

CAH MEDICAL CENTRES SDN BHD

**(FORMERLY KNOWN AS RAMSAY SIME DARBY HEALTH CARE SDN BHD)
("CMC")**

CODE OF BUSINESS CONDUCT

At CMC, your success is not only measured by the results you achieve, but also how you achieve them. Behaving in an ethical manner is your personal responsibility and you must know, understand and comply with the Code of Business Conduct (COBC).

As you read this handbook, you will learn the standards of behaviour expected of you by the Group and how to apply them in your daily work life. By doing this, you can demonstrate CMC'S Core Values to the people with whom you interact. This will result in a more positive and ethical work environment, hence driving CMC to be a respected business leader in the world.

This handbook also provides some questions to challenge your perspective on the standards of conduct required of you in certain situations, so that you can make the right decisions for the Group. If you have any concerns about actual or potential violations, you can use the reporting channel under the 'Contact Us' section.

In this handbook, the expressions "the Group", "CAH Medical Centres (formerly known as Ramsay Sime Darby Health Care)", "CMC" and "we" are used interchangeably to refer to CAH Medical Centres Sdn Bhd (formerly known as Ramsay Sime Darby Health Care Sdn Bhd) Registration No: 201301008653 (1038495-A) and its subsidiaries in general. The word "you" is used to refer to all Directors, Employees (and where applicable, the Counterparts and Business Partners).

VISION, MISSION AND VALUES

Our Vision

To be the leading healthcare provider in Asia by delivering world class healthcare and high quality outcomes to our customers as well as ensuring the sustainability of our organisation.

The employees, medical staff and others who comprise or have a relationship with CMC will fulfil this mission by adhering to our COBC when working with patients, physicians, colleagues and anyone we deal with or serve. We will provide quality care to our patients while observing high standards of legal and ethical conduct and will comply with all applicable laws, rules and regulations.

Mission

- Customer-focused preventive, diagnostic and curative healthcare services that deliver superior outcomes and touch all individuals.
- Promote, improve and sustain excellent integrated healthcare services where innovation and teaching are integral to the delivery of care.
- Quality education that nurtures competent and compassionate healthcare personnel.
- Deliver, improve and sustain all stakeholders' interests and returns.

Our Core Values

Excel in everything we do

We go the extra mile in everything we do and recognise the value of people to sustain a high-performance culture.

Innovate for continual improvement

We take pride in our achievements and actively seek new ways of doing things better.

Ethics & integrity in our practice

We value integrity and credibility in the individual and strive for operational efficiency to deliver sustainable value to stakeholders.

Care & compassion from the heart

We treat everyone like family and provide compassionate care in a safe, conducive healing ambience and a positive work environment.

Teamwork & respect for one another

We work together as one and give respect to each individual through constructive relationships to achieve positive outcomes for all.

BUSINESS PRINCIPLES

The Group's foundation is built on the Core Values, which guide our actions and the way we conduct our business. This is applied in our Business Principles:

Health, Safety and Environment

Health and safety are important for our patients, employees and communities where we operate. We are responsible for the development, implementation and evaluation of safe systems of work within a consultative framework to achieve the highest possible quality outcomes.

We ensure our business operations are sustainable, by proactively addressing environmental challenges and respecting fundamental human rights, without sacrificing long-term economic value creation.

Compliance

Complying with all laws, regulations and/ or by- laws in the countries that we operate.

Working with Local Communities

Engaging with and contributing to local communities in a socially responsible manner wherever we operate, without compromising the benefits of any particular stakeholder.

Fair Business Practices

Ensuring that we promote fair business practices and compete in an ethical manner.

MESSAGE FROM THE GROUP CHIEF EXECUTIVE OFFICER

Dear Colleagues,

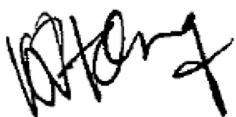
An uncompromising adherence to ethical excellence and strong corporate governance is integral to creating and sustaining the necessary strong foundation on which CAH Medical Centre's success is built and on which the Group can grow and prosper.

As an employee and Business Partner, you are faced every day with a number of business decisions and ethical choices. It is your personal responsibility to uphold the Company's high standards of business ethics and corporate governance in each and every one of these situations. It is not possible for our Code of Business Conduct (COBC) to address every situation that you may face. If you use your good business or operational judgement and experience, your business or operational decisions are not likely to raise ethical issues. It is important to use sound judgement to make the right decisions when you're faced with an ethical issue. We hope this COBC will serve as a guide to help you make the right choice or decisions.

Our goal is to abide by the highest principles of ethics, honour, trust and dignity for each other, guided by one vision - to become the leading healthcare provider in Asia by delivering sustainable and high-quality outcomes to all stakeholders. Hence it is important that we share CMC's common Core Value of being committed to the highest level of integrity in all we do.

We strongly encourage you to read the policies set forth in the COBC guide and to discuss any questions you may have with your department Heads, Group Nursing, Quality & Risk, Group Legal or with the Human Resources Department directly. The guidelines set out in this COBC are to be followed at all levels of this organisation by our board of directors, senior management, all staff members, Business Partners and Counterparts. Everyone at CMC has an obligation to safeguard the Group's reputation by upholding its core values and complying with the COBC.

We thank you for doing your part to ensure that CMC continues to realise its potential in both the business or services that we conduct and the way that we conduct business or services. Our company's success depends on each of us undertaking our business honestly, fairly and with the highest level of integrity.



Peter Hong Kah Peng

CMC Group Chief Executive Officer

Updated as at 27 February 2024

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1 PURPOSE

The COBC handbook provides guidance on the standards of behaviour expected of all Directors and Employees of the Group and where applicable, Counterparts and Business Partners. The standards of behaviour are derived from the Group's Values and Business Principles.

