



ANTI- BRIBERY AND ANTI- CORRUPTION POLICY



MiCare HealthTech
HOLDINGS

As at 1 April 2024

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MiCare HealthTech Holdings Pte Ltd and its group of companies (collectively “**MiCare**”) adopt a zero-tolerance approach towards all forms of corruption and bribery and we are committed to acting professionally, fairly and with integrity in all our business dealings and in the discharge of our business relationships, wherever we operate.

MiCare’s Code of Conduct (“**COC**”) sets out MiCare’s core principles and commitments in this regard and MiCare’s Anti-Bribery and Anti-Corruption Policy elaborate upon those principles and commitments, providing guidance to our directors and Personnel concerning how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the course of doing business. This Policy is also important to ensure that all MiCare interactions with business partners, government and commercial entities are conducted with openness and transparency and in compliance with anti-corruption laws.

Engaging in bribery or corrupt practices can have severe consequences for you and MiCare. You may face dismissal, fines and imprisonment, and MiCare may face damage to reputation, financial loss and being banned from business and other negative consequences. With the adoption of this Policy, MiCare is confident in the implementation of adequate procedures as a defence against the risks of corporate liability particularly on corruption prosecution and potentially hefty fines.

In addition, we believe it is vital to strengthen the tone from the top and reboot organisational culture and mindsets to zero tolerance of bribery and corruption. Awareness training is to be provided to all of the directors and Personnel to enable them to fully comprehend and comply with this Policy in full.

This Policy is not intended to provide answers to all questions in relation to bribery and corruption. It is, however, intended to provide Personnel with a basic introduction to how MiCare strives to combat bribery and corruption in addition to MiCare’s commitment to lawful and ethical behaviour at all times.

If you have any doubt about the scope of applicable laws or the application of this Policy, please contact the Vice President (VP), Legal and Compliance immediately.

MiCare reserves the right to amend or delete any provision in this Policy as and when it deems necessary.

1. INTRODUCTION

1.1 Applicability

This Policy applies to all members of the Board of Directors (executive and non-executive) and employees of MiCare, including full-time, part-time, contract and temporary employees (collectively, “**Personnel**”). All Personnel are required to strictly adhere to the provisions of this Policy in the course of their employment or engagement with MiCare.

Further, all Personnel shall ensure that healthcare professionals, healthcare organisation, vendors, suppliers, contractors, sub-contractors, consultants, agents, representatives, joint venture partners, introducer/government intermediaries and others who are performing work or services for and on behalf of MiCare (collectively, “**Third Parties**”), are informed of the requirements set out in this Policy and of the need for them to comply with the requirements set out in this Policy. Whenever there is any non-compliance with this Policy by Third Parties, MiCare reserves the right to terminate the agreement or arrangement with the Third Parties at any time.

If a law conflicts with a policy as set out in this Policy, you should comply with the law. If you realise that a provision in this Policy conflicts with the law in your jurisdiction, you should consult with your VP, Legal and Compliance rather than disregard the Policy without consultation. However, if a local custom or policy conflicts with this Policy, please comply with this Policy. If you have any questions about any of these conflicts, please consult the VP, Legal and Compliance.

This Policy will/has been translated into the local languages of our subsidiaries, where applicable. In the case of any inconsistencies, the English version of this Policy shall prevail.

1.2 Consequences of Breach

Adherence to this Policy is critical to the smooth running of MiCare’s business and is for the common good of MiCare and its Personnel. Any breaches of this Policy may lead to disciplinary action, including termination of employment and referral for criminal prosecution.

1.3 Definitions

All references to “you” in this Policy refer to any person to whom this Policy applies. Where more specific references are used (such as “Personnel”), the more specific reference is intended.

For purposes of this Policy, the term “family/household” includes spouse(s), children (including step-children and adopted children), parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces, nephews, and first cousins, as well as other persons who are members of your household.

The term MiCare shall mean MiCare HealthTech Holdings (Pte. Ltd.) and its subsidiaries.

1.4 What is corruption?

(a) Meaning of corruption

Corruption generally means the act of soliciting or receiving or agreeing to receive or offering or giving any gratification as an inducement or reward to improperly influence a business decision in relation to a dealing.

