

I 、 Core Principles and Values

The Company operates under the fundamental belief that ethical conduct is the foundation of sustainable business success. These principles guide every decision, from daily operations to long-term strategic planning, and apply equally to all individuals representing the Company, including full-time employees, part-time staff, temporary workers, contractors, and board members.

. **Honesty and Integrity**

- . In all internal and external communications, ensure accuracy and completeness. For example, when reporting sales data or product performance metrics, avoid exaggeration or omission of unfavorable information.
- . Take responsibility for mistakes. If errors are identified in reports, contracts, or product documentation, promptly notify relevant parties and collaborate on corrections.
- . Refrain from making false promises to customers, such as guaranteeing "100% cure rates" for medical devices, which violates industry regulations and ethical standards.

. **Respect and Inclusion**

- . Foster a workplace where diverse perspectives are valued. During team meetings, ensure all members have equal opportunity to speak, and avoid interrupting or dismissing others' ideas based on hierarchy.
- . Provide reasonable accommodations for employees with disabilities, such as accessible workstations or flexible schedules for medical appointments, in compliance with [Local Accessibility Laws].
- . Address customer inquiries with empathy, especially when dealing with patients using our CPAP devices. Avoid technical jargon that may confuse users, and take time to explain instructions clearly.
- . **Compliance with Laws and Regulations**
 - . Stay updated on industry-specific regulations, such as medical device registration requirements (e.g., FDA, CE marking) and data privacy laws (e.g., HIPAA, GDPR for patient information).
 - . Complete mandatory compliance training annually, including modules on anti-bribery, anti-corruption, and healthcare fraud prevention.
 - . Report any potential legal violations immediately to the Compliance Department, even if unsure of their severity.
- . **Quality and Patient Safety**
 - . In manufacturing, adhere to strict quality control protocols, such as conducting 100% leak tests on CPAP masks before packaging. Document all inspections to enable traceability.

- . In product development, prioritize safety over cost or speed. For example, if a new component material raises toxicity concerns, delay launch until further testing confirms it meets safety standards.
- . In post-sales support, respond promptly to product defect reports. Initiate recalls or replacement programs without delay if a safety risk is identified, even if it impacts short-term profits.

II 、 Employee Code of Conduct

. Workplace Communication and Collaboration

- . Use professional language in all interactions, whether in emails, meetings, or instant messages. Avoid sarcasm, insults, or discriminatory remarks, even in casual conversations.
- . Protect sensitive information in digital communications. Do not share patient data via unencrypted channels (e.g., personal email, messaging apps like WhatsApp) or discuss confidential projects in public spaces.
- . When collaborating with cross-departmental teams, respect role boundaries. For example, sales teams should not pressure R&D staff to approve untested features to meet deadlines.

. Data Protection and Confidentiality

- . Access only the data necessary for job responsibilities. A customer service representative, for instance, does not need access to manufacturing cost data.

- . Secure physical documents containing patient records or trade secrets in locked cabinets. Shred outdated files instead of discarding them in regular trash.
- . Report lost or stolen devices (laptops, phones) with access to company systems within 24 hours. Follow IT department protocols to remotely wipe data if necessary.

. **Fair Competition Practices**

- . Compete based on product merits, not disparagement of competitors. When comparing products in sales pitches, focus on factual differences (e.g., "Our CPAP has a quieter motor") rather than false claims (e.g., "Competitor X's devices are unsafe").
- . Do not offer or accept bribes, kickbacks, or excessive gifts to secure business. For example, a salesperson must decline a supplier's offer of a luxury vacation in exchange for a contract.
- . Adhere to antitrust laws by avoiding agreements with competitors to fix prices, divide markets, or boycott suppliers.

. **Use of Company Resources**

- . Company assets (equipment, software, vehicles) must be used primarily for work purposes. Personal use is permitted only if it is minimal (e.g., a short personal call) and does not interfere with job duties.

- . Do not install unauthorized software on company devices, as it may introduce security risks. Request IT approval before downloading new tools.
- . Report misuse of resources, such as a colleague using a company vehicle for personal errands or stealing office supplies, to Human Resources.

III 、 Conflicts of Interest and Accountability

. Identifying and Managing Conflicts of Interest

- . Disclose personal relationships that could affect decision-making, such as a family member working for a competitor or supplier. Recuse yourself from related discussions or approvals.
- . Avoid financial conflicts, such as owning stock in a competing company or investing in a supplier that you directly oversee. Seek approval from the Ethics Committee if such investments are pre-existing.
- . Be cautious of external roles, such as serving on the board of a healthcare organization that purchases our products. Ensure these roles do not compromise objectivity.

. Third-Party Relationships

- . Conduct due diligence on new suppliers and partners to verify they meet the Company's ethical standards (e.g., labor practices, environmental compliance).

- . Include anti-corruption clauses in contracts with third parties, requiring them to adhere to the same ethical standards as the Company.
- . Monitor partner activities regularly. Terminate relationships immediately if a partner is found engaging in unethical behavior (e.g., falsifying product test reports).

- . **Reporting and Investigating Violations**

- . Use multiple reporting channels: the Ethics Hotline ([Phone Number]), dedicated email ([Ethics Email]), or in-person submission to the Compliance Officer. All reports are kept confidential.
- . The Compliance Department will investigate reports within 10 business days, interviewing relevant parties and reviewing evidence (e.g., emails, transaction records).
- . Whistleblowers are protected from retaliation, including demotion, harassment, or termination. Retaliation against a whistleblower will result in severe disciplinary action against the offender.

- . **Enforcement and Consequences**

- . Disciplinary actions are proportional to the violation's severity:
 - . Minor offenses (e.g., occasional personal use of company phone): Verbal warning and counseling.

- . Moderate offenses (e.g., failing to report a minor conflict of interest):
Written warning, mandatory retraining.
- . Severe offenses (e.g., bribery, falsifying safety test results): Termination,
legal reporting, and potential civil or criminal liability.
- . Employees have the right to appeal disciplinary decisions in writing within 5
business days. The Appeals Committee will review the case and issue a final
decision.
- . The Company publishes an annual Ethics Report summarizing violation
trends, training completion rates, and improvements made to the Code.