



SUNWAY HEALTHCARE GROUP

**CODE OF CONDUCT
AND
BUSINESS ETHICS POLICY**

Version 2.0 (26 April 2022)

COMMITTED TO
SUSTAINABLE DEVELOPMENT GOALS



(Last updated on 26 April 2022)

1. OBJECTIVE

The objective of this Code of Conduct and Business Ethics (the “Code”) is to provide guidance on the behaviours expected of each and every employee, including Directors, of Sunway Healthcare Holdings Sdn Bhd and its subsidiaries and business units (“Sunway Healthcare”), which is aligned with the Sunway Group Core Values.

2. SCOPE

This Code is applicable to all employees, including Directors, of Sunway Healthcare. This Code also applies to all businesses and countries in which Sunway Healthcare operates.

3. SUNWAY GROUP’S VISION & MISSION

Vision

- To be Asia’s model corporation in sustainable development, innovating to enrich lives for a better tomorrow

Mission

- Empowering our people to deliver enhanced value to all stakeholders
- Embracing sustainability in our business processes and decisions
- Attracting and nurturing a talented and progressive workforce for the digital era

4. SUNWAY GROUP'S CORE VALUES

As a diversified group, our purpose, vision and mission are synonymous throughout the Sunway Group to deliver our best and to do business with a heart. To ensure a greater focus on win-win relationships with our customers and stakeholders, we have built a foundation based on three core values: Integrity, Humility and Excellence.

<p style="text-align: center;">Integrity</p> <p style="text-align: center;">(We believe in doing the right thing at all times)</p>	<p style="text-align: center;">Humility</p> <p style="text-align: center;">(We believe in being humble, polite and respectful)</p>	<p style="text-align: center;">Excellence</p> <p style="text-align: center;">(We take pride in all that we do)</p>
<ul style="list-style-type: none"> • We conduct ourselves in an honest and trustworthy manner • We act professionally, ethically and honourably • We ensure our actions are consistent with our words 	<ul style="list-style-type: none"> • We never stop learning • We care for and respect people and the environment • We seek first to understand, then to be understood 	<ul style="list-style-type: none"> • We strive to deliver high quality products and services • We continuously innovate and improve for greater progress • We seek to inspire others to excel

5. SUNSTAINABLE DEVELOPMENT

At the Sunway Group, we are doing our part towards building a sustainable future for all in this part of the world that we call home. For more than four decades, we have worked to develop the skills, strength, knowledge and technology for us to achieve this goal. Our stakeholders – including customers, staff, shareholders and business partners – are all deeply involved and committed towards this agenda. We constantly strive to incorporate sustainability into our business practices, processes and operations.



6. ACT WITH INTEGRITY AND ETHICS**(a) Anti-Bribery and Corruption**

We have adopted a ZERO TOLERANCE policy against all forms of bribery and corruption. We are committed to conduct our business in accordance with the Malaysian Anti-Corruption Commission (MACC) Act 2009 and the MACC (Amendment) Act 2018 and any other applicable laws.

Please further refer to our Anti-Bribery and Corruption Policy.

(b) Giving and Accepting of Gifts, Entertainment and Hospitality

We have adopted a “No Gift” policy whereby, an employee is prohibited from, directly or indirectly, receiving or providing gifts, entertainment and hospitality subject only to certain narrow exceptions. It is your responsibility to inform any third parties involved in business dealings with Sunway Healthcare of the “No Gift” policy and to request all parties to understand, respect and adhere to the policy.

Please further refer to our Anti-Bribery and Corruption Policy and Gifts, Entertainment and Hospitality Policy.

(c) Donations and Sponsorship

We always seek avenues in which we can contribute to the community through donations, sponsorships and corporate responsibility programmes. Therefore, it is an employee’s responsibility to understand that payments for donations, sponsorships and corporate responsibility programmes are made in full compliance with the Donation, Sponsorship and Corporate Responsibility Policy, Anti-Bribery and Corruption Policy, the Anti-Money Laundering Policy, and any applicable laws and regulations. All requests must be channeled to the Sunway Group Brand Marketing and Communications department for approval and it must also reflect the Sunway Group’s Core Values and be compatible with our business activities.

