

Code of Business Conduct

Aier Eye Hospital Group Co., Ltd.

Overview

The Code of Business Conduct (hereinafter referred to as “the Code”) for Aier Eye Hospital Co., Ltd. (hereinafter referred to as “Aier Eye”, “the Company” or “we”) is designed to promote the highest standards of integrity and full compliance with all applicable laws and regulations in the countries in which we operate. It reflects Aier Eye’s core values and is intended to serve as a general resource for our partners, colleagues, and peers globally.

Who Must Follow the Code

The Code applies to all full-time employees, part-time employees, contractors, temporary workers, and members of our Board of Directors, as well as those affiliated with our subsidiaries.

Applicable provisions of the Code should be included in the contract management of suppliers and business partners engaging in activities on behalf of Aier Eye.

General Principles to Follow

All employees are expected to have read, understand and comply with all applicable laws, regulations and ethical business practices that apply to their activities.

Upon being notified of a violation of the Code, company policies or laws, Aier Eye will promptly act to address the issue and prevent future occurrences. Employees are expected to cooperate and be truthful when responding to an investigation or audit. Depending on the circumstances, corrective and preventive steps might include training, counseling and/or disciplinary action up to and including termination of employment.

Manager Responsibilities

It is the responsibility of all managers within Aier Eye to lead by example, demonstrate integrity and encourage discussion of the ethical and legal

implications of business decisions. We ensure that compliance with statutory and internal regulations is continuously and properly monitored in our particular area of responsibility.

Internal control system

Aier Eye is committed to addressing business ethics risks through robust governance. We have established a Social Responsibility Management Committee composed of senior management to direct and oversee the Company's ethical behaviors, including assessing business ethics risks, setting standards and policies, and monitoring, auditing, and investigating business-ethics-related issues. The Legal Supervision Department receives the whistleblowing information and conducts investigations, and the Audit & Risk Control Department performs periodic reviews to assess adherence to the Code and mitigate risks.

Employees have several options to report potential violations anonymously:

- Speak with local management or the Human Resources department
- Submit concerns via email at jcjb@aierchina.com
- Report concerns through our hotline: +86-18975199961 (The same number on WeChat)

Communication and training

We are informed regularly about current topics relating to the Code of Business Conduct. We engage in regular dialog on compliance issues and address risks openly. We regularly receive training on individual subjects.

Anti-Corruption and Anti-Bribery

Aier Eye prohibits bribery and corruption in any form, including directly or indirectly giving, offering, accepting or authorizing bribes or related behavior. We expect the same from our business partners. We fully comply with anti-corruption laws in every country in

which we conduct business. This includes laws that prohibit bribery of government officials and employees, as well as of employees of commercial organizations.

Anti-Harassment

We strive to build and maintain a workplace that is professional and free from harassment, intimidation and bullying. "Harassment" includes sexual harassment and non-sexual harassment, intimidation and bullying, all of which are unacceptable behaviors that can lead to an unproductive and unsafe workplace. We will not tolerate harassment, intimidation, or bullying of employees under any circumstance.

Business Gifts

Offering, soliciting or accepting gifts and donations related to our business is prohibited.

Company Assets

Employees should seek to protect company assets, both tangible and intangible, and use them efficiently to advance the interests of the company. Tangible assets are those that have a physical form, such as materials, supplies, equipment, and cash, while intangible assets include intellectual property, information assets, brand value, reputation and employee's work time and talents.

Dealing with information

In all business processes and in compliance with the applicable statutory requirements, we ensure that privacy is safeguarded, personal data is protected, and all business information is kept secure. Technically and organizationally, and especially with regard to protection against unauthorized access and loss, we apply an appropriate standard that reflects the state of the art and takes account of the associated risks.

In the course of official duties for the Company, employees are granted access to information that may be confidential and proprietary. Employees should never use or disclose confidential information except

when the use or disclosure is authorized by management or legally mandated. Even if a disclosure outside of the company is authorized or required by law, the confidential information may not be disclosed unless the necessary confidentiality and/or nondisclosure agreements are in place with the third parties to whom the information will be disclosed and appropriate disclosure is made within the scope of the confidentiality agreements. Additionally, employees should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to Aier Eye or another company, is not communicated even within the company except to employees who require the information to perform their responsibilities for the Company.

