



HOSPITAL POLICY			
Document Title : CODE OF CONDUCT AND ETHICS			Process Owner : MANAGEMENT
Document No.: HOP-MGT-016	Version No.: I1R1	Controlled Copy No.: 0 – Original	Date First Initiated : 15.06.2021
			Effective Date : 21.03.2022

Disclaimer :

Any hardcopy, printed or photocopied, is considered an uncontrolled copy, unless it is an original, signed off version.

Review & Approval

Prepared By	:	Sivashangri Suriyakumaran	Assistant Human Resource Manager
-------------	---	------------------------------	----------------------------------

Approved By:

Lily Yap
Chief Executive Officer

Document Revision History

Date	Version	Description of Revision
15.06.2021	I1R0	Initial release
21.03.2022	I1R1	Change of template

HOSPITAL POLICY			
Document Title : CODE OF CONDUCT AND ETHICS			Process Owner : MANAGEMENT
Document No.: HOP-MGT-016	Version No.: I1R1	Controlled Copy No.: 0 – Original	Date First Initiated : 15.06.2021
			Effective Date : 21.03.2022

Table of Contents

1.0	PURPOSE	3
2.0	SCOPE	3
3.0	RESPONSIBILITY	3
4.0	ABBREVIATION	3
5.0	DEFINITIONS	3
6.0	POLICY	3
7.0	FLOW CHART	8
8.0	GUIDELINES & PROCEDURES	8
9.0	QUALITY IMPROVEMENT MONITORING	8
10.0	REFERENCES	8
11.0	APPENDICES	8

HOSPITAL POLICY			
Document Title : CODE OF CONDUCT AND ETHICS			Process Owner : MANAGEMENT
Document No.: HOP-MGT-016	Version No.: I1R1	Controlled Copy No.: 0 – Original	Date First Initiated : 15.06.2021
			Effective Date : 21.03.2022

1.0 PURPOSE

- 1.1. Cengild Medical Bhd (CMB) is committed to ensure its business operations are conducted with integrity, transparency and in a responsible manner.

The objective of this policy is to provide the followings:

- 1.1.1. Professional and ethical guidelines for the Directors and employees of the Company with the aim to establish, maintain and enhance the reputation, image and branding of the CMB.
- 1.1.2. Display the highest level of professionalism in all aspect of their task complying with all applicable laws and regulations stipulated under this policy.

2.0 SCOPE

- 2.1. The scope of the policy applies to ALL employees of CMB and its subsidiaries and Directors. The principals and standard of this Policy covers all activities, business and functions conducted beyond the normal working hours.

3.0 RESPONSIBILITY

Nil

4.0 ABBREVIATION

Nil

5.0 DEFINITIONS

Nil

6.0 POLICY

6.1. GENERAL PRINCIPLES

The general principles governing this code of conduct and ethnic are as follows:

6.1.1. Compliance with Laws, Rules and Regulations

- 6.1.1.1. All employees and Directors are responsible to take appropriate actions to understand and comply with all applicable laws, rules and regulations of the government, commission and exchanges in jurisdiction which CMB operates when discharging their duties.

6.1.2. Professional Integrity

- 6.1.2.1. CMB is committed to ensure employees and Directors strive to conduct all business dealings and relationship with patients, manufacturers, suppliers, business partners,

HOSPITAL POLICY			
Document Title : CODE OF CONDUCT AND ETHICS			Process Owner : MANAGEMENT
Document No.: HOP-MGT-016	Version No.: 11R1	Controlled Copy No.: 0 – Original	Date First Initiated : 15.06.2021
			Effective Date : 21.03.2022

competitors in a fair dealing and on fair competition in quality, price and service and on compliance with applicable laws and regulations.

6.1.2.2. CMB aims to provide an environment where all employees, customers manufacturers, suppliers, business partners, competitor are treated in a fair manner irrespective of race, age, gender, cultural background or religion.

6.1.3. Accuracy and Completeness of Financial Information.

6.1.3.1. Employees and Directors are to use the funds and property solely for the benefit of CMB. All payments and disbursement must be lawful and in accordance with procedures and approvals stated in the guidelines provided by CMB. Transactions, records and accounts must be controlled, clearly authorized and documented in an orderly and timely manner.

