



# NMC GROUP CODE OF CONDUCT AND ETHICS

## TABLE OF CONTENTS

1.	LETTER FROM THE CEO	03
2.	NMC's PURPOSE AND VISION	04
3.	NMC's CORE VALUES	05
4.	INTRODUCTION	07
4.1	What is the code?	07
4.2	Who does the code apply to?	07
4.3	What is expected of me?	07
4.4	I comply with the law	09
4.5	As a manager, I lead responsibly	09
5.	PATIENT CARE: I CARE ABOUT PATIENTS	10
5.1	I deliver quality care as a member of the medical staff	11
5.2	I guarantee patient's rights	12
5.3	I conduct medical research ethically and legally	12
6.	INTEGRITY: I ACT WITH INTEGRITY	13
6.1	I prevent corruption and bribery	14
6.2	Different forms of corruption	15
6.3	I keep accurate financial records and combat fraudulent behaviours	18
6.4	I watch out for conflict of interests	20
7.	ACCOUNTABILITY AND PROFESSIONALISM: I AM ACCOUNTABLE FOR MY ACTIONS AND ACT PROFESSIONALLY	22
7.1	I protect confidential information	23
7.2	I use personal data responsibly	24
7.3	I use social media responsibly	25
7.4	I compete and deal fairly	26
7.5	I comply with sanctions and export control laws	27
8.	RESPECT: I RESPECT OTHERS AND THE ENVIRONMENT	28
8.1	Respect others	29
8.2	I care about the environment	31
8.3	I protect human rights	31
9.	COURAGE: I SPEAK UP	32
9.1	How?	33
9.2	What happens when I report?	34
9.3	I face no retaliation	34
10.	KEY CONTACTS	35
11.	GLOSSARY	37





## 1. LETTER FROM THE CEO



Dear Colleague,

As the CEO of our esteemed organisation, it is my utmost pleasure to introduce you to our new Code of Conduct and Ethics.

At NMC Healthcare, we believe in conducting our business with the highest levels of integrity, honesty, and transparency. Our Code of Conduct and Ethics serves as a guiding light for all our employees to ensure that we maintain these values throughout our operations.

This Code is not just a document but a reflection of our commitment to our patients, shareholders, and the wider community. It outlines the standards of behaviour we expect from each and every member of our team, regardless of their position or department. It also highlights our responsibilities towards compliance with legal and regulatory requirements, as well as our commitment to protecting our patients' data and privacy.

I encourage each of you to familiarise yourselves with this document and incorporate it into your day-to-day work at NMC Healthcare. By adhering to these guidelines, we can continue to provide the highest quality of healthcare services to our patients while maintaining the trust and confidence of all our stakeholders.

Thank you for your continued dedication and commitment to NMC Healthcare. Let us work together to ensure that our organisation remains a beacon of excellence in the healthcare industry.

Sincerely,

**David Hadley**  
CEO, NMC Healthcare





## 2. NMC'S PURPOSE & VISION

### 2.1. NMC'S PURPOSE

NMC's overriding purpose is delivering personalised care that matters.

### 2.2. NMC'S VISION

At NMC, we aim to be the preferred healthcare system in our communities.







### 3. NMC'S CORE VALUES

Our values shape who we are and how we operate at NMC. Through these values we are committed to:

#### 3.3.1. Safety

- Prioritising the prevention of avoidable harm
- Actively manage and mitigate risk
- Developing a continuous learning culture

#### 3.3.2. Excellence

Achieving the highest standards of quality, innovation, and performance through:

- continuous learning and improvement; and
- relentless pursuit of excellence in services, processes, and quality patient outcomes

#### 3.3.3. Ethics

- Doing the right thing every time
- Being transparent with our patients and all our stakeholders
- Living our core values

#### 3.3.4. Trust

- Building & maintaining strong relationships with patients, families & communities based on honesty, transparency and compassion
- Delivering reliable care and services that exceed expectations

#### 3.3.5. Collaboration

- Creating an environment of encouraging behaviour and active communication to accomplish a shared outcome
- Valuing diversity and inclusivity





# INTRODUCTION



## 4. INTRODUCTION

### 4.1. What is the Code?

NMC holds itself to the highest ethical standards. We expect all employees, officers and directors, independent contractors, suppliers, vendors, business partners and representatives who work with, or on NMC's behalf to do the same. Our reputation depends on how we conduct ourselves. Inappropriate behaviour, wherever it takes place, can have serious and negative impacts on NMC. This Code of Conduct and Ethics has been created to prevent this from happening and is the foundation of NMC's ethics and compliance programme. The aim is to guide you as you navigate ethical dilemmas and make decisions in the course of your work.

