山东威高集团医用高分子制品股份有限公司
Shandong Weigao Group Medical Polymer Company Limited

负责任营销、广告、销售及客户关系政策
Responsible Marketing, Advertising, Sales and Customer Relations Policy

1. 目的 | Purpose

本政策旨在确保适用实体在全球范围内以准确、平衡、可验证且不具误导性的方式介绍医疗器械、医用耗材、骨科产品、输血技术装备、药品包装及相关服务，维护患者安全、医疗专业人士的独立判断、客户权益和公平竞争。

This Policy ensures that the Reporting Entities present medical devices, medical consumables, orthopaedic products, blood-transfusion technology equipment, pharmaceutical packaging and related services globally in an accurate, balanced, substantiated and non-misleading manner, while protecting patient safety, the independent judgement of healthcare professionals, customer interests and fair competition.

2. 适用范围 | Scope

除非相关政策另有说明，本政策适用于山东威高集团医用高分子制品有限公司、其于中国成立的附属公司以及在报告边界内的美国介入医疗产品制造业务（统称"适用实体"）。

Unless otherwise stated, this Policy applies to Shandong Weigao Group Medical Polymer Company Limited , its PRC subsidiaries Argon Medical's US interventional medical products manufacturing business within the reporting boundary (collectively, the "Reporting Entities").

本政策适用于董事、高级管理人员、员工、临时人员，以及代表适用实体开展推广、销售、临床教育、经销、投标、售后服务或数字传播活动的经销商、代理商、顾问和其他第三方。

It applies to directors, senior management, employees and temporary personnel, as well as distributors, agents, consultants and other third parties conducting promotion, sales, clinical education, distribution, tendering, after-sales service or digital communications on behalf of a Reporting Entity.

3. 核心原则 | Core Principles

- 所有产品和服务信息必须真实、准确、平衡、清晰、有证据支持，并符合经批准或注册的预期用途、标签、说明书和适用监管要求。不得遗漏对安全使用具有重要意义的风险、限制或警示。
  All product and service information must be truthful, accurate, balanced, clear, evidence-based and consistent with the approved or registered intended use, labelling, instructions for use and applicable regulatory requirements. Material risks, limitations or warnings relevant to safe use must not be omitted.
- 禁止虚假、夸大、未经证实、贬损竞争对手或容易造成误解的陈述；禁止以推广目的主动宣传未经批准的用途。对合法的非推广性科学交流，应由医学、监管或其他获授权职能按照本地程序处理。
  False, exaggerated, unsubstantiated, disparaging or misleading claims are prohibited. Proactive promotion of unapproved uses is prohibited. Legitimate non-promotional scientific exchange must be handled by Medical, Regulatory or another authorised function under local procedures.
- 营销和销售活动不得以礼品、付款、赞助、教育机会、样品、折扣或其他利益不当影响医疗专业人士、医疗机构、采购人员、患者组织或其他客户的决定。
  Marketing and sales activities must not use gifts, payments, sponsorships, educational opportunities, samples, discounts or other benefits to improperly influence decisions by healthcare professionals, healthcare organisations, procurement personnel, patient organisations or other customers.
- 直接面向消费者的推广仅可在当地法律允许且产品适合该等推广时开展，并应清楚说明适用健康状况、预期用途、重要风险、限制及寻求专业医疗建议的必要性。
  Direct-to-consumer promotion may occur only where permitted by local law and appropriate for the product, and must clearly state the relevant health condition, intended use, material risks, limitations and the need to seek professional medical advice.

4. 材料审批及记录 | Material Approval and Records

- 所有推广材料，包括广告、产品手册、展会内容、销售演示、培训材料、网站、社交媒体、视频、电子邮件模板和第三方内容，须在使用前完成监管/医学或技术审查、法务/合规审查及业务批准。
  All promotional materials, including advertisements, product brochures, exhibition content, sales presentations, training materials, websites, social media, videos, email templates and third-party content, must receive Regulatory/Medical or technical review, Legal/Compliance review and business approval before use.
- 非推广材料，包括科学交流、医学教育、临床培训、经济学资料和疾病教育材料，也须依据其用途完成适当审查，以确保与推广内容清晰区分。
  Non-promotional materials, including scientific exchange, medical education, clinical training, health-economic information and disease-awareness materials, must also undergo review appropriate to their purpose and remain clearly distinguished from promotional content.
- 适用实体应实施版本控制、有效期、撤回机制及记录保存要求，确保过期、被替代或不再合规的材料停止使用。
  The Reporting Entities shall apply version control, validity periods, withdrawal mechanisms and record-retention requirements so that expired, superseded or non-compliant materials cease to be used.

