

Code of Business Conduct

商业行为准则

本准则适用于三诺生物传感股份有限公司及关联企业的董事、高级管理人员与其他员工，以及代表公司开展业务的所有第三方企业和个人。

This Code applies to the directors, senior managers, and other employees of Changsha Sinocare Inc. and its affiliated enterprises, as well as all third-party enterprises and individuals that conduct business on behalf of the Company.

Sinocare三诺

Sinocare三诺
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风险合规与审计部

三诺生物传感股份有限公司
Changsha Sinocare Inc.

全球合规，为爱而诺

Global Compliance, Committed for Love

因为爱，三诺生物始终致力于为全球糖尿病及相关慢性病患者提供创新、优质的产品与服务，助力他们提升生活质量。我们的目标，是成为全球领先的糖尿病数字管理专家。公司确立“为爱而诺”的核心价值观，恪守对用户、员工、合作伙伴、社会及股东的承诺。这不仅是一句口号，更是每一位三诺人共同遵循的行为准则。

Driven by love, Sinocare has always been committed to providing innovative and high-quality products and services for diabetes and related chronic disease patients worldwide, helping them improve their quality of life. Our goal is to become a globally leading expert in digital diabetes management. The company has established "Committed for Love" as its core value, and adheres to its commitments to users, employees, partners, society, and shareholders. This is not just a slogan, but a code of conduct jointly followed by every Sinocare employee.

二十多年来，三诺始终惟精惟一，先后成为“中国血糖仪普及推动者”和“全球有影响力的血糖仪专家”，并迈向了成为“全球领先的糖尿病数字管理专家”的新征程。这一切，离不开我们始终如一的依法合规经营、对高标准道德伦理的坚守，以及对企业核心价值观的践行。

Over the past two decades, Sinocare has always been dedicated to excellence with unwavering focus. It has successively established itself as a "Promoter of Blood Glucose Meter Popularization in China" and an "Influential Global Expert in Blood Glucose Meters," and has now embarked on a new journey to become a "Globally Leading Expert in Digital Diabetes Management." None of this would be possible without our consistent law-abiding and compliant operations, our adherence to high standards of ethics and morality, and our practice of the company's core values.

每一位员工都是公司的代表，我们的一言一行，都塑造着外界对三诺的印象与评价。为确保员工行为与公司价值观一致，并能够合法、尽责地履行职责，公司制定了《商业行为准则》。该准则以企业文化为指引，从“爱用户”、“爱员工”和“爱公司”三个维度，整合了相关法律法规与国际商业规则，是指导我们处理内外部关系的基本依据，也是三诺坚持“合规经营”的郑重宣言与实际行动。

Every employee is a representative of the Company. Our words and deeds shape the external perception and evaluation of Sinocare. To ensure that employees' behaviors align with the Company's values and that they can perform their duties legally and responsibly, the Company has formulated the Code of Business Conduct. Guided by the corporate culture, this Code integrates relevant laws, regulations, and international business rules from three dimensions—"Caring for Users", "Caring for Employees", and "Caring for the Company". It serves as the fundamental basis for guiding our handling of internal and external relationships, and also represents Sinocare's solemn declaration and practical action to uphold "compliant operations".

《商业行为准则》为全员提供了明确的行为指引。每一位三诺成员都应熟知、理解其内容，并将其贯彻于日常工作中。“爱”是三诺价值观的灵魂——将爱融入工作，使我们与自己、与他人、与环境和谐共处，共同践行企业使命。而“合规”，则是我们抵御风险的金色盾牌，是铸就长期价值的坚实基础。

The Code of Business Conduct Provides Clear Behavioral Guidance for All Employees. Every member of Sinocare should be familiar with and understand the content of this Code, and implement it in daily work. "Love" is the soul of Sinocare's values—integrating care into work enables us to coexist harmoniously with ourselves, others, and the environment, and jointly fulfill the company's mission. "Compliance", on the other hand, is our golden shield against risks and a solid foundation for forging long-term value.

全球合规，为爱而诺。

Global compliance, committed for love



总经理 李心一
General Manager Li xinyi

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我们坚守的原则

Principles We Adhere to

我们要坚持合规经营

We shall adhere to lawful and compliant operations.

我们遵守业务所在国家 / 地区所适用的法律法规，并确保将需要遵守的法律法规落实在公司内部的制度、流程和内控措施中。

We comply with the applicable laws and regulations of the countries/regions where we conduct business, and ensure that the laws and regulations requiring compliance are implemented in the company's internal systems, processes, and internal control measures.

我们必须遵守哪些法律？

What laws must we comply with?

我们必须了解并遵从适用于我们各项业务活动的法律法规，各项业务的管理者应承担识别法律风险的责任。这些法律法规可能因国家 / 地区不同而存在差异。如果有任何不明确之处或遇到任何问题，我们会联系公司法务。

We must understand and follow all laws and regulations applicable to our various business activities. Managers of each business shall bear the responsibility of identifying legal risks. These laws and regulations may vary by country/region. If there is any ambiguity or any problem encountered, we shall contact the company's legal counsel.

违反法律法规对公司及员工有何影响？

What are the impacts of violating laws and regulations on the company and employees?

违反法律法规或未能遵守《商业行为准则》将会给公司和员工带来严重后果。

Violating laws and regulations or failing to comply with the Code of Business Conduct will bring severe consequences to the company and employees.

我们坚守的原则

Principles We Adhere to

对公司的后果可能是：

Potential consequences for the company:

- 刑事追责或行政处罚
Criminal liability or administrative penalties
- 公司品牌、商业信誉受损（失去用户信赖，商业环境恶化）
Damage to the company's brand and business reputation (loss of user trust, deterioration of the business environment)
- 失去发展机会（被剥夺经营资质，无法上市融资，无法获得政策优惠）
Loss of development opportunities (deprivation of business qualifications, inability to list for financing, inability to list for financing, inability to obtain policy preferences)
- 经济损失（直接的罚金罚款，面临的民事赔偿）
Economic losses (direct fines, potential civil compensation)

对员工的后果可能是：

Potential consequences for employees:

- 公司纪律处分
Company disciplinary actions
- 行政处罚与损害赔偿
Administrative penalties and compensation for damages
- 刑事追责
Criminal liability

我们应该怎样做？

What should we do?

- 不为公司谋求不当利益
Not seek improper benefits for the company
- 不为自己牟取不当利益
Not seek improper benefits for ourselves
- 做符合公司价值观的事
Act in line with the company's values
- 遵纪守法
Abide by laws and regulations
- 发现违规，请立即向上级领导汇报或通过本准则的举报渠道进行举报
Any violation discovered shall be reported to the superior leader immediately or via the reporting channels specified in this Code

01

CHAPTER

爱用户

Valuing Users

“以用户为中心，提供安全、有效、可负担的产品和服务”是三诺对用户不变的承诺。三诺从用户至上的角度出发，周密地保护用户的安全、隐私，不断地改进产品和服务的质量，持续地倾听用户心声、洞察用户需求。我们所做的一切，都是为了给用户带来更贴心的产品和更满意的服务。

"Putting users at the center and providing safe, effective, and affordable products and services" is Sinocare's unwavering commitment to users. From the perspective of prioritizing users, Sinocare meticulously protects users' safety and privacy, continuously improves the quality of products and services, and consistently listens to users' voices and identifies their needs. Everything we do is to bring users more considerate products and more satisfactory services.



1.1 保护用户安全 / Protecting User Safety

产品的安全是企业的生命线。三诺遵守业务所在国家或地区所适用的医疗器械监管法律法规、标准规范，借鉴行业的优秀实践，通过建立并持续优化涵盖产品注册、生产管理、经营活动、售后监督在内的产品全生命周期管理体系，确保公司注册、生产及经营的医疗器械安全可信赖，相关信息真实、准确、完整与可追溯。

Product safety is the lifeline of an enterprise. Sinocare complies with the applicable medical device supervision laws, regulations, and standards in the countries/regions where it operates, learns from excellent industry practices, and establishes and continuously optimizes a full product lifecycle management system covering product registration, production management, business activities, and post-sales supervision. This ensures that the medical devices registered, produced, and sold by the company are safe and reliable, and the relevant information is true, accurate, complete, and traceable.

我们应该怎样做？

What should we do?

- 我们不设计、不生产、不经营对用户健康带来风险的产品，免费产品或公益性赠品也不行。
We shall not design, produce, or sell products that pose risks to users' health—this requirement applies equally to free products or public welfare gifts.
- 我们遵守公司的管理制度，操作手册，确保管理体系持续有效运行。
We shall comply with the company's management systems and operation manuals to ensure the continuous and effective operation of the management system.
- 我们知悉任何对用户安全造成威胁的事实或线索，及时联系质量与法规中心。
We shall contact the Quality and Regulatory Center immediately upon becoming aware of any facts or clues that pose a threat to user safety.

1.2 保护用户隐私与个人信息 / Protect User Privacy and Personal Information

保护用户隐私与个人信息是提供服务的前提。三诺从出售产品到提供服务的每一个环节，都会考虑如何更好地保护用户的隐私及个人信息，并为用户对个人数据的自主控制和管理提供便利条件。我们严格遵守《个人信息保护法》及业务所在国家或地区适用的用户隐私法律法规，确保用户信息仅用于用户授权范围，保护个人数据不被泄露。目前三诺已经通过 ISO27001 信息安全管理体系认证，制定了《数据隐私和安全管理程序》等系列文件规定用户信息留存时长等具体细节，为用户隐私及个人信息提供更全面的保护。

Protecting user privacy and personal information is a prerequisite for providing services. Sinocare considers how to better protect user privacy and personal information at every stage, from product sales to service provision, and provides convenient conditions for users to independently control and manage their personal data. We strictly comply with the Personal Information Protection Law of the People's Republic of China and applicable user privacy laws and regulations in the countries or regions where our business operates, ensuring that user information is only used within the scope authorized by users and that personal data is protected from leakage. At present, Sinocare has obtained ISO 27001 Information Security Management System certification and formulated a series of documents including the Data Privacy and Security Management Procedures, which specify specific details such as the retention period of user information, so as to provide more comprehensive protection for user privacy and personal information.

个人信息是以电子或者其他方式记录的与已识别或者可识别的自然人有关的各种信息，如姓名、身份证号、银行卡、家庭住址、健康体检信息等。不包括匿名化处理后的信息。

Personal information refers to various types of information recorded electronically or by other means that relate to an identified or identifiable natural person, such as name, ID card number, bank card information, home address, and health check-up information. It does not include information that has undergone anonymization processing.

敏感个人信息是指一旦泄露或者非法使用，容易导致自然人的人格尊严受到侵害或者人身、财产安全受到危害的个人信息，包括生物识别、宗教信仰、特定身份、医疗健康、金融账户、行踪轨迹等信息，以及不满十四周岁未成年人的个人信息。

Sensitive personal information refers to personal information that, if leaked or illegally used, may easily lead to infringement of a natural person's dignity or endanger their personal or property safety. It includes information such as biometric data, religious beliefs, specific identities, medical and health information, financial account information, and location data, as well as personal information of minors under the age of 14.

