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POLICY ON EMPLOYEES INTERNAL CODE OF BUSINESS CONDUCT AND ETHICS

1. INTRODUCTION

We are committed to upholding the highest standards of integrity, transparency, and ethical conduct in all our business activities. This policy on the Employees' Internal Code of Business Conduct and Ethics (referred to as the "Code of Conduct") reflects the business practices and behaviours that are expected of all officers and employees of The Lanka Hospitals Corporation PLC and its subsidiary, Lanka Hospitals Diagnostics (Private) Limited (collectively referred to as "the Group"), medical practitioners and any other persons acting on behalf of the Group in support of this commitment (collectively referred to as the "Company Personnel").

2. PURPOSE

The purpose of this Code of Conduct is to outline the core values, ethical considerations and professionalism that are expected from Company Personnel, promoting a culture of honesty, accountability, and respect in every aspect of our operations including discharging the duties toward the patient community. It also provides clear guidelines on avoiding conflicts of interest, safeguarding confidential information, and ensuring fair dealing with all stakeholders.

We expect all Company Personnel to exercise the highest degree of professional business ethics in all actions they undertake on behalf of the Group and to adhere to this Code of Conduct. Any contravention of the clauses mentioned herein could result in disciplinary action up to and including termination/dismissal.

This Code of Conduct covers:

- Patient Care Services
- Employee Working Environment
- Business Practices
- General Legal Standards
- General Practices

3. SCOPE

This Code of Conduct applies to all Company Personnel (i.e. officers and employees of the Group, medical practitioners at any grade/level and any other persons acting on behalf of the Group). This policy excludes Directors.

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4. PATIENT CARE SERVICES

Patient care services as the prevention and treatment of illness, education and research. All such activities will be conducted with integrity, compassion and concern for human welfare and dignity. The Company Personnel are expected to make a good faith effort to meet or exceed the standard of exceptional service in a courteous manner. It is expected that every individual coming into contact with the Group be they patient, visitor, employee, physician, student or volunteer will be able to enjoy an atmosphere that fosters respect, personal safety, and courtesy.

a. Provision of Quality Care

The Company Personnel shall follow standards of care based on the identified needs of the patient. Company Personnel shall seek to avoid the provision of services that are medically ineffective. Every effort should be made to provide high-quality health care in an economical manner to patients.

b. Patient Non-Discrimination and Accommodation of Special Patient Needs

The Group acknowledges and respects individual patient differences, such as personal background, race, color, ethnic or cultural heritage, national origin, religious/spiritual views, communication needs, sex, age, marital status, veteran status, sexual orientation, handicap and development stability. It is the policy of the Group those differences will be respected in all patient service activities. All patients should be able to expect a high quality of care based on their unique health needs with respect for and regardless of individual differences. All constituents served must be able to enjoy the same non-discriminatory environment.

c. Patient Admission, Transfer, Discharge and Laboratory Services

Patient admission, transfer and discharge shall be properly conducted in an ethical manner and in accordance with all applicable local, state and national regulations. Patients who are in need of the Lanka Hospital's emergency stabilizing services shall not be denied services. Patients whose specific condition or disease cannot be safely treated at the Lanka Hospitals shall be properly transferred to an accepting facility.

Also, a patient may request a transfer to another facility. Such a request will be facilitated when medically appropriate and legally permissible. The patient will receive a complete explanation of alternatives to and risks associated with such transfer. The receiving facility must first accept the patient. All such alternatives will be carried out in a respectful and courteous manner.

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Planning for discharge from Lanka Hospital is a multi-disciplinary process involving the patient and the family. The patient will be informed by caregivers of realistic care options when hospital care is no longer medically necessary or appropriate.

All laboratory services provided at Lanka Hospitals or any other location operated by Lanka Hospitals Diagnostics (Private) Limited shall be provided with due care, in utmost good faith and in accordance with the industry-acceptable standards without any discrimination.

d. Preparation of bills and Payment Arrangements

Patients' bills must be calculated accurately by only including the services provided for them by the Group.

e. Confidentiality/Release of Patient Information

Company Personnel shall recognize the vital need to maintain patient and business information in a confidential manner. Patient information shall not be released without legal authorization. The Company Personnel including students are expected to control the informal transmission of confidential information. Sensitive information concerning personal and management issues shall be maintained in the strictest of confidence and shall be utilized only by those individuals legally authorized to review and act on such information. Any disclosure hereunder shall be as per the laws, rules and regulations of Sri Lanka.

i. What is confidential information?