### 4.2. Who Does the Code Apply to?

This Code applies to all NMC employees, including officers and directors, interns, and any agents working on NMC's behalf. It should be shared with all NMC's business partners, including suppliers and vendors, to make them aware of our standards and to encourage them to apply them themselves. If business partners already have a code of conduct, this will allow them to assess whether it sets the same standards as NMC's Code of Conduct and Ethics. If they do not have such a document, this Code will guide them to demonstrate the standards of conduct we expect of them when they do business with us or on our behalf.

Breaches of the Code of Conduct and Ethics by NMC employees may result in disciplinary action in keeping with our Disciplinary Policy. Similarly, where a business partner violates any of the principles of this Code, it may result in termination of our business relationship with them.

### 4.3. What is Expected of Me?

#### 4.3.1 I read, understand and comply with the Code

You are expected to read, understand, and comply with this Code, other internal policies, and applicable laws. You should apply common sense and professional judgment when observing this Code together with an attitude that seeks to comply fully with the letter and spirit of the principles contained within it. You must also complete your Code of Conduct and Ethics training each year and complete an acknowledgment that you have read, understood and will comply the rules set out in this Code.





## 4. INTRODUCTION

### 4.3.2. I ask myself the following questions before taking any decision or action:

- Is the action or decision legal?
- Does it comply with the Code of Conduct and Ethics?
- Is it permitted under any other NMC policy or procedure?
- Is it in line with our values?
- Would I be able to easily discuss it with my manager or my family?
- Would I be comfortable with patients or other parties outside NMC being aware of it?
- Am setting a good example by making this decision?

If your answer to any of these questions is no, you should reconsider your actions and seek guidance from your manager, your Local Integrity Champion, or the Ethics and Compliance Office to help make the right decision.

### 4.3.3. If I am unsure, I reach out

This Code cannot account for all scenarios; some may be unclear. Therefore, use your judgment and the questions outlined above to guide you. Speak to the Ethics and Compliance Office or your Local Integrity Champion if you witness, or are asked to do something that seems improper, unlawful, or contrary to NMC policies, procedures, or values. If you have any questions or doubts about possible conflicts, you should seek advice from your manager or the Ethics and Compliance Office.







## 4. INTRODUCTION

### 4.4. I Comply with the Law

At NMC, we value integrity in all that we do and in our interactions with each other, with patients, suppliers and vendors, and the communities in which we operate.

Obedying the law is one of the foundations on which NMC's ethical principles are built. All NMC employees are responsible for respecting and obeying the law, rules, and regulations of the cities, states, and countries in which we operate. This means that you must be aware of the laws and regulations that are applicable to you and the work that you do. If you are unsure, seek guidance from your manager, Quality Department, Legal Department, or the Ethics and Compliance Office. Any breach of the law may result in civil or criminal penalties.

### 4.5. I am a Manager, and I Lead Responsibly

Directors, officers, department heads, and managers must lead by example and comply with the spirit and letter of this Code. As a leader, you are expected to be a role model for your staff and to communicate the importance of this Code to them. You should also help your staff understand their responsibilities under it, encourage them to speak up whenever they have an ethics or compliance-related question or concern and create an environment where it is comfortable for them to do so. You can find out more about how to raise concerns in chapter 9 of this Code and by reading our Speak Up Policy.



SCENARIO

#### Leading responsibly

**An employee has come to me to report a breach of the Code of Conduct and Ethics that they think they have observed. What do I do?**

You must address the employee's concerns promptly. Start by listening to the concern they have raised and ask questions to make sure that you have understood it fully. Then consult this Code to determine whether it is indeed likely to have been breached. If confirmed, you must immediately inform the Ethics and Compliance Office using one of the channels given in chapter 9 of this Code. You should also inform your line manager if (taking into account confidentiality concerns) appropriate to do so.





PATIENT CARE





## 5. I CARE ABOUT PATIENTS

NMC prides itself on its commitment to deliver outstanding patient care, every day.

We continuously work hard to achieve the best results for our patients, and place safeguarding their rights and needs at the centre of our priorities.

### 5.1. I Deliver Quality Care as a Member of the Medical Staff

If you are a member of NMC's medical staff and are in direct contact with patients, you must practice your profession conscientiously, responsibly, and independently. You must adhere to established principles of medical and human ethics, and in compliance with our policies, applicable laws, regulations, and professional codes of conduct.

You are responsible for obtaining and keeping your professional licences, certifications or other credentials up to date pursuant to all applicable health regulations or laws.

