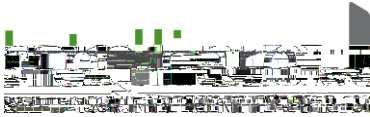


## Document Edit History

Version	Date	Additions/Modifications
1.0	August 1, 2019	Initial Draft

## Reviews and Approvals

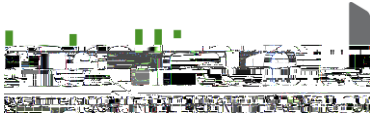
Name	Sign off Date	Remarks
Board of Directors	August 1, 2019	
Executive Committee		



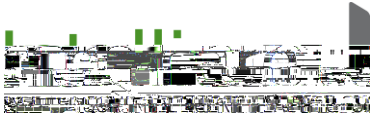
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# INTRODUCTION

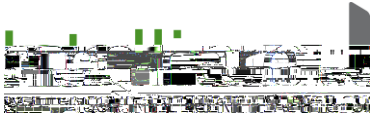
## The Companies

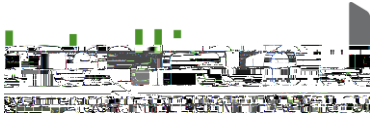
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We, at Asalus, Avega and Aventus (the Group), are committed to lead, innovate, and trailblaze a holistic approach to healthcare management.

All our endeavors and aspirations shall constantly adhere to the highest level of ethical and performance standards, guided by our Group's long-standing principles of integrity, fairness, honesty, hard work, and an enduring sense of humanity.

The end in view of this commitment is and shall always be the upholding of the right of each individual to



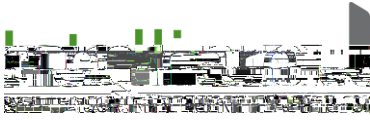


# CULTURE

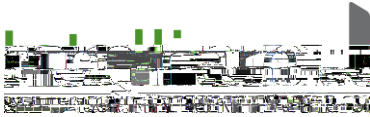
## Our Culture Towards the Group

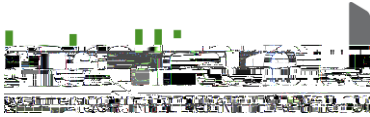
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The Group promotes equal opportunity in all of its endeavors. In the hiring and selection of its personnel, we









damage to any such property. Employees may be required to reimburse the Company appropriate costs where the loss, theft or damage was caused or contributed to by negligence or personal conduct.

Property belonging to the Company must not be removed without the written approval of an authorized officer of the Company.

Data stored on or in the property of the Company, or transmitted using Company's facilities or technologies, shall remain at all times the property of the Company. This includes software, emails, documents, files etc. As such, you must employ reasonable diligence in protecting the data under your custody from accidental or unauthorized access, disclosure, modification or deletion.

The use of Company assets in any way that may be disruptive or offensive to others or to display or transmit sexually explicit images, messages or cartoons or use of ethnic slurs, racial epithets, or anything that may be construed as harassment or ridicule of others is prohibited.

For more information on this, please refer to the Asset Management Policy.

## Proper Decorum

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Professionalism requires the highest standard of moral and ethical conduct. Here, everyone is expected to treat others well with respect to the person and to the Company at all times. Proper Decorum includes the simplest of things such as wearing proper business attire or uniform and preventing oneself from being engaged in a compromising position to the detriment of the Company and its people.

## Social Media and Freedom of Expression

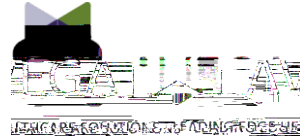
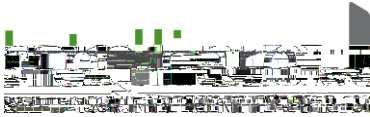
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We have built our good name for years and everyone is expected to continue promoting and protecting our goodwill even in our personal freedom space, online or otherwise. It is, thus, our policy to ensure no derogatory, discriminatory, racist, religious, defamatory comments are made in the course of expressing oneself.

As far as politically charged comments are concerned, all personnel must ensure that these views are not attributed to the Group or any of its affiliates.

In addition, giving comments on confidential or sensitive information about the Company, its activities, its clients, its patients, its business partners and its employees, or the scope, nature or details of their work within the Company, in any other online blogs, forums or other similar platforms, without the written authorization from the Company is not permitted.

For more information on this, please see Social Media Policy.

