



# Code of Conduct

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Approved by	
The Board of Directors	
Custodian	
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# CONTENTS

Document Version Control .....	2
CONTENTS .....	3
1 Purpose .....	4
2 Applicability .....	5
3 Reporting Illegal or Unethical Behavior .....	6
3.1 General Guidelines .....	6
3.2 Reporting Channels .....	6
3.3 Reporting Duty .....	7
4 Changes to the Code of Ethics .....	9
5 NHC Workplace .....	10
5.1 Conflict of Interest .....	10
5.2 Opportunities through NHC .....	10
5.3 Financial Accountability and Internal Control .....	10
5.4 Use of Corporate Letterhead .....	11
5.5 Health & Safety .....	11
5.6 Record Keeping .....	11
5.7 Use of NHC Assets .....	11
6 Employee Relationships .....	13
6.1 Honesty and Trust .....	13
6.2 Respect and Fair Treatment .....	13
6.3 Leading by Example .....	13
7 Relationship with the Public .....	15
7.1 Compliance with Laws, Rules and Regulations .....	15
7.2 Contributions .....	15
7.3 Corporate Responsibility to Society .....	15
7.4 Competition and Fair Dealing .....	15
7.5 Money Laundering .....	16
8 Relationship with Clients and Suppliers .....	17
8.1 Business Dealing .....	17
8.2 Gifts and Gratuities Offered by Employees .....	17
8.3 Gifts and Gratuities Offered to the Employees .....	17
9 Confidentiality .....	19
9.1 Confidential Information .....	19
9.2 Insider Trading .....	19
10 Communication and Annual Confirmation of Compliance .....	21
APPENDICES .....	22

# 1 Purpose

NHC Code of Conduct & Ethics (the "Code") outlines the ethical requirements at NHC. The Code represents a guide to ethical decision-making, where it assists NHC employees in making the right choices on a daily basis.

The "Code" describes and explains the expected behaviour and responsibilities of the employees in conducting business with or on behalf of the Company.

All directors, employees, consultants, must conduct business in compliance with the standards required by this Code, ethical practices and applicable laws, and take full responsibility and accountability for the manner in which the Company engages in business.

The Code serves to:

- Emphasize the Company's commitment to ethics and compliance with the law.
- Set forth basic standards of ethical and legal behaviour.
- Provide reporting mechanisms for known or suspected ethical or legal violations.
- Help prevent and detect any wrongdoing.

## 2 Applicability

The Code is applicable to all employees, consultants and directors of NHC, who must conduct themselves in accordance with the policies set out in this Code, and seek to avoid any indication of improper behavior as even one such instance could damage NHC's reputation and erode public trust.

The Code does not cover every issue that may arise, but sets out the basic principles to guide all employees, officers, and directors within NHC. It does not serve as a substitute for the individual responsibility for exercising good judgment and common sense. In addition to the Code, NHC approved policies and procedures and local laws and regulations applicable to the respective locations must be considered in all circumstances.

## 3 Reporting Illegal or Unethical Behavior

### 3.1 General Guidelines

All NHC employees should report violations of policies, procedures, regulations, or this Code, and cooperate in any internal investigation. Employees are always encouraged to disclose immediately any breach of this code of conduct or any other action that shall bring the company into disrepute, including fraud or other criminal acts committed by any employee.

All disclosures shall be kept confidential and reporting employees shall be protected from any form of retaliation or victimization.

Since NHC Management cannot anticipate every unethical situation that employees might encounter during their employment, it is important that the employees report illegal or unethical behavior. The following guidelines may assist NHC employees in approaching any potential questionable behavior:

- If confronted with a situation that appears to be potentially illegal or unethical, the employee should critically analyze the situation, asking himself / herself "Exactly what am I being asked to do?", "Exactly what did I just see? Would this be perceived as an illegal or unethical act? Could this act subject the Company and/or myself or fellow employees to litigation or questioning?"
- Clarify your own responsibility and role within NHC, as pertaining to this matter.
- Exercise common sense and good judgement to examine the situation. If your common sense says that the situation is unethical or illegal, report the same through an appropriate reporting channel (As provided in Point 3.2 below) depending on the nature, sensitivity, and materiality of the situation.
- Make sure all facts, (the number of times, names of the concerned individuals, etc.) pertaining to the situation are correctly captured in order to provide a sufficiently detailed description of the factual basis for the allegation to enable proper investigation.