2 SCOPE

The COBC applies to all Directors and Employees of the Group. This includes Employees on secondment to Joint Ventures, affiliates and associates. Counterparts are also expected to comply with this handbook when representing the Group. Business Partners shall adopt similar principles and standards of behaviour.

The COBC applies to all businesses and countries in which the Group operates.

3 GENERAL PRINCIPLES OF THE COBC

We pride ourselves on our reputation for behaving fairly, honestly and ethically wherever we do business, and our collective commitment to uphold integrity throughout the Group.

The COBC is not an exhaustive document and does not address every possible situation. You are obliged to familiarise yourself with and adhere to all applicable policies, procedures, written agreements, laws, by-laws, directives and regulations of the countries in which the Group operates.

When there is a conflict between the provisions of this handbook, the Group policies and authorities and regulatory and legislative provisions, the stricter provisions shall apply. However, if the local custom or practice conflicts with this handbook, you are required to comply with the COBC.

Above all else, you must exercise sound judgement in making the right decisions and take all practical steps to ensure it does not harm the Group and/or its members.

4 RESPONSIBILITY AND COMPLIANCE WITH THE COBC

Apart from understanding and complying with the COBC, as a Director or an Employee, you are also responsible to:

- Ensure those reporting to you understand and comply with the COBC;
- Promote compliance and good ethical values via leadership by example; and
- Provide guidance to others who have raised concerns or questions regarding the COBC.

All Directors and Employees are expected to read and understand this COBC, uphold these standards in day-to-day activities, comply with all applicable policies and procedures, and ensure that they understand and adhere to these standards. As the principles described in this COBC maybe general in nature, you should also review all applicable Company policies and procedures for more specific instruction and contact the Human Resources Department if you have any questions/queries. We are committed to continuously reviewing and updating our policies and procedures. Therefore, this COBC is subject to modification. This COBC supersedes all other such codes, policies, procedures, instructions, practices, rules or written or verbal representations to the extent they are inconsistent. You may be subject to disciplinary action, up to and including termination of employment or dismissal, for violating the COBC. Violation of the COBC that is related to criminal acts may result in prosecution after referral to the appropriate authorities. Where a Collective Labour Agreement exists in the country of operation, its terms and conditions will be adhered to.

As Counterparts, you are also required to understand and comply with the relevant aspects of the COBC. Violation of the COBC will result in blacklisting by the Group. Business Partners shall adopt similar principles and standards of behaviour.

The administration of the COBC shall be under the responsibility of Group Nursing, Quality & Risk and Group Legal Department.

5 WORKING WITH ONE ANOTHER

The Group is committed to fostering an inclusive environment where everyone is treated with respect, trust and dignity.

5.1 Respect

You shall treat your superiors, peers, subordinates and external stakeholders with respect, trust, honesty and dignity.

5.2 Equal Opportunity and Non-Discrimination

The Group provides equal opportunities to all and endeavours to ensure that employment-related decisions are based on relevant qualifications, merit, performance and other job-related factors and in compliance with all applicable laws and regulations.

You must not discriminate based on gender, race, disability, nationality, religion, age or sexual orientation unless specific laws or regulations expressly provide for selection according to specific criteria.

5.3 Harassment and Violence

We prohibit any types of harassment and violence. These actions or behaviours include derogatory comments based on gender, racial or ethnic characteristics, and unwelcomed sexual advances, spreading of malicious rumours or use of emails, voicemail and other forms of communication channels/social media to transmit derogatory or discriminatory material. Any harsh and inhumane treatment, including any type of harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse is viewed as a serious misconduct and shall not be tolerated by the Group.

5.4 Illegal Substances

The Group strictly prohibits the use or transfer of illegal drugs or other illegal substances in the workplace. The Director and employees are strictly not permitted to consume and or deal with any illegal substance whilst in employment and/or attachment with the Group.

5.5 Criminal Activities

You must not engage or become involved in any behaviour or activities that may be categorised as subversive or commit any wrongdoing, criminal or otherwise that is punishable under the laws of any country. If you are found guilty by a court of law or found to be involved in subversive activities or commit a criminal offence, you will be dealt with in accordance with the Group's relevant policies and procedures.

5.6 Environment, Occupational Safety and Health

The Group strives to provide a safe, secure and healthy working environment.

You must create and maintain a safe working environment to prevent workplace injuries by:

- Using all devices provided for your protection;
- Ensuring that protective devices are in good working condition;
- Reporting immediately unsafe equipment and tools, hazardous conditions and accidents to the Management; and
- Complying with the Occupational Safety and Health laws and regulations of any country and the Group's environmental, safety and health rules and regulations.

You are also responsible for the safety of fellow workers and the general public and are encouraged to promptly report any breaches of environmental, safety and health laws at the workplace. In case of doubt, please seek clarification from your supervisors.

5.7 Human Rights

The Group has a responsibility to respect, support and uphold fundamental human rights as expressed in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. Our commitment extends to all persons within our sphere of influence, which includes all our Employees, workers in our operations, Counterparties and communities surrounding our operations. We are also committed to working with our Counterparties and Business Partners to encourage them to uphold respect for human rights as outlined in our policies and to encourage them to have similar commitments within their own business practices.

Where adverse human rights impacts arising from our business activities are identified, we are committed to mitigating the negative effects and where possible to address and resolve such impacts in a timely manner.

We shall ensure that our standards and practices are in compliance with all applicable local legislations and are consistent with internationally recognised principles and standards. We respect the rights of our Employees, our workers in our operations and our communities through our commitments which include but are not limited to:

- Providing Equal Opportunities.
We promote diversity and inclusion and will not tolerate any form of discrimination. This shall be read together with section 5.2.
- Respecting Freedom of Association.
We respect the rights of Employees to join and form organisations of their own choice and to bargain collectively.
- Eradicating any form of Exploitation.
We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation.

