



NMC GROUP SUPPLIER & PARTNER CODE OF CONDUCT



Ethics & Compliance



CONTENTS



Supplier & Partner Code of Conduct

A. CEO Foreword	3
B. Policy Contents	
1. Introduction & Purpose	5
2. Applicability & Scope	7
3. Responsibilities	9
4. Collaboration & Integrity	11
5. People	13
6. Business Integrity	15
7. Protecting NMC	19
8. Speak Up	22
9. Glossary	24



CEO FOREWORD



At NMC Healthcare, integrity is fundamental to who we are. It underpins the trust our patients place in us, the expectations of our regulators, and the credibility we are committed to upholding across our organisation.

We are committed to conducting our business with the highest levels of integrity, honesty and transparency. This commitment extends beyond our people to all those who work with us and on our behalf.

This Supplier and Partner Code of Conduct sets out the minimum standards of ethical conduct we expect from all those who do business with NMC Healthcare. It is not simply a policy, but a reflection of our shared responsibility to uphold the values that define us and to support the delivery of safe, high-quality care.

As an extension of our organisation, we expect our Suppliers and Partners to act in a manner consistent with the principles and standards that guide our people and to honour their contractual commitments in a professional and ethical manner. This includes complying with applicable laws and regulations, protecting confidential information and conducting business in a fair and transparent way.

I encourage you to read this Code carefully, ensure that your personnel understand it, and incorporate it into your day-to-day activities. Just as we expect of our employees, we also expect our partners to foster a culture where concerns can be raised without fear and where ethical conduct is consistently demonstrated.

By working together and holding ourselves to the highest standards, I am confident that we will continue to strengthen trust, uphold our values, and deliver excellence across NMC Healthcare.

David Hadley
CEO, NMC Healthcare



INTRODUCTION & PURPOSE

1. INTRODUCTION & PURPOSE

This Code applies to you, as a Supplier or Partner, when you undertake any work with, for or on behalf of NMC Healthcare when you are doing so in that capacity.

NMC is committed to conducting our business with integrity, transparency and accountability. These principles extend beyond our organisation to all those with whom we do business. We expect our Suppliers and Business Partners to share this commitment and to operate in a manner that is consistent with our values and ethical standards.

This Code of Conduct sets out the minimum standard of ethical business practice NMC Healthcare expects from any Supplier or Business Partner engaged anywhere across our Group. It reflects the principles of our internal **NMC Code of Conduct and Ethics** and the values that guide every NMC employee.

By doing business with NMC Healthcare, you as Suppliers and Business Partners demonstrate your commitment to upholding the standards set out in this Code and to contributing to a culture of integrity, responsibility and excellence.

Policy Statement

This Supplier and Partner Code of Conduct represents NMC Healthcare's commitment to conducting business with integrity, and to requiring the same standard of all those who work with us. It is not a compliance checklist. It is a statement of our values and our expectations of the relationships we build.



APPLICABILITY
& SCOPE

2. APPLICABILITY & SCOPE

This Code applies to you when performing, representing, or acting on behalf of NMC Healthcare. Where you use sub-contractors or agencies to deliver NMC-related work, you are responsible for ensuring those third parties also comply with this Code. This Code is not a substitute for applicable laws, regulations or specific contractual obligations. Where a specific contract or agreement contains requirements that differ from or exceed this Code, those contractual terms will apply. This Code does not reduce any legal obligation you owe independently.

Compliance with this Code forms part of NMC Healthcare's supplier onboarding and due diligence process. Suppliers and Partners may be required to provide information, certifications or documentation to support this assessment as a condition of doing business with NMC Healthcare.

Compliance with this Code is a condition of entering into and maintaining a business relationship with NMC Healthcare. Failure to comply may result in corrective action, suspension of business activities, termination of the contractual relationship, exclusion from future business opportunities or any other appropriate measure determined by NMC Healthcare.



RESPONSIBILITIES

3. RESPONSIBILITIES

As Suppliers and Partners, you bear primary responsibility for ensuring your personnel and sub-contractors are aware of and comply with this Code when undertaking NMC Healthcare business. NMC Healthcare's Ethics and Compliance Office is responsible for maintaining and communicating this Code, supporting its application and receiving and investigating concerns raised under it. NMC Healthcare reserves the right to take appropriate action including contract termination - in response to any breach of this Code by a Supplier or Partner.

