

Policy for Ethics and Code of Conduct

1. Objective

[Company Name] is proud of the values with which it conducts its business activities in order to achieve its vision and mission. It continues to uphold the highest levels of business ethics and personal integrity in all types of transactions and interactions.

In this perspective, this Code of Business Conduct and Ethics serves as guiding principles to protect and promote organizational integrity and to enhance [Company Name]'s ability to achieve its organizational vision and mission.

2. Scope

This Code of Business Conduct and Ethics applies to all directors, officers, and employees, including those of each subsidiary of [Company Name].

Such directors, officers, and employees are referred to herein collectively as the "Covered Parties".

3. Vision & Mission

3.1 Our Vision

Our vision is to create the highest quality healthcare delivery ecosystem to improve the country's overall health and quality of life.

Our promise to deliver such an ecosystem does not focus on simply providing good equipment and facilities, but also on staffing our hospitals with internationally accredited, highly skilled and qualified doctors, well-trained nurses, utilizing an advanced electronic method of maintaining and storing medical records, and implementing internationally practiced medical protocols, to name a few.

3.2 Our Mission

Our mission is to take a quantum leap forward to provide our community of patients with innovative and compassionate care in a comfortable environment.

We offer our patients fully equipped surgical theatres that are staffed and supervised by some of the

leading medical practitioners in the world.

4. Standards of Conduct & Ethics

4.1 Conflicts of Interest

A conflict of interest exists when a person's private interest interferes in any way with the interests of the company. A conflict can arise when a Covered Party takes actions or has interests that may make it difficult to perform his or her work for the company objectively and effectively. Conflicts of interest may also arise when a Covered Party, or members of his or her family, receive improper personal benefits as a result of their position. Loans to, or guarantees of obligations of, Covered Parties and their family members may create conflicts of interest. It is almost always a conflict of interest for a Covered Party to work simultaneously for a competitor, customer, or supplier.

All employees shall disclose any material transaction or relationship that could reasonably be expected to give rise to such a conflict to the CEO & HR Head. No action may be taken with respect to such transaction or party unless and until it has been approved by the CEO & HR Head.

The Covered Parties shall always adhere to the Anti-Bribery, Anti-Corruption, Gifts, and Entertainment Policy as issued and approved by the CEO & HR Head from time to time.

4.2 Corporate Assets & Opportunities

Covered Parties are prohibited from taking for themselves opportunities discovered through the use of corporate property, information, or position without the consent of the Board of Directors. No Covered Party may use corporate property, information, or position for improper personal gain, and no employee may compete with the company directly or indirectly. Covered Parties owe a duty to [Company Name] to advance its legitimate interests whenever possible.

4.3 Fair Dealing

Covered Parties shall behave honestly and ethically at all times and with all people. They shall act in

good faith, with due care, and shall engage only in fair and open competition, treating ethically competitors, suppliers, customers, and colleagues. No Covered Party should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.

4.4 Insider Trading

Covered Parties who have access to confidential information are not permitted to use or share that information for securities trading purposes ("insider trading") or for any other purpose except the conduct of [Company Name]'s business. All non-public information should be considered confidential. It is always illegal to trade in [Company Name]'s securities while in possession of material, non-public information, or to "tip" such information to others.

4.5 Confidentiality

Covered Parties must maintain the confidentiality of confidential information entrusted to them, except when disclosure is authorized or required by law. Confidential information includes all non-public information that might be of use to competitors or harmful to [Company Name] or its customers if disclosed. It also includes information entrusted by suppliers and customers, including the medical records of patients. The obligation to preserve confidential information continues even after employment ends.

4.6 Protection & Proper Use of Assets

All Covered Parties should endeavor to protect [Company Name]'s assets and ensure their efficient use. Theft, carelessness, and waste directly impact [Company Name]'s profitability. Any suspected incident of fraud or theft should be reported immediately. Company equipment should not be used for non-business purposes, though incidental personal use is permitted.

The obligation of Covered Parties to protect company assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, copyrights, business plans, marketing ideas, databases, and financial data. Unauthorized use or

distribution of this information violates [Company Name] policy and may also be illegal.

4.7 Compliance with Laws, Rules & Regulations

Obeying the law, both in letter and in spirit, is the foundation on which [Company Name]'s ethical standards are built.

Covered Parties shall comply with all applicable laws, rules, and regulations at all levels of government. While not all Covered Parties are expected to know every detail, they must seek advice when unsure “ from supervisors, HODs, the CFO, or HR Head.

4.8 Timely & Truthful Disclosure

Covered Parties involved in preparing reports and documents for authorities or regulators must ensure that such disclosures are full, fair, accurate, timely, and understandable. They must provide thorough and accurate financial data and must not conceal or falsify information or mislead auditors or investors.

5. Waivers

Any waiver of this Code may be made only by [Company Name]'s CEO & HR Head and will be promptly disclosed as required by law.

6. Violations of Code

6.1 Reporting Known or Suspected Violations

Any known or suspected violation of this Code must be reported immediately in accordance with the Whistleblowing Policy. No retaliatory action will be permitted against anyone making such a report in good faith.

6.2 Accountability for Violations

If it is determined that this Code has been violated – either directly, by failure to report, or by withholding information – the offending Covered Party may face disciplinary action, up to and including dismissal. Violations may also result in criminal penalties or civil liabilities. All Covered Parties are expected to cooperate in internal investigations of misconduct.

7. Compliance Procedures

We must all work together to ensure prompt and consistent action against violations of this Code. In some situations, however, it is difficult to know if a violation has occurred. Keep these steps in mind:

Make sure all facts are gathered before taking action.

Ask: What am I being asked to do? Does it seem unethical or improper?

Clarify responsibilities and discuss with colleagues if needed.

Discuss the problem with your supervisor.

Seek help from [Company Name] resources – HR Head or CEO – if supervisor guidance is inappropriate or inadequate.

Report ethical violations according to the Whistleblowing Policy.

If in doubt, always seek appropriate guidance to avoid any violation.

8. Disclaimer

The policy and procedures in this document may change at any time, at the sole discretion of [Company Name]'s Management, without prior notice. No statement or promise by a supervisor or manager may alter this policy.

This document should be read alongside Local Labor Laws, which take precedence where applicable.

This policy is effective from the date of issuance and supersedes all previous procedures or understandings on this subject.

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