



## IMU HEALTH SDN BHD

### THIRD PARTY CODE OF CONDUCT

#### 1. PREAMBLE

- 1.1. IMU Health Sdn Bhd Group of Companies (the entities individually and collectively hereinafter referred to as “IMUH”), is committed to complying with law, advancing industry standards, and safeguarding lives and the environment, in IMUH’s conduct of business as well as in relation to third-party business dealings.
- 1.2. This Third Party Code of Conduct (“Code”) outlines minimum standards for compliance in all of IMUH’s business dealings.
- 1.3. IMUH expects all third parties with business dealings with IMUH (hereinafter referred to as “Third Parties”) to be in compliance with all applicable international, regional, cross-border and local laws, regulations, directives, standards and their equivalents (“Applicable Laws”) and this Code.
- 1.4. Any party in receipt of this Code is deemed to have been put on notice.

#### 2. COMPLIANCE WITH LAW, POLICY & CODE

- 2.1. Compliance with this Code could be by way of direct adoption or implementation of equivalent standards of conduct.
- 2.2. Other policies of IMUH and third-party contracts with IMUH incorporate this Code, wherein this Code forms part of such policies and contracts. Nothing in this Code is meant to supersede legal, authorised and express provisions in any other policy of IMUH, third-party contract with IMUH, or Applicable Laws that are more stringent or specific, or state exceptions or prohibitions. To the extent of any inconsistency between this Code and Applicable Laws, such Applicable Laws shall govern. This Code does not create any binding obligations on IMUH and may be amended from time to time.
- 2.3. IMUH conducts risk-based due diligence on Third Parties as part of assessing IMUH’s relationship with Third Parties and Third Parties’ compliance with Applicable Laws, IMUH’s policies and this Code. IMUH expects Third Parties to provide complete and accurate information to facilitate due diligence efforts undertaken by IMUH, where requested.
- 2.4. Third Parties must promptly inform IMUH if contacted by a regulatory authority regarding Third Parties’ business dealings with IMUH, and shall keep IMUH updated on any regulatory inquiries, audits, reviews or investigations in a timely manner. At the direction of IMUH, Third Parties shall cooperate with and not obstruct the work of regulatory authorities.



### **3. BUSINESS CONDUCT, COMMUNICATIONS & REPUTATION**

- 3.1. Business Integrity: Third Parties shall not engage in any illegal or unethical behaviour and are expected to uphold highest standards of fair business practices.
- 3.2. Conflict of Interest: Third Parties shall avoid all conflicts of interest or situations giving the appearance of potential conflict of interest in any of their business dealings.
- 3.3. Reputation: Third Parties shall not conduct themselves in any way that would be prejudicial to the reputation of IMUH or any other party. Third Parties shall refrain from any potentially or perceivably disrespectful, unprofessional, harassing, defamatory, discriminatory or prohibited behaviour. Other than expressly and unequivocally authorised by IMUH, Third Parties shall neither conduct themselves in any way suggestive of them doing so on behalf of IMUH, represent themselves as IMUH, nor express any views attributable to IMUH.
- 3.4. Communications: Third Parties must ensure their marketing and promotional materials and activities conform to high ethical, medical, and scientific standards. Third Parties shall not knowingly or negligently publish in any form false or otherwise inaccurate information.
- 3.5. Political Activities & Lobbying: Third Parties must not make political contributions or provide gifts to any candidate for public office, elected officials, political parties or committees on behalf of or as a representative of IMUH or in relation to any business dealings with IMUH. Third Parties must not represent their political views as those of IMUH. Third Parties must neither lobby government officials on behalf of or as a representative of IMUH or in relation to any business dealings with IMUH, nor use IMUH's resources for political activities.
- 3.6. Relationships with Politically Exposed Persons: Third Parties must disclose any close relationships with any "Politically Exposed Persons" who are defined as individuals who are or have been entrusted with prominent public functions by a country, including but not limited to heads of state or heads of government, senior politicians, senior government, judicial or military officials, senior executives of state owned corporations, important political party officials.



#### **4. PROHIBITION OF CORRUPTION & ECONOMIC CRIMES**

- 4.1. Third Parties shall neither engage in, abet nor tolerate any form of corruption.
- 4.2. Third Parties shall neither engage in, abet nor tolerate any practice of illegal or unofficial payment made in return for goods or services that a payer is legally entitled to receive without making such payment.
- 4.3. Third Parties shall neither offer, promise, give, accept nor solicit an undue advantage of any value, in violation of Applicable Laws, as an inducement or reward for a party acting or refraining from acting in relation to the performance of that party's duties.
- 4.4. Third Parties shall neither engage in, abet nor tolerate any money laundering, terrorist financing, insider trading, insider dealing, inappropriate procurement or disclosure of inside information, or other securities market abuse and economic crime activities. In addition to the foregoing, where some or all of the confidential information accessed by Third Parties may constitute material non-public information (which includes any information which is not generally available to the public and can materially affect the price or value of the securities of IMUH when it becomes publicly known), Third Parties shall not spread false information or engage in activities designed to manipulate the market for publicly traded securities, and shall not deal or trade, procure others to deal or trade, or provide information to others whether to deal or trade or not, in securities of IMUH while in possession of such material non-public information.
- 4.5. Third Parties shall take appropriate measures to prevent any occurrence of corruption.

#### **5. GIFTS, ENTERTAINMENT & HOSPITALITY**

- 5.1. Third Parties shall not offer, accept or solicit any gifts, entertainment, or hospitality whereby there is reason to believe, or a reasonable and informed third party would likely conclude, that there may be intent to improperly influence decisions or impair objectivity related to its business dealings.
- 5.2. Third Parties shall not accept or provide any gifts or favours to or from active or former government officials or commercial parties for or on behalf of IMUH.