Avoiding conflicts of interest

All employees are expected to act in the best interest of the Company and must refrain from engaging in any activity that could present a conflict of interest. A conflict of interest occurs when personal interests interfere, or appear to interfere, with the interests of the company. A conflict of interest can also arise when an employee takes action or has an interest that prevents them from performing company duties and responsibilities honestly, objectively and effectively. Employees should take great care to properly address any conflict of interest before undertaking company work.

Communications & Social Media

Posting or commenting on online content can affect the image and reputation of our company, employees, or business partners. As a result, only designated employees are authorized to communicate on behalf of Aier Eye. We expect our employees to refer to the 《Management System for Employees Receiving Media Interviews》 before making public speeches, writing articles, or engaging in other public communications when they are speaking on behalf of Aier Eye.

Environmental, Health and Safety

We understand that we have a role to play in reducing the impact of industry activities on the environment and we comply with all applicable health, safety, and environmental laws and regulations. We strive to continually improve the performance of our Occupational Health and Safety management systems and identify, assess, prevent and control physical, chemical and biological risks inherent in our activities. We are proactive in addressing climate change and have pursued initiatives to limit the environmental footprint of our activities and products across the value chain. We actively seek out and act upon meaningful opportunities to reduce risk and improve EHS performance. We are committed to educating and motivating employees to work in a safe, compliant and environmentally responsible manner and encourage our business partners to do so as well.

Equal Opportunity & Anti-Discrimination

Aier Eye provides employment and advancement opportunities to individuals based on merit, qualifications, and abilities, and will not tolerate acts of discrimination. Our policies prohibit discrimination based on race, religion, gender, age, sexual orientation, marital status, gender identity and expression, ethnicity, physical or mental disability, veteran status, or national origin, as well as any protected class. All employees are expected to treat their colleagues with fairness, courtesy and respect.

Employee Well-Being

The safety and well-being of our employees is a core commitment of Aier Eye. We have developed policies and procedures to ensure that relevant local laws and regulations related to working hours and wages are strictly upheld.

Fair Competition

Aier Eye is committed to the principle of fair competition and complies with all laws related to competition, antitrust and the gathering of competitive information.

We seek to achieve our competitive advantage through effective and successful performance, and do not condone unfair or illegal business practices. Business information about other companies should only be collected and used in a manner that is ethical, lawful, and meets confidentiality obligations.

Cooperation with authorities

In its dealings with the authorities, Aier Eye pursues a cooperative approach. As Aier Eye associates and managers, we fully cooperate when lawful investigations are conducted by Aier Eye or the authorities. This does not affect legal privilege, the right to withhold information, and any other procedural rights.

Human rights

We acknowledge and respect the fundamental principles contained in the International Bill of Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the Ten United Nations Global Compact Principles and the United Nations Guiding Principles on Business and Human Rights.

We are committed to supporting equitable remuneration and oppose unethical practices, such as child labor, forced labor and human trafficking. We recognize that human rights due diligence is a continuous process and we have policies and procedures in place in furtherance of this commitment.

International Trade Compliance

Many laws govern trade across borders, including those designed to ensure that transactions are not being used

for money laundering or do not involve sanctioned countries or persons. We are committed to preventing money laundering, the financing of terrorism, and other criminal activities, and takes appropriate actions to comply with applicable anti-money laundering laws.

Insider Trading

During the course of employment with the company, employees may become aware of information that is not yet publicly available but could influence the decision to buy or sell stock. This type of information is often referred to as "material non-public information." Such information includes financial results and information about possible mergers, acquisitions or divestitures, capital increases, capital market transactions, important licensing agreements and other collaborations, losing or gaining major contracts, results from major clinical trials, and ongoing litigation. At the level of law and company policy, we prohibit insiders of securities transactions and persons who illegally obtain insider information from using insider information to engage in securities trading activities.

Non-Retaliation Policy

We encourage employees to report any violations of applicable law or regulations, and to voice concerns regarding the Code or any other company policies, procedures, guidelines, data and recordkeeping, and ethical or legal questions. Every effort will be made to maintain the confidentiality of reports about potential violations. Concerns about a potential ethics or compliance violation will be taken seriously by Aier Eye management.