### 3.2 Reporting Channels

#### Supervisor

- The direct employee's supervisor is the first reporting level for anticipated / observed unethical situations. At this level, an employee may discuss, inquire, and obtain consultation regarding ethical considerations.
- NHC employees may directly disclose the complete information that they observe, or are aware of, regarding unethical behavior, to their supervisors.
- The direct employee's supervisor should judge the reported situation in diligence, and if the situation constitutes a deviation from / violation to the contents of the Code, should report the issue immediately, in writing, to the Chief Executive Officer (CEO) to decide on the action steps within his authority. The CEO may consider

disclosing the matter to the Audit & Corporate Governance Committee if an investigation is required, or if the action steps are beyond his authority.

- Where employees are not comfortable to discuss anticipated unethical behavior, or report the same to their supervisors, they may apply to the other reporting channels.

#### **Human Resources Department**

- NHC employees may feel comfortable discussing, consulting, and reporting anticipated unethical behavior to the Human Resources Department.
- The Human Resources Department is expected to demonstrate a diligent view of any reported situation, building on its:
  - Understanding of ethical principles, practices, and professional conduct;
  - Objectivity, as it is not directly involved in the operations of the Company;
  - Nature of departmental activity, where it interacts and deals with all employees across the Company.
- Nevertheless, the Human Resource Department is required to raise the reported issues, in writing and upon noting their opinion on the reported situation, to the Company CEO to decide on the action steps within his authority, who in turn may consider disclosing the matter to the Audit & Corporate Governance Committee if an investigation is required, or if the action steps are beyond his authority.

#### **Board Audit & Corporate Governance Committee**

- The Board Audit & Corporate Governance Committee is responsible to examine, assess, and initiate investigations upon any employee reporting anticipated / observed unethical behavior.
- Employees observing unethical behavior may report the situation directly to the Audit & Corporate Governance Committee. In addition, the Audit & Corporate Governance Committee might be approached through employees' supervisors, the Human Resources Department, or the CEO.
- The Audit & Corporate Governance Committee will keep reports confidential to the extent possible, so as to aid in conducting adequate investigation.
- The Audit & Corporate Governance Committee should decide the proper actions to be taken, and seek the approval of the Board, upon identifying and verifying unethical behavior.
- In case the Audit & Corporate Governance Committee concludes that no unethical activity was intended or has taken place, then such conclusion must be formally communicated to the parties involved in reporting the anticipated / observed unethical behavior.

#### **Anonymous Reporting**

- An anonymous disclosure shall be requested, and will be properly investigated whether or not identity is known.
- A secret communication mail box accessible to all employees shall be maintained by Human Resource Department and supervised by the CEO. The employees may report actual or anticipated unethical behavior which would be reviewed by the CEO on a monthly basis and actions taken / suggested.

### **3.3 Reporting Duty**

- An individual reporting actual or suspected illegal or unethical behavior may disclose the same to the reporting supervisor or Human Resource Department or Audit & Corporate Governance Committee, based on the level of comfort and his judgement of the situation.

## Code of Conduct

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- The individual may request for anonymous disclosure, but should include sufficient details of the actual or suspected illegal or unethical behavior and also identify himself or herself to the reporting supervisor, Human Resource Department or Audit & Corporate Governance Committee, in order to aid proper follow up and investigation.
- All records shall be kept confidential and reporting individuals shall be protected from any form of retaliation or victimization.

## 4 Changes to the Code of Ethics

The Management of NHC may amend this Code of conduct or grant waivers in exceptional circumstances, provided that any such modification or waiver does not violate any applicable law, rule, regulation or the Company's Authority Matrix and further provided that any such modification or waiver is appropriately disclosed.

- Under such exceptional circumstances, suggestions must be formally communicated by Management to the Audit & Corporate Governance Committee, through the CEO.
- The Audit & Corporate Governance Committee shall discuss and deliberate the proposed amendments and advise the Board on decisions and conclusions.
- The Board may after further discussion and clarifications, pass a resolutions to amend the Code. The amendments to the Code shall be properly communicated and the amended Code shall be distributed to all NHC employees, directors and consultants.
- The changes to the document shall be consecutively numbered and dated.
- The following log shall be used and signed off for all updates.

VERSION NO.	DATE	NAME AND INITIAL
1.		

# 5 NHC Workplace

## 5.1 Conflict of Interest

Employees have to avoid any action or omission which may involve, or may appear to involve, a “conflict of interest” between an individual’s professional and / or private interests and his / her professional duties, obligations and responsibilities to the Company that may be deemed competitive with the interests of the Company.

