

Asia OneHealthcare Group Code of Conduct and Business Ethics (CP/Eth/04; v1.1)

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1. Introduction

- 1.1 Asia OneHealthcare Bhd and its subsidiaries ("**Group**", "**we**", "**us**" or "**our**") are committed to conducting business with integrity, professionalism and accountability.
- 1.2 As a healthcare group, we have responsibilities to our patients, employees, doctors, shareholders, business partners and the communities we serve.
- 1.3 This Group Code of Conduct and Business Ethics ("**Code**") sets out the standards of conduct expected from all persons who work for, represent or have dealings with the Group. In this Code, "**you**" refers to all Directors, Employees and, where applicable, Counterparts, Business Partners and other persons who represent or have dealings with the Group.
- 1.4 This Code may not cover every possible situation. When in doubt, you should apply good judgment and seek guidance.

2. Scope

2.1 This Code applies to:

- (a) all Directors and Employees of the Group;
- (b) secondees, temporary staff, interns and contract staff;
- (c) independent medical specialists, consultants, agents, contractors, suppliers and service providers when dealing with or representing the Group; and
- (d) Business Partners and joint venture partners, where applicable.

2.2 The Group expects its Business Partners to adopt standards that are consistent with this Code.

2.3 For avoidance of doubt, this Code is not intended to restrict or affect any person's legal rights as a shareholder of any company within the Group. Where a shareholder also acts as a Director, Employee, consultant, independent medical specialist, service provider, Business Partner or representative of the Group, this Code applies to that person when acting in that relevant capacity. Shareholder rights should be exercised in accordance with applicable laws, the relevant company's constitutional documents, shareholders' arrangements and governance requirements, where applicable.

2.4 This Code applies in all countries where the Group operates. You must comply with this Code, Group policies, applicable laws and regulatory requirements. Where there is any conflict or inconsistency between them, the stricter requirement will apply, to the extent permitted by applicable law.

3. Key Definitions

Term	Meaning
Board	The board of directors of the relevant Group company.
Business Partner	Any party with which the Group has a commercial or business relationship, including customers, corporate clients, joint venture partners, business alliance partners and community general practitioners.
Confidential Information	Non-public information relating to the Group, its business, patients, employees, doctors, suppliers, customers, Business Partners, operations, finances, transactions, systems, intellectual property, records, contracts or affairs.
Conflict of Interest	A situation where personal, family, financial, business or other interests may affect, or appear to affect, a person's objectivity, judgment or duties to the Group.
Counterpart	Any party dealing directly with the Group, including consultants, agents, contractors, suppliers, service providers, independent medical specialists and other representatives.

Director	A person appointed to the board of the Group or any of its subsidiaries, including alternate or substitute directors and executive or non-executive directors.
Employee	All employees of the Group, including senior management, managers, executives, doctors employed by the Group, non-executives, secondees, temporary staff and interns.
Family Member	Includes spouse, parent, child, adopted child, stepchild, sibling, and the spouse of a child or sibling.
Government Official	Officers, employees or representatives of any government, public body, statutory body, regulator, state-owned entity, political party, public international organisation, or candidate for political office.
Group	Asia OneHealthcare Berhad and its subsidiaries.
Personal Data	Any information relating to an identified or identifiable individual, including sensitive personal data and patient information.
Whistleblowing Channel	The reporting channel established by the Group for reporting concerns or suspected misconduct.

4. Our Vision, Mission and Core Values

- 4.1 The Group's conduct is guided by its vision, mission and core values, which reflect our commitment to healthcare, ethical business conduct, patient care, teamwork, integrity and community responsibility.

The Group's vision, mission and core values set out in this Code represent the overarching principles applicable across the Group. Hospitals within the Group may maintain their own vision, mission or core values to reflect their local operations provided that these do not conflict with the Group's vision, mission and core values in this Code.

4.2 Vision

To Provide the Best Care Possible.

Providing the best possible care with our approach to offer excellence in healthcare, using the best expertise, care and support.

4.3 Mission

To deliver the best outcomes in the most accessible, effective, efficient and caring environment.

Offering a customer-first integrated, unifying approach for best possible medical outcomes.

4.4 Core Values

Customer First — Anticipating customer needs and exceeding their expectations.

Integrity — Honesty and a commitment to always doing the right thing.

Excellence — Delivering the highest standard of patient care.

Caring — Nurturing a culture of caring for our patients, their families and each other.

Teamwork — Working together with mutual respect towards a common goal.

