

Beeken Biomedical Anticorruption Policy

- 1.0 **Policy:** Beeken Biomedical is committed to the highest standard of integrity in our business practices, as outlined in the Beeken *Code of Conduct*. Beeken expects and encourages our Suppliers to follow those same expectations. This Anticorruption Policy provides additional guidance on the requirements regarding compliance with laws relating to bribery and corruption.

This Policy reinforces Beeken's commitment to compliance with the principles and objectives of the United Nations Convention Against Corruption and the Organization for Economic Cooperation & Development's Convention on Combating Bribery of Foreign Public Officials in International Business Transactions ("the OECD Convention") and implementing legislation, including the U.S. Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act 2010 ("U.K. Bribery Act"), and other, similar applicable laws, together referred to here as the "Anticorruption Legislation." These laws prohibit or restrict the provision of payments or anything of value, directly or indirectly, to Government Officials, Customers, or political parties and require strict controls over the disposition and accounts of company assets.

This Policy applies to all Beeken Suppliers (as that term is defined below), its subsidiaries, or affiliates in which Beeken directly or indirectly owns an interest.

2.0 **Definitions:**

1. **Anticorruption Legislation:** Implementing legislation of the OECD Convention, including the FCPA, the U.K. Bribery Act, and local laws applicable to Beeken or its Suppliers in the countries where it operates.
2. **Anything of Value:** Includes anything that has a monetary value or would constitute an advantage to the recipient, such as cash or cash equivalent (e.g., cashier's checks, money orders, bearer bonds, gift cards), charitable donations, political contributions, travel expenses, gifts, and employment or business opportunities.
3. **Charitable Contribution:** Includes any donation of funds, facilities, or services of any kind to a charity or non-profit organization.
4. **Facilitating Payment:** A small payment made to a Government Official to secure or expedite the performance of a routine governmental action to which the payer is entitled ordinarily.
5. **Government Official(s):** Includes anyone who is a(n):
 - a. Official (elected, appointed, or career) of a federal, state, local, or municipal government;
 - b. Employee of a government or a governmental agency or department;
 - c. Employee of a government-owned or government-controlled commercial enterprise or company;
 - d. Official or employee acting in an official capacity for or on behalf of a public international organization (e.g., UN, World Bank, EU, WTO, NATO);
 - e. Individual acting for or on behalf of a government or any of the organizations referred to under (c) through (e) above, even though he/she may not be an employee of such government or organization;
 - f. Official of a political party and/or candidate for political office;
 - g. Individual who is considered a government official under applicable local law; and
 - h. For purposes of this policy, any Close Family Member of any of the above, where "Close Family Member" means any spouse or any parent, child, or sibling, whether by blood or marriage.
6. **Hospitality Expenses:** Payments for, or related to, travel, accommodation, meals or entertainment.
7. **Payment:** The transfer from one person or entity to another of Anything of Value.
8. **Supplier:** Any current or prospective Beeken Supplier, which includes a business or person that makes goods or services available to Beeken.

When reference is made to U.S. Dollar amounts, that shall also mean foreign currency of an equivalent amount.

- I. **Prohibited Payments:** In connection with any business or activity related to Beeken Biomedical, it is prohibited to pay, offer, authorize, or promise to pay Anything of Value to a Government Official or political party to induce or influence a Government Official or political party to do or refrain from doing any official act, to assist Beeken in obtaining or retaining business, directing business to any person, or securing an improper advantage in the conduct of business.



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- II. Hospital Expense:
 - A. Under certain circumstances, payments for Hospitality Expenses could be considered Prohibited payments under this Policy and the law.
 - B. In connection with any business or activity related to Beeken, a Supplier may not provide Hospitality Expenses to a Government Official without advance, written authorization from Beeken.
 - C. It is important to note that Government Official is broadly defined in this Policy and covers not only elected and appointed government officials but also employees of government-owned or government-controlled entities. In many cases, this can include physicians, hospital employees, and university employees.

- III. Gifts and Promotional Items: Gifts to Government Officials can be considered Prohibited Payments even if the gift-giving is customary in many business cultures. Therefore, in connection with any business or activity related to Beeken, Suppliers are prohibited from offering or giving gifts or promotional items to Government Officials without advance, written authorization from Beeken.

- IV. Facilitating Payments Prohibited: Although the FCPA has a narrow exception for Facilitating Payments, most other countries' laws do not recognize such an exception. Beeken prohibits Facilitating Payments in all circumstances. Suppliers are prohibited from making Facilitating Payments in connection with any business or activity related to Beeken

- V. Political Contributions: Suppliers may not make political contributions of any kind (funds, facilities, or services) to any candidate for public office, to any political party or official thereof, or any political initiative, referendum, or other form of political campaign of Government Officials on behalf of Beeken or in connection with any business or activity related to Beeken. Nothing in this Policy is intended to preclude or affect the ability of a Supplier or the owners, directors, officers, or employees of a Supplier from making political contributions unrelated to Beeken and its business

- VI. Charitable Contributions: Beeken makes charitable contributions to bona fide charities and for proper charitable purposes. Suppliers may not make charitable contributions on behalf of Beeken or in connection with any business or activity related to Beeken. Nothing in this Policy is intended to preclude or affect the ability of a Supplier or its owners, directors, officers, or employees from making charitable contributions unrelated to Beeken and its business.

- VII. Training: Beeken provides training concerning its Anticorruption Policy and Anticorruption Legislation to its directors, officers, and selected partners. Beeken may require that certain Suppliers receive such training because of the nature of their role and responsibilities on behalf of the Company

- VIII. Compliance: Compliance with this Policy is mandatory for all Beeken Suppliers. Failure to comply with this Policy, or failure to report violations or suspected violations, may be grounds for termination of a Supplier's business relationship with Beeken.

Suppliers should report any violations or suspected violations of this Policy or the Anticorruption Legislation in connection with Beeken Biomedical's business. Such reports may be made to the Supplier's Contact with Beeken or through the Beeken's Direct Line:

- US/Canada – 800.461.9330
- Mexico – 800.681.6945
- Honduras – 504.2231.3114 (All Carriers) and 800.2791.9500 (Tigo (mobile)/Hondutel (Fixed Access))
- Singapore – 800.492.2690
- Switzerland – 0800.561.314
- Text (North America Only) – 513.987.9436