



a member of



a Singapore-incorporated company

# CODE OF CONDUCT

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## PART I: INTRODUCTION

### 1.0 Purpose and Scope Of The Code

MiCare HealthTech Holdings (Pte. Ltd.) and its subsidiaries (collectively “**MiCare**”) are committed to acting professionally, fairly and with integrity in all our business dealings and in the discharge of our business relationships, wherever we operate.

We operate in various cultural, political, and economic environments. There are a number of pressures that push us to excel. While meeting goals and expectations are very important, they must always be accomplished within our values framework.

This Code of Conduct (hereinafter referred to as the “**Code**”) reflects our commitment to being a good corporate citizen and conducting our business affairs in an ethical manner. This commitment cannot be achieved unless each of you individually accepts responsibility to promote honesty and integrity. Any activity that calls into question our reputation must be avoided. This Code establishes what we expect from you.

We cannot anticipate every situation that may create an ethical issue and understand that not every situation is black and white. The key to compliance with the Code is exercising good judgment. This means following the spirit of this Code and the law, doing the “right” thing and acting ethically when the law is not specific.

In our mission to “**Make Quality Healthcare More Affordable and Accessible**”, it is important to remember the core values that provide a foundation for the way we do business: Care, Agility, Reliable, and Entrepreneurial. Built upon unwavering integrity, trust is the essence of our history. We must uphold our integrity and trust placed in us in all actions we take.

This Code outlines the broad principles of legal and ethical business conduct under which we do business. The Code may be supplemented, but not replaced, by more detailed policies and procedures. Every person who represents MiCare, is expected to understand and comply with the provisions of this Code.

MiCare reserves the right to amend or delete any provision in this Policy as and when it deems necessary.

### 2.0 Applicability

This Code applies to all members of the Board of Directors (executive and non-executive) and employees of MiCare, including full-time, part-time, contract and temporary employees (collectively, “**Employee**”). It applies while working on our premises, at offsite locations where our business is being conducted, at any MiCare-sponsored business and social events or at any other place where you are a representative of the MiCare. All Employee are required to strictly adhere to the provisions of this Code in the course of their employment or engagement with MiCare.

*It Is Everybody’s Responsibility To:*

- Understand this Code.
- Conduct all business in compliance with applicable laws and regulations and policies, including this Code.
- Take breaches of the law or this Code seriously and always report them.
- Avoid compromising our integrity to achieve goals.

- Ask questions or seek guidance from your managers when in doubt.

### *Reporting Violations*

Violations of this Code, including failures to report potential violations, will not be tolerated and will be viewed as a disciplinary matter that may result in action, including termination of employment and referral for criminal prosecution.

If you believe a violation of this Code has occurred or you have become aware of conduct that may be contrary to the Code, always try to discuss this first with your manager. Your manager has an obligation to escalate it. If the violation involves your manager and you do not feel comfortable discussing it with your manager, then you can contact your manager's supervisor, your HR, your Compliance Officer, the Country Manager or go directly to the VP, Legal and Compliance.

No retaliation will be taken against anyone who reports an alleged violation of any law or policy, including this Code, in good faith. Anyone who retaliates may be subject to civil, criminal, and administrative penalties as well as disciplinary action, up to and including termination of employment. Remember, you have the option to use the Speak Up Channel which is available on the MiCare HealthTech Holdings (Pte. Ltd.) website, or you may send an anonymous email to [speakup@micarehealthtech.com](mailto:speakup@micarehealthtech.com).

### *If you have any questions concerning this Code*

You should talk to your manager first. However, if you do not feel comfortable talking to your manager, you may also talk to your manager's supervisor, your Compliance Officer, your HR, your General Manager or VP, Legal and Compliance.

Note: Your HR may provide you with a translated copy of this Code. However, please note that the English version prevails.

## **3.0 Definitions**

All references to "you" in this Policy refer to any person to whom this Policy applies. Where more specific references are used (such as "**Employee**"), the more specific reference is intended.

The term MiCare shall mean MiCare HealthTech Holdings (Pte. Ltd.) and its subsidiaries.

## **PART II: CODE OF CONDUCT**

### **Section A: Workplace Conduct and Environment**

This Code sets out how we maintain our moral obligation to treat people with dignity. By creating a positive workplace, we will be able to hire and retain good employees and have a productive workforce.

Our Employees are required to create and maintain a working environment that reflects MiCare's core values. All Employees must treat each other with respect, honesty, openness and trust. Respect also means valuing each other's differences and opinions and not treating others in a harassing or threatening manner.

