

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

政治捐款、慈善捐赠、赞助及政策参与管理政策
Political Contributions, Charitable Donations, Sponsorships and Policy
Engagement Policy

1. 目的及与现有政策的关系 | Purpose and Relationship to Existing Policies

本政策补充适用实体现有《反腐败政策》及举报制度，规范政治捐款、游说和公共政策参与、行业协会活动、慈善捐赠、医疗教育资助及商业赞助，防止其被用于贿赂、利益输送、不当影响或规避礼品和招待限制。

This Policy supplements the Reporting Entities' existing Anti-Corruption Policy and whistleblowing arrangements by governing political contributions, lobbying and public-policy engagement, trade-association activity, charitable donations, medical-education grants and commercial sponsorships, so that they are not used for bribery, improper benefit, undue influence or circumvention of gifts and hospitality controls.

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").

3. 政治捐款 | Political Contributions

- 适用实体原则上禁止以公司资金、资产、产品、设施、员工工时或其他资源向政党、候选人、政治行动组织或相似主体提供政治捐款。

As a general rule, the Reporting Entities prohibit the use of corporate funds, assets, products, facilities, employee time or other resources for political contributions to political parties, candidates, political-action organisations or similar bodies.

- 如当地法律允许且管理层拟保留例外，任何例外均须事先取得法务书面意见、合规尽职调查、执行管理层及企业管治委员会批准，并进行准确记录和必要公开披露。

If local law permits and management chooses to retain an exception, any exception requires prior written Legal advice, Compliance due diligence, approval by executive management and the Corporate Governance Committee, accurate records and required public disclosure.

- 员工以个人身份参与政治活动必须自费、在私人时间进行，不得暗示代表适用实体，也不得对员工施压要求其捐款或支持特定立场。

Employees may participate in political activity personally, using their own funds and time, without implying representation of a Reporting Entity. No employee may be pressured to contribute to or support a political position.

4. 游说、公共政策及行业协会 | Lobbying, Public Policy and Trade Associations

- 政策参与必须合法、诚信、以证据为基础并与改善医疗、患者安全、产品质量、公平竞争及可持续发展等正当目标相一致。不得提供虚假或误导性信息。

Policy engagement must be lawful, honest, evidence-based and aligned with legitimate objectives such as better healthcare, patient safety, product quality, fair competition and sustainable development. False or misleading information is prohibited.

- 代表适用实体开展游说或政府事务活动的人员和第三方须获得书面授权，并遵守登记、报告、礼品、接待和利益冲突要求。

Persons and third parties conducting lobbying or government-affairs activity on behalf of a Reporting Entity must be authorised in writing and comply with registration, reporting, gifts, hospitality and conflict-of-interest requirements.

- 适用实体应每年审阅重大行业协会会员资格、会费中用于政策影响的金额及协会在重大公共政策和气候议题上的立场。发现重大不一致时，应进行沟通、寻求纠正、公开说明或考虑退出。
The Reporting Entities shall annually review material trade-association memberships, the portion of fees used for policy influence and association positions on material public-policy and climate matters. Material misalignment should trigger engagement, corrective action, explanation or consideration of withdrawal.

5. 慈善捐赠、医疗教育资助及赞助 | Charitable Donations, Medical-Education Grants and Sponsorships

- 所有捐赠、资助和赞助必须具有合法、明确且可记录的公益、教育、科学或商业目的，不得以获得采购、处方、推荐、监管批准、招标优势或其他不当利益为条件。
All donations, grants and sponsorships must have a lawful, defined and documented charitable, educational, scientific or commercial purpose and must not be conditional upon procurement, prescribing, recommendation, regulatory approval, tender advantage or any other improper benefit.
- 受资助方或受益机构须接受基于风险的尽职调查，包括其合法身份、治理结构、最终受益所有人、制裁合规情况、声誉风险、与政府官员或医疗专业人员（HCP）的关联关系，以及潜在利益冲突。原则上，所有付款应直接支付给符合资格的机构，而不应支付给个人或指定第三方。
- Beneficiaries or recipient organisations shall undergo risk-based due diligence covering their legal identity, governance structure, beneficial ownership, sanctions compliance, reputational risks, relationships or affiliations with government officials or Healthcare Professionals (HCPs), and potential conflicts of interest. Payments should generally be made directly to eligible organisations and should not be made to individuals or designated third parties.
- 每项活动须有书面申请、目的、预算、审批、协议、付款证明、交付成果和使用证明。不得拆分金额以规避审批，亦不得以现金或现金等价物支付。
Each activity requires a written request, purpose, budget, approval, agreement, proof of payment, deliverables and evidence of use. Amounts must not be split to avoid approval, and payments must not be made in cash or cash equivalents.
- 对患者组织和医疗专业团体的支持须保持其独立性，并按法律或行业准则公开适用实体名称、支持性质及金额。
Support for patient organisations and professional medical bodies must preserve their independence and disclose the Reporting Entity, nature and amount of support where required by law or industry code.

6. 治理、记录及公开披露 | Governance, Records and Public Disclosure

- 法务/合规负责制定审批矩阵和禁止情形；财务确保准确入账；业务负责人确认目的和交付；内部审计或合规按风险抽查。所有记录至少按当地法律及公司记录政策要求保存。
Legal/Compliance shall establish approval matrices and prohibited circumstances; Finance shall ensure accurate accounting; business owners shall validate purpose and delivery; and Internal Audit or Compliance shall conduct risk-based testing. Records shall be retained for at least the period required by local law and corporate retention rules.
- 适用实体应每年披露政治捐款总额（包括零金额）、重大游说或行业协会支出、主要政策立场，以及慈善捐赠和赞助的管理方法；如披露具体金额受法律限制，应说明原因。
The Reporting Entities should annually disclose total political contributions, including a zero amount; material lobbying or trade-association expenditure; major policy positions; and the management approach to charitable donations and sponsorships. Where specific amounts cannot legally be disclosed, the reason should be explained.