- Ensuring Favourable Working Conditions.
We ensure decent living and working conditions for all our Employees. We strive to provide a fair wage and access to basic needs for all our Employees and workers in our operations.
- Enhancing Safety and Health.
We provide a safe and healthy working environment for our Employees and workers in our operations and support the wellbeing of our communities.
- Protecting the Rights of Vulnerable People
We protect and respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees.
- Protecting the rights of children.
We seek to promote the wellbeing of children and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography.
- Eliminating violence and sexual harassment.

We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims. This shall be read together with section 5.3.

When faced with conflicts between local and international norms and/or standards within the countries and territories in which we operate, we endeavour to uphold the higher standards, wherever possible and within the constraints of national legislation.

Each of us has the responsibility to respect these rights and to ensure that we conduct our business in line with these guiding principles. Any suspected violation of human rights within our operations shall immediately be reported through the established grievance and whistleblowing channels.

5.8 Personal Data Protection

The Group respects the privacy and confidentiality of its Employees, Directors, Counterparties, Business Partners and customers' personal data. Personal data should be kept private and protected, unless access is granted for legitimate business purposes.

If you have access to such data, you are required to comply with the applicable laws, such as Personal Data Protection Act, and also the Group's policies. Appropriate measures must be taken if you are dealing with personal data in terms of collection, processing, disclosure, security, storage and retention.

5.9 Professional Development

CMC managers and supervisors will support professional development by providing on the job training and skills enhancement. It must be acknowledged that professional development of employees is a joint responsibility of both CMC and individual employees. Employees have an obligation to maintain current skills and knowledge by pursuing appropriate professional development.

5.10 Dressing and Grooming

Employees are required to maintain a professional standard of dress and grooming which complies with health and safety requirements and is appropriate to their role.



ASK YOURSELF

- Have you been unfair and disrespectful to your subordinates?
- Have you made inappropriate jokes or comments to your colleagues?
- Are you being truthful and honest in your work?
- Do you always comply with safety procedures at your workplace?

6 AVOIDING CONFLICTS OF INTERESTS

All Directors and Employees are expected to make business decisions in the best interests of the Group.

6.1 General Guidance

Each of us has a responsibility to The Group, and to each other. Although this duty does not prevent us from engaging in personal transactions and investments, it does demand that we avoid situations where a conflict of interest might occur or appear to occur. The Company is subject to scrutiny from many different individuals and organisations. We should always strive to avoid even the appearance of impropriety. A conflict of interest may make it difficult for an employee to perform his or her work objectively and effectively. A conflict of interest exists where the interests or benefits of one person or entity conflicts with the interests or benefits of the Company. A conflict of interest arises when you have a personal interest that could be seen to have the potential to interfere with your objectivity in performing duties or exercising judgement on behalf of the Group.

If you find yourself in a situation of conflict whether actual or potential, you must report in writing as soon as practicable stating the facts, nature and extent of the conflict to your respective Unit/Department Head.

Your respective Unit/Department Head on the advice of the Group CEO shall then take action that is considered necessary to safeguard the interests of the Group and/or provide dispensation under allowable circumstances. Where the conflict involves a contract or proposed contract with the Group, the Unit/Department Head will ensure that the terms of the contract are negotiated and decided independently e.g. through an independent tender committee.

As a Director, you must disclose the conflict to the CMC Board, and where relevant, the prior approval of shareholders must be sought.

6.2 Dealings with Suppliers, Customers, Agents and Competitors

Any Director or Employee or their family members must not have:

- Any financial interest in a supplier, customer, agent or competitor of the Group, except that in the case of a public listed company whereby an interest of less than 5% in the equity will be disregarded; and
- Any business dealings or contractual arrangements with any Group Company. This excludes staff purchases for personal consumption or purchases which are on no more favourable terms than those offered to the public.

-Employees of Group Companies are prohibited from receiving commissions from Counterparts, Business Partners and competitors of the Group.

6.3 Outside Employment and Activities outside the Group

As a full-time Employee, you must not take up full-time employment outside the Group or engage in any outside business/service, which may be in competition with the Group or give rise to actual or perceived or potential conflict of interests with your duties in the Group. For the avoidance of doubt, you are encouraged to discuss and inform your involvement in any outside business/service with your Manager.

Unless written approval is obtained, you are not allowed to be a member of the government, quasi-government or statutory bodies or become office bearers, council members, or committee members of trade or professional associations. All fees and/or remuneration that you receive in connection with such membership must be paid over to the Group. This restriction does not apply to social or community-related clubs and associations.

6.4 Board Membership

Employees (excluding Group CEO and directors of the Group) may only be allowed to serve on the boards of government agencies/bodies and/or companies/unincorporated entities outside the Group in exceptional circumstances, with written approval from Group CEO. As for Group CEO and directors of CMC and subsidiaries, such approval should be sought from CMC Board.

The exception to this is where such board appointments relate to family businesses or companies/unincorporated entities formed by not-for-profit organisations (e.g. social or community-related clubs and associations).

6.5 Family Members and Close Personal Relationships

A Director or Employee should not hire, recommend hiring, exert influence over hiring decisions, supervise, affect terms and conditions of employment or influence the management of any family members engaged by the Group. Family members of Directors or Employees may be hired as employees or consultants only if the appointment is based on qualification, performance, skills and experience, and in accordance with the Group's hiring policies and procedures.

A Director or an Employee must also disclose business activities in the Group which involve family members and refrain from any related decision-making process.

Any substantial interest held by the Director's or Employee's family members in a competing company or other related companies must be declared.

6.6 Investment Activities

Personal investment decisions made by a Director or an Employee must not influence his/her independent judgement on behalf of the Group.



ASK YOURSELF

- Are you using your position for personal gain?
- It is your job to select a supplier for the Company. One of the suppliers being considered is a company owned by your brother. Do you know what actions you should take?
- Are your personal relationships influencing your business decisions?