Confidential Information includes any information, present or planned business that has not been publicly disclosed by the Group. Information such as this is vital to the patient care and business operations of the Group.

Especially Company Personnel are not allowed to release or disclose the following information without authorization

- Any information related to patients, employees or payers
- Any information related to pricing
- Any information related to financial data
- Any information related to marketing programs
- Any other information that is directly identified as Confidential

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ii. Why must we protect Confidential Information?

Disclosing Confidential Information without authorization may;

- Violate Patient Confidentiality obligations
- Create instances of conflict of interest
- Violate or create or interfere with employment matters
- Create concerns on Finances
- Violate Intellectual Property

iii. What about confidential medical record information

The Company Personnel pledge to keep medical record information confidential and to respect privacy. This pledge is especially important to the patient care and business operations of the Group. A medical record or information contained in a medical record should be released only if,

- A valid written consent for the release of this information is obtained from the patient or legally authorized representative/guardian.
- Reporting is required or permitted by law.

iv. Confidentiality and Non-Disclosure

The contents of the Group's records or information otherwise obtained in regard to business may not be disclosed to anyone, except where required for a business purpose and also on a need-to-know basis. The Company Personnel (during the term of employment/tenure and thereafter) must not disclose, furnish, or make accessible, any Confidential Information, purposefully or inadvertently (through casual conversation), to any unauthorized person inside or outside of the Group.

Company Personnel has an ethical duty not to disclose any information gleaned from business transactions and to protect confidential relationships between the Group and its customers/ suppliers/ consultants and shareholders.

Any employee and any stakeholder who accesses or is privy to price-sensitive information will be required to enter into a Non-Disclosure Agreement with the Group.

Company Personnel shall not use Confidential Information obtained in the course of their employment/tenure for the purpose of advancing any private interest or for personal gain.

Further Company Personnel should be mindful of the following procedures when participating in public events /meetings/media to ensure the highest ethical standards in line with our corporate values.

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- a) If any Company Personnel is invited for public events / meetings / media coverage which will also highlight the name of the Group or part thereof, the relevant Company Personnel should first seek the approval of HR Department (if it is an employee below executive committee grade) or Group Chief Executive Officer (if it is director or employee of executive committee grade or medical practitioner), failing which, the respective Company Personnel will be subjected to strict disciplinary action if his / her public appearance has affected the good image of the Group.
- b) Company Personnel who have obtained the approval as aforesaid should adhere to the following procedures to uphold the good name of the Group:
 - c) Must refrain from disclosing false/misleading information about the Group or part thereof.
 - d) Must behave in the best interest of the Group with proper decorum and in line with the conduct and discipline policy of the Group.
 - e) Must refrain from any business interactions/relationships that will generate personal benefits/profits by using the name of the Group.
 - f) Must refrain from divulging Confidential Information of or related to the Group.

f. Employee relief from participating in Patient Care

We acknowledge that a Group's employee may request to be relieved from participating in a patient's care or treatment in a situation where the prescribed care or treatment presents a conflict with deeply held cultural values, sense of ethics or religious beliefs. The Group shall ensure that patient care and treatments are not compromised if such a request is granted. The Ethics Committee is available for exploration and discussion upon referral.

5. EMPLOYEE WORKING ENVIRONMENT

a. Diversity

We are dedicated to providing fair, equal, non-discriminatory and safe working conditions and environment for all Company Personnel regardless of role, gender, race, age, religious beliefs, or sexual orientation or any other illegal basis. This includes ensuring fair wages, respecting freedom of association, and complying with all applicable national and local labor laws. We strictly prohibit child labor, forced labor, and any form of discrimination and/or harassment (including sexual) within our operations. Additionally, we provide fair and equitable opportunities for professional development and career advancement for employees of the Group.

The Company Personnel shall encourage open communication and a spirit of cooperation.