(b) Forms of gratification

Examples of gratification are as follows:

- Money, donation, gift, loan, fee, reward, valuable security.
- Any office, dignity, employment, contract of employment or services.
- Any payment, release, discharge or liquidation of any loan.
- Any valuable consideration of any kind, discount, commission, rebate, or bonus.
- Any forbearance to demand any money or money's worth.
- Any other service or favour of any description.
- Any offer, undertaking or promise of any gratification.

(c) Forms of corruption

Corruption may be in a variety of forms, including but not limited to the following:

- Bribery is where a person offers, gives, solicits or receives benefits (which may be in the form of corporate hospitality, entertainment or gifts) with the intention or knowledge that the benefit will be used to induce someone to perform a dishonest act.
- Embezzlement is when someone dishonestly appropriates money or other assets with which he has been entrusted.
- Abuse of power, where someone abuses a position of trust for the purposes of illicit gain.

There are multiple other risk areas where corrupt elements may arise. These risk areas are dealt with in detail in Section 2 of this Policy.

1.5 Our expectation of you

Given the above, it is imperative that you exercise due care and caution before committing any act that could amount to corruption. You are responsible for your own actions. As an employee or director, you are also accountable for upholding the good name and reputation of MiCare.

For purposes of compliance, the following are expected of each of our Board of Directors/employees:

(a) Board of Directors

- Promote corporate integrity and good corporate governance practices.
- Set a stern tone on the importance of good corporate governance practices and the non-tolerance towards unethical behaviour.
- Demonstrate support for the implementation and enforcement of this Policy.
- Demonstrate model behaviour and lead by example.
- Be watchful and alert to signs of possible misconduct or inappropriate behaviour.
- Must not condone improper practices and abuse of power.
- Encourage the use of MiCare's whistleblowing channel and give assurance on whistleblowing protection.
- Take strict actions when required.

(b) Management team

- Ensure subordinates understand and comply with the law and the requirements in this Policy.
- Implement and enforce this Policy.
- Demonstrate model behaviour and lead by example.
- Be watchful and alert of possible misconduct or inappropriate behaviour.
- Provide adequate training and exposure to compliance requirements under this Policy.
- Must not condone improper practices and abuse of power.
- Encourage the use of MiCare's whistleblowing channel and give assurance on whistleblowing protection.
- Take strict actions when required.

(c) Employees

- Take interest in and strictly comply with policies implemented by MiCare.
- Must uphold moral and ethical behaviours at all times.
- Must not condone improper practices.
- Be watchful and alert of possible misconduct or inappropriate behaviour.
- Raise red flags to the immediate superior or the VP, Legal and Compliance as soon as practicable.
- Report all suspicious transactions or improper practices and misconduct via MiCare's whistleblowing channel.
- Ensure that the third parties are bound by contractual terms to comply with all relevant laws, including complying with this Policy.

2. RISK AREAS

2.1 GIFT, ENTERTAINMENT AND CORPORATE HOSPITALITY

A. MiCare's No Gift Policy

As outlined in the CoC, in order to maintain our ethical standards and meet our obligations relating to anti-bribery and anti-corruption laws, MiCare has adopted a "No Gift Policy" whereby, subject only to certain narrow exceptions, MiCare Personnel and directors, family members or agents acting for or on behalf of MiCare Personnel, directors or their family members are prohibited from, directly or indirectly, receiving or providing gifts/or anything of value which might influence or even appear to influence the bona fide business relationship between you and another party.

By abiding to this rule, the appearance of a conflict of interest for either party in ongoing or potential business dealings between MiCare and external parties that may tarnish MiCare's reputation or be in violation of anti-bribery and anti-corruption laws can be avoided.

As set out in the CoC, a conflict of interest can occur when your personal interests (or your family/household and friends) interfere in any way or even appear to interfere with the interest of MiCare. A conflict of interest situation would undermine the duties of good faith, fidelity, diligence and integrity as expected by MiCare from its Personnel and directors in the performance of their duties and obligations.

It is the responsibility of all Personnel and directors to inform external parties involved in any business dealings with MiCare that MiCare practices a “No Gift Policy” and to request the external party’s understanding of and adherence to this Policy.