Suppliers and Partners are expected to communicate this Code to their relevant personnel and to ensure appropriate awareness or training is in place to support effective implementation. NMC Healthcare reserves the right to audit, request information, or verify compliance with this Code at any time. Where a breach occurs, NMC Healthcare may take proportionate action based on the severity of the breach, including requiring remediation plans, suspension of business activities or termination of the contractual relationship.



COLLABORATION
& INTEGRITY

4. COLLABORATION & INTEGRITY

We expect our Suppliers and Partners to keep their commitments to us and to the people who work for them.

Respect & Dignity

NMC Healthcare is committed to providing an environment that is respectful, inclusive and free from discrimination. We expect our Suppliers and Partners to foster a working environment that treats every individual with fairness, dignity and respect regardless of nationality, gender, religion, age, disability or background. You must abide by applicable national and international human rights principles.

Given the nature of healthcare services, our Suppliers and Partners must respect the dignity, privacy and wellbeing of patients at all times. You must ensure that your personnel behave professionally within clinical and non-clinical environments and adhere to applicable standards of conduct when interacting with patients and their families.

You are expected to promote a positive and inclusive working environment, where individuals feel valued and are able to raise concerns without fear of retaliation. Respectful communication, cultural awareness and sensitivity to the diverse communities served by NMC are essential in maintaining trust and delivering high-quality care.

Fair Labour Practices

NMC Healthcare respects and supports UAE labour laws and internationally recognised labour rights. We expect our Suppliers and Partners to abide by the following:

No form of forced, compulsory, trafficked or child labour will be tolerated in any part of our supply chain.

Except where required by applicable law, you must not withhold employees' identification documents, passport, or personal property as a condition of employment.

All personnel must be compensated at no less than the legally required minimum wage, paid on time and given leave and medical benefits in line with applicable law.

You must comply fully with local labour laws, including those governing working hours, health and safety, and overtime.

Where sub-contractors or agencies are used, you remain responsible for ensuring fair labour standards are maintained throughout.



PEOPLE

5. PEOPLE

Health, Safety & the Environment

The safety of patients, staff, and the communities we serve is paramount at NMC Healthcare. We expect our Suppliers and Partners to share this commitment and to operate safely in all their activities connected to NMC business. Accordingly, you must adhere to the following:

- Comply with all applicable health, safety and environmental laws and regulations.
- You must be aware of and adhere to all NMC site-specific safety policies, procedures, and emergency protocols.
- Personnel must be protected from workplace hazards – chemical, biological, physical or otherwise.
- Environmental impact must be actively managed: relevant permits and licences must be obtained and maintained; waste and resource use must be minimised.
- Sustainability is important to NMC Healthcare. Suppliers and Partners are encouraged to adopt environmentally responsible practices and support our broader sustainability commitments.
- Any incident, near-miss or risk event that affects or may affect NMC patients, staff or operations must be reported immediately to the relevant NMC contact or to NMC Healthcare's Ethics and Compliance Office - ethicscompliance@nmc.ae



BUSINESS
INTEGRITY

6. BUSINESS INTEGRITY

NMC Healthcare has a zero-tolerance approach to bribery, corruption, fraud, and any form of dishonest conduct in business.

Anti-Bribery & Corruption

You must not offer, give, solicit or accept any bribe, kickback, facilitation payment or other improper advantage in connection with NMC Healthcare business. This applies to relationships with government officials, regulators, healthcare professionals or any other party.

Compliance with all applicable anti-bribery, anti-corruption, and anti-money-laundering laws is required at all times, including the UAE Federal Law on Combating Corruption and any equivalent laws in jurisdictions where the Supplier or Partner operates.

You are expected to put in place your own internal controls to prevent bribery and to ensure that your personnel and any sub-contractors acting in relation to NMC business meet these standards. Any suspicion or evidence of bribery or corruption in connection with NMC Healthcare business must be reported immediately to NMC's Ethics and Compliance Office.