Decisions have to be made objectively, free from bias and in the best interest of the Company; “conflict of interest” is not limited or exclusive to the following examples:

- Any financial or economic interest, or other professional, family or business relationships with suppliers, customers or competitors that might impair, or even be deemed to impair, according to standard business practices, the independence of any judgment that an Employee may need to make on behalf of the Company;
- A professional and / or family relationship between staff members which may influence recruitment, promotions, rewards, workload or performance management (job evaluation or compensation);
- Performance of services for or having a financial interest in a private company that is, or may become, a supplier, customer, or competitor of the company or payment provided by the Company to the employees; and
- Any solicitation, encouragement, acceptance or offer of benefits, hospitality, entertainment, or gifts other than those of small intrinsic value, in any circumstance of contract negotiation or in relation to professional duties, where the employee is in a position to influence directly or indirectly the outcome of the decision or unduly influencing the recipient or creating business obligations on the part of the recipient.

Employees have to immediately disclose any potential, or suspected, conflict to their direct supervisor to acquire the necessary approvals. If a conflict of interest becomes unavoidable, the best action is to make an immediate and full disclosure to the employee’s direct supervisor, who in turn will consider communicating the same to NHC CEO first, or to Audit & Corporate Governance Committee as the matter might necessitate. The employee’s supervisor, the CEO, or the said Committee as appropriate, will work to address the conflict in the best possible manner.

## 5.2 Opportunities through NHC

- No employee should take advantage of opportunities for using NHC property, information or position for improper personal gain or compete directly or indirectly with NHC.
- All employees owe a duty to NHC to advance its legitimate interests at every available opportunity.

## 5.3 Financial Accountability and Internal Control

- NHC expects all employees to be familiar with and operate within established internal control policies and procedures. The Company’s internal and external auditors periodically audit internal control policies, procedures, and compliance in order to assess the sufficiency of these controls.
- All employees involved in these periodic assessments shall provide accurate information regarding the application of internal control policies and procedures.

#### 5.4 Use of Corporate Letterhead

The Company's name, logo or corporate letterhead may not be used for any purpose other than in the normal course of official company business.

#### 5.5 Health & Safety

- NHC strives to provide each employee with a safe and healthy work place.
- Employees have a responsibility for maintaining a safe and healthy workplace for all other colleagues by following safety and health rules and practices, and reporting accidents and unsafe conditions.
- Each operating location is responsible for maintaining all required permits, postings and authorizations applicable to the operating location.
- All employees are required to report to their supervisor, the use of any medication, whether or not prescribed by a physician, which may affect judgment or work performance.

#### 5.6 Record Keeping

- NHC requires honest and accurate recording and reporting of information. All of NHC books, records, accounts, financial statements, and relevant documents and information must:
  - Be maintained in reasonable detail;
  - Appropriately reflect NHC transactions;
  - Conform both to applicable legal and regulatory requirements; and
  - Conform to NHC policies and procedures.
- Requests for reimbursement of expenses incurred on behalf of NHC must be properly documented and approved in accordance with Company policies.
- Periodic and other reports, financial or otherwise, to governmental agencies must present a full, fair, accurate, timely, and understandable disclosure regarding NHC business and operations.
- Exaggeration, insulting remarks, guesswork, or inappropriate characterizations should be avoided for all business records and internal and external written communication including emails.
- All records should always be retained in accordance with applicable laws and regulations.

#### 5.7 Use of NHC Assets

- Company resources, both tangible and intangible assets and resources (the “Assets and Resources”), should be solely used to allow or facilitate the provision of services by the Employee to the Company according to the provisions of each Employee’s employment agreement. It is the policy of NHC to respect the privacy of all employees. However, the expectation of privacy does not extend to the use of NHC assets, including, but not limited to desks, cabinets, lockers, telephones, and computers.
- Theft, carelessness, and wastage have a direct impact on NHC’s profitability. Employees are expected to be efficient and economical in their use and management of Assets and Resources; inefficiency, misuse, carelessness, wastage, theft or intentional damage of Assets and Resources is condoned. All NHC assets should be used only for legitimate business purposes. This includes Company resources, equipment, and facilities. Unauthorized possession or removal, loan, donation or destruction of Assets and Resources should be immediately reported to the supervisor, CEO, or Audit & Corporate Governance Committee, as appropriate.