我们应该怎样做？
What should we do?

- 我们应当基于具体、明确、合法的目的，在获得用户授权后才能收集、处理用户信息。在用户提出变更、撤回申请时及时予以修正或删除。
We shall collect and process user information only after obtaining user authorization, and such collection and processing must be based on specific, clear, and lawful purposes. When a user submits a request for modification or withdrawal of authorization, we shall promptly make corrections or delete the relevant user information.
- 我们采取以确保适当安全性的方式收集和处理用户数据，包括采取适当的技术或组织措施以保护个人数据免遭未经授权的访问以及个人信息泄露、篡改、丢失。具体可查阅《信息安全管理手册》、《数据隐私和安全管理程序》等文件。
We collect and process user data in a manner that ensures appropriate security, including the adoption of proper technical or organizational measures to protect personal data against unauthorized access, as well as the leakage, alteration, and loss of personal information. For specific details, please refer to documents such as the Information Security Management Manual and the Data Privacy and Security Management Procedures.
- 我们处理敏感个人信息应当取得用户的单独同意；我们在处理不满十四周岁未成年人个人信息时，应当取得未成年人的父母或者其他监护人的同意，且应当制定专门的个人信息处理规则。
We shall obtain separate consent from users when processing their sensitive personal information. When processing the personal information of minors under the age of 14, we shall obtain consent from the minors' parents or other guardians, and shall formulate special rules for personal information processing.
- 我们知悉任何对用户隐私泄露或数据违规的事实或线索，应及时联系数据管理部。
We shall contact the Data Management Department immediately upon becoming aware of any facts or clues related to user privacy leakage or data violations.

1.3 提高产品品质 / Enhancing Product Quality

质量就是产品的生命。三诺秉持“全员参与，质量第一”的理念，围绕用户需求，积极创新，不断追求卓越，持续保持质量管理体系的有效性和法规符合性，坚持为客户提供优质的产品和服务。三诺从创立开始就持续推动质量体系建设，2007 年获得 CE IVDD 认证，2017 年获得了 FDA 市场准入，2019 年获得 CE MDD 认证，2020 年获得巴西 BGMP 认证，2022 年获得 IVDR 认证，2023 年获得 MDR 认证与 MDSAP 认证，2024 年又获得韩国 GMP 认证。三诺在全球主要市场通过质量合规和产品认证，产品质量逐步满足全球市场需求。

Quality Is the Lifeline of Products. Sinocare upholds the philosophy of "Full Staff Participation, Quality First." Centering on user needs, we actively innovate, pursue excellence, continuously maintain the effectiveness of the quality management system and compliance with regulations, and remain committed to providing customers with high-quality products and services. Since its establishment, Sinocare has continuously advanced the development of its quality system: it obtained the CE IVDD certification in 2007, FDA market access in 2017, CE MDD certification in 2019, Brazilian BGMP certification in 2020, IVDR certification in 2022, MDR certification and MDSAP certification in 2023, and further obtained the Korean GMP certification in 2024. Through quality compliance and product certifications in major global markets, Sinocare's product quality has gradually met the demands of the global market.

我们应该怎样做？
What should we do?

- 我们应当遵守适用的医疗器械监管法规及质量管理体系规定。
We shall comply with applicable medical device regulatory laws and regulations and quality management system regulations.
- 我们只向用户及客户提供合格的产品和服务。
We only provide qualified products and services to users and customers.
- 我们知悉任何质量问题的事实或线索，应及时联系质量与法规中心。
We shall contact the Quality and Regulatory Center immediately upon becoming aware of any facts or clues of quality problems.

1.4 倾听用户心声 / Listening to Users' Voices

用户的需求就是我们的使命。三诺坚持以“用户为中心”，提倡“用户至上”，公司积极面向用户，倾听用户心声。我们的管理层每年都会通过线上直播、接听售后服务电话、门店拜访、专项计划等形式与用户沟通。我们销售一线的同事每天都通过免测活动、面对面服务、电话沟通、现场拜访等形式与用户交流，听取他们的关切。我们产品部会定期进行消费者访谈、用户需求调研、经销商年度调研等活动，倾听各个环节的用户对公司产品的反馈，接收消费者对用户需求的建议，进行综合评估，加入到产品需求中去，切实做到产品需求从市场中来，到市场中去。此外，我们的研发、质量、售后、用户服务等团队也都通过不同方式去贴近用户。

Meeting users' needs is our mission. Adhering to the "user-centric" principle and advocating "users first," Sinocare proactively engages with users to listen to their voices. Our management team communicates with users annually through online live streams, answering after-sales service calls, Special Programs, and store visits. Colleagues on the frontline of sales interact with users daily via free testing activities, face-to-face services, phone calls, and on-site visits to understand their concerns. Our Product Department regularly conducts consumer interviews, user demand surveys, and annual dealer surveys to gather feedback on the company's products from users across all touchpoints, collect suggestions on user needs, conduct comprehensive evaluations, and incorporate these insights into product requirements—truly ensuring that product needs "come from the market and serve the market." In addition, our R&D, Quality, After-Sales, and User Service teams also connect with users through various channels.

我们应该怎样做？
What should we do?

- 我们应结合岗位实际，践行“以用户为中心”的理念，凡事多从用户角度考虑。
We shall act on the "user-centric" concept based on our job responsibilities and always consider matters from the users' perspective.
- 我们积极参与公司组织的用户贴近活动。
We shall actively participate in user-engagement activities organized by the company.
- 我们知悉任何用户的关切、不满、需求，都积极向相关部门反馈。
We proactively provide feedback regarding any concerns, dissatisfaction, or needs expressed by users to the relevant departments upon becoming aware of them.

02
CHAPTER爱员工
Caring for Employees

“为员工提供快乐工作、健康成长的平台”是三诺对员工不变的承诺。三诺尊重、包容每一位员工，提倡人与人之间平等相待、相互关爱，为员工提供了安全、舒适的工作环境，有竞争力的薪酬待遇以及完善的福利。

"Providing employees with a platform for happy work and healthy growth" is Sinocare's unwavering commitment to its employees. Sinocare respects and embraces every employee, advocates equality and mutual care among individuals, and provides employees with a safe and comfortable working environment, competitive remuneration, and comprehensive benefits.



2.1 三诺关爱员工 / Sinocare Cares for Its Employees

2.1.1 禁止歧视与骚扰
Prohibition of Discrimination and Harassment

尊重与包容是美德。三诺禁止任何人以任何理由歧视他人，包括但不限于民族、种族、宗教信仰、性别、年龄、国籍、遗传、残障、肤色等。我们绝不容忍针对任何个人或群体的性骚扰或其他形式的侵犯或不当行为。我们将这些原则应用于员工之间以及与我们有业务往来的供应商、客户及合作伙伴。

Respect and inclusiveness are virtues. Sinocare prohibits any form of discrimination against others by anyone for any reason, including but not limited to ethnicity, race, religious belief, gender, age, nationality, genetics, disability, and skin color. We have zero tolerance for sexual harassment against any individual or group, or other forms of infringement or improper conduct. These principles apply to interactions among employees, as well as with our suppliers, customers, and partners with whom we conduct business.

2.1.2 保护人权
Protection of Human Rights

人人生而平等。三诺保护每一个人的人权，尊重每个人的人格尊严、隐私和权利，不打听、议论他人隐私，不进行不适宜的评论或玩笑，共同为每一位员工营造公平、和谐、友善的工作环境。我们禁止对他人施加恐吓、虐待、折磨和精神控制，禁止用任何方法对他人进行侮辱、诽谤和诬告陷害，禁止通过大众传播媒介或者其他方式贬低、损害他人人格。

All human beings are born equal. Sinocare protects the human rights of every individual, respects the dignity, privacy, and rights of each person. We shall not inquire about or gossip about others' privacy, nor make inappropriate comments or jokes. Together, we create a fair, harmonious, and friendly working environment for every employee. We prohibit intimidating, abusing, tormenting, or mentally controlling others; we prohibit insulting, defaming, or falsely accusing others by any means; and we prohibit demeaning or harming others' dignity through mass media or other channels.

2.1.3 环境、健康、安全
Environment, Health and Safety

EHS 是可持续发展的基石。三诺致力于构建健康、安全、舒适的办公场所和工作环境，禁止任何损害环境或影响员工健康及安全的行为。我们构建了完善的 EHS（Environment、Health and Safety）管理体系，坚持保护环境，维护职业健康，保障工作安全。当然，环境、健康、安全的持续优化需要我们每一个人积极参与。三诺制定了《职业健康管理制度》《环境与职业健康安全手册》等相关制度细化 EHS 要求及相关操作程序。

EHS is the cornerstone of sustainable development. Sinocare is committed to building a healthy, safe, and comfortable workplace and working environment, and prohibits any behavior that harms the environment or endangers employees' health and safety. We have established a sound EHS (Environment, Health, and Safety) management system, and adhere to protecting the environment, safeguarding occupational health, and ensuring work safety. Naturally, the continuous improvement of environment, health, and safety requires the active participation of every one of us. Sinocare has formulated relevant systems including the Occupational Health Management System and the Environmental, Occupational Health and Safety Management Manual to specify EHS requirements and related operating procedures.

我们应该怎样做？
What should we do?

- 如果我们知晓或意识到任何可能或已经对工作环境、人员健康、身心安全产生威胁的情况，应当立刻向上级或者EHS 团队报告。
If we know or become aware of any situation that may or has posed a threat to the working environment, personnel health, or physical and mental safety, we shall report it to our supervisor or the EHS team immediately.
- 如果发生紧急事件，我们应当以保护人员生命安全为首要任务。
In the event of an emergency, we shall prioritize the protection of personnel's life safety as the primary task.
- 我们都应当参加健康体检、EHS 教育培训，遵守 EHS 规定，避免冒险行为。
We shall all participate in health check-ups and EHS training, comply with EHS regulations, and avoid risky behaviors.

2.1.4 合法用工

员工是企业的财富。三诺持续严格按照适用的法律法规合法用工。我们始终遵循合法合规、平等自愿、协商一致、诚实信用的原则与员工建立劳动关系，任何情况下不使用童工，保护未成年人的合法权益；按时足额支付劳动报酬，所在国际或地区法律法规对最低工资标准有规定的，不得低于规定的标准；通过工作时间和休息休假制度，规范员工出勤时间及保障合理休息休假的时间；禁止强迫员工劳动；尊重员工结社自由和集体谈判的权益；为员工缴纳所在国家或地区法律法规规定的社会保险，为员工提供完善的福利，让员工“每一步幸福”都在三诺实现。

Employees are the wealth of an enterprise. Sinocare continuously and strictly complies with applicable laws and regulations in employment practices. We always establish labor relations with employees in accordance with the principles of legality and compliance, equality and voluntariness, consensus through consultation, and good faith. Under no circumstances shall we employ child labor, and we shall protect the legitimate rights and interests of minors. We shall pay labor remuneration in full and on time; if the laws and regulations of the country or region where we operate stipulate a minimum wage standard, the remuneration paid shall not be lower than such standard. Through the working hours and leave system, we standardize employees' attendance hours and ensure they have reasonable time for rest and leave. We prohibit forced labor of employees, respect employees' right to freedom of association and collective bargaining, and pay social insurance for employees in accordance with the laws and regulations of the country or region where we operate. We also provide employees with comprehensive welfare benefits, enabling employees to realize "every step of happiness" at Sinocare.