**No Discrimination** – NMC does not tolerate any form of discrimination against patients. It is strictly forbidden to discriminate among patients because of race, colour, ancestry, nationality, religion, age, sex, marital or familial status, sexual orientation, gender identity and/or expression, political affiliation, genetic information, immigration status, or any characteristic protected by applicable law. This is of utmost importance to NMC.

NMC's Quality and Patient Safety Policies outline the steps you must follow to administer the best quality care possible to patients such as:



## 5. I CARE ABOUT PATIENTS

- **Visit, Admission and Discharge** – We are committed to delivering the best possible patient care as well as to utilising hospital resources efficiently. NMC employees do so by respecting proper patient visit, admission, and discharge procedures.
- **Emergency** – During emergencies, you must provide all necessary care and treatment to stabilise the patient and ensure that no loss of life or permanent damage occurs and to obtain the best possible medical outcome for the condition you are treating.
- **Medical Records** – You must properly document all care provided to patients and enter this into the patient's medical record as required by NMC's applicable standard operating procedures.
- **Patients' Referrals** – NMC requires that its physicians, medical staff, and management provide the best care to patients without financial or other inappropriate considerations affecting any patient care decisions. NMC does not give or receive kick-backs for patient referrals.

### 5.2. I Guarantee Patient's Rights

We provide patients with a statement of their rights when they visit or are admitted to an NMC healthcare facility so they are fully informed. Among other things, the statement includes the right to:

- be attended to in a timely and courteous manner upon entering the facility;
- know the risks and benefits of proposed treatments, and of any alternatives to them; and
- receive information in an easy-to-understand format that will allow for informed consent or refusal of the proposed procedure or treatment, including medication.

For further information, please refer to our Patient Rights Policy.

### 5.3. I Conduct Medical Research Ethically and Legally

NMC actively sponsors and participates in medical research, investigation, and clinical trials. The results of NMC's research programme reach and impact patients and the field of medical research in Abu Dhabi, the United Arab Emirates and the Middle East. For more information about how we conduct medical research at NMC, please refer to our Corporate Policy on Clinical Research.





INTEGRITY



## 6. I ACT WITH INTEGRITY

NMC prohibits corruption, bribery and fraud and does not tolerate them in any form.

We compete and aim to succeed on the quality and value of our workforce and of the healthcare services we offer. Corruption, bribery, fraud, and any other misconduct undermine our core values, and ultimately our long-term success. They can lead to serious consequences for the responsible individuals as well as for the company.

### 6.1. I Prevent Corruption and Bribery

NMC does not tolerate any form of bribery or corruption.

A **"bribe"** or **"bribery"** is the offering or giving anything of value to a **public** or a **private** person to induce them to act or refrain from acting. It can be either **active** (the person giving or offering the bribe) or **passive** (the person receiving the bribe). Both are prohibited.



SCENARIO

#### Active corruption

During an audit visit by the Department of Health, you offer the lead official an all-expenses paid getaway to a luxurious villa in Dubai as a "thank you" in anticipation of a 'good' audit result for NMC.

This may be seen as a bribe to the public official in order to influence the outcome of the audit.

#### Passive corruption

A bidder to supply NMC MRI machines offers you premium tickets to the Formula 1 racing event at Yas Island in return for information that you can give them (being a member of the Procurement Department) to "help" them make a more competitive bid.

This type of corruption is 'passive' on the Procurement team member's part because they are being offered the benefit without soliciting it.





## 6. I ACT WITH INTEGRITY

### Anything of value

is interpreted literally and broadly. It includes tangible things like cash or cash equivalents, discounts, gifts, meals, entertainment, or business travel. It could also include less tangible things like personal favours, employment or internship for a family member, or free or discounted use of vacation homes.

The mere attempt is enough to qualify as a breach of this Code or an offence.

### 6.2. Different Forms of Corruption

Corruption can take many forms: gifts, entertainment, facilitation payments, bribe through intermediaries, etc.

#### 6.2.1 Facilitation payments

A facilitation payment is a small value payment to a public official that is made to secure or expedite the performance of a routine, governmental action, such as the granting of permits, visas or licences, to which the payer is entitled. Facilitation payments are strictly forbidden by NMC.



SCENARIO

#### Facilitation payment

NMC wants to open a clinic at a new location. The employee responsible for the project is approached by a public official who claims that he will obtain a licence more quickly for NMC to open the clinic if the employee gives him an extra payment to make it happen.

#### What should the employee do?

You respectfully and politely refuse the proposal and report the incident to your manager or the Ethics and Compliance Office. NMC only uses proper and official channels to obtain licences and certifications.