#### **6. ECONOMIC SANCTIONS & EXPORT CONTROLS**

- 6.1. Third Parties shall take appropriate measures to prevent and avoid conducting themselves in any way that could expose IMUH and themselves to potential or perceived violation of Applicable Laws in relation to economic sanctions and export controls.



## **7. FAIR COMPETITION**

- 7.1. Third Parties shall refrain from, whether alone or in collusion with other parties, and object to any commercially unfair or anti-competitive business practices, including any such practices contemplated by competition and antitrust laws, regulations, directives, standards, and their equivalents.

## **8. HEALTH & SAFETY**

- 8.1. Third Parties shall minimise and respond to health and safety incidents and accidents occurring in the workplace and provide adequate personal protective equipment.
- 8.2. Third Parties shall set up reasonable occupational health and safety management systems to ensure employees' and IMUH's students and patients' safety.

## **9. CONFIDENTIALITY, DATA PROTECTION & INTELLECTUAL PROPERTY**

- 9.1. Third Parties shall handle and disclose personal data and confidential information that they obtain in the course of their business dealings with IMUH, only as authorised and directed by IMUH and as required by Applicable Laws. Third Parties shall protect personal data and confidential information against unauthorised and unlawful use, disclosure, access, loss, alteration, damage, and destruction.
- 9.2. Third Parties shall respect the intellectual property rights of IMUH and other parties, and not misappropriate or make unauthorised use of the intellectual property of IMUH or other parties.

## **10. LABOUR STANDARDS & WELFARE**

- 10.1. Working Time: Third Parties shall comply with Applicable Laws and sector-specific labour regulations concerning working time, including overtime laws.
- 10.2. Wages & Benefits: Third Parties shall provide wages and benefits as prescribed by Applicable Laws, including minimum wage legislation, in accordance with any employee union agreements, and in line with existing practices in the industry and local labour markets.
- 10.3. Non-Discrimination & Fairness: Third Parties shall apply principles of equal opportunity for and fair treatment of employees. Third Parties shall prevent and not tolerate any form of discrimination not related to the individual's merit or the inherent requirements of the position sought.
- 10.4. Safe Workplaces: Third Parties shall prevent and not tolerate any verbal or physical harassment at their workplaces.



- 10.5. Prohibition of Underaged Labour: Third Parties shall comply with applicable minimum legal working age and working conditions requirements prescribed by Applicable Laws.
- 10.6. Prohibition of Human Trafficking & Modern Slavery: Third Parties shall neither engage in, abet nor tolerate modern slavery, human trafficking, or forced, bonded or involuntary labour.

## **11. SUSTAINABILITY**

- 11.1. Third Parties shall conduct responsible business practices with good governance and take appropriate measures to minimise, reduce and prevent undesired or adverse environmental, economic, and social impacts in all respects of their business activities, and ensure sustainable business performance.
- 11.2. Third Parties shall maintain appropriate environmental management systems for environmental protection and preservation.

## **12. INFORMATION TECHNOLOGY SECURITY**

- 12.1. Third Parties shall ensure their information technology security standards meet IMUH's requirements to maintain and protect information, including physical and electronic assets, and prevent and effectively deal with any cyberattack.

## **13. BUSINESS MANAGEMENT SYSTEMS**

- 13.1. In addition to those stated elsewhere in this Code, Third Parties shall maintain appropriate business management systems including in relation to the following regards stated in this section.
- 13.2. Accountability & Risk Management: Third Parties shall implement mechanisms to identify, determine and manage risks in all areas addressed by this Code and with respect to all Applicable Laws.
- 13.3. Business Continuity: Third Parties must maintain appropriate business continuity plans in relation to any business dealings with IMUH. These plans must ensure prompt recovery and restoration of business conduct to minimise disruption to IMUH's business and safeguard IMUH's reputation.
- 13.4. Financial Integrity & Accurate Record Keeping: Third Parties must ensure that their accounting and financial records meet the highest standards of accuracy, completeness, and reporting. IMUH reserves the right to audit or inspect Third Parties' records and facilities, as applicable and permitted by law.
- 13.5. Third Party Management: Third Parties shall ensure through appropriate due diligence and notification measures that their employees, persons and entities associated with or affiliated to them, agents, third party representatives, consultants, business partners and any other contractors do not cause Third Parties to be in violation of this Code.



13.6. Identification of Concerns: Third Parties shall enable their employees and third parties to report illegal activities and unethical behaviour confidentially and anonymously or raise concerns in the workplace through formal reporting structures. Third Parties shall assure their employees and third parties and ensure that they will not be subject to retaliation because of such reporting or raising of concern that is done in good faith. Third Parties shall investigate reported concerns, and if needed, take corrective action.

#### **14. CONSEQUENCES OF VIOLATION**

14.1. Any violation of this Code may result in IMUH subjecting Third Parties to any or all of the following or other similar actions: IMUH directing Third Parties to audit their own organisations or supply chains and to report on findings; IMUH recommending or requiring the implementation of corrective-action or remediation plans; and/or IMUH classifying Third Parties as non-preferred parties as regards business dealings. IMUH reserves the right to suspend or terminate relationship with Third Parties.

#### **15. INQUIRIES & REPORTING**

15.1. Third Parties and their employees or any other party shall, in good faith and in timely manner, report incidents or can raise concerns in relation to this Code to IMUH. Such reports or concerns can be made confidentially and anonymously the extent permissible by law.

15.2. Third Parties shall fully cooperate with and not obstruct any review or investigation carried out by IMUH in relation to such reports and concerns.