7 GUARDING AGAINST BRIBERY AND CORRUPTION

The Group takes a zero-tolerance approach towards bribery and corruption, and is committed to behaving professionally, fairly and with integrity in all our business dealings and relationships wherever the Group operates and implementing and enforcing effective systems to counter bribery and corruption.

The consequences of bribery and corruption are severe, and may include imprisonment for individuals, unlimited fines, debarment from tendering for public contracts, and damage to the Group's reputation. We therefore take our legal responsibilities very seriously.

You must not influence others or be influenced, either directly or indirectly, by paying or receiving bribes or kickbacks or any other measures that are deemed unethical or will tarnish the Group's reputation.

7.1 Bribery and Corruption

You must comply with all applicable anti-corruption laws and regulations and treaties in all countries in which the Group operates.

You must not directly or indirectly promise, offer, grant or authorise the giving of money or anything else of value, to Government Officials, officers of private enterprises and their connected persons to obtain or retain a business or an advantage in the conduct of business.

These include but are not limited to:

- giving and accepting gratification;
- giving or accepting gratification by an agent;
- corruptly procuring the withdrawal of a tender;
- bribery of an officer of a public body;
- bribery of local or foreign Government Officials;
- using an office or position for gratification;
- receiving commissions that you have reason to suspect will be perceived as bribes or have reason to suspect will be used by the recipient to pay bribes or for other corrupt purposes; and
- facilitation payments ('grease payments') which are regarded as payments to government officials to gain access, secure or expedite the performance of a routine function they are in any event obligated to perform.

The Group does not allow facilitation payments to be made.

If you have encountered any request for a facilitation payment or if you have made any payment which could possibly be misconstrued as a facilitation payment, you must immediately notify the Group Nursing, Quality & Risk and Group Legal Department or send notification to CMC Whistleblowing channel, and the payment recorded accordingly.

You must also refrain from any activity or behaviour that could give rise to the perception or suspicion of any corrupt conduct or the attempt thereof. Promising, offering, giving or receiving any improper advantage in order to influence the decision of the recipient or to be so influenced may not only result in disciplinary action but also criminal charges.

All Counterparts (when representing the Group Companies) are under a duty not to promise, offer or give any improper advantage on behalf of the Group. Directors and Employees must endeavour to ensure that these Counterparts do not promise, offer or give any such improper advantage on behalf of the Group.

ASK YOURSELF

- Have you solicited or received money or gifts from any supplier?
- The agent that your predecessor hired to negotiate on the company's behalf with the local government officials is doing a great job, but his fees seem to be higher than you would have expected. What should you do?



8 GIFTS, ENTERTAINMENT AND TRAVEL

The Group prohibits the use of gifts, entertainment and travel to influence business decisions. You must comply with all applicable policies, procedures, laws and regulations related to the use of gifts, entertainment and travel in all countries in which the Group operates.

It is acknowledged that the practice of business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The intention behind the gift should always be considered, so that it does not create an appearance of bad faith and impropriety and should not be misunderstood by others to be a bribe.

8.1 Gifts

You or your family members must not solicit any gifts from Counterparts or Business Partners directly or indirectly. You or your family members are also discouraged from accepting gifts from these parties.

Similarly, you may offer gifts to promote good business relationships. However, you must be sensitive to the recipient organisation's gifts receiving policy.

You or your family members may accept or offer the gifts subject to the criteria and approvals set out in established procedures. As a Director, you must consult the CMC Board.

You must never accept or offer, with or without approval, gifts in the form of cash or cash equivalents, personal services or those otherwise that may put yourself in a position of conflict, influence your business decision or was otherwise intended or given with the expectation of gaining any advantage, or which may adversely affect the Group's reputation.

In the infrequent circumstances where gifts are accepted (because, for example, refusal may be taken as an offence by the giver), the following guidelines apply:

- i) All gifts received by the Director or employee from the external parties must be declared to Group Nursing, Quality & Risk and/or Group Legal department. A file note will be kept on the action taken, i.e. whether the gifts are retained or donated to charity.
- ii) As a general rule, festive-related gifts and promotional gifts are acceptable provided that the cost is reasonable, i.e. no more than RM 200 / IDR 670,000 / HKD 400. However, it is advised that prior to the distribution of the gifts, the following recommendation should be fulfilled:
 - Equality in terms of value of all festive gifts given to external parties
 - The recipient of the gift should not be to a selected group
 - No preferential treatments to any parties receiving the gifts
 - Not an inducement expecting any future favours that can be deemed as a form of corruption.

- Only relevant individuals should receive the festive gift, e.g. Muslims for Hari Raya only.
- All gifts given to external parties should be declared to Group Nursing, Quality & Risk and/or Group Legal department.

8.2 Entertainment

You and your family members must not solicit any form of entertainment from Counterparts or Business Partners directly or indirectly. You may accept invitations to social events or entertainment within reason according to the scope of your work provided these events or entertainment are not lavish or become a regular feature that may influence any business decision making process.

You may also offer modest entertainment that is legal and reasonable within the scope of your work. When offering entertainment, you must be sensitive to the recipient organisation's entertainment receiving policy. If in doubt, you must consult the Group Nursing, Quality & Risk and/or Group Legal department. As a Director, you must consult the board of CMC. Claims for entertainments will be based on the Group's Limits of Authorities.

You must not accept, engage or offer any entertainment that is indecent, sexually oriented or that otherwise might put yourself in a position of conflict or adversely affect the Group's reputation.

8.3 Travel

You may accept lodging and other expenses (e.g. food, transportation) provided by Counterparts, Business Partners or other stakeholders within the host country if the trip is for business purposes and is reasonably provided. The cost of travelling to the host country may be borne by the Group.