## 6. I ACT WITH INTEGRITY

### Are there any exceptions to the “no facilitation payments” rule?

NMC recognises that in some countries and circumstances, your personal safety may be at risk if you don't respond positively to a demand for a facilitation payment. If you are ever faced with a situation like this or feel that you are being physically threatened, you should make the payment, noting the time place, circumstances you were in, and the reason for making the payment. You should then immediately inform the Ethics and Compliance Officer or Local Integrity Champion who will log the incident.

#### 6.2.2. Gifts, Hospitality and Business Courtesies

You are generally prohibited from giving to or accepting from any person or company who conducts, or seeks to conduct business with NMC, any Gift, Hospitality or Business Courtesy, with certain exceptions for activities that do not create an actual or perceived influence over a business decision or conflict of interest and is consistent with NMC's policies and procedures and other Applicable Rules. Not abiding to these guidelines may tarnish the NMC Group's reputation or be in violation of Applicable Rules, including anti-bribery and anti-corruption laws.

For further information regarding the **prohibition of giving or accepting gifts and other items**, refer to our Gifts, Hospitality and Business Courtesies Policy. If you have any doubts or concerns, you should reach out to your manager or the Ethics and Compliance Office.

#### 6.2.3. Sponsorships

Corruption can also be disguised as donations, sponsorships or lobbying activities.

With respect to sponsorships, NMC Employees are encouraged to attend third-party sponsored educational events such as professional and scientific conferences, congresses, and symposia, if they are purely for educational, research or similar purposes.

NMC also sponsors such events. However, such sponsorship must never be under circumstances that are conditional upon an obligation to recommend, supply or promote NMC services.



#### Improper sponsorship

Using NMC funds, you sponsor a government official's charity gala knowing he is also in charge of granting a licence to NMC.





## 6. I ACT WITH INTEGRITY

### 6.2.4. Undue influence

consists of using your position of authority or power to influence a person's decision-making process. You should ensure that patients make decisions based on their own free will and provide informed consent for treatment. You should also ensure that you make decisions based solely on your professional judgement and free from any external influence such as religious or political beliefs.



#### Undue influence

##### Impressionable patients

A doctor persuades a patient not to take a vaccination because of some religious beliefs she has.

##### Influencing a patient's Will

A doctor uses her position of trust with a long-standing patient to influence her to leave a gift, or donation to a charity of the doctor's choice, in the patient's Will.

You should take special care when dealing with **public officials**.

Our daily operations require us to have frequent dealings with government agencies. The definition of public official is very broad. It includes an employee, official, candidate for, or member of government agencies, departments, whether elected or appointed, which include, without limitation:

- doctors and healthcare professionals (including nurses, lab personnel and their staff) working for government-owned hospitals and universities;
- public health officials;
- customs and importation officials;
- healthcare regulators;
- government-owned or controlled companies; and
- public international organisations.

For more details, please refer to our Anti-Bribery and Anti-Corruption Policy.





## 6. I ACT WITH INTEGRITY

### 6.3. I Keep Accurate Financial Records and Combat Fraudulent Behaviours

We are careful to maintain all our business, financial and medical records accurately. This is essential to comply with the law and to protect NMC's credibility and reputation with our patients, business partners, regulators, and our shareholders.

**Fraudulent behaviour** is any act of deception designed to gain an improper or illegal advantage. NMC does not tolerate fraud and any proven cases may result in disciplinary action and criminal prosecution. When employees steal or commit fraudulent acts, they harm NMC's reputation and brand.



#### Fraud

- Falsifying medical documents for the benefit of another.
- Falsifying expense reports and financial documents.
- Manipulating treatment or treatment prices to benefit the company or for personal gain.
- Misrepresenting credentials, qualifications, or previous employment for the purpose of obtaining work at NMC.

More specifically, fraudulent behaviours may take the form of specific offences such as:

#### 6.3.1. Abuse of company assets

which occurs when someone who is entrusted with managing or using NMC assets or resources does not use them responsibly, legally, or in accordance with our policies. You should be proactive in protecting company assets from loss, damage, theft, misuse, unauthorised disclosure, and access. When using company resources, you should remember that all information and material transmitted or stored on NMC-owned equipments, systems or networks may be monitored, retained, or reviewed.



#### Unacceptable use of company assets

- Routine or excessive use of company resources (such as IT equipment, company vehicles, company time, etc.) for personal purposes.
- Using company resources to conduct outside business.
- Leaving desktops, laptops, or other mobile devices unattended for an extended period.





## 6. I ACT WITH INTEGRITY

### 6.3.2. Theft

is not tolerated at NMC. This is the taking of assets which do not belong to you. At NMC we also consider staff taking property belonging to colleagues at work to be theft.