## Discrimination & Harassment

Never discriminate based on race, religion, gender, sexual orientation, age, nationality, disability or marital status. Everyone has a responsibility to ensure that unlawful discrimination and harassment, including sexual harassment, are not tolerated in our workplace nor part of any employment-related decisions, such as:

- Recruitment
- Training
- Hiring
- Disciplining
- Compensation
- Promotion

If you have any questions about discrimination or harassment, please contact your manager or HR.

## Workplace Safety

We are committed to providing a safe and clean environment so that everyone can conduct business in an efficient and productive manner.

Employee's safety is a top priority and we work diligently to protect the health and safety of our workforce by ensuring effective training and protective measures are in place. Everybody is required to enforce and support our safety policies.

## Drug Use and Alcohol

Using, selling, possessing or working under the influence of illegal drugs or alcohol is prohibited as Employees are expected to perform their job duties free from the influence of any substance that could impair job performance or pose unacceptable safety risk to the Employees or others.

There may be company-sponsored events or functions where the serving of alcoholic beverages is permitted. In these cases, all appropriate liquor laws must be followed.

## Employee's Privacy

We should always respect our colleagues' property and personal information. Access to Employee's personal information or property is only authorised for appropriate personnel with legitimate reasons to access such information or property.

## Section B: Group Information, Record and Assets

### Integrity & Accuracy of Records/Transaction

Employees should ensure that accurate and complete records of our business, operations, dealings, and transactions are kept and maintained in such a form and for such a period as determined by relevant regulations and internal policies.

Entries should never be made and entries should not be allowed to be made for any account, record or document that are false or would obscure the true nature of the transactions as well as to mislead the true authorisation limits or approval by the relevant authority of such transactions. Similarly, any alteration or deletion to records must be properly authorised by the appropriate authority and any removal of records must be properly documented.

Employees must ensure that MiCare's information and records are not copied by unauthorized persons and Employees should report to their superior immediately upon discovery of any unauthorised copying, entries, deletions, or alterations in any of the records.

All records and computer files or programmes owned by the MiCare, including customer files, financial statements, and customer information, must be accessed and used only for the management and client approved purposes for which they were originally intended.

### Public Disclosures

Our public image is key to building trust with our employees, authorities, clients, customers, other stakeholders, and the public. To ensure we maintain this trust, everyone needs to protect MiCare's public image. It is therefore important that our public communications are carefully managed.

You are not authorized to speak on behalf of MiCare in public. In addition, you are not allowed to publicly comment on MiCare or issues related to our business without pre-approval from Corporate Communications.

*This restriction applies to:*

- Commenting in blogs, chatrooms or in social networking sites
- Making comments in an open forum
- Speaking with media or journalists

We have no desire to interfere with your social networking activities. However, where such activities adversely affect your job performance or job performance of other employees or MiCare's business interests and reputation, MiCare reserves the right to take appropriate action to protect MiCare's reputation and interests.

Be aware that social media sites are increasingly monitored by clients, colleagues, customers and regulators alike.

### Misuse of Information

Employees should not copy, remove or make use of any information obtained in the course of business for the direct or indirect benefit of themselves or of any other persons.

Employees in possession of confidential information should not use it in the following ways for the benefit of themselves or any other persons:-

- a. To influence any customer or any third party in dealing in any transaction; or
- b. To communicate such information to any customer.

The above prohibitions relating to the misuse of information continue unconditionally after an employee cease to be working for or being employed by MiCare.

Employees in a separate division, department, branch or subsidiary should not retrieve or obtain information from another division, department, branch or subsidiary unless the information so received is necessary in their normal course of work. Any transmission or transfer of information among the divisions, departments, branches or subsidiaries should be properly authorised.

Employees shall not deal in securities of any company listed or pending listing on a stock exchange at any time when he is in possession of information, obtained as a result of his employment by, or his connection with a company which is not generally available to shareholders of that company and the public, and which, if it was so available, would likely bring about a material change in the market price of shares or other securities of the company concerned.

### Insider Information

Employees who possess insider information is also prohibited from influencing any other person to deal in the securities concerned or communicating such information to any other person, including other employees who do not require such information in the normal course of their duty.

### Protecting Confidential Information

Confidential information is vital to our business and third-party relationships. This Code provides guidance on what it is and ways to protect it.