Unless prohibited by law or the policy of the recipient's organisation, the Group may bear the costs of transportation and lodging for Counterparts, Business Partners or other stakeholders in connection with a visit to the Group's facility. The visit must be for a legitimate business purpose e.g. on-site examination of equipment, contract negotiations or training. Prior approval in accordance with established procedures must be obtained.

9 DONATIONS AND SPONSORSHIP

Company donations are part of the Group's commitment to society and a way of contributing to worthy causes. Unfortunately, even legitimate donations sometimes have the risk of creating the appearance of bribery and corruption.

You must ensure that all donations and sponsorships on behalf of the Group are given through legal and proper channels. Particular care must be taken in ensuring that the charities or sponsored organisations on the receiving end are valid bodies and are able to manage the funds properly.

You should also avoid situations where conflicts of interests could arise from making donations or sponsorships. Beware of making contributions to charities or sponsored organisations that may have links to Government Officials or their families, as this could be seen as an act to influence the official's decision in gaining benefit to the company.

You must obtain prior approval in accordance with established procedures before making donations or sponsorships on behalf of the Group. Approved donations and sponsorships should be made transparently and recorded accurately. All requests for donations and sponsorships received by the Directors must be referred to the CMC Board.

ASK YOURSELF

- Does the receipt of a gift from your supplier or customer make you feel obligated?
- Is the gift you are giving to a customer an exceptional reward or an incentive for a transaction?
- Were the gifts or hospitality that you received considered lavish?
- A supplier gave you a cash voucher worth RM 200 / IDR 670,000 / HKD 400 as a token of appreciation for expediting a long outstanding payment. Should you keep it?



10 PROTECTING THE GROUP AND SHAREHOLDERS

The Group is committed to protecting its assets and resources.

10.1 Protecting Group Assets

The Group entrusts you with the Group's assets in the performance of your job. You must protect these assets against waste, loss, damage, abuse, misuse, theft, misappropriation or infringement of Intellectual Property rights and ensure these assets are used responsibly.

10.2 Accuracy of Financial Information

The Group is committed to ensuring the integrity of financial information for the benefit of stakeholders, including but not limited to the Board of Directors, Management, shareholders, creditors and government agencies.

As the Group relies on accounting records to produce reports, you must ensure that all business records and documents are prepared accurately, reliably and in a timely manner.

- These records must conform to generally accepted accounting principles as well as to all applicable laws and regulations of the jurisdiction in which the Group operates; and
- Such records are important to the Group's decision-making processes and the proper discharge of its financial, legal and reporting obligations.

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

10.3 Information Technology

All computer facilities must be safeguarded against theft, damage and improper usage. The Group does not permit the usage of computer facilities involving sensitive and illegal matters, infringement of Intellectual Property rights, unauthorised access, misuse of the Group's time and resources and risking the integrity of computer facilities.

To the extent allowed by applicable laws in the countries in which it operates, the Group reserves the right to monitor your email messages, instant messaging, blogs, use of the internet and contents in Group issued computer facilities. This information can be recovered and used as evidence in domestic proceedings and courts of law or disclosed to the authorities or regulatory bodies as the case may be.

You must use the Group's computer facilities responsibly and primarily for the business purposes for which they are intended. The computer facilities include access to the Internet, email services and all other computer hardware, software and peripherals.

10.4 Proprietary and Confidential Information

The Group values and protects all confidential, proprietary and personal information.

In the performance of your duties, you may obtain information or may be given by or may have obtained access to confidential, proprietary or personal information from any member of Group or Group's customers, suppliers or other stakeholders/parties which not generally available or known to the public or the market.

Hence, you must not communicate or disclose this information in any manner to competitors, customers, persons engaged in any aspect of the securities industry, members of trade associations or other third parties unless such communication or disclosure is authorised by the Group.

- You must be aware that any unlawful or unauthorised disclosure of proprietary or confidential information may result in irreparable loss and/or damage to the Group. In such cases, the Group may institute civil and criminal proceedings against the offending party.
- It is equally important that proprietary 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 the appointment/employment has ceased, unless disclosure is required by any order of any court of competent jurisdiction or any competent judicial, governmental or regulatory authority.

The Directors, employee and Business Partner have an obligation to continue to preserve the confidential, proprietary and personal information even after the appointment/employment has ceased, unless disclosure is required by law, an order of any court of competent jurisdiction or any competent judicial, governmental or regulatory authority. Misappropriation of property owned by Group, customers or suppliers will not be tolerated. Any misappropriation should be reported immediately and properly investigated. Appropriate disciplinary and/or legal action will be taken. In recognising the importance of respecting the privacy rights of individuals, the Group is also committed to ensuring compliance with the requirements of applicable laws relating to protection of personal data (e.g. the Malaysian Personal Data Protection Act 2010 or relevant laws in respective countries).

10.5 Insider Information, Securities Trading and Public Disclosure

The Group is 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.

You or other representatives of the Group are not allowed to trade in securities or other financial instruments based on knowledge that is obtained in the performance of duties, if that information has not been reported publicly.

You must also refrain from disclosing insider information/ insider trading to anyone, including your family members and friends, unless disclosure is required by any order of any court of competent jurisdiction or any competent judicial, governmental or regulatory authority.

Disclosure of material, non-public information to others can result in civil and criminal penalties.

10.6 Business Communication

You must ensure that all business communication is clear, truthful and accurate. You must avoid misleading information, speculative opinions or derogatory remarks.

This applies to communications of all kinds, including e-mail and informal notes or memos.

10.7 Social Media

Every Employee and Business Partner have the responsibility to protect the Group's reputation and brand image. When using your private social media accounts, you must ensure that your posts reflect only your personal opinions and does not negatively affect public perception of the Group. You should also take extra precaution so as to not share any Confidential Information, proprietary business information and any information not available to the public.

10.8 Records Management

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, legible, 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.