### 6.3.3. Money Laundering

refers to any attempt to hide illegally obtained funds or assets and/or bring these funds or assets back into circulation through legal activities. NMC is committed to complying with applicable money laundering laws and prohibits any attempt to involve NMC or its employees in such activities. We must also ensure that business partners are contractually bound to adhere to our high integrity standards before we enter into any business relationship with them.

### 6.3.4. Terrorism Financing

refers to funds being allocated or used to aid terrorists and organisations that support terrorism. NMC prohibits such financing and ensures transparency in our transactions.

It can be difficult to detect money laundering and organisations financing terrorism during day-to-day business operations. You must therefore insist on obtaining clear information about the person or entity you are dealing with. This should include their ultimate beneficial owners to carry out appropriate due diligence on them. Please consult with the Ethics and Compliance Office for more information.

### 6.3.5. Financial Statements

must be maintained accurately at NMC. Doing so helps to keep the confidence and trust of our patients, business partners, shareholders and other stakeholders. If your job at NMC involves any aspect of the financial reporting process, you have a special responsibility to ensure that our financial statements are accurate, complete, objective, relevant and understandable, and compliant with relevant accounting standards and legal requirements. Accurate billing and allocation to the correct accounting codes are also key.

You are strictly prohibited from recording information in NMC's books with the intention of hiding, misleading or disguising the true nature of any financial or non-financial transaction, result, or balance. For further information regarding financial records, including accurate billing and how to deal with the discovery of errors, please consult with the Finance Department.

## 6 | ACT WITH INTEGRITY



SCENARIO

### Accurate reporting

I have been told by my manager to “make the numbers work”. What do I do?

Your responsibility is to be honest and accurate. Don't give into instructions or encouragement to be 'creative' with accounting activities. If you feel like you are being pressured to do something unethical, contact the Ethics and Compliance Office or the NMC Integrity Line.

Even if you are not in a finance role, you may still have responsibilities towards maintaining the integrity of NMC's financial statements.

When you report fraudulent activities against NMC, customers, colleagues, business partners or other stakeholders, you help safeguard NMC's assets and reputation. NMC will ensure that you are protected from any form of retaliation.

If you have doubts about a specific situation or business partner, please contact the Ethics and Compliance Office.

### 6.4. I Watch Out for Conflicts of interest

A conflict of interest occurs when an employee's personal or private interest interferes with the interests of NMC or our patients. A conflict of interest may be actual (present) or potential (in the future). Conflicts of interest are harmful to NMC since they make it difficult for employees to act objectively in their work and in the best interests of the company.



EXAMPLE

### Conflicts of interest

Engaging in work that:

- directly or indirectly competes with NMC or its subsidiaries;
- is for the benefit of a supplier;
- prevents you from carrying out your duties objectively and in the best interests of NMC or our patients; or
- conflicts with your scheduled working hours (including overtime) or the performance of a company assignment.



## 6. I ACT WITH INTEGRITY



### Other examples of conflicts of interest include:

- Being involved in a decision about a supplier who provides NMC with medical gear knowing that you have close (relative, close friend or business associate) ties with the supplier's CEO.
- Receiving or paying fees in return for patient referrals.
- Holding significant amounts of shares in a competitor's company.
- Having a direct or indirect reporting line with a relative or close friend.
- Receiving a high value gift (or regular small ones) from a supplier or patient.

You must avoid any potential or actual conflict of interest, or even the appearance of such a conflict. If you find that you do have a conflict of interest, you must declare it immediately to the Ethics and Compliance Office.

Conflicts of interest may not always be clear-cut, so if you have a question, or believe that a certain conflict of interest is unavoidable, you should first consult the Conflicts of Interest Policy. If, after this, you are still unsure, you should contact your manager, your Local Integrity Champion, or the Ethics and Compliance Office for further guidance.



### Conflicts of interest declarations

All NMC Employees are required to submit at least one conflicts of interest declaration form to the Ethics and Compliance Office each year. You must also submit a new declaration if any new conflict arises during the same period.







ACCOUNTABILITY  
AND  
PROFESSIONALISM





## 7. I AM ACCOUNTABLE FOR MY ACTIONS AND ACT PROFESSIONALLY

### 7.1. I Protect Confidential Information

Employees, medical staff, officers, and directors must keep all data entrusted to them in the course of their work, confidential. They must be careful not to disclose it except when authorised to do so by company policy or law.

Confidential information includes all non-public information that might be of use to competitors or harmful to NMC or its patients if disclosed. It also includes information that suppliers and patients have entrusted to us. Your obligation to preserve confidential information continues even after your employment at NMC ends.



