



**SUNWAY HEALTHCARE HOLDINGS BERHAD**  
(Registration No. 202101000296 (1400594-U))

**CODE OF CONDUCT  
AND  
BUSINESS ETHICS POLICY**

Version 3.0 (13 August 2025)

Process Owner : Group Human Resources  
Intended Users : Sunway Healthcare Group – All Users  
Approved by the Board : 13 August 2025  
Last Updated : 13 August 2025

COMMITTED TO  
SUSTAINABLE DEVELOPMENT GOALS



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(Last updated on 13 August 2025)

**1. OBJECTIVE**

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

**2. SCOPE**

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

**3. SUNWAY HEALTHCARE GROUP’S VISION AND MISSION**

**3.1 Vision**

To be one of the leading private healthcare networks in the ASEAN region.

**3.2 Mission**

**Service with a SMILE**

- S – Satisfactory return to stakeholders
- M – Modern, comprehensive and safe facility and environment
- I – Inspired, engaged and driven team
- L – Leading-edge clinical practices and technologies
- E – Exceed customer’s expectations

**4. SUNWAY HEALTHCARE GROUP’S CORE VALUES**

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

- **Compassion:** We are always sensitive to our patients’ needs.
- **Humility:** We believe in being humble, polite and respectful.
- **Excellence:** We strive for excellence and take pride in all that we do.
- **Respect:** We respect every individual and are always professional in our conduct and behaviour.
- **Integrity:** We believe in doing the right thing at all times.

**5. SUSTAINABLE DEVELOPMENT**

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

**6. ACT WITH INTEGRITY AND ETHICS**

**6.1. Anti-Bribery and Corruption**

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

*(Reference: Anti-Bribery and Corruption Policy)*

**6.2. Giving and Accepting of Gifts, Entertainment and Hospitality**

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

*(Reference: Gifts, Entertainment and Hospitality Policy)*

**6.3. Donations and Sponsorships**

We always seek avenues in which we can contribute to the community through donations, sponsorships and corporate responsibility programmes. Therefore, it is your responsibility to understand that payments for donations, sponsorships and corporate responsibility programmes are made in full compliance with the Donations, Sponsorships and Corporate Responsibility Policy, the Anti-Bribery and Corruption Policy, the Anti-Money Laundering, Countering Financing of Terrorism and Countering Proliferation Financing Policy, and any applicable laws and regulations. All requests must reflect our Core Values and align with our business activities, and must be channeled to the Sunway Healthcare Group Brand Marketing and Communications department for approval.

*(Reference: Donations, Sponsorships and Corporate Responsibility Policy)*

**6.4. Abuse of Power**

The abuse of power or authority is the improper use of a position of influence, power or authority by an employee towards others. You are not to use your position to influence others, current and/or potential partners or customers of Sunway Healthcare for your personal interest/gain or for the interest/gain of others under your authority.

Abuse of power or authority can also happen when you abuse your influence, power or authority to negatively influence the career or employment conditions (including, but not limited to, appointment, assignment, contract renewal, performance evaluation or promotion) of other individuals within and outside Sunway Healthcare. It may also consist of conduct that creates a hostile or abusive work environment, which includes, but is not limited to, the use of intimidation, threats, blackmail or coercion.

Being an employee of Sunway Healthcare, you shall only use your position, power or authority in accordance with the laws of the country and the organisation's regulations, policies and procedures for the sole advantage and benefit of Sunway Healthcare.

**6.5. Anti-Money Laundering, Countering Financing of Terrorism and Countering Proliferation Financing**

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

*(Reference: Anti-Money Laundering, Countering Financing of Terrorism and Countering Proliferation Financing Policy)*

**6.6. Insider Trading**

As a public listed company, we are required to comply with various laws and regulations to make timely, full and fair public disclosure of information that may materially affect the market for our stock. You are not to buy or sell, nor to recommend or suggest anyone else to buy or sell the securities of Sunway Healthcare either directly or indirectly when you are aware of insider information about Sunway Healthcare for personal benefit. Insider information here refers to material non-public information relating to the securities of Sunway Healthcare. A violation of this policy can result in civil and criminal penalties.

*(Reference: Insider Trading Policy)*

**6.7. Fraud**

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

**6.8. Dealing with Competitors**

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

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

*(Reference: Competition Law Compliance Manual)*

#### **6.9. Avoid Conflict of Interest(s)**

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

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

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

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

*(Reference: Conflict of Interest Policy)*

#### **6.10. Sunway Healthcare's Property and Benefits**

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

### **7. WORKING WITH ONE ANOTHER**

#### **7.1. Human Rights**

- (a) At Sunway Healthcare, we respect and support the Universal Declaration of Human Rights and United Nations Guiding Principles on Business and Human Rights and the rights of all employees as well as our business associates. We use these frameworks to guide the development and implementation of our Human Rights Policy.

- (b) As a responsible global corporate citizen, we shall endeavour to meet standards and practices that are consistent with internationally recognised principles, subject to the laws and regulations of the countries and territories in which we operate. We do not tolerate unethical labour practices such as child labour, forced or compulsory labour, restriction of freedom of movement.
- (c) We respect the rights of our employees, stakeholders and communities through our commitments which include, but are not limited to:
  - (i) Providing Equal Opportunities
  - (ii) Respecting Freedom of Association
  - (iii) Eradicating any form of Harassment or Abuses
  - (iv) Enhancing Safety and Health
  - (v) Forced/ Compulsory Labour
  - (vi) Protecting the Rights of Children