2.2 做守法公民 / Being Law-abiding Citizens

守法是发展事业的根基。三诺倡导员工认真学习国家法律、法规以及公司规章制度，做到诚实守信、遵纪守法，严格按照公司规章制度合法合规办事；树立正确的价值观、权利观、利益观，正当履职，不以权谋私，不获取不正当利益，不为公司谋取不正当经济利益。严格按照三诺合法合规经营的原则要求开展工作。

Abiding by the law is the foundation for business development. Sinocare advocates that employees earnestly study national laws, regulations, and the company's rules and systems, act with integrity, comply with laws and regulations, and conduct business in a legal and compliant manner in strict accordance with the company's rules. Employees shall establish correct outlooks on values, rights, and interests, perform duties properly, refrain from abusing power for personal gain, refrain from obtaining improper benefits, and refrain from seeking improper economic benefits for the company. We shall conduct work in strict accordance with the principles of Sinocare's lawful and compliant operations.

2.2.1 预防职务犯罪 Preventing Job-Related Misconduct

员工要预防职务类犯罪，例如：**不得收受贿赂**，是指公司、企业或者其他单位的工作人员不得利用职务上的便利，索取他人财物或者非法收受他人财物，为他人谋取利益，他人包括公司外部人员，也包括公司内部成员。**不得行贿**，是指不得为谋取不正当利益，给予公司、企业或者其他单位的工作人员以财物、好处。**不得职务侵占**，是指公司、企业或者其他单位的人员，不得利用职务上的便利，将本单位财物非法占为己有。**不得挪用资金**，是指公司、企业或者其他单位的工作人员不得利用职务上的便利，挪用本单位资金归个人使用或者借贷给他人。

Employees shall prevent job-related misconduct, such as:
No Accepting Bribery: Employees of companies, enterprises, or other entities shall not, by taking advantage of their positions, demand property from others or illegally accept property from others to secure benefits for others. "Others" includes both external personnel and internal members of the company.
No Offering Bribery: No one shall give property or benefits to employees of companies, enterprises, or other entities to secure improper benefits.
No Job-Related Embezzlement: Employees of companies, enterprises, or other entities shall not, by taking advantage of their positions, illegally appropriate the property of their own entity for personal use.
No Misappropriation of Funds: Employees of companies, enterprises, or other entities shall not, by taking advantage of their positions, misappropriate their own entity's funds for personal use or lend them to others.

2.2.2 预防知识产权犯罪 Preventing Intellectual Property Violations

员工要预防知识产权类犯罪，例如：**不得侵犯商业秘密**，是指不得以盗窃、利诱、胁迫或者其他不正当手段获取权利人的商业秘密，或者非法披露、使用或者允许他人使用其所掌握的或获取的商业秘密，给商业秘密的权利人造成损失。**不得假冒注册商标**，是指不得违反国家商标管理法规，未经注册商标所有人许可，在同一种商品上使用与其注册商标相同的商标。**不得侵犯他人著作权**，是指不得以营利为目的，未经著作权人许可复制发行其文字、音像、计算机软件等作品，出版他人享有独占出版权的图书，未经制作者许可复制发行其制作的音像制品，制作、展览假冒他人署名的美术作品。**不得假冒专利**，是指不得违反专利法规，假冒他人专利。

Employees shall prevent intellectual property-related violations, such as:**No Infringement of Trade Secrets:** It means no one shall obtain the right holder’s trade secrets through theft, inducement, coercion, or other improper means; nor shall they illegally disclose, use, or allow others to use the trade secrets they possess or have obtained, thereby causing losses to the trade secret right holder.**No Trademark Counterfeiting:** It means no one shall violate national trademark administration regulations by using a trademark identical to a registered trademark on the same type of goods without the permission of the registered trademark owner.**No Infringement of Others’ Copyrights:** It means no one shall, for profit, reproduce and distribute the right holder’s works (such as written, audio-visual, or computer software works) without the copyright owner’s permission; publish books for which others hold exclusive publishing rights; reproduce and distribute audio-visual products without the producer’s permission; or create or exhibit works of fine art falsely signed in another person’s name.**No Patent Counterfeiting:** It means no one shall violate patent regulations by counterfeiting others’ patents.

2.2.3 预防信息安全犯罪
Preventing Information Security Breaches

员工要预防信息安全类犯罪，例如：**不得出售、非法提供公民个人信息**，是指不得违反国家有关规定，向他人出售或者提供公民个人信息。**不得破坏计算机信息系统**，是指不得违反国家规定，对他人计算机信息系统功能或计算机信息系统中存储、处理或者传输的数据和应用程序进行破坏，或者故意制作、传播计算机病毒等破坏性程序，影响计算机系统正常运行。**不得非法侵入计算机信息系统**，是指不得违反国家规定，侵入国家事务、国防建设、尖端科学技术领域的计算机信息系统。

Employees shall prevent information security-related breaches, such as:**No Selling or Illegally Providing Citizens’ Personal Information:** It means no one shall, in violation of relevant national regulations, sell or provide citizens’ personal information to others.**No Damaging Computer Information Systems:** It means no one shall, in violation of national regulations, damage the functions of others’ computer information systems, or the data and applications stored, processed, or transmitted in such systems; nor shall they intentionally create or spread destructive programs (e.g., computer viruses) that affect the normal operation of computer systems.**No Illegal Intrusion into Computer Information Systems:** It means no one shall, in violation of national regulations, intrude into computer information systems related to state affairs, national defense construction, or cutting-edge science and technology.

2.2.4 预防工商类犯罪
Preventing Industrial and Commercial Misconduct

员工要预防工商类犯罪，例如：**不得生产、销售伪劣产品**，是指生产者、销售者不得在产品中掺杂、掺假，以假充真，以次充好或者以不合格产品冒充合格产品。**不得生产、销售不符合标准的医用器材**，是指不得违反国家产品质量管理法规，生产不符合保障人体健康的国家标准、行业标准的医疗器械、医用卫生材料，或者销售明知是不符合国家标准、行业标准的医疗器械、医用卫生材料。**不得私刻公章**，是指不得伪造、变造、买卖或者盗窃单位的公章或法人印鉴。

Employees shall prevent industrial and commercial misconduct, such as:**No Production or Sale of Counterfeit or Substandard Products:** It means producers and sellers shall not adulterate products with impurities, pass fake products off as genuine, pass inferior products off as superior, or pass unqualified products off as qualified.**No Production or Sale of Substandard Medical Devices/Supplies:** It means no one shall, in violation of national product quality management regulations, produce medical devices or medical hygiene materials that fail to meet national or industrial standards for protecting human health; nor shall they sell medical devices or medical hygiene materials that they know do not meet such national or industrial standards.**No Unauthorized Engraving of Official Seals:** It means no one shall forge, alter, buy, sell, or steal the official seals or legal representative seals of an entity.

2.2.5 预防财务类犯罪
Preventing Financial Misconduct

员工要预防财务类犯罪，例如：**不得进行内幕交易**，是指内幕信息的知情人员不得在涉及股票、证券的发行、交易或者其他支股票、证券的价格有重大影响的信息尚未公开前，买入或者卖出该股票、证券，或者从事与该内幕信息有关的期货交易，情节严重的行为。**要依法披露信息**，信息披露义务人应当按照规定披露信息，其所公告的证券发行文件、定期报告、临时报告及其他信息披露资料不得存在虚假记载、误导性陈述或者重大遗漏。**不得会计造假**，是指不得伪造、变造会计凭证、会计帐簿，编制虚假财务会计报告。**不得虚开增值税专用发票罪**，是指不得虚开增值税专用发票或者虚开用于骗取出口退税、抵扣税款的其他发票，不得为他人虚开、为自己虚开、让他人為自己虚开、介绍他人虚开。**不得逃避缴纳税款**，是指纳税人、扣缴义务人或经办人员不得故意违反税收法规、采取伪造、变造、隐匿、擅自销毁账簿、记账凭证、在账簿上多列支出或者不列、少列收入、不缴或者少缴应缴纳税款。**不得骗取出口退税**，是指企业或经办人员不得故意违反税收法规，采取以假报出口等欺骗手段，骗取国家出口退税款。

Employees shall prevent financial misconduct, such as:**No Insider Trading**, It means persons with access to inside information shall not, before the information (which materially affects the issuance, trading, or prices of stocks or securities) is made public, buy or sell the relevant stocks or securities, or engage in futures transactions related to such inside information—especially if the circumstances are serious.**Lawful Information Disclosure**, Persons obligated to disclose information shall do so in accordance with regulations. The securities issuance documents, periodic reports, interim reports, and other information disclosure materials they announce shall not contain false records, misleading statements, or material omissions.**No Accounting Fraud**,It means no one shall forge or alter accounting vouchers or account books, or prepare false financial accounting reports.**No Falsely Issued VAT Special Invoices**,It means no one shall falsely issue VAT special invoices or other invoices used for defrauding export tax rebates or tax deductions; this includes falsely issuing invoices for others, for oneself, arranging for others to falsely issue invoices on one’s behalf, or acting as an intermediary for false invoicing.**No Tax Evasion**, It means taxpayers, withholding agents, or handlers shall not intentionally violate tax regulations by forging, altering, concealing, or destroying account books and accounting vouchers; overstating expenses or understating income in account books; or failing to pay or underpay due taxes.**No Defrauding Export Tax Rebates**, It means enterprises or handlers shall not intentionally violate tax regulations by using deceptive means (such as falsely declaring exports) to defraud state export tax rebates.

2.2.6 预防其他犯罪 Preventing Other Violations

员工要预防其他类犯罪，例如：**不得盗窃**，是指不得以非法占有为目的，盗窃公私财物或者多次盗窃、入户盗窃、携带凶器盗窃、扒窃公私财物。**不得诽谤**，不得以暴力或者其他方法公然侮辱他人或者捏造事实诽谤他人。**不得集资诈骗**，是指不得以非法占有为目的，违反有关金融法律、法规的规定，使用诈骗方法进行非法集资，扰乱国家正常金融秩序，侵犯公私财产所有权。**不得组织他人偷越国(边)境**，是指不得违反出入国(边)境管理法规，非法组织他人偷越国(边)境。**不得危害公共安全**，是指不得故意或者过失地实施危害不特定多数人的生命、健康或者重大公私财产安全。**不得危害国家安全**，是指不得危害国家主权、领土完整和安全，分裂国家、颠覆人民民主专政的政权和推翻社会主义制度。

Employees shall prevent other types of violations, such as:**No Theft**,It means no one shall steal public or private property for the purpose of illegal possession, including repeated theft, theft from residences, theft with dangerous weapons, or pickpocketing.**No Defamation**: It means no one shall publicly insult others by violence or other means, or fabricate facts to defame others.**No Fund-Raising Fraud**: It means no one shall, for the purpose of illegal possession and in violation of relevant financial laws and regulations, conduct illegal fund-raising through fraudulent means, disrupting the state's normal financial order and infringing on the ownership of public or private property.**No Organizing Illegal Border Crossings**: It means no one shall violate border entry/exit administration regulations by illegally organizing others to cross national borders.**No Endangering Public Security**: It means no one shall intentionally or negligently commit acts that endanger the lives, health of an unspecified majority of people, or the safety of major public or private property.**No Endangering National Security**: It means no one shall endanger national sovereignty, territorial integrity and security, split the country, subvert the people's democratic dictatorship, or overthrow the socialist system.