B. Exceptions to MiCare’s No Gift Policy

Although MiCare’s general rule is not to receive or provide any gifts, MiCare is aware that exchanging gifts can be a delicate matter where gift-giving is a central part of business etiquette in certain cultures or business settings. Despite acknowledging MiCare’s “No Gift Policy”, some external parties may insist on providing gifts. Even though the general rule is to refuse or return such gifts immediately, there are a few limited circumstances where accepting such gifts is permitted in the event such refusal is likely to offend and/or sever MiCare’s business relationship with the external party.

In view of this, the following are the limited circumstances in which the receipt and provision of gifts are permitted:

- (a) Exchange gifts on a company-to-company level (e.g., gifts exchanged between companies as part of an official company visit/courtesy call, and the gift is treated as company property).
- (b) Gifts provided to external institutions or individuals in relation to official functions, events and celebrations (e.g., Commemorative gifts or door gifts offered to attendees of events).
- (c) Gifts from MiCare to its Personnel and/or family members in relation to an internally or externally recognised company function, event and celebration (e.g., Long Service Award).
- (d) Token gifts of nominal value, typically bearing MiCare’s company logo or that are given out equally to members of the public, delegates, customers, exhibitions, training, trade shows, etc. and deemed as part of MiCare’s brand-building or promotional activities (e.g., T-shirts, pens, mugs, diaries, calendars and other small promotional goodies).
- (e) Gifts to external parties with no business dealings with MiCare (e.g., monetary gifts to charitable organisations).

In the circumstances above, Personnel and directors are expected to immediately report and record the gift in the following manner:

- (d) Complete the ‘Gifts, Entertainment and Corporate Hospitality Form’ in the format in Appendix A hereto;
- (e) Send the completed Form by email to hellocompliance@micarehealthtech.com.

The VP, Legal and Compliance will then decide whether to approve the acceptance of the gift or require it to be returned. In deliberating the same, the VP, Legal and Compliance is expected to exercise proper care and judgment in each case, taking into account pertinent circumstances, including the character of the gift, its value, purpose, the position/seniority of the person(s) providing the gift, business context, reciprocity, applicable laws, cultural norms and whether such gift comes with a direct/indirect suggestion, hint, understanding or implication that in return for the gift, some expected or desirable outcome is required.

If it is decided for the gift to be returned, the gift must be politely returned with a note of explanation of MiCare's no-gift policy. Should it be decided that the gift can be accepted, the gift should be treated using one of the following manners:

- (a) donate the gift to charity;
- (b) use it as departmental display;
- (c) share with others in the team/unit/department of the employee; or
- (d) retain by the employee if the gift is of nominal value.

Notwithstanding, under no circumstances is a Personnel, director, or his/her/family/household member permitted to accept gifts in the form of cash or its equivalent (cash equivalents could be in the form of vouchers, discounts, coupons, shares, commission, etc.). In addition, even in the above exceptional circumstances, all Personnel and directors are expected to exercise proper judgment in handling gifts and behave in a manner consistent with the following principles:

- (a) Conscientiously maintain the highest degree of integrity;
- (b) Always exercise proper care and judgment;
- (c) Always avoid conflicts of interest or the appearance of conflict; and
- (d) Refrain from taking advantage of your position or exercising your authority to further your own personal interest at the expense of MiCare's interests.

C. Providing Gifts

Generally, Personnel is not allowed to provide gifts to third parties, with the exception of the CEO, the Country Heads and the Executive Management Team.

D. Entertainment and Corporate Hospitality

MiCare acknowledges and recognises that providing and receiving occasional entertainment and corporate hospitality of a modest level is a legitimate way to build the network and foster good business relationships with external parties. As such, directors and eligible Personnel are allowed to entertain external clients through a reasonable and modest act of hospitality as part of business networking as well as a measure of goodwill towards the external clients.

