for political office; and (vi) officials or employees of public international organizations (such as the United Nations or the World Bank).

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Healthcare Professionals - Healthcare Professionals or Healthcare Organizations are individuals or entities that are (i) involved in providing healthcare services and/or items to patients; (ii) in a position to purchase, lease, recommend, use, arrange for the purchase or lease of, or prescribe MicroPort's products; (iii) direct service providers and others who may be involved in the decision to purchase, lease, or recommend MicroPort's products; or purchasing agents, physician's practice managers, and management within group purchasing organizations.

3. Improper Payments

It is the policy of Microport to prohibit the direct or indirect giving or receiving of improper payments or other benefits for purposes of obtaining or retaining any business advantage.

Representatives of MicroPort may not directly or indirectly make, promise, approve, authorize, or offer to give to anyone – or accept or solicit from anyone- anything of value if the purpose is to improperly induce the recipient to take (or to refrain from taking) any action that would bestow a commercial benefit or advantage to MicroPort or any other party.

MicroPort prohibits both public sector and commercial bribery.

4. Dealing with Government Officials

Interactions with Government Officials must be monitored especially closely due to the increased risk for violations of applicable anti-corruption laws. Bribery of a Government Official is against the law in every country, and often carries criminal penalties for both the individual employee/representative and the company. Any direct or indirect dealings with Government Officials that involve the provision of anything of value, including the provision of any gifts or hospitality, will be scrutinized by MicroPort.

Many countries have laws prohibiting the bribery of government or public officials in countries other than their own. The U. S. Foreign Corrupt Practices Act and the UK Bribery Act are two examples of such laws. An improper payment or provision of anything of value may create problems for you and MicroPort in more than one legal jurisdiction (including outside the jurisdiction where you work or where the conduct occurs).

5. Interactions with Healthcare Professionals

In many countries, Healthcare Professionals (HCPs) employed by or otherwise affiliated with public hospitals, public universities, or public health systems are considered government officials for the purpose of applicable anti-bribery laws and regulations. As noted in the Code of Business Conduct, MicroPort's interactions with all HCPs, not only those who may be considered Government Officials,

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must be conducted with full transparency. MicroPort has implemented procedures to ensure that these interactions are conducted in compliance with applicable laws, including but not limited to, the US Anti-kickback Statute, and regional industry codes.

MicroPort may retain HCPs for consulting services such as training, research, and advisory boards, for which a legitimate business need has been identified and for which MicroPort pays fair market value. Consulting relationships with HCPs must be conducted according to a written agreement and approved by MicroPort's management. HCP consultants are selected based on their qualifications and experience and not on past or potential purchase, recommendation, or endorsement of our products. Sales personnel may recommend potential HCP consultants based on the individual's skill and expertise, but MicroPort does not permit those in sales roles to control or improperly influence the decision to select a particular consultant to provide a service.

6. Accounting Books and Records

Compliance with the internal accounting control procedures of MicroPort is mandatory. The books and records of each subsidiary of MicroPort shall be maintained and recorded in compliance with local laws and the International Financial Reporting Standards (IFRS). All accounting records, expenditures, expense reports, invoices, vouchers, gifts, business hospitality, and any other business expense must be accurately reported and recorded.

All payments by or on behalf of MicroPort must be documented and approved according to all internal control requirements and based on appropriate supporting documentation for the purposes specified in the documentation. Such purposes shall be recorded in accordance with applicable corporate procedures.

If a MicroPort employee receives hospitality or a gift, he or she must keep documentation explaining the who, what, where, when, and why even if it is not yet determined that this gift or hospitality was appropriate.

7. Grants

MicroPort is committed to making a positive contribution in the communities where we do business and to fostering research and education within the industry. We apply due diligence to any grant requests to ensure that the recipient organization is legitimate. We do not make charitable contributions to gain an improper business advantage. All requests for donations and grants should be submitted to grants@ortho.microport.com.

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8. Political Contributions

MicroPort encourages its representatives to participate in community activities, which may be political in nature. However, MicroPort funds or assets cannot be used as resources for political contributions, nor can reimbursements be made for contributions to political parties, candidates, or activities. Participation in all political activities must take place on personal time, not during working hours, and at personal expense.

9. Responsibility to Support This Policy

The Executive Compliance Committee has overall responsibility for this policy. MicroPort management is responsible for ensuring that appropriate processes, procedures, and controls are in place within their respective areas to demonstrate compliance with this policy. It is the responsibility of every Representative to understand and comply with this Policy.

Each Representative must make an immediate report of any suspected or actual violation of applicable laws or regulations or of this Policy and any related policies or procedures. Reports can be submitted through the following methods:

Directly reporting to Compliance Office:

Email: ethics@ortho.microport.com

Anonymously reporting to Ethics Point:

In the US or Canada: 855-726-6898

Outside the US: International directory at www.ethicspoint.com

Or via direct link: <https://secure.ethicspoint.com>

Non- Retaliation - No Representative reporting a violation of this policy will be subject to retaliation based on any good faith report he or she makes.

MicroPort will investigate all credible reports of potential misconduct, and, as part of the investigation, will evaluate the root cause of the misconduct and implement appropriate remediation measures where needed.

10. Penalties

Failure to comply with anti-bribery and gift laws could lead to criminal and civil penalties for MicroPort and its employees and representatives personally, significant business disruptions, and harm to MicroPort's business reputation. Violations of MicroPort's Code of Business Conduct and this Policy will result in discipline, up to and including termination of employment.