Gifts, Hospitality and Business Courtesies

A business courtesy is anything of value such as a gift, hospitality, entertainment, or benefit in kind which is offered or received in a business context. The offer or receipt of inappropriate business courtesies can compromise judgment and create conflicts of interest, even when no improper intent is present.

NMC Healthcare personnel are not permitted to accept gifts of cash or cash equivalents under any circumstances. You should not offer NMC staff lavish gifts, excessive hospitality, or any courtesy that is inconsistent with professional norms or that could be seen as an attempt to influence a business decision.

During any procurement, tendering or contract award process, Suppliers and Partners involved must not send or offer any business courtesies to NMC personnel involved in that process.

6. BUSINESS INTEGRITY

Conflicts of Interest

NMC Healthcare personnel are expected to always act in the best interests of the organisation. You must support this by maintaining full transparency:

- You must disclose to NMC any relationship such as financial, personal or otherwise between your personnel and NMC staff that could appear to influence any NMC business decision.
- You must not engage or make payments to NMC employees for personal services that have not been fully and transparently disclosed to NMC in advance of any work award.
- Personal or family relationships between your personnel and NMC staff are not in themselves prohibited but must not be used to influence any NMC business judgment and must be declared to NMC to ensure transparency and appropriate management of any potential conflicts of interest.
- You should have your own appropriate conflict of interest policies to ensure your personnel are not themselves compromised when engaged with NMC business.

Transparency & Financial Integrity

- You must maintain accurate books, records and accounts that reflect your actual business activities and demonstrate compliance with applicable law. You are expected to be alert to irregular payments, suspicious transactions or any activity that may indicate money laundering, and to have appropriate internal mechanisms in place to report such concerns promptly. Any such concerns connected to NMC Healthcare business must be reported to NMC's Ethics and Compliance Office (ethicscompliance@nmc.ae) without delay.
- If you become subject to any investigation, audit or regulatory inquiry connected to NMC Healthcare or to work performed for or with NMC, you must notify NMC's Ethics and Compliance Office promptly.

6. BUSINESS INTEGRITY

Accurate Information & Transparency

- Suppliers and Partners are expected to ensure that all information provided to NMC is accurate, complete and up to date. This includes, but is not limited to, legal entity details, ownership information, bank account details, and relevant certifications. Any changes to such information must be communicated to NMC promptly.
- Deliberate misrepresentation, omission, or submission of misleading or outdated information is not acceptable and may be treated as a breach of this Code.
- Where you become aware of any actual or suspected fraud, unauthorised access, or compromise of bank account details or payment credentials used in connection with NMC, you must report this to NMC promptly. Timely notification allows NMC to initiate appropriate controls and prevent financial loss. Failure to report may be treated as a breach of this Code.
- All interactions with NMC systems and processes must be conducted transparently and in good faith. You must not engage in practices that could undermine data integrity, including duplicate registrations, falsification, or manipulation of vendor records.

Fair Business Practices & Supply Chain

- You must conduct your business in accordance with fair competition principles and in compliance with all applicable antitrust, trade and competition laws. You must participate honestly and transparently in any NMC sourcing or procurement process and must not engage in anti-competitive conduct.
- You are responsible for the conduct of those you engage to perform NMC-related work. Sub-contractors, agents and third-party representatives must be selected transparently on merit and competitiveness and with appropriate due diligence. Responsibility for supply chain compliance cannot be delegated. Suppliers must conduct and retain evidence of appropriate due diligence on any subcontractors or third parties engaged in connection with NMC-related work. NMC Healthcare may request evidence of such due diligence at any time.

Protected



PROTECTING
NMC

7. PROTECTING NMC

Safeguarding NMC Healthcare

As our Suppliers and Partners, you are expected to protect the assets, information, and reputation of NMC Healthcare with the same care you would apply to your own.