Directors and Personnel must also remember that this is an area where perception is often regarded as more important than facts. Therefore, you should always exercise proper care and judgment when providing entertainment to third parties, especially when it involves public officials, to ensure compliance with local anti-bribery and corruption laws. Therefore, proper care and judgment must always be exercised by the directors and Personnel when providing and receiving entertainment and corporate hospitality. Any entertainment activities involving public officials shall require approval from the CEO or Country Heads in consultation with the VP, Legal and Compliance.

Note that entertainment and corporate hospitality must not be carried out or received to improperly cause undue influence on any party in exchange for some future benefit or result. It is of paramount importance to give due consideration to the following to avoid the appearance of impropriety:

- (a) Bona fide: Can entertainment and corporate hospitality be linked to any dishonest purpose or cause?
- (b) Integrity: If the provision or receipt of entertainment and corporate hospitality be made known to others in MiCare and the public, would it harm the reputation of MiCare and cast doubt on the integrity of the person involved?

- (c) Proportionality and reasonableness: Do entertainment and corporate hospitality incur the excessive cost and occur regularly and exceed the level of reasonableness?
- (d) Transparency: Are the entertainment and corporate hospitality carried out in a covert manner?

If any of the above is answered in the affirmative, the relevant act of providing and receiving entertainment and corporate hospitality shall be ceased immediately and reported and recorded in the following manner:

- (a) Complete the 'Gifts, Entertainment and Corporate Hospitality Form' in the format in Appendix A hereto;
- (b) Send the completed Form by email to hellocompliance@micarehealthtech.com.

If you have any doubts about the appropriateness of receiving and providing entertainment or corporate hospitality, you should either decline or consult with your Country Head/ VP, Legal and Compliance.

2.2 DONATIONS, SPONSORSHIP AND CORPORATE SOCIAL RESPONSIBILITIES (CSR)

A. Corporate Social Responsibilities

MiCare is a responsible corporate citizen and is committed to contributing to the well-being of the people and nation in the countries where it operates. That said, all CSR must be sifted through for legitimacy and not be made to influence a business outcome improperly.

In the event of any CSR requests, the CSR has to be conducted and must involve a legitimate organisation, and appropriate due diligence must be undertaken in particular to ensure whether any public officials are affiliated with the organisation. Extra caution has to be exercised if any public officials are involved in the CSR activity, and guidance from the VP, Legal and Compliance and CEO is required. If the request is rejected, the CSR must not proceed.

CSR requests determined to be legitimate and have no affiliations with public officials must be carefully structured to ensure that the benefits reach their intended recipients. If you need clarification on whether a charitable organisation or social benefit is appropriate, consult the VP, Legal and Compliance for guidance before proceeding further.

B. Donation and Sponsorship

All Personnel must ensure that all donations and sponsorships are not used as a deception to conceal bribery or to evade or avoid any integrity provisions of this Policy, particularly the prohibition on bribery.

MiCare must ensure that donations to charities or beneficiaries are not disguised as illegal payments to government officials and that charities or beneficiaries are not a conduit to fund illegal activities. All donations and sponsorships must adhere to the following:

- (a) Ensure such contributions are allowed by applicable laws;
- (b) Obtain all necessary internal and external authorisations;
- (c) Select well-established entities with adequate organisational structure to guarantee the proper administration of the funds;
- (d) Be accurately reflected in the company's accounting books and records; and

- (e) Not to be used to cover up an undue payment or bribery.

MiCare requires all Personnel to use good judgment and common sense in assessing the requests for donations and sponsorships. If you are in doubt, you should seek advice from the VP, Legal and Compliance and CEO before proceeding with the donations and sponsorships.

C. Due Diligence Requirements

Before any Personnel agree to commit to any donations, sponsorships or CSR requested by a third party, Personnel is required to conduct proper due diligence to ensure that the requests are legitimate and that any red flags are resolved prior to commit the funds.

Employees are to ensure that the proposed donations, sponsorships, or CSR meet the following criteria:

- (a) There is no risk that the funds will be perceived as giving improper advantage to MiCare;
- (b) The proposed recipient is a legitimate organisation, and proper background checks are conducted;
- (c) The proposed recipient/organisation has no affiliations with any government officer/department.

If the proposed donations, sponsorships, or CSR meets the requirements above and is reasonably established to be legitimate, do seek confirmation and approval from the Country Managers and VP, Legal and Compliance before proceeding with such donations, sponsorships or CSR activities.