10.9 Risk Management

Risk Management is a core business strategy that must be applied to all Group business activities. All employees will be expected to acknowledge and comply with relevant responsibilities as communicated by the Group. These responsibilities include:

- The accurate, effective, timely, and systematic identification, analysis, control and evaluation of risks; and
- Maintenance of relevant contemporary professional standards.

The Group is committed to managing risks of a corporate, clinical or workplace nature and has documented and implemented comprehensive and dynamic communication, reporting, accountability and committee frameworks. The Group, its management and its employees will continue to evaluate these at all levels of the Group.

The implementation of proactive and contemporary risk management practices on the part of the Group and its employees is intended to prevent and/or minimise the potential for loss, harm, injury or damage to the people, the Group or the environment.

10.10 Complaints Mechanism

All complaints will be viewed as an opportunity to improve services. Complaints regardless of source are to be dealt with in a structured, consistent and effective manner.

Complaints are to be acknowledged, investigated and resolved as soon as possible. All CMC facilities will maintain a complaint register.

A commitment is expected from all employees to an unhindered complaints culture and the efficient and fair resolution of complaints.

The principles underpinning Complaints Management within CMC are:

- Respect for consumer rights and responsibilities;
- Organisational commitment to effective complaint management;
- Fairness to all parties;
- Timeliness of response;
- Assistance with complaints; and
- Improvement of outcomes

ASK YOURSELF

- Have you uploaded, downloaded or transmitted questionable material?
- Can you use your network of external contacts to obtain the pricing information of a competitor?
- When you leave the Group, can you take any Group -related information with you?
- You order software and your supervisor is asking you to record the charge against another expense category because it has exceeded the budget for software. What should you do?



11 DEALING WITH COUNTERPARTS AND BUSINESS PARTNERS

The Group strives to build and strengthen its relationships with Counterparts and Business Partners. Directors and Employees are expected to conduct business ethically and share the business ethics and principles prescribed in the COBC with their Counterparts and Business Partners.

Business dealings shall be impartial, objective and free from any influence, either within or outside the Group. In this respect, Directors and Employees must avoid any business dealings with those who are likely to harm the Group's reputation and who violate laws and regulations e.g. safety, environmental, anti-bribery or anti-trust laws.

11.1 Counterparts

The Group selects its Counterparts impartially and based on merit with considerations to, among others, price, quality, service, integrity and ethical standards.

- You must ensure that all procurement decisions are made solely in the Group's best interests and in compliance with the Procurement policies and procedures of respective countries.
- Payments made shall commensurate with the services or products provided.
- Commission payments are generally allowed as per local country's laws and regulations and where covered by the terms and conditions of a legally binding contract between the Group and the Counterparts. The rates of commissions or fees paid to any dealer, distributor, agent or consultant must be reasonable in relation to the value of the product or work that has been performed and should be benchmarked against industry practices.

It is important to be aware that an offer/payment to a company rather than an individual is not an automatic safeguard; the same tests must be strictly applied.

If there is any doubt whatsoever as to whether an offer/payment is proper and in accordance with the Group's procedures for commission, then advice should be sought from the Group CEO who may consult Group Nursing, Quality & Risk and/or Group Legal.

Contractors or subcontractors play a vital role as the Group's representatives in fulfilling the Group's contracts and obligations to customers. The Group seeks to do business with those who comply with all applicable legal requirements and act consistently with the COBC.

Counterparts will be blacklisted for non-adherence to the COBC.

11.2 Customers (Business Partner)

You must always treat customers with honesty and respect. You must provide them with accurate and truthful information about products and services. You must also endeavour to enhance the quality and reliability of products and services via continuous process improvement and innovation. Deliberate misleading messages, omission of important facts, or false claims about the Group's or its competitors' offerings are prohibited.

11.3 Joint Ventures and Business Alliances (Business Partner)

The Group endeavours to work or associate with companies that share the Group's values and ethics, and the principles behind the COBC.

11.4 Competition and Anti-Trust Laws

The Group is committed to competing ethically in the marketplace. You are required to comply with competition and anti-trust laws in the countries in which the Group operates. You must be aware that infringement of such laws can result in civil and criminal liability for both you and the Group.

In addition, you must not use illegal or unethical methods to compete in the market. This includes without limitation:

- Exchanging competitive information with competitors;
- Fixing prices or terms related to pricing;
- Dividing up markets, territories or customers;
- Rigging a competitive bidding process (including arrangements to submit sham bids);
and
- Adopting strategies to illegally exclude competitors from the market, such as without limitation anti-competitive bundling or predatory pricing.

You must not misappropriate proprietary information or possess trade secrets obtained without the owner's consent or by pressuring disclosures from employees of other companies.

11.5 Environment, Land Access and Sustainable Development

The Group strives to minimise health and environmental risk by utilising natural resources responsibly and reducing waste and emissions, where practicable. You must support this commitment by complying with the Group's policies and procedures. You must notify your respective Manager, Administrator, Facility CEO, Group Nursing, Quality & Risk, Group Legal and representatives of Environment, Safety & Health, if hazardous materials come into contact with the environment or are incorrectly handled or disposed.

In addition to applicable laws and permits tied to the land, the Group also recognises that there may be other claims to the land such as ancestral, indigenous or native titles. The appropriate bodies such as interest groups, locals and the government authorities should be consulted to clarify the rights or claims which come along with the land titles, so that harmony can be maintained.



ASK YOURSELF

- Do you deal honestly with your Business Partners?
- Do you consider the legality of fees or commissions paid to your Counterparts?

12 DEALING WITH GOVERNMENT AUTHORITIES, POLITICAL PARTIES AND INTERNATIONAL ORGANISATIONS

The Group strives to build transparent and fair relationships with government agencies, public officials and international organisations. Appropriate action must be taken to comply with the applicable laws and regulations in all countries, in which the Group operates, as well as the Group's relevant policies and procedures.

