

## Code of Business Conduct and Ethics for Employees

The Code of Business Conduct and Ethics for Employees (“**Code**”) establishes the fundamental principles of ethical and professional conduct expected of all employees of the Group.

### **Responsibilities to the Group**

#### 1.1 Co-operating with the authorities and professional parties

Employees are required to cooperate fully with the authorities and other professional parties (e.g. auditors) in the course of work. Queries shall be answered truthfully. When in doubt, the employees shall consult their direct supervisor or an executive director or officer.

Press or media inquiries relating to financial and corporate affairs must be referred to the CEO immediately.

#### 1.2 Intellectual property

Intellectual property, including, but not limited to, patents, trademarks and copyrights, developed or otherwise acquired by the Group is the property of the Group. Employees must make all efforts to ensure that the Group’s interests in intellectual property are secured. Employees with access to such intellectual property must not, without proper authorization, disclose or use the intellectual property, both during and after their employment with the Group.

#### 1.3 Accurate records and records retention

The Group’s accounting and business records must always be prepared with accuracy and reliability. No information on any record or document is to be tampered with or falsified.

Proper records and accounts of each Group entity shall be retained for at least 5 years or the minimum number of years according to local laws and regulations, whichever is longer.

### **Gifts and entertainment** <sup>(1)</sup>

Anti-corruption law <sup>(2)</sup> prohibits companies, their employees and agents from using bribery to obtain or retain business or obtain an unfair business advantage. Any employee guilty of bribery or corruption shall be subject to severe disciplinary action and may also be prosecuted under anti-corruption laws.

#### Notes:

(1) “Gifts” refer to any giving of money, any item of value, service, loan, thing or promise, discounts or rebates. In this Code, “gifts” and “entertainment” also refer to unwarranted favours, advantages and preferential treatments. “Gifts” does not include discounts or rebates given in the ordinary course of business and available to the general public, inheritances, plaques and trophies and campaign contribution.

(2) Laws relating to corruption or illegal gratification applicable in the country where the employee works. For example, Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act (Singapore Statutes, Cap 65A).

#### 1.4 Guidelines for gifts and entertainment

(i) Gifts or entertainment shall generally not be accepted

The receipt of gifts and entertainment by employees may create an inappropriate expectation or obligation that are in conflict with his/her duty to the Group, or a wrong impression that there was an improper inducement to grant concessions.

The Group specifically requires all employees to comply with the following:

- No employee shall ask for any gift or entertainment from customers, suppliers and other counterparties of the Group.
- Unless otherwise approved by the CEO, no employee shall propose to any external party or any business unit of the Group for contributions or sponsorship for any company, social or employee event.

(ii) Circumstances when gifts or entertainment may be accepted

- Employees may accept a gift if the value is in line with accepted business practices and would not be construed as improperly influencing their good business judgment.
- The CEO has given pre-approval to employee(s) to receive the particular gifts and entertainment from counterparty.

In circumstances where it is impractical or inappropriate to refuse a gift or entertainment, or where refusal would cause offence or embarrassment, the employee(s) concerned may accept it and inform the Human Resource ("HR") Department and direct supervisor via email within 5 business days if the gift or entertainment is above S\$300 in value individually. The HR Department and direct supervisor would then decide whether to allow the employee to retain the gift or otherwise.

- If the gift is acceptable, it shall be shared with fellow employees or applied to the Company's benefit as far as possible.

(iii) Guidelines for offering gifts or entertainment

- The Group develops relationships with clients/ investors and business associates on a foundation of mutual trust. The Group does not bribe or offer gifts for unethical or illegal purposes.

To ensure that offers of gifts or entertainment are appropriate, the following guidelines must be followed:

- Gifts and entertainment to be offered which is non-routine in nature and more than S\$100 in value need to be pre-approved by the CEO.
- Gifts or entertainment offered must be in good taste and not of excessive value, as determined by accepted business practices.

## **Privacy / Confidentiality**

### 1.5 Confidentiality, customer privacy and data security

- (i) Employees must maintain the confidentiality of business information both during and after employment with the Group. This includes, but is not limited to the following:
  - Human resources and employee salary and benefits information;
  - Patients' and customers' personal data and medical and treatment record;
  - Business strategies and plans; and
  - Other proprietary information acquired during the course of the employee's work.
- (ii) Employees must comply with applicable privacy laws and data security laws, as well as contractual requirements, when handling corporate information and business data.

## **Insider trading and conflict of interest**

### 1.6 Securities dealing

Employees, while employed by the Group, may have access to internal information about the Group or other listed companies (including their subsidiaries and associates) that has not been provided to the public. It is illegal for an employee to buy or sell or otherwise speculate in securities on the basis of the material non-public information. This type of illegal conduct is referred to as "insider trading". Passing on or "tipping" material non-public information to someone who may buy or sell securities may also be a violation of the applicable laws, by both the person who provides the information and the person who receives it.

All employees are to note that a conviction for insider dealing carries with it a fine and/ or imprisonment under the Securities and Futures Act of Singapore.

### 1.7 Conflict of interest

Employees must be sensitive to any activity, interest or relationship that may interfere or appear to interfere with the best interests of the Group. Employees must not knowingly permit themselves to be placed in a position where their interest could be perceived as adverse to the Group.

Employees must not permit any business decision to be influenced, or seen as being influenced, by interests unrelated to the Group. A decision to transact business with any party must be based solely on business considerations.

Employees must maintain sound personal finance conditions and avoid any situation that may prevent them from carrying out the responsibilities to the best of their ability.

Any perceived, potential or actual conflict of interest must be brought to the attention of any executive directors or executive officers. As it is not practical to describe every potential conflict of interest in this Code, Employees must exercise sound judgment and adhere to the highest ethical standards in the conduct of both professional and personal affairs.

The Finance Department (in consultation with the HR Department) shall determine employees whose position, job responsibilities and relationships that could give rise to conflict of interest and require these employees to make an 'Annual Conflict of Interest Declaration' (Appendix 1).

## **Non-compliance**

Any employee who compromises or violates the provisions of the Code may be subject to disciplinary action, including termination of employment.

Examples of conduct that may result in disciplinary actions include:

- (i) Actions that violate the Code;
- (ii) Instigating others to violate the Code; or
- (iii) Failure to report or promptly report a known or suspected violation of rule in the Code.

In all cases, it is the judgment of the Group and not the employee as to whether a particular action violates the Code.