2.3 POLITICAL DONATIONS

MiCare and Personnel acting on behalf of MiCare are prohibited from making or offering to make any monetary or in-kind political contributions to political parties, political party officials or candidates for the political officer, politically linked organisations, political campaigns, or any person or entity acting on behalf of the foregoing.

Notwithstanding, MiCare does not prohibit Personnel or directors from making personal political contributions as appropriate within limits established by law, but under no circumstances should they make any representation that they are doing so on behalf or with the support of MiCare. Under no circumstances will any Personnel or director be compensated or reimbursed by MiCare for the same.

2.4 PURCHASING AND PROCUREMENT PRACTICES

Relevant Third Parties should be awarded businesses from MiCare based on objective and transparent assessment criteria such as product or service suitability, price, quality and delivery effectiveness. Any purchasing and procurement decisions must be made based solely on the best interest of MiCare.

Personnel involved are to ensure that all purchasing and procurement made must be documented in the form of proper agreement, and such agreement must clearly identify key points such as the services or products to be provided, the basis for payment, the applicable rate or fee and the due date for delivery. Most importantly, the payment agreed to must be commensurate with the quality of the services or products provided.

Below are some of the features of sound procurement practices that all Personnel involved in the procurement must adhere to:

- (a) Ensure a level playing field where all vendors are treated equally and all are afforded the same information at the same time;
- (b) Ensure confidentiality of the purchasing and procurement process so that there is no leakage of information;
- (c) Avoid any conflict of interest (or potential conflict) and declare such conflict where relevant and take the appropriate steps to ensure there is no favouritism amongst suppliers and vendors;
- (d) Ensure that the power to decide is not centralised on one individual so that there are checks and balances; and
- (e) Ensuring transparency in the purchasing and procurement process so that the processes are auditable, justifiable and can stand up to scrutiny by outsiders.

When there is a tender process, all Personnel must observe strict procedures to avoid impropriety and biases. In the event of any conflicts of interest (or potential conflict) through relationships or friendships with Personnel of any of the tenderers, such conflicts or potential conflicts must be declared to the VP, Legal and Compliance.

2.5 FACILITATION PAYMENTS

Facilitation payments are defined as payments made to secure or expedite the performance of a person performing a routine or administrative duty or function. Offering, promising or requesting facilitation payments is just as prohibited as actually paying or receiving facilitation payments. Facilitation payments need not involve cash or other financial assets. It can manifest in any form of advantage with the intention to influence a selected group of people to perform their duties.

As facilitation payments constitute a form of bribery and corruption, MiCare prohibits the acceptance or provision, whether directly or indirectly, of facilitation payments by any Personnel, regardless of whether such facilitation payments are for the benefit of the employee himself or any other person. All Personnel must not offer, promise, give, request, accept, or receive anything which might reasonably be regarded as facilitation payments.

If any Personnel receives a request for facilitation or is being offered facilitation payments, this must immediately be escalated to the VP, Legal and Compliance for appropriate actions to be taken.

2.6 DEALING WITH PUBLIC OFFICIALS

Because of the nature of our business, you will come into regular contact with various government and regulatory agencies and state-owned enterprises. Dealing with government officials always requires special consideration and care — particularly when you are giving or receiving gifts and hospitality. According to the CoC, examples of government officials include:

- (a) Any official or employee of a government hospital or government healthcare institution;
- (b) Any official or employee of a government agency or regulatory authority (e.g. Ministry of Health, Customs Department, Tax, etc.);

- (c) Any political candidate or member of a political party; and
- (d) Any government official acting in that capacity for a commercial enterprise.

It is important to ensure MiCare's interactions with public officials are open, transparent and do not violate anti-bribery and anti-corruption laws. Extra caution must be exercised when dealing with public officials, as bribery and corruption laws in some countries are more stringent and provide for stricter punishments. Providing gifts, entertainment or corporate hospitality to public officials or their family/household members is generally considered a 'red flag' in most jurisdictions.