Confidential information are information about the MiCare that is not generally known or reasonably ascertainable. It often has commercial value for our business and provides an advantage over our competitors.

#### *Examples of Confidential Information*

- Strategies
- Budgets
- Business Processes & Information Systems
- Intellectual Property
- Trade & Price Discounts
- Policies & Procedures
- Contractual Terms & Other Commercial Information
- Distribution Margins
- Trade Secrets & Service
- Sales Data
- Credit Terms & Payment/Collections Methods
- Pricing & Costing Information
- Marketing Information
- Employee Salaries & Compensation
- Sensitive

All Employees are responsible for making sure adequate safeguards are in place to prevent the unauthorised disclosure or loss of confidential information.

We must protect confidential information we receive from third parties in the same way as we protect our own information – as it is sensitive and not for general dissemination.

Contact your manager concerning any confidentiality breaches or if you have any questions about handling confidential information.

### Privacy of Personal/Sensitive Information

We have clear responsibilities to protect and preserve the privacy and confidentiality of Personal Information gathered from patients, healthcare providers (“HCP”), clients, customers and employees. The highest standards of integrity must be applied when handling personal Information.

We and our business partners are all accountable for protecting Personal Information and for processing it only within the boundaries of applicable laws and MiCare policies and procedures.

### *What Is Personal Information?*

Personal Information (sometimes referred to as personally identifiable information) is information that is about, or can be related to, an identifiable individual. Some examples of Personal Information:

- Name
- Date of birth
- Telephone number
- Home or email address
- Passport or ID card number
- Gender
- Medical history
- Prescription history
- Physician notations
- Genetic information
- Purchase history
- Bank account details
- Marital status
- Racial or ethnic origin
- Religious beliefs
- Offences or criminal convictions

### **Safeguarding Property**

Protecting MiCare's property and assets under our care is a key fiduciary responsibility of every Employee, agent and sub-contractor.

Everybody is responsible for the proper use of MiCare's property and assets, both tangible and intangible, and should use them only for legitimate business purposes. Tangible properties include, but are not limited to, equipment, hardware systems, etc. Intangible property includes, but is not limited to, software supporting advanced warehouse systems, order fulfilment systems, emails, trade secrets, copyrights and trademarks, policies and procedures, etc. Everybody must also safeguard MiCare property against loss, damage, misuse or theft.

Unauthorized alteration, destruction, use, disclosure, or distribution of MiCare property is a violation of this Code.

### **Financial Reporting and Records**

MiCare must have sound financial records and statements in order for management to make informed decisions and to meet the reporting and disclosure requirements of certain stakeholders. We require that all transactions be properly recorded in accordance with our relevant accounting policies and all applicable local laws and regulations.

Employees must maintain records that are accurate, honest and represent the facts. You must never provide or enter information in our books or records that intentionally misleads, misrepresents, misinforms, omits, or disguises the true nature of any transaction or result.

You are also expected to fully cooperate with independent and internal auditors and should immediately report any suspected violations or concerns to your manager.

## Section C: Duties Of Good Faith, Diligence and Integrity

### Gifts, Hospitality and Other Benefits

In order to maintain our ethical standards and meet our obligations relating to anti-corruption and anti-bribery laws, Employees must ensure that gifts, hospitality and other benefits are not given or received to inappropriately influence our interactions with third parties. You must never give or request anything of value which might influence (or even appear to influence) the bona fide business relationship between you and another party.

Corruption is illegal and subject to criminal penalties. You must not give any bribes, kickbacks or other benefits to any person or company to attract or retain business.

These guidelines apply to both commercial, government and state-owned enterprise relationships. Relationships with governments always require special consideration and care, so ensure that you understand your responsibilities and local laws and regulations.

Fees, commissions and other amounts paid to outside consultants, agents or other third parties must never be used with the intent to circumvent this Code and our Anti Bribery and Anti Corruption Policy.

Contact your Manager or Compliance Officer, the VP, Legal and Compliance if you have any questions or concerns about a gift, hospitality or other benefits, or this Code.

### Competing Fairly

There are serious consequences for breaching competition laws, as well as damage to our reputation if we compete for business unfairly. It is essential that everyone understands how to behave when conducting our business.

Competition laws prohibit business practices that interfere with free and open competition and it can involve competitors, suppliers or clients. We are committed to obeying both the letter and spirit of these laws. We always will lawfully compete in the marketplace and our commitment extends to the rights of our competitors, our customers and the community.