*(Reference: Human Rights Policy)*

## **7.2. Health and Safety**

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

*(Reference: Occupational Health, Safety and Environment Policy)*

## **7.3. Harassment and Violence**

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

*(Reference: Anti-Sexual Harassment Policy)*

## **7.4. Equal Opportunities and Non-Discrimination**

We are committed in encouraging equal opportunities and non-discrimination at the workplace. We aim to create a culture that respects and values each other's differences, promotes equality and diversity, and encourage individuals to grow and develop in order to realise their full potential. We nurture a workplace environment that values and utilises the contribution of employees with diverse ideas, backgrounds, experiences, and perspectives for the growth and prosperity of Sunway Healthcare, our customers and the communities we serve. We promote dignity and respect for all and do not tolerate direct or

indirect discrimination, victimisation, intimidation, bullying or harassment in the workplace.  
(Reference: *Diversity and Inclusion Policy*)

**7.5. Substance Misuse and Criminal Activities**

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

(Reference: *Alcohol and Drug Abuse Policy*)

**7.6. Social Media**

You have the responsibility to protect Sunway Healthcare's brand reputation and image. When using your private social media accounts, you must indicate that your posts reflect only your personal opinions and do not negatively affect Sunway Healthcare's brand perception. You must also safeguard confidential and proprietary business information and not disclose internal information to people outside of Sunway Healthcare.

**7.7. Engaging in Political Activity**

Your participation in any political activity shall not be carried out during company working hours, utilising company resources or brand, and should be entirely on your own accord, volition, time and resources.

**7.8. Manager's Responsibility**

If you hold a managerial position, you are responsible for the enforcement of and compliance with this Code including necessary distribution to ensure employee's knowledge and compliance with this Code. You are to ensure that the employees you supervise understand and practice the Code in their day-to-day activities. You have the responsibility to ensure that employees feel safe and comfortable to provide any feedback related to job and performance.

**7.9. Dress Code and Uniform**

As a proud Sunwayian, you represent the image of Sunway. You are required to be properly attired as prescribed in the Employee Handbook at all times during working hours whilst in the office premises. The policy is also aimed at creating a professional image for the Group through its staff. Therefore, it is imperative that you must exercise self-discipline and conformity to the policy.

(Reference: *Employee Handbook*)

**8. ENSURE COMPLIANCE OF LAWS AND GOVERNANCE**

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

**8.1. Accuracy of Financial Information / Financial Integrity**

You are responsible for ensuring that all the financial statements of Sunway Healthcare are prepared timely, accurately, and conform to generally accepted and applicable accounting principles and to all applicable laws and regulations. You are responsible for ensuring that Sunway Healthcare's books and records accurately, fairly and reasonably reflect the substance of transactions. You must comply with company accounting policies and internal control requirements on matters relating to finance. Purposely misrepresenting information or activities on company documents and reports may be considered falsification of documentation, which is a serious offence. Sunway Healthcare reserves the right to report any act of misrepresentation suspected of being criminal in nature to the police or other relevant authorities.

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

**8.2. Confidential Information**

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

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

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

**8.3. Internal Controls and Record Management**

Sunway Healthcare's documents and records are meant for business purposes and requirements, and in 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.

**8.4. Information Technology**

**(i) Strict Prohibition**

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

*(Reference: E-Policy)*

**(ii) Information and Assets**

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

*(Reference: E-Policy)*

**(iii) Intellectual Property**

We encourage you to be inventive and innovative in discharging your normal duties and responsibilities. Any intellectual properties including but not limited to copyrights, patents, trade secrets, and other intellectual property rights associated with any concepts, works of authorship, discoveries, inventions, techniques, processes, writings, creations, programs, product improvements, plans, designs, products, manuals, documents, materials, ideas, computer programs, results of technological researches, trademarks, registered designs and confidential information that were created and/or developed by you in the course of your employment and/or by using Sunway Healthcare's resources, shall become the sole and exclusive property of Sunway Healthcare. You should not, without the prior written consent of Sunway Healthcare, reproduce, adapt, modify, use or disclose intellectual properties or inventions or any information relating thereto to any person whomsoever except to Sunway Healthcare's duly authorised parties as instructed or notified by Sunway Healthcare.

*(Reference: E-Policy)*

**8.5. Representing Sunway Healthcare Externally**

You must obtain prior approval from your Business Unit Management\* or Group Corporate Function Management\*\* before you accept external invitations to give speeches, presentations or describe your job nature at the business unit or Group.

**8.6. Personal Data Protection**

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

*(Reference: Personal Data Protection Compliance Manual)*

**8.7. Laws and Regulations**

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

**8.8. Annual Staff Declaration**

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

- Code of Conduct and Business Ethics Policy,
- Anti-Bribery and Corruption Policy,
- Conflict of Interest Policy;
- E-Policy;
- Personal Data Protection Compliance Manual;
- Human Rights Policy; and
- Any other mandatory policies decided by Sunway Healthcare from time to time.

**9. NON-COMPLIANCE**

Non-compliance with this Code will be taken very seriously and may result in disciplinary action, including termination as well as civil or criminal proceedings. You may seek advice from your

Business Unit Management\* or Group Corporate Function Management\*\* and the Human Resources Department when you are unsure of an appropriate or ethical course of action under this Code.

#### **10. WHISTLEBLOWING**

If you encounter actual or potential violations of this Code, please report your concerns via our Whistleblowing platform as follows:

E-mail : [SHG\\_Whistleblowing@sunway.com.my](mailto:SHG_Whistleblowing@sunway.com.my)  
Address : Group Internal Audit Department, No. 5, Jalan Lagoon Selatan,  
Bandar Sunway, 47500 Subang Jaya, Selangor.

\* **Business Unit Management** means the Chief Executive or Head of each business unit of Sunway Healthcare.

\*\* **Group Corporate Function Management** means the Chief Executive or Head of the respective corporate services function of Sunway Healthcare Holdings Berhad.