In the circumstances, Personnel and directors are expected to immediately report and record any gift and entertainment relating to public officials in the following manner:

- (a) Complete the 'Gifts, Entertainment and Corporate Hospitality Form' in the format in Form A hereto;
- (b) Send the completed Form by email to hellocompliance@micarehealthtech.com.

Any entertainment activities involving public officials shall require approval from the CEO or Country Heads in consultation with the VP, Legal and Compliance.

2.7 DEALING WITH THIRD PARTIES

As an entity committed to preventing bribery and corruption, MiCare's dealings with Third Parties must comply with all relevant laws and regulations. All forms of bribery and corruption are unacceptable and will not be tolerated.

It is MiCare's expectation that all Third Parties acting for or on its behalf share the values, principles and ethical standards of MiCare, as their actions can implicate MiCare legally and tarnish MiCare's reputation. It is also imperative for members of the public that deal with MiCare to adhere to ethical conduct and practices.

Thus, before establishing any business relationship with these Third Parties or onboarding them as our panel, MiCare is obligated to conduct appropriate due diligence to understand the business and background of these prospective Third Parties before entering into any arrangements with them, where applicable. This is to ascertain that MiCare engages and deals only with those that subscribe to the acceptable standard of integrity in their business practices. Business dealings should only be entered into with prospective business partners reasonably suspected of engaging in bribery and improper business practices if those suspicions have been investigated and resolved satisfactorily.

As a way of ensuring that MiCare only does business with Third Parties that share MiCare's values, principles and ethical standards, the following must be complied with:

- (a) Conduct due diligence to assess the integrity of MiCare's prospective business counterparties;
- (b) All Third Parties are made known of this policy;
- (c) Continue to be cognizant of and monitor Third Party performance and business practices to ensure ongoing compliance.

In relation to the due diligence, if at any point during the due diligence exercise or in the dealings with a Third Party, there are conflicts of interest or "red flags" raised, these further warrant investigations must be sufficiently addressed before the engagement of the Third Party can

progress.

Examples of common “red flags” involving Third Parties include:

- (a) Family, business or “special” ties with the government, political party or public officials.
- (b) Agreeing to make payments in sums exceeding the contract sum without justification.
- (c) A reference check reveals a flawed background or a reputation for getting “things done” regardless of the circumstances or suggests that for a certain amount of money, he can fix the problem.
- (d) The Third Party requests that a transaction is structured to evade normal record-keeping or reporting requirements.
- (e) Objection to anti-bribery representations and warranties in commercial agreements or negative response when told of such requirements.
- (f) Convoluting payment arrangements include payment in cash, payment to a third party or accounts in other countries or requests for upfront payment for expenses or other fees.
- (g) The Third Party requires that his/her identity not be disclosed as part of the business transaction.
- (h) Inadequate credentials for the nature of the engagement or lack of an office or an established place of business.
- (i) Third Party is specifically recommended or insisted upon by an existing business partner, employee, or public official.
- (j) Been offered an unusually generous gift or lavish benefits or entertainment by a Third Party.

MiCare requires its Personnel to use good judgment and common sense in assessing the integrity and ethical business practices of Third Parties to ensure that MiCare deals only with those who share common values as MiCare.

In any case, whenever in doubt, Personnel should seek advice from VP, Legal and Compliance whenever questions arise relating to Third Parties that MiCare has appointed or is considering appointing.

2.8 MERGERS, ACQUISITIONS AND INVESTMENTS

MiCare will undertake due diligence in its evaluation of mergers and acquisitions, and investments exercise to ensure compliance with anti-bribery and corruption laws. Transparency International has provided a guide (<https://www.transparency.org.uk/our-work/publications/227-anti-bribery-due-diligence-for-transactions>) for companies undertaking anti-bribery and corruption due diligence in the course of mergers, acquisitions and investments which is as follows:

A. Pre-Acquisition Due Diligence

- (a) Anti-bribery due diligence is considered proportionate for all mergers and acquisitions,

investments and other forms of investment transaction but on a risk-based approach, with the level of due diligence being proportional to the investment and the risk of bribery.