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b. Maintaining employee safety in the working environment

We are committed to maintaining comprehensive health and safety management systems to prevent accidents and occupational health and hazards and to provide a healthy, safe and secure environment for everyone within our premises to work. This includes (a) rigorous implementation of safety protocols, regular inspections and periodic maintenance of equipment, machinery and other safety items (including life and fire safety), (b) implementation of comprehensive safety measures to prevent accidents and injuries, including maintaining safe, healthy and clean working conditions at all times, (c) providing and maintaining clean and hazard-free equipment, machinery and environment and ensuring safe storage of all dangerous goods and substances,

(d) ensuring proper use of personal protective equipment and having appropriate First Aid equipment available at all our locations, (e) providing ongoing training for staff on safety procedures and emergency response to ensure employees are able to do their work in a safe manner, (f) promoting the overall health and wellness through initiatives such as health screenings, wellness programs, and mental health support, (g) providing employee protection from sexual harassment, exploitation and abuse and discrimination in the workplace and treating all incidents seriously and will promptly investigate all such allegations, (h) promoting a healthy work-life balance for all our Company Personnel, (i) fostering an inclusive atmosphere by providing fair access to facilities and services and accommodating diverse needs where Company Personnel feel respected and valued, (j) establishing and regularly updating emergency preparedness plans to effectively manage and respond to any potential health and safety incidents. This includes clear communication of emergency procedures, regular drills, and coordination with local emergency services.

We hereby pledge:

- To continue to develop procedures and conduct training programs to meet legal standards of health, safety and environmental protection.
- To consider the effects that new developments have on the environment
- To recognize and respond to community concerns about the effects of our business on the environment and the community we serve.
- To provide a safe and secure environment for our customers, service providers and visitors while they are on our premises and are dedicated to delivering high-quality healthcare services that respect patient rights, privacy, and confidentiality, ensuring a patient-centered approach to care.

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Employees are expected to:

- Learn the procedures for handling and disposal of any hazardous material used in their job.
- Know the safety procedures that apply to their jobs.
- Share ideas for improving safety and reducing waste with supervisors.
- Use best efforts to ensure that actions are carried out in a safe and healthy manner.

A commitment to health, safety and environmental protection can be seen in our effort to use resources efficiently, minimize waste through recycling or reuse practices or responsible disposal to minimize environmental impact and reduction of emissions and effluents to minimize our environmental footprint while maintaining a safe environment for all stakeholders.

c. Use of Company Property, Equipment and other Assets

All Company Personnel are required to handle the Company's property/ equipment and other assets with due diligence and care. They shall return all such property/ equipment and other assets to the respective company in the Group in good condition at the time of separation from the Group or as and when directed by the Management.

d. Use of Computer, Internet and Email

Computer:

The Group purchases and licenses the use of various computer software/ hardware for business purposes. Company Personnel may only use software according to the business requirement. The Group prohibits the illegal duplication of software and its related documentation.

Internet:

The Group is not responsible for material viewed or downloaded by Internet users. The Internet is a worldwide network of computers that contains millions of pages of information. Users are cautioned that many of these pages include offensive, sexually explicit, and inappropriate material.

In general, it is difficult to avoid at least some contact with these materials while using the Internet. Even innocuous search requests may lead to sites with highly offensive content and having an e-mail address on the Internet may lead to receipt of unsolicited e-mails containing offensive content. Users accessing the Internet do so at their own risk.

Company Personnel are permitted to make use of the internet facility granted as per the IT Policy for official purposes as and when required.

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When using the internet:

- Do not use the internet for any illegal purposes and to promote any external commercial activity.
- Do not download information or pictures that are likely to offend any other potential observers unless you have to do so in the proper discharge of your duties.
- You must not deliberately visit websites, or disseminate or retrieve information or software that contains material of an offensive obscene or discriminatory nature.
- Take all appropriate action to prevent viruses from entering into the network

Email:

Company Personnel are permitted to make use of the e-mail facilities provided for official purposes. The company's e-mail system is designed exclusively for business purposes. Personal use of the e-mail system is not permitted. Company Personnel provided with access to e-mail should use discretion and professionalism when writing e-mail messages.

Each e-mail user has a unique access login and password. The login allows access to messages sent for the user. Use of passwords or other security measures does not in any way diminish the Group's rights to access materials on its system, or create any privacy rights of Company Personnel in the messages and files on the computer/ laptop. Any password used by Company Personnel must be revealed to the Group on request, as emails may need to be accessed by the Group in an individual's absence.