Please refer further to our Anti-Bribery and Corruption Policy, Anti-Money Laundering Policy and Donation, Sponsorship and Corporate Responsibility Policy.

(d) Anti-Money Laundering

We prohibit all practices related to money laundering, including dealing in the proceeds of criminal activities and terrorism financing. As a general rule, reasonable degree of due diligence must be carried out in order to understand the business and background of any prospective customer, vendor, third party or business partner that intends to do business with Sunway Healthcare to determine the origin and destination of money or assets involved. Any suspected activities relating to money laundering or terrorism financing should be reported immediately to Bank Negara Malaysia and relevant authorities in accordance with our Anti-Money Laundering Policy.

Please further refer to our *Anti-Money Laundering Policy*.

(e) Insider Trading

As Sunway Berhad, being the ultimate shareholder of Sunway Healthcare, is a public listed company, we are required to comply with various laws and regulations to make timely, full and fair public disclosure of information that may materially affect the market for its stock. Do not buy or sell and do not recommend or suggest anyone else to buy or sell the securities of any company in the Sunway Group either directly or indirectly when you are aware of insider information about the Sunway Group (including Sunway Healthcare), for personal benefit. A violation of this policy can result in civil and criminal penalties.

Please further refer to Sunway Group's *Insider Trading Policy*.

(f) Fraud

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

(g) Dealing with Competitors

We are committed to compete ethically in the marketplace. You are required to comply with competition and anti-competition laws in the countries in

which Sunway Healthcare operates. Whenever there is a need to collect, share and use information about our competitors, it must be done in a legal and ethical manner.

Please further refer to our *Competition Law Compliance Manual*.

(h) Avoid Conflict of Interest

Conflict of interest is a situation where you have a private or personal interest sufficient to influence or appear to influence the objective exercise of his/her official duties as an employee or a professional. You must avoid such conflicts and situations that may be perceived as creating a conflict of interest that may influence your judgment in the discharge of your duties and responsibilities. You must not use your position, working hours, Sunway Group's resources and assets, relationships or any knowledge that is gained directly or indirectly in the course of your duties or employment for private or personal advantage either directly or indirectly.

It is your direct responsibility to declare any situation of conflict in the areas such as financial benefit, personal relationship and personal benefit/involvement, through Sunway Healthcare's annual exercise of Conflict of Interest Declaration and within two weeks of any change in the status.

A full time employee must obtain prior approval from the company if he/she wishes to engage in any outside employment to ensure it will not interfere or compete with his/her regular work and/or give rise to an actual or perceived conflict of interest or the use of company's asset. This includes holding a second job, providing services, conducting a business and/or active involvement in other organisations.

The onus of declaring any actual or perceived conflict of interest shall be on the employee. An employee should self-disclose and any non-declaration will be deemed as a major misconduct and may warrant immediate dismissal. If you are not clear whether the situation is a conflict of interest, you must check with the Human Capital Department for clarification.

Please further refer to Sunway Group's *Conflict of Interest Policy*.

(i) Company's Property and Benefits

The Sunway Group's (including Sunway Healthcare) property forms an integral part of the business infrastructure and any loss, damage, misuse and waste thereof is a serious misconduct. Do not use the Group's assets and benefits for an employee's personal use or to the benefit of anyone else who are not allowed or authorised by the company.

7. WORKING WITH ONE ANOTHER**(a) Health and Safety**

We strive to provide a safe, secure and conducive workplace environment. Employees must diligently observe and comply with all Occupational Health, Safety and Environment laws and regulations of any country that the employee is working in and the Sunway Healthcare's Occupational Health, Safety and Environment (OHSE) requirements, policies and procedures. Safety and health is everyone's responsibility.

(b) Harassment and Violence

We aim to provide a safe and conducive working environment. Any harassment at the workplace, including sexual harassment, is prohibited and will not be tolerated or condoned by Sunway Healthcare. Sunway Healthcare will investigate all complaints of any harassment in confidence and proceed with the appropriate disciplinary action based on available evidence. Disciplinary action will not only be confined to the harasser but will also include the complainant if any such complaint is found to have been falsely made.

