

Anti- Bribery and Anti-Corruption Policy

Zylox-Tonbridge Medical Technology Co., Ltd. (the "Company", together with its branches and subsidiaries collectively referred to as "Zylox-Tonbridge") is committed to ethical business practices and compliance with all applicable regulations. As a listed company on the Hong Kong Stock Exchange, we ensure transparency in all business interactions and adhere to the highest standards of ethical conduct. To this end, we have established this Anti- Bribery and Anti-Corruption Policy (the "Policy") to ensure that Zylox-Tonbridge's managers, employees, suppliers and partners understand and comply with the legal and ethical standards governing the Company's business activities.

I. Policy Statement: Zylox-Tonbridge prohibits all forms of direct or indirect bribery and corrupt practices. This prohibition applies to all managers, employees, suppliers and partners. This policy governs all business activities of Zylox-Tonbridge, whether conducted within or outside P.R. China, and applies to all interactions with government officials, customers, suppliers, partners, and other manufacturers. This policy is applicable in conjunction with Zylox-Tonbridge's management rules, including the "Reporting Procedures", "Anti-Corruption and Anti-Bribery Rules", "Anti-Fraud Management Rules V2.0", as well as the "Criminal Law", the "Anti-Unfair Competition Law", the "Provisional Regulations on the Prohibition of Commercial Bribery", and other laws, regulations and judicial interpretations of the People's Republic of China.

II. Prohibited Conduct: Zylox-Tonbridge strictly prohibits all forms of bribery and corruption. Bribery refers to the direct or indirect provision, offering, giving, soliciting, or accepting of valuable items and interests—whether in cash or kind—to any individual, whether publicly or privately, with the intent to secure commercial, governmental, or manufacturer advantages for Zylox-Tonbridge. Such valuable items and interests include but not limited to gifts, favors, cash payments, commissions, or other financial advantages.

III. Due Diligence: Zylox-Tonbridge undertakes to conduct due diligence on its business partners, suppliers, customers and other third parties, including but not limited to: anti-bribery and anti-corruption behavior review, industry reputation assessment and compliance verification.

IV. Gifts and Hospitality: While gift-giving and hospitality may be normal and acceptable in business practices, such activities can also serve as means of bribery and corruption.

Zylox-Tonbridge prohibits the following gifts: ① house renovation services; ② cash, prepaid membership cards, gift cards, or gift vouchers; ③ travel expense payments; ④ bank cards with existing credit limits; ⑤ selling goods at unreasonably low prices; ⑥ transferring or granting of equity without appropriate consideration; ⑦ payments disguised as gambling losses; ⑧ bribery to family members of government officials; and ⑨ any gifts that may influence public officials' performance of their duties (regardless of value).

Zylox-Tonbridge prohibits employees from accepting benefits from business partners, suppliers, clients or other third parties, except for small gifts from business partners for the sake of politeness and relationship building at the appropriate time. All employees should avoid social engagements with these parties or accept overly intimate or extravagant hospitality.

V. Bribery and Collusion Fees: Zylox-Tonbridge strictly prohibits the use of bribery or collusion fees to influence the conduct of government officials or cooperating manufacturers. Bribery refers to small payments made to government officials or other entities to expedite or ensure the implementation of routine governmental procedures. Collusion fees encompass any monetary payments intended to influence the actions or decisions of government officials or manufacturers. Such practices are categorically unacceptable to Zylox-Tonbridge.

VI. Reporting: "Reporting Procedures" of Zylox-Tonbridge ensure that any reporters reporting potential misconduct or policy violations are protected from retaliation and discrimination. Employees, suppliers, and partners may report suspected or actual policy violations to the reporting department and HR department through mail, email, phone calls, or in-person submissions. Zylox-Tonbridge will immediately investigate any suspected violations and take appropriate disciplinary actions against managers, employees, suppliers, or partners who breach these policies.

VII. Compliance: The managers, employees, suppliers or partners of Zylox-Tonbridge shall comply with this policy. If there is any question about this policy, you may seek explanation from the department head or the legal department of Zylox-Tonbridge. Non-compliance with this policy may result in disciplinary action or even dismissal.

VIII. Training: Zylox-Tonbridge will provide regular training and guidance on this policy according to the specific title and responsibilities, so that they can fully understand the company's policies on honest operation, anti-bribery and anti-corruption, as well as the possible consequences and risks caused by violating the policies.

IX. Audit: All systems, processes, policies and controls implemented to implement this policy must be subject to regular audits to assess their effectiveness and timeliness. All managers, employees, suppliers or partners must cooperate with internal and external auditors and respond honestly during the audit.

X. Review and Updates: This policy will be periodically reviewed and updated to ensure compliance with applicable laws, regulations, and industry standards. The policy will be reviewed and updated as necessary to maintain its alignment with Zylox-Tonbridge's commitment to developing its business in an honest and ethical manner. Additionally, Zylox-Tonbridge will continuously monitor policy compliance and take appropriate action if any violations are identified.