我们应该怎样做? What should we do?

- **学习法律知识**：学习法律法规，了解哪些行为是违法犯罪行为，不做法盲，不做违法犯罪的事。
Learn legal knowledge: Learn laws and regulations to understand which acts constitute illegal or criminal offenses. Refrain from being legally illiterate and from engaging in any illegal or criminal activities.
- **三思而行**：当获取不当利益的机会摆在自己面前时，应当问问自己，这合法吗？我将面临什么后果？
Think twice: When faced with opportunities to obtain improper benefits, ask yourself: Is this legal? What consequences will I face?
- **拒绝诱惑**：洁身自爱，学会拒绝不义之财，不过度追求金钱和物质财富。
Resist temptation: Conduct oneself with integrity, learn to refuse ill-gotten gains, and avoid excessive pursuit of money and material wealth.



CHAPTER 03

爱公司

Safeguarding
the Company

关爱公司，保护公司，努力发展公司，就是为了坚守“以用户为中心，提供安全、有效、可负担的产品和服务”的承诺，就是为了践行“为员工提供快乐生活、健康成长的平台”的承诺，就是为了履行“与合作伙伴共同成长，用于承担社会责任，为股东创造合理利润”的承诺。

Caring for the Company, protecting the Company, and striving to develop the Company is to uphold the commitment of "putting users at the center and providing safe, effective, and affordable products and services"; to fulfill the promise of "providing employees with a platform for a happy life and healthy growth"; and to perform the commitment of "growing together with partners, taking social responsibility, and creating reasonable profits for shareholders."

3.1 保护公司利益和财产 / Protecting Company Interests and Assets

3.1.1 避免利益冲突

Avoiding Conflicts of Interest

恪尽职守是员工应尽的义务。我们应当积极承担公司赋予的岗位责任，勤勉工作，为企业创造价值并维护企业合法正当利益。当我们在第三方的行为或享有的利益令自己难以公正客观、不偏不倚且有效地履行公司赋予的工作职责时，即产生利益冲突。**我们不得与公司发生任何形式的利益冲突，除非这种利益冲突获得公司豁免**。利益冲突会影响我们的判断，导致不能尽职尽责地为公司创造价值，也会损害供应商、客户和合作伙伴的利益，给公司带来负面影响或严重损失。

Fulfilling duties with due diligence is an employee's obligatory responsibility. We shall actively undertake the job responsibilities assigned by the Company, work diligently to create value for the Company, and safeguard the Company's legitimate and proper interests. A conflict of interest arises when our actions or interests involving a third party make it difficult for us to perform the job duties assigned by the Company in a fair, objective, impartial, and effective manner. **We shall not engage in any form of conflict of interest with the Company, unless such conflict of interest has obtained the Company's exemption.** Conflicts of interest will affect our judgment, prevent us from fulfilling our duties to create value for the Company, damage the interests of suppliers, customers, and partners, and cause negative impacts or severe losses to the Company.

什么情况会导致利益冲突？

What situations may lead to conflicts of interest?

■ 外部雇佣关系或工作时间内的兼职活动

External Employment or Part-Time Work During Working Hours

- 在公司任职期内在第三方公司兼职；
Holding a part-time position in a third-party company while employed by the Company;
- 在公司任职期内为第三方公司提供服务；
Providing services to a third-party company while employed by the Company;
- 在公司任职期内从第三方公司获得工资、奖金或其他劳动收入；
Receiving salaries, bonuses, or other labor income from a third-party company while employed by the Company;
- 在公司办公场所或上班时间内，从事非公司业务相关的其它工作（不含利用业余时间的兼职）；
Engaging in work unrelated to the Company's business (excluding part-time work during spare time) on the Company's premises or during working hours;
- 利用业务时间在三诺的同行业第三方公司兼职；
Holding a part-time position in a third-party company that is a competitor of Sinocare during spare time;
- 使用公司的资产来从事非公司的工作。
Using the Company's assets to conduct work unrelated to the Company.

我们应该怎样做？

What should we do?

- 当我将从事第二职业或兼职业务时，向公司人力资源部申请豁免，获得同意者可以兼职。

When we intend to take up a second job or part-time work, we shall apply to the Company's Human Resources Department for exemption; only those who obtain approval may engage in part-time work.

■ 经济往来

Economic transactions

- 我们从三诺的客户、供应商、合作伙伴、经销商企业（下称往来企业）或竞争对手处获得借款，或者上述实体为我们的贷款提供担保，但与银行或其他金融机构直接进行的合理交易则除外；
Obtaining loans from the Company's customers, suppliers, partners, distributors (hereinafter referred to as "business-related entities") or competitors, or having the aforementioned entities provide guarantees for our loans (except for reasonable transactions directly conducted with banks or other financial institutions);
- 我们与往来企业或竞争对手共同设立合资 / 合伙企业、合伙或参与其他商业安排；
Establishing joint ventures/partnerships, entering into partnerships, or participating in other business arrangements with business-related entities or competitors;

- 我们与往来企业或竞争对手存在经济往来，或其他形式的非经济往来且可能导致我们不能公平对待合作伙伴或将对公司利益将造成损害者，即构成利益冲突。

Having economic transactions with business-related entities or competitors, or having other forms of non-economic interactions that may prevent us from treating partners fairly or cause harm to the Company's interests—these shall constitute conflicts of interest.

我们应该怎样做？

What should we do?

- 终止与往来企业的经济往来。
Terminate economic transactions with business-related entities.
- 彻底回避与往来企业的业务。
Avoid any business dealings with business-related entities entirely.
- 向风险合规与审计部报备，接受监督。
Report to the Risk, Compliance and Audit Department and accept supervision.

■ 持有第三方利益

Holding third-party interests

- 我们持有与三诺存在竞争关系公司的任何权益，通过公开证券市场购买者除外；
Holding any interests in a company that competes with Sinocare, except for interests acquired through purchases in the public securities market;
- 我们持有客户、供应商、合作伙伴、经销商或由三诺生物离职员工开设的经济实体的任何权益；
Holding any interests in customers, suppliers, partners, distributors, or economic entities established by former employees of Sinocare;
- 我们的关联方（指父母子女，祖父母外祖父母，夫妻双方的兄弟姐妹，下同）持有与三诺存在竞争关系公司的任何权益，关联方通过公开证券市场购买者或在竞争同行任职者除外；
Having related parties (referring to parents, children, grandparents, maternal grandparents, and siblings of both spouses; the same below) hold any interests in a company that competes with Sinocare, except for interests acquired by related parties through purchases in the public securities market or when related parties work for competing companies;
- 我们的关联方持有客户、供应商、合作伙伴、经销商或由三诺生物离职员工开设的企业的任何权益，关联方在上述企业中任职者除外。
Having related parties hold any interests in customers, suppliers, partners, distributors, or enterprises established by former employees of Sinocare, except when related parties work in the aforementioned enterprises.

我们应该怎样做？
What should we do?

- 请立即终止持有的第三方利益。
Immediately terminate the holding of third-party interests.
- 我们知悉任何持有第三方利益的事实或线索，应及时联系风险合规与审计部。
We shall contact the Risk, Compliance and Audit Department immediately upon becoming aware of any facts or clues regarding the possession of third-party interests,

■ 亲密关系
Intimate relationships

- 我们的关联方在与三诺存在竞争关系公司任职时，当因我们与关联方的亲密关系而导致商业秘密泄露、公司的商业机会丢失、公司的客户流失等的时候，即构成利益冲突；

When a related party of ours works for a company that competes with Sinocare, a conflict of interest arises if the intimate relationship between us and the related party leads to the leakage of trade secrets, loss of the Company's business opportunities, loss of the Company's customers, or similar consequences;

- 我们的关联方在三诺的客户、供应商、合作伙伴、经销商企业（下称往来企业）任职时，当我和我的关联方分别作为三诺及往来企业业务代表展开合作时，即构成利益冲突；

When a related party of ours works for Sinocare's customers, suppliers, partners, or distributors (hereinafter referred to as "business-related entities"), a conflict of interest arises if we and our related party act as business representatives of Sinocare and the business-related entity, respectively, to conduct cooperation;

- 我们的关联方在往来企业任职时，当我向公司经办部门积极推介而使得关联方所在的往来企业在三诺获得超额利益或不适当的利益时，即构成利益冲突。（如客户方获得了同等条件下更低的购买价格或更优惠的条件，供应商或合作伙伴获得了同等条件下更高的价格或更优的付款条件，经销商在同等条件下获得了更低的进货价格或者更多的费用支持等，且合作方获得上述超额利益与我同关联方的亲密关系是存在因果关系的。）

When a related party of ours works for a business-related entity, a conflict of interest arises if we actively recommend the business-related entity (where our related party works) to the Company's handling department, resulting in the business-related entity obtaining excessive or improper benefits from Sinocare. (For example, the customer obtains a lower purchase price or more favorable terms under the same conditions; the supplier or partner obtains a higher price or better payment terms under the same conditions; the distributor obtains a lower purchase price or more expense support under the same conditions—and there is a causal relationship between the cooperative party's acquisition of such excessive benefits and the intimate relationship between us and our related party.)

我们应该怎样做？
What should we do?

- 申请回避，不得经办任何涉及亲密关系企业的任何业务。
Apply for recusal and shall not handle any business involving the entity related to the intimate relationship.
- 向人力资源部报备亲密关系。
Report intimate relationships to the Human Resources Department.

■ 过度的礼品及消费应酬
Excessive gifts and entertainment

- 在不影响员工做出客观、公正商业决定的前提下，我们可以接受规定范围内的礼品及消费应酬；但我们禁止在业务往来中以任何形式向合作方索取礼品或消费应酬，禁止收受影响正常业务交往或损害公司利益的馈赠，禁止收受其他不符合法律、行业法规及公司规章制度的馈赠。

On the premise that it does not affect employees' ability to make objective and fair business decisions, we may accept gifts and entertainment within the specified scope; however, we are prohibited from demanding gifts or entertainment from cooperative parties in any form during business interactions, prohibited from accepting gifts that affect normal business exchanges or harm the Company's interests, and prohibited from accepting other gifts that do not comply with laws, industry regulations, or the Company's rules and systems.

- 我们不可以接受过度的礼品及消费应酬。
We cannot accept excessive gifts and consumption entertainment.

我们应该怎样做？
What should we do?