Please further refer to Sunway Group's *Anti-Sexual Harassment Policy*.

(c) Equal Opportunities and Non-Discrimination

We are committed in encouraging equal opportunities at the workplace. We aim to create a culture that respects and values each other's differences, promotes equality and diversity, and encourage individuals to grow and develop in order to realise their full potential. We nurture a workplace environment that values and utilises the contribution of employees with diverse ideas, backgrounds, experiences, and perspectives for the growth

of Sunway Healthcare and the success of the customer and communities we serve. We promote dignity and respect for all and do not tolerate direct or indirect discrimination, victimisation, intimidation, bullying or harassment in the workplace.

Please further refer to Sunway Group's *Diversity and Inclusion Policy*.

(d) Substance Misuse and Criminal Activities

The misuse of substances, such as alcohol or drugs, can impair performance at work and can be a threat to health, safety and the environment. Hence, it is Sunway Healthcare's policy that the unauthorised consumption, possession, distribution, purchase or sale of any such substances within its premises or while conducting its businesses or being under the influence of any such substances while working is prohibited. In this respect, employees must diligently heed and comply with the policies and procedures on substance misuse issued by the Sunway Group and Sunway Healthcare as amended and updated from time-to-time.

Please further refer to Sunway Group's *Alcohol and Drug Abuse Policy*.

8. ENSURE COMPLIANCE OF LAWS AND GOVERNANCE

We will comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions and countries within which Sunway Healthcare operates. Employees are responsible for taking appropriate actions to understand and comply with the laws, rules and regulations that are applicable to his/her positions and/or work.

(a) Accuracy of Financial Information / Financial Integrity

All books, records and accounts must be controlled and maintained so that they are prepared timeously, and conform to generally accepted and applicable accounting principles and to all applicable laws and regulations. You are responsible for ensuring that Sunway Healthcare's books and records accurately, fairly and reasonably reflect the substance of transactions. You must comply with company accounting policies and internal control requirements on matters in finance. Purposely misrepresenting information or activities on company documents and reports may be considered falsification of documentation, which is a serious

offence. Sunway Healthcare reserves the right to report any act of misrepresentation suspected of being criminal in nature to the police or other relevant authorities.

Falsification of financial or any other records or misrepresentation of information may constitute fraud and can result in civil and criminal liabilities for Employees (including Directors) and Sunway Healthcare and the Group. Employees are obliged to report false entries or omissions, and to highlight questionable or improper accounting in the books and records of the Group to the relevant parties.

(b) Confidential Information

Employees must exercise caution and due care to safeguard any information of confidential and sensitive nature relating to Sunway Healthcare and the Group, which is acquired in the course of an employee's employment, and are strictly prohibited to disclose to any party, unless the disclosure is duly authorised or legally mandated.

In the event you know of material information affecting the Group which has not yet been publicly released, the material information must be held in the strictest confidence by you until it is publicly released. It is equally important that propriety or confidential information is only disclosed to other employees on a need-to-know basis.

You have an obligation to continue to preserve the proprietary and confidential information even after your appointment/ employment has ceased, unless disclosure is required of any order of any court of competent jurisdiction or any competent judicial, governmental, or regulatory authority. A violation of this policy can result in civil and criminal penalties.

(c) Internal Controls and Record Management

Sunway Healthcare and the Group's documents and records are meant for business purposes and requirements, compliance with legal, tax, accounting and regulatory laws. You must control and maintain such records so that they are accurate, up-to-date, eligible, readily identifiable and retrievable. You must also ensure that all records are handled according to the appropriate level of confidentiality, in accordance with any applicable

policies and procedures and in conformity with all applicable laws and regulations.

(d) Information Technology

(i) Strict Prohibition

You are strictly prohibited from accessing, distributing, or storing inappropriate or unlawful materials on the computer resources. Other prohibited activities include usage or wastage of computer resources for non-work related activities, misuse of software, and communication of trade secrets.