5. 与医疗专业人士、医疗机构及患者组织的互动 | Interactions with Healthcare Professionals (HCPs), Healthcare Organisations (HCOs) and Patient Organisations

- 聘用医疗专业人士提供顾问、讲课、培训、研究或其他服务，必须基于真实业务或科学需要，事先签署书面协议，按照合理市场水平支付报酬，并保留服务成果和付款记录。不得按产品采购量、处方、推荐、转诊或使用量支付报酬。
  Engagements of healthcare professionals for consultancy, speaking, training, research or other services must be based on a genuine business or scientific need, documented in a prior written agreement, remunerated at a reasonable fair-market level and supported by records of services and payments. Remuneration must not be linked to product purchases, prescriptions, recommendations, referrals or utilisation.
- 会议、培训、餐饮、差旅及接待必须适度、与活动目的直接相关、符合当地法律和行业准则，并不得成为不当利益。陪同人员、娱乐性活动及奢华安排原则上不予资助。
  Meetings, training, meals, travel and hospitality must be modest, directly related to the purpose, compliant with local law and industry codes, and must not constitute an improper benefit. Funding for accompanying persons, entertainment or lavish arrangements is generally prohibited.
- 对患者组织的资助或合作必须透明、以书面协议为基础并尊重其独立性。适用实体不得控制其编辑观点、治理、患者选择或公共立场，也不得以资助换取产品推荐。
  Funding of or collaboration with patient organisations must be transparent, documented in writing and respectful of their independence. A Reporting Entity must not control editorial views, governance, patient selection or public positions, nor exchange funding for product endorsement.
- 捐赠、教育资助、研究支持、样品和演示产品必须遵循明确资格、审批、用途限制、接收确认、追踪及必要的公开披露要求。
  Donations, educational grants, research support, samples and demonstration products must follow defined eligibility, approval, use restrictions, receipt acknowledgement, tracking and, where required, public disclosure requirements.

6. 数字渠道、经销商及第三方 | Digital Channels, Distributors and Third Parties

- 公司赞助的数字内容须清楚标识发布主体；员工和第三方不得使用虚假账户、隐瞒商业关系或擅自作出产品声明。适用实体应对官方网站、社交媒体及主要第三方数字活动进行风险导向监测。

Company-sponsored digital content must clearly identify the publisher. Employees and third parties must not use false accounts, conceal commercial relationships or make unauthorised product claims. The Reporting Entities shall monitor official websites, social media and material third-party digital activities on a risk-based basis.

- 经销商、代理商及其他销售第三方须通过合同接受本政策或等效要求，完成相关培训，并接受尽职调查、抽查、审计及整改。重大或重复违规可导致暂停、终止合作或向主管机关报告。
  Distributors, agents and other sales third parties must contractually accept this Policy or equivalent requirements, complete relevant training and remain subject to due diligence, sampling, audit and corrective action. Material or repeated breaches may result in suspension, termination or reporting to authorities.

7. 客户反馈、投诉及不良事件 | Customer Feedback, Complaints and Adverse Events

- 任何从营销、销售、培训、数字渠道或客户互动中获悉的产品投诉、不良事件、潜在质量缺陷或标签问题，须立即按质量、监管和警戒程序升级，不得由销售人员自行判断是否需要报告。
  Any product complaint, adverse event, potential quality defect or labelling issue identified through marketing, sales, training, digital channels or customer interactions must be escalated immediately under Quality, Regulatory and vigilance procedures. Sales personnel must not independently decide whether reporting is required.
- 适用实体应建立统一的客户满意度测量方法，明确调查或回访对象、覆盖率、评分方法、年度目标、结果趋势及改进行动，并区分投诉结案率与客户满意度。
  The Reporting Entities shall establish a consistent customer-satisfaction measurement method specifying the population surveyed or followed up, coverage, scoring method, annual target, result trends and improvement actions, and shall distinguish complaint-closure rates from customer satisfaction.

8. 培训、监测与披露 | Training, Monitoring and Disclosure

- 相关员工和高风险第三方应在上岗或合作开始时及此后定期接受培训。
  Relevant employees and high-risk third parties shall receive training at induction or onboarding and periodically thereafter.
- 各适用报告实体应至少跟踪以下指标：营销材料审批覆盖率、相关员工培训覆盖率、营销或产品标签不合规事件数量、重大整改措施、因虚假或误导性营销引发的法律损失、与医疗专业人员（HCP）及医疗卫生机构（HCO）互动相关的付款或资助披露情况，以及客户满意度。
  Each Reporting Entity within the scope of this Policy shall, at a minimum, track the following indicators: marketing material approval coverage, relevant employee training coverage, marketing or product labelling non-compliance incidents, significant remediation actions, legal losses arising from false or misleading marketing practices, disclosure of payments or funding provided in connection with interactions with Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs), and customer satisfaction.
- 任何疑似违规可通过适用实体的合规或举报渠道提出，举报人受到保密及反报复保护。
  Suspected breaches may be raised through the applicable compliance or whistleblowing channels, with confidentiality and protection against retaliation.