- 我们可以接受的礼品及消费应酬的标准详见《受赠礼品及消费应酬管理制度》，子公司可以根据所在国家或地区的法律或政策等制定相应的政策。

For the standards of acceptable gifts and entertainment, please refer to the Management System for Accepted Gifts and Entertainment, subsidiaries may formulate corresponding policies in accordance with the laws, policies, and other relevant requirements of the countries or regions where they are located.

- 当礼品明显超过可以接受的额度时，应积极婉言谢绝并告知本公司廉洁从业的相关规定；经再次谢绝无法推却的，主动向合作方打收条并要求赠送人签字后，随礼品一起上交；若对方坚决不在收条上签字又无法继续回绝的，在接收礼品后 24 小时内向分管总监报告。

If a gift clearly exceeds the acceptable limit, we shall politely decline it and inform the cooperative party of the Company's relevant regulations on integrity in work; if the gift cannot be declined after repeated refusals, we shall proactively issue a receipt to the cooperative party, request the giver to sign it, and submit the receipt together with the gift; if the giver refuses to sign the receipt and the gift cannot be further declined, we shall report to the supervisor in charge within 24 hours of receiving the gift.

- 收到合作方的邮递物，开箱后若确认属于礼品，应在 24 小时内向分管总监报告。若能联系赠送人，则主动联系对方退还礼品并向其宣讲公司的廉洁从业要求；若不能联系上赠送人，则上交公司处理。

If we receive a package from a cooperative party and confirm it contains a gift after opening, we shall report to the supervisor in charge within 24 hours. If we can contact the giver, we shall proactively contact them to return the gift and explain the Company's integrity requirements; if we cannot contact the giver, we shall submit the gift to the Company for handling.

- 回避原则：当我们与业务合作伙伴存在亲属、同学、同事、朋友等密切私人关系，不受约束，但我们应主动向公司申明并申请业务回避，公司与该业务合作伙伴的任何公务往来合作由其他同事承担。

Recusal principle: When we have close personal relationships (such as relatives, classmates, colleagues, or friends) with business partners, there is no restriction on the personal relationship itself; however, we shall proactively declare this to the Company and apply for business recusal, and other colleagues shall be responsible for any official cooperation and interactions between the Company and the business partner.

■ 竞业限制

Non-compete Obligations

- 向客户销售或提供与公司相竞争的产品或服务；
Selling or providing products or services that compete with the company's to customers;
- 违反与公司之间的竞业禁止协议或其他类似协议的条款和条件。
Violating the terms and conditions of non-compete agreements or other similar agreements with the company.

我们应该怎样做？
What should we do?

- 我们不得向客户销售或提供与公司相竞争的产品或服务。
We shall not sell or provide products or services that compete with the company's to customers.
- 我们应当严格遵守与公司签订的竞业禁止协议。
We shall strictly comply with the non-compete agreements signed with the Company.

■ 公司机会

Company opportunities

- 当出现增加公司合法利益的机会时，我们有责任通过履行岗位职责，为公司创造商业利益。如果我们在知悉上述机会时，未通过履职将上述商业机会转化为公司利益，而是选择向公司隐瞒，并通过这个商业机会为自己或关联方牟利，也构成利益冲突。

When an opportunity to increase the Company's legitimate interests arises, we are obligated to create commercial benefits for the Company by performing our job responsibilities. If, after becoming aware of such an opportunity, we fail to convert it into the Company's benefits through performing our duties, instead choose to conceal it from the Company and use the opportunity to profit for ourselves or related parties, this also constitutes a conflict of interest.



鉴于不能——列举每种可能发生的利益冲突，以上列举的是一些常见的存在实际或潜在利益冲突的情况，当我们无法准确判断某种行为是否存在或属于利益冲突时，请联系风险合规与审计部。

Given that it is impossible to list every possible conflict of interest, the above are common situations involving actual or potential conflicts of interest. If we cannot accurately determine whether a certain act constitutes a conflict of interest, please contact the Risk, Compliance and Audit Department.

3.1.2 保护公司资产

Protect Company Assets

资产是公司发展的基础。公司资产对于我们的业务发展至关重要。因此，我们应当确保公司资产得到妥善保护及充分利用。作为员工，我们在实现资产的保护及利用方面，发挥着决定性的作用。公司资产包括有形资产（如资金、场地、办公设备、生产物料等）和无形资产（如专利、商标和版权，软件，系统等）。为了妥善保护好公司资产，我们需要了解和评估这些资产，并采取积极措施予以保护。我们应合理使用公司提供的办公设备、生产工具及生产物料等资产，不得将其用于个人用途；此外，我们不得擅自使用那些需要授权后才能使用的资产。

Assets are the foundation of the company's development. Company assets are crucial to our business development. Therefore, we should ensure that company assets are properly protected and fully utilized. As employees, we play a decisive role in protecting and utilizing assets. Company assets include tangible assets (such as funds, venues, office equipment, production materials, etc.) and intangible assets (such as patents, trademarks and copyrights, software, systems, etc.). To properly protect company assets, we need to understand and evaluate these assets and take active measures to protect them. We should reasonably use the office equipment, production tools, production materials and other assets provided by the company and shall not use them for personal purposes; in addition, we shall not use assets that require authorization without authorization.

我们应该怎样做？
What should we do?

- 我们应当在各自职责范围内识别关键业务资产，并根据他们发生安全事件的可能性和潜在影响对资产风险进行分类。
We shall identify key business assets within our respective responsibilities and classify asset risks according to the possibility and potential impact of security incidents.
- 针对不同类别的资产，分别制定和实施保护措施。
Formulate and implement protection measures for different types of assets respectively.
- 我们应定期确认资产的保护措施及状态，确保资产获得持续保护。
We should regularly confirm the protection measures and status of assets to ensure continuous protection of assets.
- 我们使用公司的设施及物品，仅用于符合公司政策的商业目的。
We use the company's facilities and items only for commercial purposes in line with company policies.
- 我们知悉任何未经授权的使用、更改、破坏、浪费或其他不当行为的事实或线索，应及时联系风险合规与审计部。
We shall contact the Risk, Compliance and Audit Department immediately upon becoming aware of any facts or clues of any unauthorized use, alteration, damage, waste or other improper behaviors.

3.1.3 保护公司涉密信息
Protect Company Information

公司涉密信息是企业的重要资产。三诺非常重视并确保敏感的公司信息不会被未经授权的人员或第三方获取。公司的涉密信息涉及很广，涵盖公司产品、营销、采购、工艺、生产、研发、质量等经营信息，也包括公司战略、投资者关系、财务、审计、人力资源、公共关系等重要信息。遵守公司信息分级分类要求并妥善保护公司涉密信息非常必要。

Confidential information of the company is an important asset of the enterprise. Sinocare attaches great importance to and ensures that sensitive company information is not accessed by unauthorized personnel or third parties. The company's confidential information covers a wide range, including operational information such as the company's products, marketing, procurement, processes, production, R&D, and quality, as well as important information such as the company's strategy, investor relations, finance, auditing, human resources, and public relations. It is essential to comply with the company's information classification and grading requirements and properly protect the company's confidential information.

我们应该怎样做？
What should we do?

- 我们根据公司《信息资产管理控制程序》将涉密信息分类为“机密”、“保密”、“内部公开”，并根据类别进行处理。
We classify confidential information into three categories—"Confidential", "Restricted", and "Internal Public"—in accordance with the Company's Information Asset Management and Control Procedure, and handle such information based on its category.
- 我们不会对外使用“机密”、“保密”、“内部公开”类信息和文件，这也同样适用于内部社交媒体平台，除非使用条款规定可以使用或获得授权者除外。
We shall not use "Confidential", "Restricted", or "Internal Public" information and documents externally. This rule also applies to internal social media platforms, except when their use is permitted by applicable terms or authorized by the relevant authority.
- 我们不得与他人共享个人密码，不得披露涉密信息。
We shall not share personal passwords with others or disclose confidential information.
- 我们在所有的沟通活动中都应当考虑到我所知悉的公司内部信息是否需要保密。
In all communication activities, we should consider whether the internal information of the company that we know needs to be kept confidential.
- 我们在公布非公开信息之前，应检查其是否属于涉密信息。
Before disclosing non-public information, we should check whether it is insider information.
- 我们在谈论公司时要保持谨慎。
We shall exercise caution when discussing the Company.

3.1.4 保护公司声誉
Protect Company Reputation

声誉是一个企业的口碑。良好的声誉可以增强产品和服务的信誉，提升公司的品牌形象，获得合作伙伴的尊重与信赖，得到求职者的认同与青睐，能在各个方面提升公司的竞争力。我们每一位员工都是公司形象的代言人。在代表公司参加公务活动时，我们应当保持恰当的言行举止，尊重每一位合作伙伴，认真服务每一位用户；在私人社交中涉及公司的言论时，需要考虑相关言论对公司声誉的影响；未获得公司授权，不得代表公司发表言论。

Reputation is the public praise of an enterprise. A good reputation can enhance the credibility of products and services, improve the company's brand image, gain the respect and trust of partners, win the recognition and favor of job seekers, and enhance the company's competitiveness in all aspects. Every one of us is a spokesperson for the company's image. When representing the company in official activities, we should maintain appropriate words and deeds, respect every partner, and seriously serve every user; when making remarks involving the company in private social interactions, we need to consider the impact of relevant remarks on the company's reputation; without the company's authorization, we shall not make remarks on behalf of the company.

我们应该怎样做？
What should we do?

- 我们代表公司参加公开宣传活动，如接受采访、出席行业展会、投资路演、行业会议、论坛与峰会等公开活动，应在其职权范围内或获得公司单独授权。
When we represent the company in public publicity activities, such as interviews, industry exhibitions, investment roadshows, industry conferences, forums and summits, we should do so within our authority or with separate authorization from the company.
- 我们对外披露公司信息，应评估自己是否获得授权，应评估是否属于内幕消息。
When disclosing company information to the outside world, we should evaluate whether we have obtained authorization and whether it is insider information.
- 我们对公司进行评价时，应基于客观事实，不得恶意损害公司形象。
When evaluating the company, we should be based on objective facts and shall not maliciously damage the company's image.
- 我们不使用个人社交媒体发布或转发与公司品牌形象不符或有损于公司声誉的不当言论。
We shall not use personal social media to post or forward inappropriate remarks that are inconsistent with the company's brand image or harmful to the company's reputation.
- 我们知悉有损公司声誉的事实或线索，应及时联系总经办。
We shall contact the General Manager's Office immediately upon becoming aware of any facts or clues that damage the company's reputation.

3.1.5 禁止内幕交易
Prohibit Insider Trading

坚决反对内幕交易。内幕信息是指为内幕人员所知悉、尚未公开的涉及公司及子公司经营、财务或者对上市公司证券市场价格有重大影响的信息。公司内每一位内幕信息知情人都应对内幕信息承担保密义务，并且不得通过知悉的此类信息获取不当利益。内幕交易是违法行为，这种行为可能给相关公司造成严重后果，也会导致个人民事赔偿责任及刑事责任。

We firmly oppose insider trading. Insider information refers to important information known to insiders that has not been made public and may affect the price of the securities market. Every insider of insider information in the company shall bear the obligation to keep insider information confidential and shall not obtain improper benefits through such known information. Insider trading is an illegal act, which may cause serious consequences to the relevant.