6.1.3.2. Any false entries or activities on company documents and reports may be classified as falsification and is a serious offence. CMB reserves the right to report such activities to the relevant authorities.

▶ 6.1.4. Confidential Information

6.1.4.1. It is the responsibility of all employees and Directors to exercise caution and due care to safeguard information entrusted to CMB by patients, suppliers and business partners that would reasonably be considered to be confidential and sensitive in nature.

6.1.4.2. Employees and Directors are refrain from discussing confidential or sensitive information with external parties who does not have the legitimate need to know and must not be used for personal gain.

6.1.5. Conflict of Interest

6.1.5.1. Conflict of interest arise when employees and Directors have competing interests or loyalties sufficient to influence or appear to influence the objective exercise. Such situation where it may influence the judgement in the discharge of their duties and responsibility must be avoided.

6.1.5.2. All activities conducted should always place the lawful and legitimate interest of CMB over personal gain.

6.1.5.3. Employees and Directors should not use his/her position, working hours, CMB's resources or assets, relationship or any knowledge that is gained directly or indirectly

HOSPITAL POLICY			
Document Title : CODE OF CONDUCT AND ETHICS			Process Owner : MANAGEMENT
Document No.: HOP-MGT-016	Version No.: I1R1	Controlled Copy No.: 0 – Original	Date First Initiated : 15.06.2021
			Effective Date : 21.03.2022

in the course of their duties or employment for private or personal advantage either directly or indirectly.

6.1.5.4. It is the responsibility of the employees and Directors to declare at all times the nature and extent of any conflict of interest, whether direct or indirect, whether actual or potential, in the course of discharging their duties.

6.1.5.5. Employees and Directors are required to obtain prior approval if they wish to engage in any outside employment to ensure it will not interfere or compete with their work and/or give rise to an actual or perceived conflict of interest or the use of Company's assets.

6.1.6. Integrity & Ethics

6.1.6.1. Anti-Bribery and Corruption

CMB constantly uphold all laws and have adopted a ZERO tolerance policy against all forms of bribery and corruption in all the jurisdictions where the Company operates. CMB is bound by the laws of Malaysia, in particular the Malaysian Anti-Corruption Commission Act 2009 ("MACCA 2009"), pertaining to our conduct both at home and abroad. (Refer to CMB Policy 001 Anti-Bribery and Corruption for details.)

6.1.6.2. Gifts and Entertainment

Except in connection with and specifically pursuant to programs officially authorized, employees and Directors may not accept, directly or indirectly, any money, objects of value, or premiums from any person or company that has or is doing or seeking business with CMB. Employees and Directors must disclose any financial dealings including the giving and the receiving of payments and gifts to the management, and these transactions must be accurately recorded. (Refer to CMB Policy 001 Anti-Bribery and Corruption for details.)

6.1.6.3. Facilitation Payment and Kickbacks

CMB does not accept and will not make any form of facilitation payments of any nature. CMB does not allow kickbacks to be made or accepted. (Refer to CENGILD-HR-SOP-009 - Facilitation Payment Policy Procedure and Guidance to Personnel for details).

HOSPITAL POLICY			
Document Title : CODE OF CONDUCT AND ETHICS			Process Owner : MANAGEMENT
Document No.: HOP-MGT-016	Version No.: 11R1	Controlled Copy No.: 0 – Original	Date First Initiated : 15.06.2021
			Effective Date : 21.03.2022

6.1.6.4. Political Donations

CMB will not make donations, whether in cash, kind or by any other means, to support any political parties or candidates as this may be perceived as an attempt to gain an improper business advantage. (Refer to CENGILD-HR-SOP-010 - Political Donations Payment Policy, Procedure and Guidance to Personnel for details).

6.1.6.5. Charitable Contributions

CMB accepts and encourages the act of donating to charities as part of its corporate social responsibility initiatives, whether through services, knowledge, time or direct financial contributions (cash or otherwise). We shall ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are offered or made in accordance with the Group's approval mandate. (Refer to CENGILD-HR-SOP-008 - Charitable Contribution Payment Policy, Procedure and Guidance to Personnel for details).