- NHC communication systems, including computers, electronic mail, intranet and Internet access, instant messaging, telephones, voice mail, conferencing systems, and paper documents are the property of NHC and are to be used primarily for business purposes. Employees must keep professional levels of confidentiality in relation to the copying, disclosure, transfer or communication, under any shape or form, of emails, documents or any other information deemed confidential.
- NHC management has the right to monitor and inspect without prior notice all NHC communications and record systems. All messages and information generated on or handled by NHC communication and record systems are the property of the Company. The Company may adopt disciplinary and / or legal measures for discriminatory, offensive, defamatory, pornographic and other similar type of messages or materials sent by e-mail, intranet or accessed through the Internet.
- NHC expense accounts, bank accounts, and intellectual properties such as copyrights, business plans, and other resources are strictly limited to NHC use. Personal charges on NHC accounts are prohibited.
- All third party software used by NHC employees must be properly licensed to the Company.
- Software may be distributed only to NHC employees authorized to use it. No software may be installed, copied, shared or distributed without prior written approval from NHC IT, having ultimate responsibility for the type of software in question.

## 6 Employee Relationships

The diversity of NHC employees is a tremendous asset. NHC is committed to provide equal employment opportunity, treatment, courtesy and respect. The following are the basic characteristics of the Company's Employee Relationships ethics:

### 6.1 Honesty and Trust

- NHC employees are expected to perform their duties with integrity and conduct themselves ethically at all times.
- Honesty improves work coordination and build an effective work environment among the employees. NHC employees are thus required to build trust amongst themselves, through enduring honesty in conduct and behavior.

### 6.2 Respect and Fair Treatment

- All employees have a right to, and responsibility for maintaining, a fair, safe, and productive work environment.
- NHC workplace should be free from violent and abusive behavior and have a work environment where professional dignity of each individual is respected. Threatening, aggressive, or abusive behavior towards fellow colleagues or others in the workplace will not be tolerated.
- All employees are expected to treat their colleagues with respect and are prohibited from engaging in any misconduct towards other individuals or groups.
- NHC employees should in the conduct of their business, abide by management directives and comply with instructions, unless these are suspected to be violating this Code, in which case, they may report the case as set out in this Code. Any discrimination, sexual / non-sexual harassment including but not limited to harassment relating to race, nationality, ethnicity, origins, colour, age, gender, family status, pregnancy, physical or intellectual impairment, or on the grounds of political or religious convictions, vilification, and offensive behavior are intolerable and will be subject to disciplinary actions.

### 6.3 Leading by Example

NHC employees holding leadership positions (i.e. Supervisors, Managers and Department Heads) have additional responsibilities under the Code. They must:

- Promote compliance and ethics by setting the right example – in other words, they should be able to conduct themselves in a way that demonstrates to the employees under their supervision what it means to “act with integrity”.
- Possess the knowledge to answer questions from employees under their supervision regarding NHC values, policies, and procedures;
- Properly train the employees under their supervision to sufficiently orient them to the requirement of the Code.
- Foster an environment of clear and open communication where compliance issues are brought forward by employees across all management levels-without fear of retaliation and mistakes; and

## Code of Ethics

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- Use reasonable care to monitor third parties acting on behalf of NHC to ensure they work in a manner consistent with the Code.

# 7 Relationship with the Public

## 7.1 Compliance with Laws, Rules and Regulations

- Compliance with applicable laws and regulations, both in letter and in spirit, is integral to the achievement of the ethical standards of this Code.
- All NHC employees must comply, personally and while conducting NHC business, with the National laws in which NHC operates. While it is not expected that each employee knows all details of the law, it is required that NHC employees seek advice from authorized Company representatives, being direct supervisors, Human Resource Department, or the Audit & Corporate Governance Committee, as appropriate. Excuses for violations such as “everyone does it” will not be tolerated.

## 7.2 Contributions

- Although NHC neither encourages nor discourages participation in political and civil activities at a personal level, no contribution or statement of support may be made on behalf of NHC or using NHC resources to any candidate for public office, or charitable organization without obtaining a written authorization letter from the CEO.
- It is strictly prohibited to offer anything of value directly or indirectly to any governmental party. The promise, offer, or delivery to any governmental party or employee of any governmental agency not only violates NHC policy, but may also expose NHC and the concerned employee to a criminal offence.