如何识别内幕信息？
How to Identify Insider Information?

- 判断原则：凡是理性投资人认为对股票或其他证券的买入、持有或卖出决定具有重要性的信息，即属内幕信息。
Judgment Principle: Any information that a reasonable investor deems important for making decisions on buying, holding, or selling stocks or other securities shall be deemed inside information.
- 公司的经营方针、政策或者经营范围发生重大变化；
The company's business policies, strategies, or business scope undergo significant changes;
- 公司发生重大的投资行为或者购置、出售金额较大的长期资产的行为；
The company conducts major investment activities, or engages in the acquisition or disposal of long-term assets with a relatively large amount;
- 公司订立重要合同、提供重大担保或者从事关联交易；
The company enters into important contracts, provides significant guarantees, or engages in connected transactions;
- 公司发生重大债务，未能归还到期债务的违约情况；
The company incurs major debts or defaults on repaying due debts;
- 公司发生重大经营性或非经营性亏损，资产遭受到重大损失；
The company incurs major operating or non-operating losses, or suffers significant losses to its assets;
- 公司的生产经营环境发生重大变化，行业面临国家政策的重大调整；
The company's production and operation environment undergoes significant changes, or the industry faces major adjustments to national policies;

- 上市公司的董事长、1/3 以上的董事或者总经理发生变化，董事长或者总经理无法履职；
For a listed company, changes occur to its chairman, more than one-third of its directors, or its general manager; or the chairman or general manager is unable to perform their duties;
- 公司股东、高管增减持公司股票；
Shareholders and senior executives of the company increase or decrease their holdings of the company's shares.
- 公司实际控制人及其控制的企业从事与公司相同或相似业务情况发生较大变化；
Significant changes occur in the business operations of the company's actual controller and the enterprises controlled by them that are the same as or similar to the company's business;
- 公司的分红派息，增资扩股计划，股权结构发生重要变化；
The company's dividend distribution, capital increase and share expansion plans, or significant changes in its equity structure;
- 涉及公司的重大诉讼、仲裁事项，董事会或股东会决议被依法撤销或宣告无效；
Major litigation and arbitration matters involving the company, or the resolutions of the board of directors or the shareholders' meeting are rescinded or declared invalid according to law.
- 公司及公司实际控制人、董事、监事、高管涉嫌犯罪被立案调查、采取强制措施；
The company, its actual controller, directors, supervisors, and senior management are suspected of crimes and have been placed under investigation or subjected to compulsory measures.
- 涉及发行人的重大诉讼事项；
Major litigation matters involving the issuer.
- 公司的减资、合并、分立、解散及申请破产的决定，进入破产、清算状态。
The company's decisions on capital reduction, merger, division, dissolution, and application for bankruptcy, as well as its entry into bankruptcy or liquidation status;



重大信息难以逐一列式，详细请参阅《三诺生物传感股份有限公司内幕信息知情人登记管理制度》，若对知悉的消息是否属于内幕信息存在疑虑，请联系投资者关系部。

Not all material information can be enumerated individually. For detailed provisions, please refer to the Insider Information Recipient Registration Management System of Sinocare Bio-sensing Co., Ltd. Should you have any doubts about whether the information you have obtained constitutes insider information, please contact the Investor Relations Department.

哪些人可能是内幕信息知情人？
Who May Be Insiders of Insider Information?

- 公司及其董事、监事、高级管理人员；
The company and its directors, supervisors, and senior management personnel;
- 公司的控股股东、实际控制人控制的其他公司及其董事、监事、高级管理人员；
Other companies controlled by the controlling shareholders and actual controllers of the issuer's listed companies, as well as their directors, supervisors, and senior managers;
- 持有公司百分之五以上股份的股东；
Shareholders holding more than 5% of the company's shares;
- 由于所任公司职务或者因与公司业务往来可以获取公司有关内幕信息的人员；
Personnel who can obtain the company's securities trading information due to their positions in the company;
- 上述证券交易内幕信息知情人中自然人的配偶等。
Spouses of natural persons among the above-mentioned insiders of securities trading insider information, etc.

我们应该怎样做？
What should we do?

- 我们不会根据内幕消息进行内幕交易；
We will not engage in insider trading based on insider information;
- 我们不会根据内幕消息推荐、诱导他人进行证券交易；
We will not recommend or induce others to conduct securities transactions based on insider information;
- 我们对内幕消息严格保密，保证未经授权的人员无法获得这些信息；
We strictly keep insider information confidential to ensure that unauthorized personnel cannot obtain such information;
- 我们不向内幕信息知情人打听内幕消息。
We do not ask insiders of insider information for insider information.

3.2 维护共赢的行业生态 / Maintain a Win-Win Industry Ecosystem

3.2.1 反舞弊
Anti-Fraud

坚决反对舞弊。舞弊是指公司的治理层、管理层、员工或其他方使用欺骗手段获取不当或非法利益的故意行为。舞弊通常分为损害公司正当经济利益和为公司谋取不正当经济利益两类。舞弊活动是违法行为，它损伤了合作伙伴公平竞争的基础，破坏了商业生态，损害了包含用户在内的全行业利益。我们坚决反对。

We firmly oppose fraud. Fraud refers to the intentional act of the company's governance, management, employees, or other parties using deceptive means to obtain improper or illegal interests. Fraud is usually divided into two categories: damaging the company's legitimate economic interests and seeking improper economic interests for the company. Fraudulent activities are illegal acts that damage the basis of fair competition among partners, destroy the business ecosystem, and harm the interests of the entire industry including users. We firmly oppose it.

我们应该怎样做？
What should we do?

- 我们与其他单位有业务接触时，应按《受赠礼品及消费应酬管理制度》的标准进行对外业务交往，不得有索取或收受财物、提取回扣等舞弊行为；
When conducting business interactions with other entities, we shall follow the standards specified in the Management System for Accepted Gifts and Entertainment for external business communications, and shall not engage in fraudulent acts such as demanding or accepting property, or receiving kickbacks.
- 我们不得刁难合作伙伴的人员，不得推诿办事，不得威胁合作单位；
We shall not make things difficult for personnel of cooperative partners, shirk responsibilities, or threaten cooperative units;
- 我们公平、公正地对待合作单位，行为上不偏不倚，为合作单位之间公平竞争创造条件，不得差别对待，不得与合作单位串通、泄密，不得违规给合作单位提供帮助；
We treat cooperative units fairly and impartially, act impartially, create conditions for fair competition among cooperative units, shall not treat them differently, collude with cooperative units, leak secrets, or provide help to cooperative units in violation of regulations;
- 我们在验收合作单位交付的产品或服务时，严格按照制度或协议公平办事，不故意放松验收标准，也不故意刁难；
When accepting products or services delivered by cooperative units, we shall act fairly in strict accordance with systems or agreements, not intentionally relax acceptance standards, or intentionally make things difficult;
- 我们不得为不正当的目的而支出，拒绝任何形式的贿赂；
We shall not spend money for improper purposes and refuse any form of bribery;
- 我们只依据合理的申请文件，出于合理的目的，向合法的合作伙伴付款；
We only make payments to legitimate partners based on reasonable application documents and for reasonable purposes;
- 我们知悉《三诺生物反舞弊管理制度》的要求，并按其要求规范日常工作行为。
We acknowledge the requirements of the Sinocare Anti-Fraud Management System and shall standardize our daily work behaviors in accordance with such requirements.
- 我们知悉任何舞弊的事实或线索，应及时联系风险合规与审计部。
We shall contact the Risk, Compliance and Audit Department immediately upon becoming aware of any facts or clues of any fraud.

3.2.2 反垄断与反不正当竞争
Anti-Monopoly and Anti-Unfair Competition

我们反对垄断和不正当竞争。自由、公平、有效的竞争能促进企业创新，最终保护了用户、企业和全社会的利益。违反反垄断法及反不正当竞争法会给企业及相关员工带来严重后果，如高额的罚款、损害赔偿、名誉受损甚至监禁等。公司从不利用自身市场份额优势进行垄断或滥用市场支配地位排除竞争，也不会采取不正当竞争行为争夺市场。

We Oppose Monopoly and Unfair Competition. Free, fair, and effective competition promotes enterprise innovation and ultimately safeguards the interests of users, enterprises, and the entire society. Violations of the Anti-Monopoly Law and the Anti-Unfair Competition Law will bring severe consequences to enterprises and relevant employees, such as heavy fines, compensation for damages, damage to reputation, and even imprisonment. The Company never uses its market share advantage to engage in monopoly or abuse its dominant market position to eliminate competition, nor does it adopt unfair competitive practices to compete for the market.

我们应该怎样做？
What should we do?

- **我们不与经营者、交易相对者等达成垄断协议以排除、限制竞争：如固定价格、划分市场、限制产量、限制新技术、新设备、新产品、联合抵制交易等；也不组织或帮助他人达成垄断协议。**
We shall not enter into monopoly agreements with business operators, transaction counterparts, or other parties to eliminate or restrict competition, such as agreements on price-fixing, market division, output restriction, restriction of new technologies, new equipment or new products, and joint boycotts of transactions; nor shall we organize or assist others in entering into monopoly agreements.
- **我们不滥用市场支配地位。**
We shall not abuse our dominant market position.
- **我们不采取混淆、商业贿赂、虚假广告、侵犯他人商业秘密、不正当有奖销售、损害竞争对手声誉等不正当竞争方式。**
We shall not adopt unfair competitive methods such as confusion practices, commercial bribery, false advertising, infringement of others' trade secrets, unfair premium sales, and damage to competitors' reputation.
- **我们不实施其他反垄断法、反不正当竞争法及其他法律法规规定的反垄断、反不正当竞争行为。**
We shall not engage in any other anti-monopoly or anti-unfair competition acts as prohibited by the Anti-Monopoly Law, the Anti-Unfair Competition Law, and other relevant laws and regulations.

3.2.3 保护知识产权
Protect Intellectual Property

知识产权是企业竞争力的重要源泉。知识产权是研发投资凝结的最重要成果。如果我们的创新没有得到妥善的保护，第三方可就可以复制、模仿我们的产品，免费使用我们的产权，这将导致我们丧失竞争优势。反之，如果我们侵害了第三方的知识产权，也将对知识产权拥有者的利益造成伤害。保护知识产权就是维护行业利益。

Intellectual property is an important source of enterprise competitiveness. Intellectual property is the most important achievement of R&D investment. If our innovations are not properly protected, third parties can copy and imitate our products and use our property rights for free, which will cause us to lose our competitive advantage. Conversely, if we infringe on the intellectual property rights of third parties, it will also harm the interests of intellectual property owners. Protecting intellectual property rights is to safeguard industry interests.

知识产权包括哪些？
What Does Intellectual Property Include?