These laws are complex and vary considerably from country to country. If you have any questions, you should always ask your manager and VP, Legal and Compliance.

### Interaction with Healthcare Providers

We are committed to respecting the independent judgement of HCPs. Under no circumstances should we improperly influence HCP's prescribing practices or decisions. Employees and representatives may not provide anything of value, including a payment, gift, hospitality, sponsorship or other benefits to an HCP to inappropriately induce the HCP to approve, prescribe, recommend, promote, purchase, supply and/or administer any medical products or services.

All value exchanges, including meals, hospitality, travel, accommodation, and service fees, between us and an HCP must be documented and in accordance with our policies.

It is therefore important to MiCare that our Employees, especially those that have interactions with HCPs in their operations, understand the importance of acting with integrity and honesty in our relationships with HCPs. All interactions with HCPs must comply with this Code as well as our policies on Anti-Corruption and Anti-Bribery Policy.

## Client, Customer and Other Key Relationships

It is important that everybody understands the importance of acting appropriately with clients, customers and other stakeholders.

In the event your job puts you in contact with any clients, customers (or potential customers) or other stakeholders, it is critical for you to remember that you represent MiCare and its values. Act in a manner that always creates value and helps to build relationships based on trust. We have been providing our services for many years and have built-up significant goodwill over that time. This is one of our most important assets and you are expected to preserve and enhance our reputation.

Clients, customers and other stakeholders are critical to our future. To create an environment where they have an incentive to work with us, they must be confident that they will be treated lawfully and in an ethical manner.

## Environment

We believe we have an ethical responsibility to protect the environment and comply with environmental laws and regulations. It is important for us to reinforce that commitment in this Code.

We are committed to the protection of the environment as part of every decision we make. Responsible environmental actions are not only important to our clients, customers, and other key stakeholders, it is the right thing to do. Our goal is to avoid any situation that may lead to unacceptable environmental or health hazards for employees, the public or the environment in general.

## Political and Charitable Contributions

To ensure we provide value, invest effectively, and do not make political or charitable contributions to gain improper advantages, this Code provides guidance on how these types of contributions should be made. MiCare is committed to making a positive contribution in the communities where we do business. It can be very rewarding to participate in the civic life of your community, and we encourage you to do so. As part of that commitment, we maintain a corporate philanthropy program to support organizations and activities in those communities. We do not, however, support political candidates or parties, religious or fraternal organizations.

## Conflicts of Interest

You are expected to avoid situations that may conflict with the interests of MiCare. A conflict of interest can occur when your personal interests interfere in any way or even appear to interfere, with the interest of MiCare. In other words, you must not take advantage of your employment with MiCare for personal gain or take any actions or have any interests that make it difficult for you to perform your work objectively and effectively, or that interfere with your judgment in the course of your job.

If you think you may have a conflict, actual or potential, you must always discuss the details with your manager. Remember to always report a potential conflict of interest to your manager or HR and get any necessary approvals. We will work together with you to address the conflict and your concerns.

## Government Relationships

During the course of our business, our employees may come into contact with various government and regulatory agencies and state-owned enterprises. We value our relationships

with the relevant government agencies and will work fairly and honestly with them. Dealing with government agencies always requires special consideration and care — particularly when you are giving or receiving gifts and hospitality.

Therefore, you are required to understand what you can or cannot do under the Gifts, Hospitality & Other Benefits section of this Code. You must never make any payment or provide any other thing of value (including gifts, hospitality, or promises or offers to provide anything of value) directly or indirectly to a government official for the purpose of obtaining or retaining business or securing any improper advantage. Please refer to MiCare's Anti Bribery and Anti-Corruption Policy for more information.

### Money Laundering

Money laundering is a process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.

Employees should always ensure that they are conducting business with reputable customers, for legitimate business purposes and with legitimate funds. Employees need to be mindful of the risk of MiCare's business being used for money laundering activities and if they suspect money laundering activities, they should report it to their respective Manager or the relevant person designated by MiCare.

### Whistleblower

We have put in place a MiCare-wide Whistleblower Policy to uphold the highest standards of professionalism, integrity and ethical behaviour in the conduct of its business and operations.

The policy sets out procedures which enables Employees and members of the public to raise genuine concerns regarding actual or suspected unethical, unlawful, illegal, wrongful or other improper conduct and also sets out the process for managing any action, intimidation or harassment against a whistleblower.

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This Code of Conduct has been reviewed and approved by MiCare Healthtech Holdings (Pte. Ltd.) Management.