SCENARIO

#### Confidential information

**I accidentally sent an email containing confidential information to the wrong person. What should I do?**

If you find that you have sent information of a particularly sensitive nature to the wrong person by mistake, you should first ask the recipient to delete the message from their inbox to limit any damaging consequences that might result. You should then inform your manager as soon as possible.

#### Using messaging apps

My team and I use an encrypted messaging app to discuss company business including to discuss clinical cases.

You should only use company approved communications channels to discuss or process patient data or company business information. Examples include Insta, company email, company approved file transfer tools, Microsoft Teams, etc. You should not use non-company or publicly available channels such as WhatsApp, Dropbox, or others for these purposes.





## 7. I AM ACCOUNTABLE FOR MY ACTIONS AND ACT PROFESSIONALLY

### 7.2. I Use Personal Data Responsibly

Data Privacy or data protection refers to the protection of personal data. Personal data is defined as any information that can identify an individual. This can include names, email addresses, Patient Reference Numbers, addresses, telephone numbers, medical data, etc.

When processing personal data at NMC, you must:

- a) do so in a way that is lawful, fair and transparent;
- b) collect it for a specified purpose and not use it for another incompatible purpose;
- c) only process data that is necessary and adequate for that purpose;
- d) ensure that the data is accurate and kept up to date (correcting it where necessary);
- e) not keep the data in a form that permits identification of the individual for longer that is necessary for the purpose for which it is processed; and
- f) ensure that the personal data is processed securely and that you protect it from loss, damage, or unlawful access.

It is critical that you familiarise yourself with and adhere to these principles when processing patient, employee, and business partner personal data at NMC.

Consult the Data Protection Policy for more information. You may also reach out to NMC's Data Protection Officer at [dataprivacy@nmc.ae](mailto:dataprivacy@nmc.ae) for further guidance and support.



## 7. I AM ACCOUNTABLE FOR MY ACTIONS AND ACT PROFESSIONALLY



SCENARIO

### Protecting personal data

My department has collected personal data from patients so that NMC can send them marketing emails about new healthcare services. A new potential partner for medical devices has approached us to use this database so that they can also market medical devices to them. Can I give it to them?

No, you cannot. Collecting personal data that was originally intended to be used by NMC and then transferring it to a third party to promote their services is not consistent with the original purpose for which it was collected and therefore goes against NMC's privacy principles. Doing so could also breach privacy laws.

The only way to put the data to this use would be for you to tell the patients what you intend to do with the data when collecting it and obtain their consent to pass this information on to a third party.

### 7.3. I Use Social Media Responsibly

When using social media such as Twitter, Facebook, LinkedIn, blogs or other social media platforms, you should remember to act responsibly. You are responsible for opinions you express through these media, so use discretion and common sense in all your interactions. You should never reveal NMC confidential information. Also, you should not comment on an NMC-related subject in a way that gives the impression that you are doing so on behalf of the company unless you have proper authority to do so.

When using social media:

- Make sure that your communications do not break the law (for instance, defamation, harassment, discrimination, or copyright laws) or company policies.
- Avoid identifying or discussing NMC, our customers, suppliers, or colleagues.
- Never include NMC logos, trademarks, photos or videos unless authorised by the Marketing and Communications Department to do so.
- Always safeguard your own personal information.



## 7. I AM ACCOUNTABLE FOR MY ACTIONS AND ACT PROFESSIONALLY



SCENARIO

### Using social media

I see a Facebook post criticising NMC, should I leave a comment to discredit the author?

No, you shouldn't. At NMC, we respect the right to exercise free speech. However, you should report the post to the Marketing Department and Legal Department if you consider it to be seriously harmful to NMC.

### 7.4. I Compete and Deal Fairly

We compete fairly and honestly.

Antitrust and competition laws are intended to foster competition and encourage NMC and its competitors to compete fairly in the marketplace. NMC complies with all applicable antitrust and competition laws. You must not gain an unfair advantage by stealing proprietary information, possessing trade secret information obtained without the owner's consent.

Breaches of competition law may look like:

- agreeing to fix prices for a particular treatment with a competitor; or
- using NMC's dominant position in the market of a particular treatment to set relatively low prices to sink competitors.

You should be particularly conscious of these laws before attending any meeting, conference, or any event to be attended by competitors or likely to entertain communication with competitors.



SCENARIO

### Anti-competitive behaviour

I was recently at a conference with other healthcare providers and a discussion ensued over lunch which sounded like the beginnings of a conversation about our respective pricing strategies. I immediately excused myself from the table. Was that the right thing to do?