- (b) Anti-bribery due diligence starts sufficiently early in the due diligence process to allow for adequate due diligence to be carried out and for the findings to influence the outcome of the negotiations or stimulate further review if necessary.
- (c) The partners or board provide commitment and oversight to the due diligence reviews, i.e. the findings of anti-bribery due diligence should be properly examined and understood at the highest level of decision-making during the transaction, for example, at the level of the board or investment committee.
- (d) The information gained during the anti-bribery due diligence is passed on efficiently and effectively to the company's management once the investment has been made.

B. Post–Acquisition Due Diligence

- (a) To conduct due diligence on a proportionate basis immediately after purchase to determine if there is any current bribery and if so, take immediate remedial action.
- (b) To ensure that the target has or adopts an adequate anti-bribery and corruption programme equivalent to its own.
- (c) Bribery detected through due diligence is reported to the authorities.

2.9 RECRUITMENT OF EMPLOYEES

MiCare, being a diversified business entity, provides equal opportunity for any qualified and competent individual to be employed by the company from various multicultural and multiracial backgrounds.

The recruitment of Personnel should be done based on approved selection criteria to ensure that only the most qualified and suitable individuals are employed. This is imperative to ensure that no element of corruption is involved in the hiring of Personnel and to avoid allegations of bribery and corruption.

If you find or suspect that another person subject to this policy has violated or is about to violate this policy or applicable law, whether deliberately or inadvertently, you must forthwith report the same, in writing, to the VP, Legal and Compliance or your Human Resource Department.

3. CONTROL MEASURES

3.1 Record Keeping

In order to ensure the smooth implementation of its business activities, MiCare keeps accurate and complete books, records and accounts to support its operations, dealings and transactions. MiCare is committed to devising and maintaining appropriate and sufficient internal controls (including financial and non-financial controls) to ensure the accuracy of its books, records and accounts.

MiCare understands the importance of having in place appropriate internal controls and accurate, complete and up-to-date books, records and accounts that will serve as evidence underlying the business reason for the making of certain business decisions. These elements are vital as part of a robust anti-corruption compliance program. This is so because accurate, complete and up-to-date financial records would justify the making and receipt of payments to and from any third parties.

In order to ensure that MiCare retains proper, complete and accurate records, it is important for

all Personnel to, amongst others:

- (a) Submit all expenses (including claims relating to expenses spent on gifts, entertainment and corporate hospitality) incurred for third parties in accordance with the internal expenses policy and ensure that a reason is recorded for every expenditure;
- (b) Prepare and maintain all accounts, invoices and other records relating to dealings with the third party from time to time to ensure that they are up-to-date complete and accurate; and
- (c) Not to keep any accounts “off-book” with the intention to facilitate or conceal improper payments.

3.2 Reporting

MiCare encourages openness and transparency in its commitment to the highest standard of integrity and accountability.

In line with MiCare’s commitment to prevent corruption and create an open, transparent and honest work environment, we encourage all staff to report any concerns or suspicious behaviour or dealings, particularly any suspicions of bribery or corrupt behaviours, that they encounter.

If you suspect any of your colleagues or superiors engage in corrupt practices, or if you are approached by any Third Party who attempts to persuade you to engage in any unethical practices, you should immediately report it directly to our management team, or you may make use of the whistleblowing channel. Please refer to MiCare’s Whistleblowing Policy for more details on the whistleblowing mechanism.

4. SYSTEMIC REVIEW, MONITORING AND ENFORCEMENT

4.1 Reviews and continuous evaluation

MiCare is committed to reviewing this Policy regularly to assess the performance, efficiency and effectiveness of this Policy as a part of the anti-corruption program that we implement. Such review will also investigate whether this Policy has been appropriately implemented and enforced. The review may be carried out by an internal auditor, the VP, Legal and Compliance or an outsourced external party with the objective of improving control of this Policy and its related procedures.

The outcomes of the reviews conducted shall form the basis of any efforts to improve this Policy and any existing anti-corruption control measures that are in place. Continuous evaluations and improvements on MiCare’s anti-corruption compliance program is important to MiCare and action plans indicating the remedial steps to address the shortcomings revealed through the reviews should be devised accordingly.