- You must not send or distribute e-mail messages, attachments or other material that employ language or contain images that may reasonably be considered to be discriminatory, obscene, derogatory, offensive, threatening, insulting, illegal, harassing or otherwise harmful to recipients.
- If you receive any e-mail which you think may contain a virus you should not open it, but inform the designated officer concerned.

e. Gender Harassment

Gender harassment refers to behavior of a sexual nature that is not welcome and which interferes with a Company Personnel's status of performance by creating an intimidating, hostile or offensive working environment. It is a form of assault, which can manifest itself in terms of physical and psychological acts. This behavior may involve either the same gender or the opposite gender.

Any form of sexually determined behavior, directly or by implications such as:

- Physical contact and advances
- A demand or request for sexual favours

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- Sexually colored remarks
- Showing pornography

If the veracity of the complaint of sexual harassment is proved, appropriate disciplinary action will be initiated against such Company Personnel. This conduct may include, but is not limited to, the following:

- Making unwelcome sexual advances and/ or requests for sexual favors or other verbal/physical conduct of a sexual nature as a condition of employment.
- Submission to or rejection of the behavior becomes (implicitly or explicitly) a basis for decisions that affect the individual's employment or a condition of the individual's employment.
- The behavior has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.
- Repeated, offensive and unwanted flirtations or advances. Demanding sexual favours.
- Verbalizing sexual innuendoes, suggestive comments, lewd/ sexual jokes or references, sexual propositions or threats.
- Displaying sexually suggestive objects, graphic commentaries, making suggestive or insulting sounds, whistling and obscene gestures.
- Sexual harassment may be subtle or obvious. Whatever form it takes, it can be insulting and demanding and will not be tolerated.

The Group has zero tolerance for any sexual or gender harassment at all levels. The Group discourages such behavior and has a comprehensive framework to deal with such cases.

g. Maintaining a positive work attitude & environment

We are committed to providing a positive and learning environment to all Company Personnel where all Company Personnel are treated fairly, with respect, regardless of their status/ designation. Company Personnel also are expected to follow the same principle when dealing with colleagues. Company Personnel should refrain from engaging in acts of intimidation and harassment, passing derogatory/insulting remarks about any colleague, making negative comments about any policy/system/process/methodology of the Group, which will lead to unrest and disturb the work environment. Company Personnel are required to follow the grievance handling procedure to vent their grievances/ complaints etc.

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6. BUSINESS PRACTICES

a. Service Delivery

We are committed to the delivery of high-quality care at reasonable and competitive prices. To that end, we rely on the ability and professionalism of our employees and representatives to communicate effectively the merits of service to the patient, physicians, and customer and expects our employees to use only legitimate competitive practices.

b. Financial Matters

Our employees shall work to maintain the financial records of the Group in an accurate and complete manner.

Our accounting controls will be sufficient to provide reasonable assurance that;

- Expenditures are made with proper approval and authorization.
- All transactions are recorded to help and prepare financial statements and accounts for resources in accordance with established policies
- Access to assets is permitted only with proper approval.
- Assets are adequately safeguarded, with any discrepancies immediately reported to management. Refer to the policy on Control and Management of Company Assets and Shareholder Investments for more details.

The financial matters of Company Personnel and patients are very private. Company Personnel should not reveal these matters to outside parties without permission from the Group Chief Executive Officer and Group Chief Financial Officer. Any disclosure should be done in accordance with the policy on corporate disclosures.

c. Billing for Services Rendered

We recognize the imperative nature of accurate and timely billing. Patients and third parties should be billed only for the service actually provided to the patients and fully documented in the patient's medical records.

- Initial patient billing should include a summarization of charges and dates of services. Itemized charges should be available to patients upon request.

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- When a patient or a payer has a question about a specific charge, that inquiry shall be viewed expeditiously and response will be timely and courteous.
- Assistance will be provided to patients and/or the patient's designee who is seeking to understand the cost of their care, or who is seeking to gain information regarding the estimated cost of treatment.
- Patient should receive written notice of any balance due on the account.
- Fair debt collection practices shall be adhered to in attempting to collect any outstanding balance from a patient.
- Patient who are unable to pay the balance on their account may be referred to higher management and/or CFO for necessary actions.

d. Billing and Claims

Using their best efforts, the Company Personnel who are entrusted with specific duties of billing and claims management must ensure that all services are properly documented, coded and billed to the responsible party.

e. Gifts and other Inducements

Company Personnel are prohibited from offering or accepting gifts, invitations, hospitality, or other benefits that could be perceived as an attempt to influence business decisions or gain an unfair advantage.