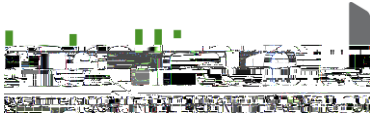


# BUSINESS CONDUCT

## Government Dealings

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It is our policy to be accurate and truthful in representing business transactions to government agencies. If you conduct business with any government officials, foreign or local, on any of the Company's behalf, please make sure you have a thorough understanding of these laws and know enough about any third parties doing business in our name to ensure they are making appropriate decisions on our behalf. At no time will the Company permit



For more information, please refer to the Anti-Graft and Corrupt Practices Policy and the Gifts and Entertainment Policy.

## Sales and Marketing

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We compete on the merits of its products and services in all sales and advertising. To this end, communications with our clients or potential clients must be truthful and accurate. We sell the quality of what we provide. We depend on our strengths and not on disrespecting our competitors.

## Fair Competition

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We adhere to fair and open competition. In this process, we make our own business decisions, free from understandings or agreements with competitors or suppliers that restrict competition. Thus, in conducting our business, all of our personnel must:

1. Not discuss nor disclose pricing, production or markets with competitors,
2. Always present our services and products consistent with our values
3. Not induce a third party to breach an existing agreement,
4. Never act in a manner that could be seen as an attempt to exclude present or potential competitors to control market prices.
5. Coordinate properly with the regulatory agencies and industry association in pursuit of this goal.

## Conflict of Interest

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We do not condone conflict of interests. By this we mean, our people must at all times prevent any event where personal interest or activity interferes or appears to interfere with the duties being performed at, or owe to, any of the Companies. This requires preventing also an appearance of conflict and not just actual conflict of interest.

Please refer to our Conflict of Interest Policy.

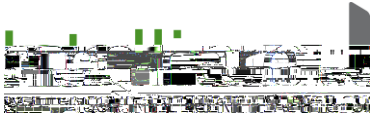
## Outside Employment

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Generally, our people cannot accept employment, directorship or any such positions in any other company, firm or organizations. Any outside appointments whether as employee, partner, agent, consultant or advisor may only be undertaken with the written approval of the Company President and the Human Capital Management and Development Department.

However, engagements as Lecturer, Guest Speakers and Trainers Roles are generally permitted as long as these do not conflict with our interest. If you do engage in this type of activities, you are expected to utilize your





5. All manuals, systems, documentation, reports, correspondence, memoranda or other materials related to any of the items listed above;
6. Information, data, and expertise of any kind related to the business and/or investors that the Group obtains, receives, or to which it has access as a result of any discussions or dealings with third parties, clients, partners or members;
7. All information which would under the circumstances, appear to a reasonable person to be confidential or proprietary; and
8. All documents containing sensitive personal information of our employees, personnel, members, clients or partners as defined under the Data Privacy Act of 2012, including its amendments and other data privacy laws, both here and abroad.

This shall, however, exclude the following:

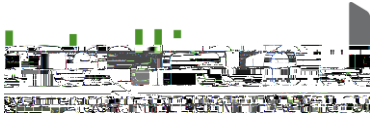
1. Those in the public domain at the time it was disclosed by the Group or has entered the public domain through no fault of the receiving personnel;
2. Those in the possession of the personnel, without restriction, at the time of disclosure;
3. Those received by the personnel from a source who lawfully acquired it and who is under no obligation to restrict its disclosure under any law, regulation or agreement and otherwise not in violation of the Group's rights;
4. Those independently developed without access to any confidential information disclosed to the Group; and
5. Those disclosed with prior written approval of the Group.

Everyone is enjoined to implement reasonable measures within their control to prevent unauthorized use, misuse, access or disclosure of information covered by this provision. You must not even try to access any part of the system for which you do not have authorization or which you do not need for your job. If you need access to additional functions or applications, ask your Supervisor for permission and you will be granted the necessary access.

Any attempt to disclose, use or process confidential information, with malice, to the detriment of the Company or its reputation is considered a serious infraction and shall be the subject of severe disciplinary sanction, including termination.

Everyone should not commit fraud or make any false or misleading statements or entries in the books, accounts, records, financial statements of the Company. Destroying, altering or falsifying records that may be connected to an investigation, litigation or bankruptcy proceeding are strictly prohibited.

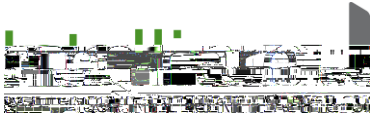
These obligations apply even to those who have been separated from us and maybe separated from us, subject (er)6(ed)ml been



# Intellectual Property

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Being part of our family, the things you create belong and must be shared to the Company. This includes inventions, discoveries, ideas, improvements, software programs, artwork and works of authorship. This work product is our Company's



# CODE OF DISCIPLINE

## Purpose

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Our Code of Discipline shall form an integral part of this document. Said Code will guide you in understanding Said