知识产权包括著作权、专利、商标、域名、网址和商业秘密等基于创造成果和工商标记依法产生的权利。常见的知识产权侵权行为包括侵害著作权（版权）、专利侵权和商业秘密侵权。著作权载体主要包括**软件、文章、照片、字体、视听材料等**。专利包括发明、实用新型和外观设计。

Intellectual property includes copyrights, patents, trademarks, domain names, web addresses, and trade secrets, which are rights legally generated based on creative achievements and business marks. Common intellectual property infringement behaviors include copyright infringement, patent infringement, and trade secret infringement. Copyright carriers mainly include **software, articles, photos, fonts, audio-visual materials, etc.** Patents include inventions, utility models, and designs.

我们应该怎样做？
What should we do?

- **我们应遵守公司知识产权和信息安全政策，保护并合法使用公司的知识产权。**
We shall comply with the company's intellectual property and information security policies, protect and legally use the company's intellectual property rights
- **我们应尊重他人知识产权，应合法使用他人知识产权。**
We shall respect the intellectual property rights of others and legally use others' intellectual property rights.
- **我们严格遵守与第三方签订的保密协议，禁止滥用他人智慧成果。**
We strictly abide by the confidentiality agreements signed with third parties and prohibit the abuse of others' intellectual achievements.
- **我们知悉任何侵犯知识产权的事实线索，应及时联系投资者关系部。**
We shall contact the Investor Relations Department immediately upon becoming aware of any facts or clues regarding intellectual property infringement.

3.2.4 公平诚信交易
Fair and Honest Transactions

公平和诚信是对我们要求。在与供应商、服务商开展合作过程中，我们应遵循公平与诚信的原则，通过公平公正的程序，基于产品或服务的质量、价格、交付、售后等标准综合选择匹配的合作伙伴，严格按照合同履行权利义务，不得歧视、欺骗供应商及服务商。对待用户及经销商，我们将通过产品和服务的竞争力来获得客户的青睐，不会以任何非法或不道德的方式获得商业机会。

Fairness and integrity are our requirements. In the process of cooperating with suppliers and service providers, we should follow the principles of fairness and integrity, select matching partners through fair and impartial procedures based on standards such as product or service quality, price, delivery, and after-sales service, strictly perform rights and obligations in accordance with the contract, and shall not discriminate against or deceive suppliers and service providers. When dealing with users and dealers, we will win customers' favor through the competitiveness of products and services, and will not obtain business opportunities in any illegal or unethical way.

我们应该怎样做？
What should we do?

- 我们用明确的指标公平公正地评价供应商的质量、价格、售后、交付等绩效。
We use clear indicators to fairly and impartially evaluate suppliers' performance in terms of quality, price, after-sales service, and delivery.
- 我们不得歧视供应商或给予不平等对待。
We shall not discriminate against suppliers or give them unequal treatment.
- 我们不得虚假宣传，欺瞒用户及经销商。
We shall not make false propaganda or deceive users and dealers.
- 我们应靠产品和服务取胜，不得贬损、打压竞争对手。
We should win by virtue of products and services and shall not belittle or suppress competitors.
- 我们应遵从合同对权利义务的约定，坚决反对与任何合作伙伴签署阴阳合同。
We shall comply with the agreement on rights and obligations in the contract and firmly oppose signing false or duplicate contracts to conceal true transactions with any partners.

3.3 遵从外部法律法规 / Comply with External Laws and Regulations

作为一家全球经营的企业，三诺必须遵守联合国及主要经营所在地国家或地区可适用的管制法规。包括但不限于贸易管制、金融制裁与反洗钱等。

As a globally operating enterprise, Sinocare must comply with the applicable regulatory laws and regulations of the United Nations and the countries or regions where its main operations are located. Including but not limited to trade control, financial sanctions, and anti-money laundering.

3.3.1 贸易合规
Trade Compliance

三诺尊重并遵守各个国家或地区相关出口管制法律法规，包括但不限于联合国、中国、美国、欧盟等可适用的出口管制法律法规。

Sinocare respects and complies with the relevant export control laws and regulations of various countries or regions, including but not limited to the applicable export control laws and regulations of the United Nations, China, the United States, the European Union, etc.

我们应该怎样做？
What should we do?

- 我们应当跟踪法律法规变化，将贸易合规嵌入公司制度与流程，实现对采购、研发、销售、供应、服务等各个业务环节运作的贸易合规管理与监督。
We shall track changes in laws and regulations, embed trade compliance into company systems and processes, and realize trade compliance management and supervision of the operation of various business links such as procurement, R&D, sales, supply, and services.
- 我们应当对标行业标杆，建立一套成熟、可持续并符合业界实践的贸易合规内部遵从体系。
We shall benchmark against industry leaders and establish a mature, sustainable internal trade compliance system that conforms to industry practices.

3.3.2 金融制裁与反洗钱
Financial Sanctions and Anti-Money Laundering

三诺严格遵守所有可适用的金融制裁、反洗钱、反恐融资法律法规及国际组织决议，严禁公司及员工参与相关违规活动。

Sinocare strictly complies with all applicable laws, regulations, and international organization resolutions regarding financial sanctions, anti-money laundering, and counter-terrorist financing. The company and its employees are strictly prohibited from engaging in any related illegal activities.

我们应该怎样做？
What should we do?

- 我们不得与他人合谋，开展旨在逃避金融制裁法律法规的资金交易或收付款结算。
We shall not collude with others to conduct fund transactions or payment/settlement activities intended to evade laws and regulations on financial sanctions.
- 我们不得向金融机构提供虚假信息或材料，或隐瞒真实的信息或材料。
We shall not provide false information or materials to financial institutions, nor conceal true information or materials.
- 我们不得接受客户通过地下钱庄、赌场，或委托空壳公司等方式支付贸易款项。
We shall not accept trade payments from customers via underground banks, casinos, or through methods such as entrusting shell companies.
- 在客户或供应商未提供合理理由及合法材料的前提下，我们不得接受合作方指定第三方个人或实体代付 / 代收款项。
We shall not accept payments/receipts of funds from third-party individuals or entities designated by our cooperation partners, unless the customer or supplier provides reasonable reasons and legal supporting documents.
- 我们不得接受与海外供应商或客户进行大额现金进行收款或付款。
We shall not accept or make large-value cash payments/receipts in transactions with overseas suppliers or customers.

3.4 践行企业社会责任 / Practicing Corporate Social Responsibility

社会责任体现了公司的道德。作为一家上市公司，三诺不断提升产品及服务竞争力，完善并优化治理结构，为社会源源不断创造财富；我们坚持保护环境，坚持创新，为企业可持续发展打下坚实基础；我们为人才提供干事创业的广阔舞台，为员工提供贴心周到的福利安排，帮助大家在公司持续成长、全面发展；我们关爱糖尿病患者，热心乡村教育，通过三诺糖尿病公益基金会、湖南弘慧教育发展基金会两个公益基金会助力公益、回报社会、传递爱心。

Social responsibility reflects a company's ethics. As a listed company, Sinocare continuously enhances the competitiveness of its products and services, improves and optimizes its governance structure, and continuously creates wealth for society. We are committed to environmental protection and innovation, laying a solid foundation for the company's sustainable development. We provide a broad platform for talents to pursue their careers, offer thoughtful welfare arrangements for employees to support their continuous growth and all-round development. We care for diabetic patients and are passionate about rural education, contributing to public welfare, repaying society, and spreading love through two public welfare foundations: The Sinocare Diabetes Foundation and Hunan Wispring Education Development Foundation.

3.4.1 价值创造
Value Creation

创造价值是公司的首要社会责任。三诺自成立以来，坚定不移地提升产品和服务质量，日复一日、年复一年，持续为千千万万的糖尿病等慢病患者提供好用、实惠的产品。公司上市后，管理团队始终保持创业奋斗的精神，积极优化内部管理，不断健全内部制度，用治理的规范和优化为企业发展赋能。公司发展的同时，用户的生活品质提升了，员工的收入薪水上涨了，股东的投资收益增长了，政府的税收提高了。让利益相关者共享公司发展红利就是公司创造价值的生动表现。

Creating value is the company's primary social responsibility. Since its establishment, Sinocare has been unswervingly improving the quality of its products and services, providing practical and affordable products to millions of patients with chronic diseases such as diabetes year after year. After going public, the management team has maintained an entrepreneurial spirit, actively optimizing internal management, continuously improving internal systems, and empowering corporate development through standardized and optimized governance. As the company grows, users' quality of life improves, employees' salaries increase, shareholders' investment returns grow, and government tax revenue rises. Allowing stakeholders to share the dividends of the company's development is a vivid manifestation of the company's value creation.

3.4.2 可持续发展
Sustainable Development

可持续发展包括环境及企业的可持续发展。保护我们赖以生存的环境是每一个企业、每一个人都应尽的义务和责任。我们的一切都来源于环境，我们所做的一切又都会影响环境。三诺承诺严格遵守与环境保护相关的国际标准和可适用的法律法规，通过完善 EHS 管理体系将环境保护政策嵌入公司制度流程中，目前三诺已通过 ISO14001 环境管理体系认证。公司提倡节约用水、用电、用气、用纸，不浪费粮食。用我们的实际行动为环境的可持续发展做出贡献。创新是企业可持续发展的保障。客户的需求会随着经济社会的发展而不断变化，这就要求我们要不断的研发新的产品和服务，唯有如此才能持续满足顾客的需求；此外，经营环境也是持续变化的，企业要想长期生存发展，势必要进行管理创新，使其管理不断随着环境进化。公司持续不断地加大创新投入，不断研发新的产品和服务，不断革新公司管理，为公司的可持续发展助力。创新既是企业的社会责任，也是企业可持续发展的源泉。只有环境和企业发展能协调兼顾才能实现可持续发展。

Sustainable development includes environmental sustainability and corporate sustainability. Protecting the environment we depend on is an obligation and responsibility that every enterprise and individual should fulfill. Everything we have comes from the environment, and everything we do affects the environment. Sinocare is committed to strictly complying with international standards and applicable laws and regulations related to environmental protection.