However, having understood that Gifts or Invitations or Entertainment or Corporate Hospitality could also be offered to build good business relationships, any narrow exceptions (for example inconsequential items such as a mug/calendar/diary/pen/desk holder, health vouchers, etc.,) to the above if inevitable, must be approved by the Executive Committee of the Group and documented in accordance with the related procedures of the Company, specifically in accordance with the Policy on Anti-Bribery and Corruption. Any such narrow exception shall be approved based on the parameters set out in the Policy on Anti-Bribery and Corruption of the Group.

Any sponsorships for educational programs, conferences or training programs should also be assessed under the parameters set out within the Policy on Anti-Bribery and Corruption. It is the responsibility

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of the Company Personnel to maintain their objectivity in discharging the duties without being induced by any such offers.

f. Conflicts of Interest

We recognize that the relationships or circumstances potential for conflicts of interest exist at all levels. If you are aware of any circumstances or relationship which you think may give rise to a conflict of any kind, or if you become aware of information which places you in difficulty in carrying out your function or duties, or even appear to interfere with your ability to act in the best interest of the Group, we request you to disclose such relationships or circumstances which may lead to a potential conflicts of interest, so that appropriate actions may be taken in advance to ensure that any applicable conflict does not inappropriately influence decisions of the Group.

What's a conflict of interest?

A conflict of interest arises when an individual's (who is subjected to the scope of this Code of Conduct) private interest or that of an immediate family member conflicts or appears to interfere or conflict in any way with interest of The Lanka Hospitals Corporation PLC and/or Lanka Hospitals Diagnostics (Private) Limited.

Each Company Personnel has a duty to avoid relationships or circumstances that may lead to conflicts of interest or the appearance of conflicts of interest. If any Company Personnel or an immediate family member, are faced with a relationship, transaction, decision, or situation that they think may create a conflict of interest, it should be promptly reported to the reporting supervisor (copying to the Group Chief Human Resources Officer) or the Head of the Department/Cluster Manager. The respective Head of the Department/Cluster Manager through the Group Chief Human Resources Officer shall inform the same to the Executive Committee. The required assessment will be carried out through Group Internal Audit Department or other body as deemed necessary and appropriate by the Executive Committee (or in the event if the Conflict of Interest is related to a member of the Executive Committee by Group Chief Executive officer) in order to identify whether there is a real conflict of interest due to the disclosed relationship or circumstances and necessary actions will be implemented.

Disclosure of a particular situation that may be a conflict of interest does not mean that the Group will consider it to be substantial enough to be prohibited. Each situation will be considered on its merits.

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g. Marketing and Public Relations

We are committed to fully and accurately representing ourselves, our services and our capabilities to the public. Marketing materials should reflect those services available, the current level of licensure and accreditation and provide communications, which are designed to inform and persuade but not to deceive and in accordance with the guidelines stipulated in the policy on Corporate Disclosure. All comparisons to competitive offerings will be fair. Patient confidentiality and privacy will be respected and protected in any Groups' marketing or public relations activities.

h. Trading in Listed Securities

- a) The laws of Sri Lanka regulate the use and disclosure of inside information concerning the Group. Any information that has not been publicly disclosed shall be treated as "inside information". We prohibit the disclosure of material inside information to anyone other than persons within the Group whose positions require them to know such information in order to perform their duties. In addition, any corporate disclosure should be in accordance with the provisions laid down in the Policy on Corporate Disclosure.
- b) This policy also prohibits trading in the securities of The Lanka Hospitals Corporation PLC by any Director or their family members while in the possession of inside information. Moreover, any employee or their close family members shall not trade in the securities of the Company even after the release of the information to the Colombo Stock Exchange for a period, which should not be less than two (02) market days after the release of the information to permit thorough public dissemination and evaluation thereof. In computing this period of two (02) market days, the day on which disclosure is made will be excluded. All employees (including their close family members) shall comply with provisions of Section 8.6 and any other related provision of the Listing Rules of the Colombo Stock Exchange pertaining to trading in listed securities by employees/individuals or their family members.
- c) This policy also prohibits providing inside information to other persons or recommending that they buy or sell the company's securities on the basis of inside information. More restrictive rules apply to certain key employees and officers. An employee or their close family members shall not trade in the securities of another company if, in the course of his or her employment or position with the company/Group, he or she learns confidential information about such