Yes. Making a "noisy exit" reduces the risk that you or NMC may be implicated in cartel conduct. Contact the Ethics and Compliance Office to report the incident and do not share any information you may have heard.





## 7. I AM ACCOUNTABLE FOR MY ACTIONS AND ACT PROFESSIONALLY

### 7.5. I Comply with Sanctions and Export Control Laws

NMC complies with all relevant sanctions laws and export control regulations. We do not engage in transactions with persons, entities, governments or countries that have been targeted by sanctions imposed by the UAE, the United Nations, or other relevant bodies. In line with the applicable export control laws, we do not engage in unauthorised or unlicensed re-exports or transfers of controlled items or technologies to other countries or parties.

Please contact the Ethics and Compliance Office before entering any transaction that involves the sale, lease, export or transfer of any hospital equipment such as MRI scanners, x-ray machines and other electronic equipment to a third party.



SCENARIO

#### Sanctions and export controls

I was presented with an excellent business opportunity by a potential business partner that would greatly benefit NMC and its future economic growth. However, I believe that this entity may be targeted by US sanctions. NMC is not a US company so it should be ok to deal with them, right?

You should not accept the offer and should immediately consult the Ethics and Compliance Office to perform background checks on the potential business partner. Engaging with sanctioned entities can result in NMC itself being blacklisted by other companies or sanctioned.

### 7.6. I Act Within My Scope of Authority

NMC has set limits of authority within which the Board and management at all levels must act. As an NMC Employee, you must therefore be sure to familiarise yourself with these limits of authority and adhere to them in your work.

Please refer to NMC's Delegation of Authority Policy.





RESPECT





## 8. I RESPECT OTHERS AND THE ENVIRONMENT

At NMC we respect each other, our patients, and business partners. We also care about the environment.

### 8.1. I Respect Others

#### 8.1.1. Diversity and inclusion

We are inclusive and celebrate the diversity of our workforce. We ensure that all voices are heard, and that everyone is treated with fairness, dignity, and empathy. Together we create a welcoming environment where there are equal opportunities and equal access.

NMC does not tolerate any unlawful discrimination in the workplace or in business dealings and will take active steps to stop it from occurring.

#### 8.1.2. Bullying and harassment

We take great pride in the diversity of our workforce at NMC. We respect our cultural and religious differences and strive to keep our workplace free from harassment and discrimination. We must celebrate this diversity, and its potential to create value. We should start in the workplace by treating each other with fairness and respect. Always be sensitive to cultural differences and be careful to avoid offensive behaviour such as unwelcome remarks, inappropriate physical contact or verbal abuse.

Ensure that promotions and similar opportunities are based on merit and not on subjective factors such as nationality, gender, race, colour, ancestry, citizenship, religion, age, disability, medical condition or sexual orientation.



## 8. I RESPECT OTHERS AND THE ENVIRONMENT



### Bullying in the workplace

- Abusive, insulting, or offensive language
- Spreading misinformation or malicious rumours
- Behaviour or language that frightens, humiliates, belittles or degrades, including offensive jokes and criticism that is delivered with shouting or screaming
- Displaying offensive material
- Inappropriate comments about a person's appearance, lifestyle or their family

NMC does not tolerate any form of bullying behaviour, sexual harassment, physical or verbal abuse or intimidation in the workplace and will take disciplinary action against employees who engage in these practices.

If you believe you are being harassed, or have witnessed harassment of a colleague, you should report this to your manager and the Ethics and Compliance Office.

For further information regarding bullying and harassment at work, please refer to the Anti-Discrimination, Harassment and Bullying Policy.





## RESPECT

### 8.1.3 Alcohol

The health and safety of our patients and of our employees are paramount. You are prohibited from consuming or being under the influence of alcohol or illegal drugs while at work. You must be free from any side effects of legal drugs or controlled substances that could prevent you from conducting your work safely.

### 8.2. I Care about the Environment

We are committed to complying with relevant environmental laws and work hard to minimise the impact that our operations have on the environment.

At work, you should practice recycling, and reduce the consumption of water, energy and other resources. You should take practical steps like conserving paper by limiting the amount of printing you do, reuse boxes or other containers, when possible, switch off lights and appliances when not in use. You should also make sure to dispose of all electronic products and components properly.

### 8.3. I Protect Human Rights

NMC recognises the importance of maintaining and promoting fundamental human rights in our daily work. Derived from the principles and guidance of the United Nations, the International Labour Organization and the Organization for Economic Cooperation and Development, NMC operates under programmes and policies that ensure human rights such as fair and equitable wages, benefits, and other conditions of employment in accordance with local laws; and provide humane and safe working conditions.



