

Sunway Medical Centre Sdn Bhd

Code of Conduct & Business Ethics

1. INTRODUCTION

Sunway Medical Centre Sdn Bhd (hereinafter referred to as “SMC” or the “Company”) Code of Conduct and Business Ethics (the “Code”) provides the ethical framework to guide actions and behaviors of all Directors and Employees of the Company while at work.

This Code reflects the increasing need for effective corporate governance compliance measures in the conduct of the Company’s business domestically and worldwide. It emphasizes and advances the principles of discipline, good conduct, professionalism, loyalty, integrity and cohesiveness that are critical to the success and well-being of the Company.

2. OBJECTIVE

The objective of the Code is to provide guidance on the standards of behavior expected of all Directors and Employees of the Company, and where applicable, Counterparts and Business Partners. The standards of behavior are derived from the Company’s Core Values and Business Principles. For all intent and purposes, all Directors and Employees shall always observe and ensure compliance with all applicable laws and regulations to which they are bound to observe in the discharge of their duties.

3. SCOPE

The Code is applicable to Directors and Employees (including full time, probationary, contract and temporary staff) (“Employees”) of the Company. Each Employee has a duty to read and understand the Code. Violation of any of the Code’s provisions can result in disciplinary action, including termination of employment. The Code applies to all businesses and countries in which the Company operates.

4. CORE SECTIONS OF CONDUCT

A. Act with Integrity & Ethics

i. Avoid Conflict of Interest

A conflict between your personal interests and the interests of the Company is a conflict of interest. All of us must avoid such conflicts and situations that may be perceived as creating a conflict of interest that may influence our judgment in the discharge of responsibilities. Directors and Employees must not use their positions or knowledge gained directly or indirectly in the course of their duties or employment for private or personal advantage (directly or indirectly).

ii. Corrupt Practices are Strictly Prohibited

Corrupt practices are operationally defined as the misuse of entrusted power for private gain. Directors and employees must comply strictly all provisions of the Malaysian Anti-Corruption Commission Act (MACC) 2009 accordingly.

iii. Acceptance and Provision of Gifts and Entertainment

It is important not to accept or provide inappropriate gifts or entertainment as it may create conflict of interest and influence business decisions. Generally, acceptance of inexpensive “token” non-cash gifts which are occasional, customary gifts during festive or special occasions and gifts from social events attended by the Directors or Employees is permissible. In addition, infrequent and moderate business meals and entertainment with clients and infrequent invitations to attend local social events and celebratory meals with clients can be appropriate aspects of promoting good business relationships, provided that they are not excessive and do not create the appearance of impropriety.

If in doubt, before accepting any gifts or courtesy, please consult with your respective Head of Department and/or Business Unit Head for advice and approval relating to acceptance of gifts and/or entertainment.

iv. Solicitation of Sponsorship

SMC discourages its employees, whether directly or indirectly, from soliciting, accepting or agreeing to accept, from any party any form of

sponsorship or gifts and hospitality from business partners. Sponsorship gifts and hospitality may be in the form of cash or cash equivalent, personal services, loans, events or meals where the business partner is absent or during periods when important business decisions are being made. Sponsorship gifts and hospitality must never influence your business decisions and must not place you or SMC under any obligation.

v. Insider Trading

Do not buy or sell and do not recommend and suggest anyone else to buy or sell the securities of any company in the Sunway Group of Companies either directly or indirectly when you are aware of insider information about the Group, for personal benefit. A violation of this policy can result in civil and criminal penalties. Please refer to the Company's existing policy on Insider Trading for appropriate guidance and compliance.

vi. Fraud

Employee must not engage in any forms of fraudulent acts or any dishonest conducts involving property or assets, or on the financial reporting and accounting of SMC or third party. This may not only entail sanctions but also result in criminal charges.

B. Comply with laws & regulations

i. Ensure compliance with applicable laws & regulations

The Company will comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions and countries within which the Company operates. Each of us is responsible for taking appropriate actions to understand and comply with the laws, rules and regulations that are applicable to their positions and/or work.

C. Working with one another

i. Health & safety

The Company strives to provide a safe, secure and conducive workplace environment. Every employee must diligently observe and comply with all Occupational Safety and Health laws and regulations

of any country and the Company's environmental safety rules and regulations.

ii. Sexual harassment & violence

We will not tolerate and condone any form of harassment and violence. Any employee who believes that he/ she has been subjected to harassment can lodge a report to SMC's Human Capital Department who will be responsible to review the case and consider the appropriate course of action where applicable. Please refer to SMC's Human Capital Department for existing policy in this matter for appropriate guidance and compliance.

iii. Respect, equal and non-discrimination

Each of us will be treated with respect and dignity. The Company will endeavour to provide equal opportunity to ensure that employment decisions are based on merits and performance without regard to race, religion, gender, age, nationality or disability, and shall not create any form of discrimination or prejudice in the workplace.

D. Protect SMC's assets & intellectual property

i. Protect SMC's information & assets

The Company values and protects all proprietary and confidential information and is committed to protecting its assets and resources. Directors and employees are expected to exercise reasonable care to safeguard the Company's assets to avoid any loss, damage, misuse or theft. In addition, we must safeguard proprietary, confidential information, plus personally identifiable information at all time to prevent harm to SMC, our shareholders, and individuals or other third parties that have trusted us with their information.

ii. Confidential Information

All Directors and Employees must exercise caution and due care to safeguard any information of a confidential and sensitive nature relating to the Company which is acquired in the course of their employment, and are strictly prohibited to disclose to any party, unless the disclosure is duly authorized or legally mandated. In the event that a Director or an Employee know of material information affecting the Company which has not yet been publicly released, the material

information must be held in the strictest confidence by the Director or Employee involved until it is publicly released.

iii. Records management & control

All books, records and accounts must be controlled and maintained so that they are prepared on timely basis and conform to generally accepted and applicable accounting principles and to all applicable laws and regulations.

E. Ensure financial and non-financial integrity & controllership

i. Maintain books & records

We are all responsible for ensuring that SMC's books and records are recorded accurately fairly and reasonably reflect the substance of transactions. They must comply with companies accounting policies and internal control requirements.

Purposely misrepresenting information or activities on company documents and reports may be considered falsification of documentation, which is a serious offence. The Company reserves the right to report any act of misrepresentation suspected of being criminal in nature to the police or other relevant authorities.

ii. Comply with internal controls & procedures

Maintain and adhere to sound internal controls and procedures to ensure critical risks are managed to the best of ability and that financial and operational information reflects all business transactions accurately, timely and unbiased, financial forecasts and assessments are genuine and assets are safeguarded.

F. Environment

i. Sustainable development

The Company strives to achieve sustainable development by focusing on safeguarding people's health, operating the business responsibly, protecting the environment, and fostering good relationships with the communities in which we operate.

5. ADMINISTRATION

5.1 Reporting of violations of the Code

Seek advice when you are unsure of an appropriate legal or ethical course of action. You are encouraged to report concerns of violation of the Code through the Company's Whistle Blowing Policy. No individual will be discriminated or suffer any act of retaliation for reporting in good faith.

5.2 Review of the Code

The Board will monitor compliance with the Code and review the Code regularly to ensure it remains relevant and appropriate.