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other company that is likely to affect the price of such securities. Employees and their close family members are discouraged from short-term speculation in the securities of The Lanka Hospitals Corporation PLC. The use of derivatives or other financial instruments that could result in financial gain from a decline in The Lanka Hospitals Corporation PLC's share price is strictly prohibited

- d) Company Personnel are required to disclose any trades in the company's securities to the company within three working days of the transaction. The company will also disclose any material transactions involving Company Personnel in its periodic reports to the Colombo Stock Exchange, as required by applicable regulations and laws of the country.
- e) If Company Personnel are uncertain about the status of the information they hold, they should consult the Company Secretary for clarification.

7. GENERAL LEGAL STANDARDS

We are committed to adhering to all applicable laws, regulations, and standards in Sri Lanka while maintaining cooperative relationships with our Regulators. Company Personnel shall uphold applicable laws and regulations. In general, it is illegal and a violation of our policy to:

- Engage in bribery and any corruptive practices
- Misappropriate, steal or engage in any dishonest practice in respect of the Group's property or the property of another
- Commit a fraud or purposely mislead another through the use of false statement
- Injure an individual or his/her property by committing an unlawful act
- Violate any national, state or local law or regulation

Violation of the law must be avoided under all circumstances. Notwithstanding the legal consequences of which violation, any employee found guilty will be additionally liable to disciplinary actions, initiated by the company for violating the Code of Conduct.

a. Prohibition of Bribery and Corruption:

The Group strictly prohibits all forms of bribery and corruption. No Company Personnel shall, directly or indirectly, offer, give, solicit, or receive any bribe or participation in any acts or situations that may

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lead to, or be perceived as, bribes or engage in any corrupt practice, whether for the benefit of the Company or any other party or to obtain or retain an undue personal advantage. All related aspects are governed by the policy on Anti-Bribery and Corruption of the Group.

b. Copyright and Intellectual Property Laws:

Consistent with the high value the Group places upon proprietary information, we pledge to abide by all laws that protect intellectual property. During the course of employment/tenure, Company Personnel may have access to intellectual property owned by other businesses. This information may include patents, techniques, publications or trade secrets. This information is confidential and should not be disclosed to others or used for personal purposes or any other manner that is permitted and to carry out the duties and obligations entrusted to you.

The Group ensures not to invest in and engage with businesses, projects and activities that are prohibited, violate the country's laws, regulations and policies and cause irreversible environmental and social impacts. We focus on minimizing our environmental footprint, fostering a diverse and inclusive workplace, and upholding robust governance practices that ensure transparency, accountability, and ethical behavior. All employees are expected to uphold the highest standards of environmental, social, and governance practices.

8. GENERAL PRACTICES

a. Investments

Employees are prohibited from investing in any of the Group's clients, suppliers or competitors unless the securities are publicly traded, the investments are on the same terms available to the general public. The prohibition applies to all forms of investments and to all employees of the Group and their immediate families. Employees of the Group should not have any financial interest in a client, supplier, and competitor that could cause divided loyalty or give the appearance of divided loyalty.

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b. Corporate Opportunities

All Company Personnel are expected to conduct themselves in a manner that creates and enhances their loyalty towards the Group. Company Personnel are prohibited from taking themselves personally, any opportunities that are discovered through the use of corporate property, information or position or competing with the Group directly or indirectly at any given time.

c. Fair Dealing

Company Personnel are expected to deal fairly with the customers, suppliers, competitors and any other party who works with the Group. None should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice. Inappropriate use of proprietary information, misuse of trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. The Senior Management must deal fairly and must oversee fair dealing by Company Personnel.

d. Ethical Standards

We expect all Company Personnel to exercise the highest degree of professional business ethics in all actions they undertake on behalf of the Group. Company Personnel should observe all laws and regulations governing business transactions and engage in fair competitive actions. Company Personnel are prohibited from using, directly or indirectly, corporate funds and assets for any unlawful purpose or to accomplish any unlawful goal. The Group also prohibits the establishment or maintenance of undisclosed or unrecorded funds and assets. All reporting of information should be timely and accurate. Company Personnel should not make any false or misleading entries in any book or record. Company Personnel should use Company funds only for legitimate and ethical purposes. The use of Corporate Assets should be done in accordance with the Policy on Company Assets and Shareholder Investments.