Community — Sharing and being involved in the life of the communities we serve.

5. Responsibility for Compliance

- 5.1 You must understand and comply with this Code, Group policies and all local and national laws and regulations.
- 5.2 Leaders and managers must lead by example, promote ethical conduct, guide their teams and encourage employees to speak up.
- 5.3 A breach of this Code may result in disciplinary action, termination, dismissal, reporting to authorities, legal action or blacklisting by the Group, where applicable.

6. Respectful and Safe Workplace

- 6.1 The Group is committed to providing a respectful, safe, inclusive and professional workplace.
- 6.2 Discrimination, harassment and any form of bullying based on race, gender, religion, ethnicity, sexual orientations, disability or any other characteristics are prohibited.
- 6.3 You must:
 - (a) treat colleagues, patients, doctors, suppliers, customers and stakeholders with respect and dignity;
 - (b) avoid harassment, bullying, intimidation, discrimination, violence or threats;
 - (c) comply with health, safety and environmental requirements;
 - (d) report unsafe conditions, accidents, incidents and hazards promptly; and
 - (e) not engage in criminal conduct, fraud, dishonesty or other misconduct that may harm the Group.
- 6.4 Employment decisions should be based on merit, qualifications, performance and business needs, and must comply with applicable laws.

7. Human Rights

- 7.1 The Group respects fundamental human rights and fair labour practices.
- 7.2 We strictly prohibit any form of forced labour, bonded labour, slavery, human trafficking, child labour or any form of exploitation.

- 7.3 We are committed to fair working conditions, workplace safety, protection of vulnerable persons and children, and working with Business Partners who uphold similar standards.

8. Personal Data and Confidentiality

- 8.1 The Group respects the privacy and confidentiality of personal data, including patient, employee, doctor, customer and Business Partner information.
- 8.2 You must:
- (a) collect, use, disclose, store and retain personal data only for legitimate and authorised purposes;
 - (b) comply with applicable data protection laws and Group policies;
 - (c) protect personal data and confidential information from unauthorised access, loss, misuse or disclosure;
 - (d) report any data breach promptly; and
 - (e) take particular care when handling patient records, medical information, confidential information and other sensitive data.
 - (f) comply with records management, retention and disposal requirements.
- 8.3 Confidentiality obligations continue even after your employment, appointment or relationship with the Group ends.

9. Conflicts of Interest

- 9.1 You must act in the best interest of the Group and avoid conflicts of interest.
- 9.2 A conflict may arise where your personal, family, financial or business interest could affect your objectivity or decision-making.
- 9.3 Where a situation may reasonably give rise to an actual, potential or perceived conflict of interest, you must disclose it in writing in accordance with Group procedures.
- 9.4 Directors must disclose conflicts to the Board and comply with applicable laws, listing requirements and governance procedures.

10. Anti-Bribery and Anti-Corruption

- 10.1 The Group adopts a zero-tolerance approach to bribery and corruption.
- 10.2 You are strictly prohibited from directly or indirectly offering, giving, soliciting or accepting bribes to obtain any business or personal advantage for yourself or others.

- 10.3 You must comply with all applicable anti-bribery and anti-corruption laws in all countries which the Group operates, Group Anti-Bribery and Anti-Corruption Policy and applicable procedures relating to gifts, sponsorship, donation, hospitality and entertainment.

11. Gifts, Entertainment, Hospitality and Travel

- 11.1 Gifts, entertainment, hospitality and travel must not be used to improperly influence decisions or obtain an improper advantage.
- 11.2 You must not offer or accept gifts, entertainment, hospitality, travel or accommodation that is lavish, intended to influence a decision or likely to damage the Group's reputation.
- 11.3 Cash or cash-equivalent benefits are subject to strict restrictions and must not be offered or accepted unless expressly permitted under applicable procedures, approved where required, and properly recorded.

12. Donations and Sponsorships

- 12.1 Donations and sponsorships may be made or accepted only for legitimate, lawful and proper purposes, including appropriate community, educational, healthcare-related or professional purposes, and must not be used to obtain an improper advantage, improperly influence decisions, or in a manner likely to damage the Group's reputation.
- 12.2 Employees are encouraged to be socially responsible however you are not permitted to contribute the Group's funds, information, facilities, equipment or any form of the Group's resources to any political candidates, party, charity, or similar organizations or use the same for the purpose of any political or charitable activities or functions,
- 12.3 All donations and sponsorships must be properly assessed, approved in accordance with Group policy, and accurately recorded.