We integrate environmental protection policies into the company's systems and processes by improving the EHS (Environment, Health, Safety) management system. Currently, Sinocare has obtained ISO 14001 Environmental Management System certification. The company advocates saving water, electricity, gas, and paper, and opposes food waste. We contribute to environmental sustainability through practical actions. **Innovation is the guarantee of corporate sustainable development.** Customers' needs continue to change with the development of the economy and society, which requires us to continuously develop new products and services—only in this way can we continuously meet customer needs. In addition, the business environment is constantly changing; for an enterprise to survive and develop in the long term, it must carry out management innovation to keep its management evolving with the environment. The company continuously increases investment in innovation, develops new products and services, and reforms corporate management to support its sustainable development. Innovation is not only an enterprise's social responsibility but also the source of its sustainable development. **Only when environmental protection and corporate development are coordinated can sustainable development be achieved.**

3.4.3 人才发展 Talent Development

公司承担为社会育人的责任。三诺努力为员工提供快乐工作、健康成长的平台。公司持续健全人才发展体系，不断完善员工职业发展通道。根据公司发展需求，员工可以自由地选择管理通道发展，也可以在自己的专业发展通道上不断深耕。公司每年会开展组织及人才盘点，识别关键岗位梯队人才，并予以针对性培养（如轮岗、工作职责扩充、重要项目历练）。同时，针对在岗人员和高潜人员持续开展“航系列”和“翔系列”的领导人才培养项目，加速其在三诺的成长。在专业能力培养方面，公司不断探索数字化专业能力平台建设，通过萃取、沉淀、复制传播内部专家优秀工作经验及持续开展“认真工匠”活动，提升员工专业履职能力；同时通过系列学习活动（如糖尿病知识学习、21天读书打卡活动、英语学习活动等）开展，努力提升全员学习的能力。

The company assumes the responsibility of nurturing talent for society. Sinocare strives to provide employees with a platform for happy work and healthy growth. It continuously improves its talent development system and refines employees' career paths. Based on corporate needs, employees can freely choose to develop in management roles or deepen their expertise in professional tracks. The company conducts annual organizational and talent reviews to identify key talent for critical positions and provides targeted training (e.g., job rotations, expanded responsibilities, and important project experience). For current employees and high-potential talent, it continues to offer "Hang Series" and "Xiang Series" leadership development programs to accelerate their growth. In terms of professional competence, the company explores digital platforms for skill development, promotes excellent work experiences of internal experts, and holds "Conscientious Craftsman" activities to enhance employees' professional capabilities. It also organizes learning activities (e.g., diabetes knowledge sessions, 21-day reading challenges, and English courses) to foster a company-wide learning culture.

3.4.4 社会公益 Social Welfare

公益是爱的传递。公司及主要股东和员工一直持续参加各类社会公益事业，公司创始人及主要股东 2008 年发起设立了湖南弘慧教育发展基金会，2019 年发起设立了湖南省三诺糖尿病公益基金会。公司员工多次以志愿者的身份积极参加公益活动、或为基金会捐款。

Public welfare is the transmission of love. The company, its major shareholders, and employees have long participated in various public welfare initiatives. The company's founders and major shareholders established Hunan Honghui Education Development Foundation in 2008 and Hunan Sinocare Diabetes Public Welfare Foundation in 2019. Employees frequently participate in public welfare activities as volunteers or donate to the foundations.

湖南弘慧教育发展基金会通过“筑梦计划”资助贫困学子，让他们得到从经济资助到心灵关怀，从能力成长到人格养成，从个体发展到社会担当的全方面帮助，让他们有机会公平地面对未来，有尊严、有担当地融入社会；通过“营地计划”在暑期为不同年龄阶段的孩子提供不同类型的营地活动，增强乡村孩子对家乡自然的热爱，提高自我认知的能力和社会责任意识；通过“乡村好校长计划”面向湖南全省，每年寻找并表彰不超过 10 位有教育情怀、有突出素质教育实践成果的乡村“好校长”，并对“乡村好校长”的教育理念、教育实践予以肯定与传播，助力“乡村好校长”进一步成长，并鼓励“乡村好校长”带动乡村校长群体共同成长，引领更广泛的乡村教育工作者探索做适合乡村孩子的教育，促进乡村教育的多元化发展。

Hunan Wispring Education Development Foundation supports underprivileged students through the "Dream-Building Program," providing comprehensive assistance from financial aid and mental care to capacity building, character development, and social responsibility, enabling them to face the future equitably and integrate into society with dignity and responsibility. Through the "Camp Program," it offers age-appropriate summer camps for rural children to enhance their love for their hometown's nature, self-awareness, and sense of social responsibility. The "Excellent Rural Principals Program" identifies and honors up to 10 rural principals in Hunan Province annually who demonstrate educational passion and outstanding achievements in quality education. It promotes their educational philosophies and practices to support their growth, encouraging them to lead other rural principals and guide broader rural educators in developing education suitable for rural children, fostering diversified rural education.

湖南省三诺糖尿病公益基金会（以下简称“三诺基金会”）由三诺创始人、董事长李少波先生，首席科学家蔡晓华先生，副董事长李心一女士以及三诺生物传感股份有限公司共同发起，经湖南省民政厅批准，于 2019 年 1 月 11 日成立。三诺基金会是中國大陸第一家专门面向糖尿病患者的非公募基金会，属慈善组织。

The Sinocare Diabetes Foundation (SDF) was jointly initiated by Li Shaobo, Chairman of Sinocare Inc.; Cai Xiaohua, Chief Scientist; Li Xinyi, Vice Chairman; and Sinocare Inc. With the approval of the Hunan Provincial Department of Civil Affairs, the foundation was officially established on January 11, 2019. SDF recognized as a charitable organization, and is the first diabetes-focused public welfare foundation in mainland China.

■ 面向 1 型糖尿病家庭

For Families with Type 1 Diabetes

三诺基金会发起“甜蜜小孩”项目,通过甜蜜生活包、甜蜜生活支持计划、甜蜜康乐营、甜蜜心咨询等一系列活动,帮助新确诊家庭走出确诊初期的恐慌和迷茫,为经济困难的家庭提供费用和耗材的支持,引导他们学习科学的糖尿病知识,积极应对糖尿病。

The Sinocare Foundation has launched the *Sweet Kids Program*. Through a series of initiatives including the Sweet Life Kit, Sweet Life Support Program, Sweet Wellness Camp and Sweet Heart Counseling, the program helps newly diagnosed families overcome the panic and confusion in the initial stage of diagnosis, provides financial and consumable support to economically disadvantaged families, and guides them to learn scientific diabetes knowledge and respond to the disease proactively.

■ 面向 2 型糖尿病群体

For People with Type 2 Diabetes

联合《糖尿病之友》杂志和国内医护,开展糖尿病教育,引导大家走向健康的生活方式。

In collaboration with *Diabetes Friends* magazine and medical professionals across China, the Foundation carries out diabetes education activities to guide the public to adopt a healthy lifestyle.

■ 面向医护群体

For Medical Professionals

三诺基金会通过“甜蜜医生培育项目”“1 型糖尿病教育师计划”等项目,加强医护专业能力培训,推动提升全国各地 1 型糖尿病管理水平。

Through programs such as the *Sweet Doctor Training Program* and the *Type 1 Diabetes Educator Program*, the Sinocare Foundation strengthens the professional training of medical staff and promotes the improvement of Type 1 diabetes management standards nationwide.

■ 面向社会大众

For the General Public

联合国内各大药房开展免测,帮助大家早发现、早干预、早达标,为实现健康中国 2030 目标而努力;同时发起“甜蜜校园行”“诺跑”活动,让社会大众更了解糖尿病;发起“守糖人计划”,链接糖友、家属、医生、护士、捐赠人、公益组织、爱心企业等作为基金会志愿者,在全国各地开展在地糖尿病公益服务,实现更全面、多渠道帮扶糖尿病患者。

In partnership with major pharmacies across China, the Foundation provides free blood glucose testing services to help the public achieve early detection, early intervention and early target attainment of blood glucose levels, striving to realize the goals of *Healthy China 2030*. Meanwhile, it has launched public outreach activities including the *Sweet Campus Tour* and *Sinorun* to raise public awareness of diabetes. The Foundation has also initiated the *Sugar Guardian Program*, which connects volunteers including people with diabetes, their family members, doctors, nurses, donors, public welfare organizations and caring enterprises to carry out localized diabetes public welfare services across the country, enabling more comprehensive and multi-channel support for people with diabetes.

■ 面向妊娠糖尿病群体

For Women with Gestational Diabetes

计划发起“甜蜜妈妈包”,帮助妊娠糖尿病群体缓解心理压力,学习科学的糖尿病知识,控制好血糖。

The Foundation plans to launch the *Sweet Mom Kit* initiative to help women with gestational diabetes relieve psychological stress, acquire scientific diabetes knowledge and maintain good blood glucose control.

公益源于爱,更是在播种爱。

Public welfare stems from love and sows love.

我们应该怎样做?

What should we do?

- 我们应当理解、认同公司的社会责任主张,积极参与公司的社会责任活动。
We should understand and endorse the company's social responsibility initiatives and actively participate in related activities.
- 我们应当做好本职工作,拒绝“躺平”,与公司一道不断成长。
We should perform our duties well, reject complacency, and grow together with the company.
- 我们应当践行公司“为爱而诺”的文化,爱自己、爱家人、爱他人,爱社会。
We should practice the company's "Promise for Love" culture, loving ourselves, our families, others, and society.

附则

Supplementary Provisions

本准则参照了相关的法律法规及公司相关管理制度、规则，本准则未尽事宜可详细阅读相关法律法规及公司相关制度、规则；本准则适用于公司及关联企业的董事、高级管理人员与其他员工，以及代表公司开展业务的所有第三方企业和个人。若有不明事项，请联系风险合规与审计部。

This Code is formulated with reference to relevant laws, regulations, and the Company's related management systems and rules. For matters not covered in this Code, please refer to the detailed provisions of relevant laws, regulations, and the Company's related systems and rules. This Code applies to the directors, senior managers, and other employees of the Company and its affiliated enterprises, as well as all third-party enterprises and individuals that conduct business for or on behalf of the Company. For any unclear matters, please contact the Risk, Compliance and Audit Department.

CHAPTER 04

5. 违反本守则的处分

Disciplinary Actions for Code Violations

公司及关联企业的董事、高级管理人员与其他员工，以及代表公司开展业务的所有第三方企业和个人必须熟悉本准则中的各项要求及公司相关规章制度。在任何适用情形下，均应参照本守则及公司相关规章制度的要求开展业务活动。违反本守则可能会给公司造成严重后果。任何违反本守则的行为将根据公司《员工手册》《员工行为奖惩制度》或其他适用的制度、规定予以处罚，情节严重的，公司将追究其法律责任。

Directors, senior management personnel, and other employees of the Company and its associated enterprises, as well as all third-party enterprises and individuals representing the Company in conducting business, must be familiar with all requirements set forth in this Code and the Company's relevant rules and regulations. In all applicable circumstances, business activities shall be conducted in accordance with the requirements of this Code and the Company's relevant rules and regulations. Violations of this Code may cause serious consequences to the Company. Any act of violating this Code shall be punished in accordance with the Company's Employee Handbook, Employee Code of Conduct for Rewards and Punishments, or other applicable systems and regulations; in cases of serious violations, the Company shall pursue the violator's legal liability.

6. 文件生效

Effectiveness

本守则自 2025 年 12 月 25 日起生效。

This Code shall take effect on December 25, 2025.

4. 联系方式

Contact information

如果您有任何疑问或情况需要咨询，可通过以下联系方式咨询对应部门。

If you have any questions or matters that require consultation, you may contact the corresponding department via the contact information provided below.

■ 质量与法规中心
Quality and Regulatory Center

@ 邮箱 PMSTeam@sinocare.com
Email

■ 数据管理部
Data Management Department

@ 邮箱 dataprivacy.global@sinocare.com
Email

■ 总经办
General Manager's Office

☎ 电话 0731-89935517
Phone Number

■ 投资者关系部
Investor Relations Department

☎ 电话 0731-89935529
Phone Number

■ 风险合规与审计部
Risk, Compliance and Audit Department

☎ 电话 0731-89935532
Phone Number

@ 邮箱 sjts@sinocare.com
Email