

# Anti-Corruption and Anti-Commercial Bribery Policy

Aier Eye Hospital Group Co., Ltd.

## PURPOSE

The Company adheres to the corporate culture of "integrity, cleanliness and health", strengthens internal management, adheres to the principle of taking the law as the guideline, turns the knife inward, cracks down on corruption and commercial bribery, and unwaveringly builds up a cadre of cleanliness and responsibility, and shapes a clean and sunny working environment for the employees.

## SCOPE OF APPLICATION

The Policy applies to Aier Eye Hospital Group Co., Ltd. and all subordinate medical institutions. In addition, the Company encourages all suppliers and partners to comply with the *Anti-Corruption and Rice Commercial Bribery Policy*, which is consistent with this policy.

## PRINCIPLES AND COMMITMENTS

As a listed chain eye hospital group committed to providing high-quality medical services, the Company complies with the *Company Law of the People's Republic of China*, the *Anti-Money Laundering Law of the People's Republic of China*, the *Criminal Law of the People's Republic of China* and other laws and regulations, as well as industry guidelines such as the *Nine Guidelines on Integrity for Healthcare Institutions' Practitioners* of the National Healthcare Commission and implements the *Aier Eye Hospital Employee Handbook* and the *Integrity Agreement between Aier Eye Hospital and its Partners*", formulate regulations on anti-corruption and anti-bribery, and undertake to conduct business under the legal framework of fair competition, anti-bribery and anti-corruption.

## CORPORATE RESPONSIBILITIES

The Legal Supervision Center of the Company is the supervisory and management department for the Group's anti-corruption and anti-bribery and other business ethics related matters, reporting to the Board of Directors and the Vice President in charge of the Company, with the main responsibilities are as follow:

- 1) To govern, supervise, investigate and deal with the Group's anti-commercial bribery and anti-corruption and other business ethics related matters in compliance with relevant national policies, laws, regulations and the Group's rules and regulations;
- 2) Strengthen the supervision and management of the integrity of all employees, especially those in important positions and links. Prevention and treatment at source, treating both the symptoms and the root causes, improving system construction, and promoting a culture of integrity;
- 3) Implement the signing of an employee anti-corruption and anti-commercial bribery commitment by all employees, and follow up and supervise and inspect the implementation of the commitment.

## PROHIBITED BEHAVIOR

- 1) Taking advantage of the position, to occupy company property for personal use.
- 2) Privately transacting with patient parties on private orders, intercepting patient party contributions, or transferring business opportunities that generate Company revenue to third parties outside the Company.
- 3) To open, own, operate, manage or work in other medical institutions, optical stores, medical supply companies and commercial companies, either directly or indirectly in the name of another person, without the approval of the Company.
- 4) Transferring, keeping and disposing of the Company's assets such as cash, bank deposits, shopping cards and coupons, equipments and instruments, products and materials, business revenues, and purchases payable in violation of the law.
- 5) Taking advantage of the position to ask for or accept valuable property such as red packets, kickbacks, and benefit payments from related parties, or accepting high-grade banquets, travel reimbursements, and travel hospitality from related parties, which are recognized as commercial bribery.

- 6) Giving property to relevant parties to seek undue benefits.
- 7) Assigning the Company's profitable business to one's own relatives or friends for operation; purchasing goods or accepting services from a company operated and managed by one's own relatives or friends at a price significantly higher than the market price or selling goods or providing services to a company operated and managed by one's own relatives or friends at a price significantly lower than the market price; or purchasing or accepting unqualified goods or services from a company operated and managed by one's own company.
- 8) Violating the rules of misrepresentation, fraudulent claim, retention and distribution of performance bonuses, special incentives, allowances and other special funds issued by the Company.
- 9) Discounting or selling company or enterprise assets at low prices for favoritism or fraud.
- 10) Organization or participation in collusion, bid-rigging and Accompanying-Bidding.
- 11) The acts of covering corrupt purposes in the form of charity and donation include but are not limited to using charitable donations for illegal benefit transfer, evading legal responsibilities, money laundering, embezzlement and bribery.

No. 188 Furong South Road, Changsha, Hunan Province.

#### **REQUIREMENTS FOR SUPPLIERS AND PARTNERS**

We require our suppliers and partners to comply with national laws and regulations on anti-commercial bribery, medical industry norms and contract integrity clauses. We will evaluate the implementation of anti-commercial bribery for suppliers regularly and require rectification or termination of cooperation for suppliers or partners with problems.

#### **REPORTING AND ACCEPTANCE**

The company encourages employees and related parties to report all kinds of corruption in real name or anonymously. The Group will maintain strict confidentiality of the informant's information. Legal Supervision Center to receive reports and complaints, should be immediately registered, and timely investigation and disposal work.

- 1) Reporting and Complaints Number: 18975199961 (same number as Wechat);
- 2) E-mail: jcjb@aierchina.com ;
- 3) Letter receiving address: Legal Supervision Center, 16th Floor, North Tower, Aier Eye Hospital Building,
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