Protecting Patient & NMC Healthcare Information

Information is among NMC Healthcare's most sensitive assets and particularly patient health information, which is protected under applicable data protection and healthcare privacy laws. Where you are granted access to NMC information or data, you must treat it with the utmost care and discretion:

- Confidential information belonging to NMC Healthcare must only be accessed and used for the purpose for which it was shared, and in line with all applicable contractual, legal, and professional obligations. You must be familiar and comply with all relevant agreements entered into with NMC, including any Data Processing Agreements (DPAs).
- You must not disclose NMC confidential information to any third party without prior written authorisation. Where the processing of NMC personal data is governed by a DPA, personal data disclosure must comply fully with the terms and conditions set out in that agreement.
- NMC personal data, and in particular patient data, must be handled in strict compliance with applicable data protection laws, contractual agreements with NMC, and NMC's internal data governance requirements.

7. PROTECTING NMC

Intellectual Property & Physical Assets

- NMC Healthcare's intellectual property including trademarks, proprietary processes, clinical protocols, software and brand materials must be used only in strict accordance with the permissions granted. You must not copy, reproduce, adapt or exploit NMC intellectual property beyond the scope of your engagement.
- Where you, as a supplier or partner are entrusted with access to NMC facilities, equipment, systems or other assets, you must take care of those assets responsibly. Assets must be used only for the purposes for which access was granted and must not be damaged, misappropriated or wasted. Any loss or damage must be reported promptly.

Cybersecurity & Technology

- Where you, as a supplier or partner, access NMC's systems, networks or digital infrastructure, you must comply with all applicable cybersecurity policies and requirements. Unauthorised access, data breaches, or security incidents that affect NMC's systems must be reported immediately to the relevant NMC contact and our IT Security team.
- If you become aware of a data breach involving NMC personal information, e.g., patient, employee personal data, you must report it without undue delay, even if it occurs outside of normal working hours by sending an email to DPO@nmc.ae and your point of contact at NMC. Prompt reporting is essential to allow NMC to assess the incident and meet its regulatory and contractual obligations.

SILENT

SILENT

SPEAK UP

SILENT

SILENT



SPEAK UP

8. SPEAK UP

NMC Healthcare is committed to acting with integrity in all it does. Working with NMC means committing to that same standard — and speaking up when something is wrong.

We ask our Suppliers and Partners to provide reasonable cooperation to NMC's Ethics and Compliance Office in the resolution of any concern. This may include making relevant records, information, or personnel available when appropriately requested, and maintaining the confidentiality of any ongoing inquiry.

Raising a Concern

If you become aware of any conduct that may breach this Code, applicable law, or NMC Healthcare's values, you are expected to raise that concern promptly through the following channels:

Ethics and Compliance Office

ethicscompliance@nmc.ae

Procurement & Supply Chain

MDMTeam@nmc.ae

Integrity Line Portal

My Voice (online portal, available 24/7)

Our anonymous ethics reporting platform is independently hosted and allows reports to be submitted online or by phone, in multiple languages, with the option of full anonymity where desired.

Non-Retaliation

NMC Healthcare strictly prohibits retaliation of any kind against anyone — whether an employee, Supplier, Partner, or any other individual — who reports a concern in good faith, participates in an investigation, or refuses to participate in conduct that violates this Code. We expect our Suppliers and Partners to uphold the same standard for their own personnel.



GLOSSARY

9. GLOSSARY

Code: means this NMC Healthcare Supplier and Partner Code of Conduct, as may be amended from time to time.

Confidential Information: means any non-public information belonging to NMC Healthcare, including patient data, business plans, financial information, clinical protocols and intellectual property.

Ethics and Compliance Office: means the NMC Healthcare group-level function responsible for the oversight of ethical conduct and regulatory compliance.

NMC Healthcare: means NMC Healthcare together with any directly or indirectly majority-owned subsidiary or affiliated entity.

Supplier and/or Partner: means any individual, company, or organisation that does or seeks to do business of any kind with any part of NMC Healthcare, including suppliers of goods, services, technology, and expertise.



Ethics & Compliance

Contact the Integrity Line to report a concern:

 **Toll-free Number:** 800 0651 2118

 **<https://nmc.ethix360ae.com>**

NMC Ethics & Compliance Office

 **+971 (2) 497 8313; Ext. 18313**

 **Ethicscompliance@nmc.ae**

www.nmc.ae