12.1 Political Activities

You have the right to participate as individuals in the political process. Your participation shall be carried out entirely on your own accord, by your own volition, in your own time and with your own resources. Your political opinions must be clearly delivered as personal opinions and not representative of the Group's position.

Any Employee who wishes to hold any key position as office bearer in any political party must disclose and obtain prior approval from the Group CEO. Those who wish to actively participate full time in politics or are nominated as candidates in any election or are elected as representatives in the Federal or State Legislative Body must resign from the Group.

Any Director who wishes to hold any key position as office bearer in any political party must disclose this intention to the CMC Board.

12.2 Dealing with Regulators and Government Agencies

Your department or operating unit may be subjected to formal or informal queries, surprise inspections, investigations or raids by regulators and government agencies. In any of these events, Employees are expected to recognise the proper procedures in engaging with our stakeholders, including the notification and necessary approval requirement, where applicable.

12.3 Political Contributions

The Group observes all applicable laws and regulations concerning political contributions in the countries that we operate in. You must not use company funds or resources to make any direct or indirect political contributions on behalf of the Group without approval from the CMC Board. You should avoid from even having the appearance of making such contributions or expenditure to any political party, candidate or campaign.

Corporate political contributions are strictly regulated and must be approved by the CMC Board. If you wish to contribute your own time or money to any political activity, it shall be deemed as an entirely personal and voluntary decision.

Political contributions or expenditures include, but not limited to:

- Paying for advertisements and other political campaign expenses;
- Buying tables for fundraising dinners organised by a political party; and/or
- Loaning Employees to support political events during working hours.

12.4 Anti-Money Laundering and Anti- Terrorism Financing

Money laundering is the process of hiding the true nature or source of illegally obtained funds (such as from the drug trade or terrorist activities) and passing it surreptitiously through legitimate business channels by means of bank deposits, investments, or transfers from one place (or person) to another.

Anti-money laundering provisions are designed to help prevent legitimate businesses from being used by criminals for this purpose, and to assist law enforcement agencies to trace and recover criminal assets and terrorist funding.

The Group prohibits your involvement in money laundering activities, either directly or indirectly. The activities may include, but not limited to, the following:

- Payments made in currencies that differ from invoices;
- Attempts to make payment in cash or cash equivalent (out of normal business practice);
- Payments made by third parties that are not parties to the contract; and
- Payments to or accounts of third parties that are not parties to the contract.

ASK YOURSELF

- Your friend is running for a political office. Can you help with the campaign?
- Have you been asked to make payment to another person, in another country to a numbered bank account or to pay in cash?



13 ADMINISTRATION OF THE COBC

13.1 Where to Get Guidance

You can seek advice from the Group Nursing, Quality & Risk and/or Group Legal if you are uncertain as to the interpretation or application of this handbook.

13.2 Raising a Concern or Reporting a Violation

It is your responsibility, without exception, to ensure that any instance of actual or suspected violation of the COBC is reported promptly.

The Group practises an open door policy and encourages you to share your questions, concerns or suggestions with someone who can address them properly. In most cases, your immediate superior is in the best position to address any concerns.

Where it is not possible to do so, you are encouraged to speak or write to the respective Manager, Administrator, Facility CEO, Group Nursing, Quality & Risk, Group Legal, Group Human Resources or Group CEO. However, if you are not satisfied with the response or if your concerns have not been addressed, you may raise your concerns to the relevant Facility CEO or the Group CEO or the secured whistleblowing channel-details of which are available at page 37 of this handbook.

All instances or suspected violation of the COBC received by each Operating Unit or Business Unit must be escalated to Group Nursing, Quality & Risk and Group Human Resources to initiate any investigation if necessary.

When you raise a concern or report a violation, your identity will be kept confidential. However, your consent will be sought should there be a need to disclose your identity for investigation purposes. Please take note that the investigation may be impacted if you do not provide your consent or if you choose to remain anonymous.

The Group expects all parties to act in good faith and have reasonable grounds when reporting a concern or issue. If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

You will not suffer harassment, retaliation or adverse employment consequence if you make a report in good faith. A Director or an Employee who retaliates against others (including Counterparts and Business Partners) who make a report in good faith will be subject to disciplinary action up to and including termination of employment or dismissal.

13.3 Investigation of Potential COBC Violations and Disciplinary Actions

The Group takes all reports and incidents of possible violations to the COBC seriously and shall investigate them thoroughly in accordance with the relevant investigation procedures. Appropriate disciplinary actions shall be taken where violations have been proven.

In respect to Directors and Employees who are found to be in breach of the COBC, they will be dealt with in accordance with the Group's relevant policies and procedures.

All reports made on a possible violation shall be treated in a confidential manner, with disclosure limited to conduct a full investigation of the alleged violation. Disclosure of reports to individuals who are not involved in the investigation will be viewed as a serious disciplinary offence which may result in disciplinary action, up to and including termination of employment or dismissal.

DEFINITIONS

The definitions of the key terms used in this COBC handbook are as follows.

TERMS	DESCRIPTIONS
Anti-bribery Laws	Laws that prohibit the offer of money, goods or services to a person in order to persuade them to perform an action, in many cases illegal, in the interests of the person offering the bribe.
Anti-trust Laws	Laws intended to promote free competition in the market place by outlawing monopolies.
Assets	Tangible or intangible resources controlled by the enterprise as a result of past transactions or events and from which future economic benefits are expected to flow to the enterprise. Such resources shall include buildings, sites, equipment, tools, supplies, communication facilities, funds, accounts, computer programmes, information, technology, documents, patents, trademarks, copyrights, know-how and other resources or property of the Group.
Breach	Behaviour that results in any form of disciplinary action against a person or persons.
Bribery	A bribe is an inducement or reward (financial or otherwise) offered, promised or given, directly or indirectly, in order to gain any improper commercial, contractual, regulatory, personal or other advantage.
Business Partner	Any party with which the Group has a commercial relationship with but is not in a position to exercise a significant or controlling influence over, such as: <ul style="list-style-type: none"> • Customers • Joint Ventures which the Group or Operating Unit does not have a or controlling interest, and • Business alliances e.g. corporate clients, Community General Practitioners, etc.
Business Unit	A segment of the Group or Operating Unit representing a specific business function e.g. Human Resource, Finance, Legal and Business Development, etc.
Cash Equivalent	An asset, such as property or stock, that has a realizable cash value equivalent to a specific sum of money, or an asset that is easily convertible to cash, for example, a Treasury bill.
Code of Business Conduct (COBC)	A set of guidance aimed at governing the business conduct of Directors, Employees, Business Partners and Counterparts.