4.2 Performance

In enforcing MiCare’s anti-bribery and anti-corruption program, the VP, Legal and Compliance is responsible to monitor the performance of all Personnel relating to the policies and procedures to combat bribery and corruption that MiCare has adopted. This is to ensure that the Personnel understand and comply with the requirements of these policies and procedures whilst performing their roles and functions.

5. TRAINING AND COMMUNICATIONS

5.1 Training

MiCare understands that adequate training for all Personnel and directors and where relevant to our third-party business partners is an essential part of an effective anti-corruption compliance program. In this respect, we are committed to providing proper and periodical training to our Personnel and directors and where required, our third-party business partner to ensure full understanding of MiCare's commitment towards the prevention of bribery and corruption and the importance of complying strictly with the requirements under this Policy.

The Human Resources Department are responsible for organising and coordinating trainings for the Personnel and directors and where relevant to our third-party business partners. Records of trainings conducted as well as records of attendance of the targeted attendees at the trainings shall be properly kept.

5.2 Communications

Besides training, MiCare is aware that communications of MiCare's commitment towards the prevention of bribery and corruption and the measures that MiCare takes in this respect to all Personnel, directors and our Third Parties are also a crucial element that would contribute to the effectiveness of our anti-corruption compliance program.

The VP, Legal and Compliance is responsible to ensure that MiCare's commitment towards the prevention of corruption and this Policy in particular, are communicated timely and adequately to all Personnel, directors and our Third Party. To ensure this, the following can be carried out:

- (a) Translating this Policy and all relevant memos relating thereto to the local language of its subsidiary to ensure all Personnel are able to read and comprehend this Policy and its requirements;
- (b) Pasting a memo in visible places within the vicinity of MiCare's subsidiary's office to inform all Personnel about this Policy and its requirements;
- (c) Providing a copy of this Policy to all new Personnel who joins the company;
- (d) Circulating the Policy and other compliance documents through email to ensure that all Personnel receive the same;
- (e) Publishing the Policy on MiCare's website to ensure that its stance on bribery and corruption is effectively communicated to all Personnel and Third Parties, as well as made available for the public's viewing; and
- (f) Pasting the list of dos and don'ts in relation to bribery and corruption in visible areas within the vicinity of MiCare's offices.

6. MiCARE'S WHISTLEBLOWING POLICY

MiCare practices an "open-door" policy and encourages openness and transparency in its commitment to the highest standard of integrity and accountability.

If you report or disclose any actual or perceived bribery or corruption in good faith, belief, without malicious intent, that a breach or violation as aforesaid may have occurred or may about to occur, you will be accorded protection of confidentiality, to the extent reasonably practicable, notwithstanding that, after investigation, it is shown that you were mistaken. In addition,

Personnel who whistleblow internally will also be protected against detrimental action for having made the disclosure to the extent reasonably practicable.

Please refer to MiCare's Whistleblowing Policy for more details on the whistleblowing mechanism.

This Anti Bribery and Anti-Corruption Policy has been reviewed and approved by MiCare Healthtech Holdings (Pte. Ltd.) Management.

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APPENDIX A
GIFTS, ENTERTAINMENT AND CORPORATE HOSPITALITY FORM

Part I – TO BE COMPLETED BY EMPLOYEE		
1	Name & Designation of Giver	
2	Company	
3	Purpose	
4	Business Relationship	*Customers/ Agents/ Vendors/ Contractors/ Suppliers/ Consultants/ Senior Public Officers * - strike-off where not applicable
5	Description of Occasion	
6	Description of Gifts/Entertainment/Corporate Hospitality	
7	Value/Estimated Value of Gifts/Entertainment/Corporate Hospitality	

Part II – TREATMENT FOR RECEIVING GIFTS, ENTERTAINMENT AND CORPORATE HOSPITALITY		
()	Retain by Employee	
()	Retain as departmental display	
()	Share with other Personnel	
()	Donate to charity	
()	Return to offeror	
()	Others (Please specify)	

SUBMITTED BY	RECEIVED BY
Name:	Name:
Designation:	Designation:
Department:	Department:
Date:	Date:

PART III – APPROVAL BY VP, LEGAL AND COMPLIANCE
Approved/Not Approved (Insert Notes, if any)
 VP, Legal and Compliance