13. Protecting Group Assets

- 13.1 You must protect the Group's assets from loss, damage, misuse, theft, fraud and waste.
- 13.2 Group assets include company information, property, funds, equipment, systems, documents, intellectual property and business opportunities.
- 13.3 You must:
 - (a) Keep confidential all information reasonably considered to be confidential and should refrain from discussing confidential Group business with outsiders and

with anyone else who does not have legitimate need to know the information.
All outside enquiries regarding the Group should be referred to persons in the Group authorized to respond to the particular inquiry

- (b) use Group assets responsibly and for authorised purposes;
- (c) ensure records, claims, invoices, payments and reports are accurate and properly supported;
- (d) use Group IT systems responsibly and securely.

14. Insider Information and Public Disclosure

14.1 The Group must ensure timely, accurate and fair disclosure of material information.

14.2 You must not:

- (a) deal or trade, procure others to deal or trade, or provide information to others to deal or trade in the securities of the Group (where applicable) or any other company while in possession of material non-public information;
- (b) share insider information with family members, friends or any unauthorised person; or
- (c) make public statements on behalf of the Group unless authorised.

14.3 All business and public communications must be accurate and not misleading.

15. Social Media

15.1 You must use social media responsibly.

15.2 You must not post or share content that:

- (a) discloses confidential information or personal data;
- (b) identifies patients or patient information without proper authorisation;
- (c) damages the Group's reputation;
- (d) is discriminatory, offensive or misleading; or
- (e) gives the impression that you are speaking on behalf of the Group without authority.

16. Dealing with Business Partners, Customers and Patients

16.1 The Group deals with suppliers, contractors, service providers, customers, patients, doctors and Business Partners fairly, honestly and ethically.

16.2 You must:

- (a) select suppliers and service providers based on objective criteria such as price, quality, service, capability and compliance;

- (b) ensure payments are properly approved;
- (c) provide accurate information about the Group's services;
- (d) treat customers and patients with honesty, care and respect; and
- (e) ensure that arrangements and dealings with doctors and healthcare professionals are conducted in accordance with law.

17. Fair Competition

17.1 The Group is committed to fair and ethical competition.

17.2 You must not engage in anti-competitive conduct, including:

- (a) price fixing;
- (b) bid rigging;
- (c) market sharing;
- (d) exchanging competitively sensitive information with competitors;
- (e) restricting customers, suppliers or territories; or
- (f) using illegal or unethical methods to exclude competitors.

18. Regulators, Government Authorities and Political Activities

18.1 You must deal with regulators, government agencies and public authorities honestly, professionally and respectfully.

18.2 Any inspection, investigation, raid, inquiry, notice or request from a regulator or government agency must be handled in accordance with Group procedures.

18.3 You may participate in political activities in your personal capacity, on your own time and using your own resources. You must make it clear that your political views are personal and do not represent the Group.

18.4 Group funds, assets or resources must not be used for political contributions unless permitted by law and approved by the Board.

19. Anti-Money Laundering and Sanctions

19.1 The Group prohibits money laundering, terrorism financing and dealings involving proceeds of crime.

19.2 You must be alert to suspicious transactions, including:

- (a) cash payments outside normal business practice;
- (b) payments by or to unrelated third parties;
- (c) attempts to avoid approval processes.

Where relevant to your role, you must also comply with applicable sanctions, import and export control laws, Group Anti Money Laundering, Countering Financing of Terrorism and Countering Proliferation Financing Policy and Group procedures.

20. Environment and Sustainability

- 20.1 The Group is committed to environmental, social and governance sustainability in its business activities and operations, and all Employees are required to uphold and promote sustainable practices in their work and conduct.

21. Risk Management

- 21.1 The Group is committed to managing clinical, financial, legal, regulatory and reputational risks.
- 21.2 You must understand and follow applicable procedures and report incidents promptly.

22. Speaking Up and Reporting Concerns

- 22.1 The Group encourages good-faith reporting of concerns or suspected breaches of this Code, Group policies or applicable laws. Concerns may be raised through the appropriate reporting channels in accordance with the Group's Whistleblowing Policy and Procedures and applicable procedures.

23. Guidance and Administration of the Code

- 23.1 If you are unsure about the application of this Code or the appropriate course of action in a particular situation, you should seek guidance before acting.
- 23.2 This Code is administered by Group Legal & Compliance, Group Human Resources and the relevant quality and assurance functions across the Group.
- 23.3 This Code may be amended from time to time. The Group may issue more detailed policies, procedures or guidelines to support this Code.