TERMS	DESCRIPTIONS
Competitors	Competitors are persons or entities that render the same or very similar services or supply the same or similar products as the Group in any one or a number of business environments.
Confidential Information	<ul style="list-style-type: none"> • Any information in any form whatsoever not generally known, and propriety to the Group including but not limited to information relating to their processes, operations, trade, products, research, development, manufacture, purchasing, business, business prospects, transactions, affairs, activities, know-how, Intellectual Property, accounting, finance, planning, operations, customers data, engineering, marketing, merchandising and selling, proprietary trade information, payroll figures, personal data of Employees, customers' list, records, agreements and information, technical and other related information, and any books, accounts and records kept by the Group for the purpose of its business; • All information disclosed to a Director, Employee or Business Partner or to which the Director, Employee or Business Partner obtains access during his/her tenure which he/she has reason or ought to have reason to believe to be confidential information, shall be presumed to be confidential information and shall include (but shall not be limited to) price lists, business methods, customer history, records, information and inventions; and • Any such information as described in (a) and (b) above which relate to any of the Group's suppliers, agents, distributors and customers.
Connected Persons	<p>Connected Persons include the following:</p> <ul style="list-style-type: none"> • A family member of that business partner or official, including his/her spouse, parent, child (including adopted child and stepchild), brother, sister and the spouse of his/her child, brother or sister; • A body corporate which is associated with that business partner or official; • A trustee of a trust (other than a trustee for an employee share scheme or pension scheme) under which that business partner or official or a member of his/her family is a beneficiary; or • A partner of that business partner or official or a partner of a person connected with that business partner or official.
Contract	An agreement that legally obliges a party to do, or not to do, a certain thing. Examples of contracts include sales and purchase contracts, service contracts and others.

TERMS	DESCRIPTIONS
Counterparts	<ul style="list-style-type: none"> • Joint Ventures which the Group or Operating Unit has controlling interest or • Business Consultants • Agents • Contractors and • Goods/service providers of the Group who have direct dealings with the Group including Independent Medical Specialists of CMC hospitals
Facility CEO	Chief Executive Officer to the Operating Units or Facility in respective countries.
Customers	Customers are persons or entities to which the Group provides products or render services to and includes potential customers.
Directors	Person appointed to the CMC Board or the Board of the subsidiaries of CMC, including alternate or substitute Directors.
Employees	Employees shall encompass all personnel including senior management, managers, executives, doctors and non-executives under the employment of the Group. This also covers temporary staff and interns.
Ethics	Refers to standards of conduct, which indicate how to behave, based on moral duties and virtues arising from principles of right and wrong. Ethics involve two aspects namely the ability to distinguish right from wrong and the commitment to do what is right.
Family Members	Shall include the Director's or Employee's spouse, parent, child (including adopted child and step child), brother, sister and the spouse of his/her child, brother or sister.
Fraud	A false representation of a matter of fact, whether by words or by conduct, by false or misleading allegation, or by concealment of what should have been disclosed, that deceive or is intended to deceive another person.
Government Officials	Government Officials are defined broadly to include officers or employees acting on behalf of a government or public body or agency. It could also refer to officers or employees of a government international organisation, such as the United Nations. It also includes political officials or employees of political parties or candidates for political office.

TERMS	DESCRIPTIONS
Gratification	<p>The expression of “gratification” includes –</p> <ul style="list-style-type: none"> • money, donation, gift, loan, property, financial benefit or other similar advantage; • any office, dignity, employment, contract of services; • any payment, release or discharge of any loan, obligation or other liability; • any discount, commission, rebate, bonus or percentage; • any forbearance to demand any money or money’s worth or valuable thing; • any favour of any description, including protection from any penalty or proceedings of a disciplinary or criminal nature or forbearance from the exercise of any right, power or duty; and • any offer or promise of any gratification within the meaning of any of the preceding items.
Group	CMC and all its subsidiaries
Group CEO	Chief Executive Officer of the Group reporting to the CMC Board.
Harassment	Any direct or indirect action, conduct or behaviour which any individual or group of individuals finds abusive, humiliating, intimidating or hostile, whether verbal, physical or visual.
Intellectual Property	Proprietary business or technical information of value protected by patent, trademark, copyright, or trade secret laws.
Operating Unit	A unit within a subsidiary or a joint venture that operates as if it were an independent company. E.g. individual Hospitals.
Political Party	A group of people organised to acquire and exercise political power.
Proprietary Information	Proprietary Information is information held by a person or entity concerning the know-how, trade secrets or other information of any kind, whether in printed or electronic format, including but not limited to Intellectual Property rights, technical information, business processes, sales forecasts, marketing strategies, customer lists or potential customer information, financial records or operations which is regarded as being confidential in nature (whether or not labelled as confidential) and belongs to and owned by the Group.
Retaliation	Action by way of unfair, unlawful or otherwise inappropriate reprisal taken in return of an actual or perceived injury or offence.
CMC	CAH Medical Centres Sdn Bhd (formerly known as Ramsay Sime Darby Health Care Sdn Bhd)

CONTACT US

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