(ii) Information and Assets

The Group values and protects all proprietary and confidential information, and is committed to protecting its assets and resources. You are expected to exercise reasonable care to safeguard the Group's assets to avoid any loss, damage, misuse or theft. In addition, you must safeguard proprietary, confidential information, plus personally identifiable information at all times to prevent harm to the Group, our shareholders, and individuals or other third parties that have trusted us with their information. Any access to proprietary, confidential information, plus personally identifiable information via personal devices are highly discouraged. However, due to unavoidable circumstances, those required to access via personal devices will require approval from your Head of Department and security review by IT SSC Administrators.

(iii) Intellectual Property

We encourage you to be inventive and innovative as it is part of your normal duties and responsibilities. Any intellectual properties including but not limited to copyrights, patents, trade secrets, and other intellectual property rights associated with any concepts, works of authorship, discoveries, inventions, techniques, processes, writings, creations, programs, product improvements, plans, designs, products, manuals, documents, materials, ideas, computer programs, results of technological researches, trademarks, registered designs and confidential information that were created and/or developed by you in the course of your employment and/or by using Sunway Healthcare's resources, shall become the sole and exclusive property of Sunway

Healthcare and/or the Group. You should not, without prior written consent of Sunway Healthcare, reproduce, adapt, modify, use or disclose intellectual properties or inventions or any information relating thereto to any person whomsoever except to Sunway Healthcare's duly authorised parties as instructed or notified by Sunway Healthcare.

Please refer further to Sunway Group's *E-Policy*.

(e) Representing Sunway Externally

You must obtain prior approval from the CEO of your business unit/healthcare facility before you accept external invitations to give speeches, presentations or describe your job nature at the business unit/healthcare facility, and obtain the prior approval of the Managing Director before you accept external invitations to give speeches, presentations or describe your job nature in Sunway Healthcare.

(f) Personal Data Protection

We respect and are committed to the protection of your personal data and your privacy. We ensure proper and adequate protection of personal data within the control, in compliance with the Personal Data Protection Act 2010. If you have access to personal data, you are expected to read and be familiar with Sunway Healthcare's Personal Data Protection Compliance Manual, which is designed to assist you in handling personal data and sensitive personal data in the manner that is in compliance with the Act. The Compliance Manual is also pertinent as a guide as to the do's and the don'ts in relation in the handling, retention and destruction of personal data and sensitive personal data.

Please refer further to our *Personal Data Protection Compliance Manual*.

(g) Laws & Regulations

You shall comply with all Federal and State laws, regulations, and ordinances that are applicable to your work and responsibilities. If you are found to have been in violation of any applicable Federal and State laws, regulations and ordinances, such violation may be the basis for your disciplinary action, including termination of employment.

(h) Annual Staff Declaration

You are required to read, understand and to declare in writing annually, by the first quarter of each year, that you will abide to the following mandatory policies:

- Anti-Bribery and Corruption Policy,
- Code of Conduct and Business Ethics Policy,
- Conflict of Interest Declaration Policy;
- E-Policy; and
- Competition Law Compliance Manual.

9. NON-COMPLIANCE

Non-compliance with this policy will be taken very seriously and may result in disciplinary action, including termination as well as civil or criminal proceedings. Seek advice from the Management Team and Human Capital Department when you are unsure of an appropriate or ethical course of action under this policy.

10. WHISTLEBLOWING

If you encounter actual or potential violations of this policy, you are required to report your concerns immediately to the Management Team or reach out directly to Sunway Group's Head of Group Internal Audit via our Whistleblowing platform as follows:

Email to: whistleblowing@sunway.com.my

Direct line: +603 5639 8025

Fax to: +603 5639 8027

Write to:

Head of Internal Audit Department

Level 4, Menara Sunway

Jalan Lagoon Timur, Bandar Sunway

46150 Petaling Jaya

Selangor Darul Ehsan, Malaysia.

Please further refer to our *Whistleblowing Policy and Procedures*.