I SPEAK UP



## 9. I SPEAK UP

If you have a concern or see any conduct or activity that breaches this Code, you must speak up so NMC can address the matter. Not speaking up quickly can lead to laws being breached, or risks to health, safety, security, or to the company's reputation.

### 9.1. How?

There are different ways you can speak up at NMC if you have a concern.

#### You can:

- speak with your manager;
- contact the Ethics and Compliance Office;
- contact the Legal or Human Resources Departments; or
- call or report confidentially through the NMC Integrity Line.

 Online Portal: [nmc.ethix360.com](https://nmc.ethix360.com)

Any manager who receives a report of violation or potential violation of this Code or law should report it promptly to the Ethics and Compliance Department. Please refer to our Speak Up Policy to understand how to report.

Reports may be made anonymously via the NMC Integrity Line. Nonetheless we encourage you to provide your name and a precise description of your specific concern to facilitate the investigation.







## 9. I SPEAK UP

### 9.2. What Happens when I Report?

NMC takes all allegations of misconduct seriously and will investigate them.

Depending on the nature of the issue raised, allegations will be investigated by the Ethics and Compliance Office in a confidential manner.

You are expected to cooperate fully and to answer all questions honestly and thoroughly during any investigation. If disciplinary action is applied, the procedures outlined in the applicable disciplinary policy will frame the sanction. Depending on the circumstances of the case, this may include training, warnings, loss of benefits, suspension, termination of employment and, in the most serious cases, reporting to authorities for prosecution. Please refer to our Investigation Policy and Disciplinary Policy for further information.

### 9.3. I Face No Retaliation

It takes courage to speak up when something is not right, and we are committed to an environment in which employees feel comfortable doing so. NMC prohibits retaliation in any form. For further information, please refer to our Speak Up Policy.





KEY CONTACTS



## 10. KEY CONTACTS

### 10. KEY CONTACTS

#### The Ethics and Compliance Office

NMC AssetCo Ltd.  
10<sup>th</sup> Floor, Al Ain Towers,  
PO Box 6222,  
Abu Dhabi. UAE.  
Tel.: **+971-2-4978313 (Ext: 18313)**  
Email: **[ethicscompliance@nmc.ae](mailto:ethicscompliance@nmc.ae)**





GLOSSARY





## 11. GLOSSARY

At NMC we respect each other, our patients, and business partners. We also care about the environment.

**"Applicable Rules"** means laws, statutory regulations, binding case law, contractual obligations, published guidance, rules, processes and procedures, policies and other voluntarily binding requirements of the NMC Group. Applicable Rules includes, for example, the relevant policies and codes set out by the Abu Dhabi Department of Health and Minister of Health and Prevention and the United Arab Emirates Ministry of Health & Prevention.

**"Business Courtesy"** means an item of value, whether tangible or intangible, that is (a) accepted by an NMC Employee from a third party including any supplier or (b) offered by an NMC Employee to a third party. (Examples: gift, meal, entertainment, ticket, admission, pass, or access to an opportunity or place not available to the general public.)

**"Local Integrity Champion"** means the person appointed at the local departmental or unit level to support the Ethics and Compliance Officer to build and embed an effective compliance programme and culture of integrity and ethics at NMC Group.

**"Fair Market Value"** means the value of an item or service, as bargained for in an arms-length negotiation, in which both the buyer and seller willingly agree to such value and neither is under pressure to complete the transaction.

**"Gift"** means benefits of any kind that is received by an individual for which the recipient has not paid Fair Market Value, including but not limited to food, event tickets, cash, cash equivalent, products and prizes.

**"Hospitality"** means meals, travel, accommodations, or other incidental expenses.

**"NMC" and "NMC Group"** mean NMC HoldCo, NMC OpCo and NMC Affiliates.

**"NMC Affiliates"** means all legal entities, in which the NMC Group has more than 50% of shareholder votes or the right to appoint more than 50% of the Board of Directors.

**"NMC Employees"** means senior leaders, executives, management, salaried employees, temporary employees and trainees within the NMC Group.

**"NMC HoldCo"** means the NMC Group holding company (HoldCo SP.V Ltd).







## 11. GLOSSARY

**"NMC OpCo"** means the NMC Group Operating Company (OpCo Ltd).

**"Specialist Compliance Officer"** means the compliance officer appointed for a particular subject matter sphere of responsibility, such as the Specialist Compliance Officer Finance, the Specialist Compliance Officer Medical, the Specialist Compliance Officer Nursing, the Specialist Compliance Officer Procurement and the Specialist Compliance Officer Human Resources.