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e. Engaging in private trade or alternate/ outside employment

All employees who are full-time employees of the Group, shall not engage directly or indirectly in any private trade and/ or alternative employment which will adversely affect performance and conflict with the business interest of the Group.

f. Participation in political activities

You shall not engage in any type of political activity/ campaigning within the office premises.

g. Smoking

We are committed to promoting a safe and healthy work environment free from hazards associated with smoking. Smoking entails risk to personal health and secondary smoking to the health of others in the Group. As all company premises are declared as Non-Smoking Zones, smoking by Company Personnel on the premises is strictly prohibited. Therefore smoking in all wards, Rooms, washrooms, corridors and public areas including the car park is prohibited. There are smoke detectors placed throughout the premises and smoking would raise the alarm. In addition, bringing in beverages containing alcohol, narcotics and /or consumption within the Hospital premises is strictly prohibited.

h. Inappropriate/ Illegal Behavior

We are committed to providing its Company Personnel, patients and visitors a safe, healthy and productive work environment. Violent behavior or threat of violent behavior in the workplace will not be tolerated. Employees are prohibited from bringing weapons on Company/client premises, including parking lots, leased buildings and recreation areas. Any employee, who threatens violence, by word or deed, shall be asked to leave the Company/client premises immediately until an inquiry is conducted.

Company Personnel must avoid improper acts and the violation of any government law or regulations in the course of performing his/her duties. When in doubt about any law or regulation, the employee should consult the HR department. The following guidelines have to be adhered to:

- No corporate or subsidiary funds, assets or corporate participation in any nature should be used for personal benefits, directly or indirectly.
- No corporate or subsidiary funds or assets will be used for any improper or unlawful purpose such as paying bribes or kickbacks to obtain privileges, concessions or special benefits.

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- No employee will accept payment or anything of value whether characterized as a bribe or a kickback or otherwise; whether intended for company/Group or personal use, if the payment and/or receipt is illegal or is designed to cause the employee to grant a privilege, benefit or concession to the payer.
- No undisclosed or unrecorded funds or assets of the Group will be established for any purpose.
- No false or artificial entries or documents will be made or entered into the books or records of the Group or its subsidiaries for any reason, and no Company Personnel will participate in an arrangement that results in such a prohibited act.
- No payment on behalf of the Group will be approved or made with the intention, understanding or agreement that any part of such payment is to be used for any purpose other than what is described by the documents supporting the payments.
- No employee will use the Group's resources unless properly authorized.
- Any employee having knowledge of any prohibited act, past or present, should report it to the HR Division.

Note:

The content of this policy is non-exhaustive. Also, any other published policies and professional/ethical practices related to various professions will be applicable to all relevant employees in addition to this policy. (Ex. All medical officers/consultants are required to be abide by the SLMC code of ethics as well.)

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ACKNOWLEDGMENT

I hereby acknowledge that I have read, understood and agree to the terms of this document relating to the Internal Code of Business Conduct and Ethics of Lanka Hospitals Group.

.....

.....

Signature

Date

Name :

Designation :

Department :

Emp. No :

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REFERENCES

- Articles of Association of the Company
- Company Act No 7 of 2007
- Listing Rules of the Colombo Stock Exchange, Sri Lanka
- Cosmetics., Devices and Drugs Act, No. 27 of 1980
- Code of Ethics for Professional Accountants
- Protection of the Rights of Persons with Disabilities Act No. 28 of 1996
- Right to Information Act No. 12 of 2016
- Anti-Corruption Act No 09 of 2023
- Personal Data Protection Act No. 09 of 2022
- WHO guidelines on ethical issues in public health surveillance
- Other rules and regulations & law of the land
- Internal Policies- Policy on Clinical Governance, Policy on Risk Management and Internal Controls, Policy on Environmental, Social and Governance Sustainability, Policy on Corporate disclosures, Policy on Anti-Bribery and Corruption, Policy on Control and Management of Company assets and shareholder investments, Policy on Whistleblowing, Policy on Remuneration and Policy on relations with Shareholders and Investors

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