6.1.7. Health and Safety

6.1.7.1. CMB strives to provide a safe, secure and conducive working environment that prevents, to the extent possible, injury to our employees, directors, customers, suppliers, contractors and business partners.

6.1.7.2. Employees and Directors are required to uphold and promote sustainable practices in their work and conduct and must be diligent to observe and comply with all Occupational Health, Safety and Environment laws and regulations.

6.1.8. Equal Opportunities, Non-Discrimination, Harassment and Violent

6.1.8.1. CMB is committed in encouraging equal opportunities at the workplace.

6.1.8.2. CMB aims to establish an inclusive culture that respects individual differences, promotes equality and diversity, and encourage growth and development to realize their full potential.

6.1.8.3. CMB promotes dignity and respect and do not tolerate direct or indirect discrimination, victimization, intimidation, bullying or harassment in the workplace.

6.1.8.4. CMB will investigate all complaints of any harassment and violence 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.

HOSPITAL POLICY			
Document Title : CODE OF CONDUCT AND ETHICS			Process Owner : MANAGEMENT
Document No.: HOP-MGT-016	Version No.: 11R1	Controlled Copy No.: 0 – Original	Date First Initiated : 15.06.2021
			Effective Date : 21.03.2022

6.1.9. 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 environment. Unauthorized consumption, possession, distribution, purchase or sales of any such substances within its premises or while conducting its businesses or being under the influence of any such substances while working is strictly prohibited.

6.1.10. Anti-Money Laundering

6.1.10.1. Anti-money laundering (AML) refers to the laws, regulations and procedures intended to prevent criminals from disguising illegally obtained funds as legitimate income. CMB do not condone to such practices and employees and Directors must take all appropriate action to prevent such activity.

6.1.10.2. No employees and Directors shall investigate or attempt to investigate any suspected case of money laundering on his/her own account and any such case or incident shall be reported to an immediate superior, head of department or Human Resource Department.

6.1.11. Social Media

Employees and Directors have the responsibility to protect CMB brand reputation and image. When using private social media account, employees and Directors must indicate that the posts reflect only their personal opinions and do not negatively affect the company's brand perception. Employees and Directors are responsible to safeguard confidential and business information. (Refer to CENGILD/GEN/HOS/Policy 013 – Personal Data Protection Act).

6.1.12. Making A Report

6.1.12.1. Employee who suspect or have knowledge of violations of this policy have an obligation to report their concerns to their immediate supervisors, managers, the relevant HR department or equivalent to any member of Cengild Medical Berhad BOD or Senior Management.

6.1.12.2. All allegations of improper or illegal behaviour will be investigated promptly and thoroughly. The investigation shall remain as confidential as practicable and those conducting the investigation shall respect the privacy of all persons involved.

6.1.12.3. No adverse action shall be taken or permitted against anyone for communicating legitimate concerns to the appropriate person.

HOSPITAL POLICY			
Document Title : CODE OF CONDUCT AND ETHICS			Process Owner : MANAGEMENT
Document No.: HOP-MGT-016	Version No.: I1R1	Controlled Copy No.: 0 – Original	Date First Initiated : 15.06.2021
			Effective Date : 21.03.2022

6.1.12.4. While an investigation will be facilitated if the employee identifies himself or herself, the company will accept and investigate matters submitted anonymously.

6.1.13. Review

6.1.13.1. Code of Conduct and Ethics will be reviewed and updated periodically in accordance the needs of the Company.

6.1.13.2. The Code of Conduct and Ethics will be made to public on the Company's website.

7.0 FLOW CHART

Nil

8.0 GUIDELINES & PROCEDURES

Nil

9.0 QUALITY IMPROVEMENT MONITORING

Nil

10.0 REFERENCES

- 10.1. CMB Policy 001 Anti-Bribery and Corruption
- 10.2. CENGILD/HR/SOP/008- Charitable Contribution Payment Policy, Procedure and Guidance to Personnel
- 10.3. CENGILD/HR/SOP/009- Facilitation Payment Policy Procedure and Guidance to Personnel
- 10.4. CENGILD/HR/SOP/010-Political Donations Payment Policy, Procedure and Guidance to Personnel
- 10.5. CENGILD/GEN/HOS/Policy 013 – Personal Data Protection Act

11.0 APPENDICES

Nil