## 7.3 Corporate Responsibility to Society

NHC is committed to be a good neighbor and a contributing corporate member in the communities in which it operates. NHC is responsible to conduct its business activities in ways that honor ethical values, respect people, communities, and the natural environment.

NHC works toward the sustainable improvement of community by:

- Rendering high-quality professional services;
- Delivering services and products that consider the interest and match the needs of the communities in which it operates;
- Evaluating and addressing community priorities in diligence, upon delivering the services and products anticipated to fulfill community needs; and
- Providing a workplace that contributes to the professional growth, the development, and the personal success of NHC people, being part of the communities in which NHC operates.

## 7.4 Competition and Fair Dealing

- NHC employees should strive to help NHC outperform competitors at every opportunity. This should be done honestly and fairly at all times.
- Impractical / unfeasible commitments should never be made concerning NHC services. This also applies to false statements or innuendos about competitors or former employees. NHC seeks competitive advantages through superior performance, and not through unethical or illegal business practices.

- Theft of proprietary information or possession and use of trade information without the owner's consent (or inducement of such disclosures by past or present employees of other companies) is prohibited.
- Each employee should endeavor to respect the rights of, and deal fairly with, NHC customers, suppliers, competitors and employees. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other- unfair practice.

## 7.5 Money Laundering

Laundering allows criminals to transform illegally obtained gains into seemingly legitimate funds by mixing these gains with funds of legitimate origin, thereby concealing-it's criminal origin. NHC may unknowingly be used to launder money derived from criminal activity. The intention behind these types of transactions is to hide ownership of the funds from the government.

- The Company must apply every effort to resist being associated with money laundering or any other type of criminal activity.
- NHC employees are prohibited from engaging in money laundering. All employees are required to immediately report all attempts to launder money and/or all suspicious activities.
- Any employee who knowingly and willfully launders money, or attempts or assists someone in laundering money will be subject to legal action.

# 8 Relationship with Clients and Suppliers

## 8.1 Business Dealing

- NHC seeks building productive relationships with all suppliers, clients, and alliances based on integrity, ethical behavior, and mutual trust.
- Suppliers and alliances should be selected by NHC based on the quality, price, service, delivery, and supply of needed goods and services. Procurement decisions should be based on objective business rationale and not on personal interest or bias.

## 8.2 Gifts and Gratuities Offered by Employees

- Employees may not, on behalf of NHC, and in connection with any transaction or business of NHC, directly or indirectly give, offer, or promise anything of value to any individual, business entity, organization, governmental unit, public official, or any other person for the purpose of influencing the actions of the recipient.
- This standard of conduct is not intended to prohibit normal business practices such as providing occasional meals, entertainment, tickets to cultural and sporting events, promotional gifts, favors, discounts, price concessions, gifts given as token of friendship or special occasions (such as Wedding), so long as they are of nominal and reasonable value under the circumstances, and promote the Company's legitimate business interests
- The gift should constitute an ordinary and customary business expense of nominal value that are unlikely to be interpreted as having any influence in obtaining or maintaining business or services for NHC, or as being a bribe or other improper payment, or as influencing any governmental decision or action
- If they are of more than nominal value they must first be approved in writing by the appropriate authority within NHC.
- In all cases, such gifts must be proper, legitimate and legal under applicable law; they must qualify as ordinary and customary business expenses. No other gifts or entertainment, other than as described above, are allowed.

## 8.3 Gifts and Gratuities Offered to the Employees

- It is prohibited that any employee of NHC corruptly solicit, demand, or accept for the gifts (i.e. any gift, inducement, entertainment, hospitality, free lodging, invitation to seminars, conferences and other business or entertainment events, both at home and abroad) of any person or party, anything of value in return for any business, service, or confidential information of the Company, either before or after a transaction is discussed or consummated, which is likely to conflict with or influence the role, responsibilities or decision-making process of the employee
- Things of value exchanged between NHC employee, family members, or social friends are not covered by this Code of Ethics if they are exchanged solely because of the family or social relationship and not in connection with NHC business. However, the exchange of things of value that may create the appearance of a conflict of interest should be avoided.
- Although acceptance of things of value in connection with NHC business is generally prohibited, an employee may accept meals, refreshments, travel arrangements or

accommodation, or entertainment, all of reasonable value, in the course of a meeting or other occasion, the purpose of which is to hold business discussions or to foster better business relations, provided that the benefit would be a reasonable expense if paid for by NHC instead of the other party.

- However, an employee may not receive things of value for purely personal benefit, or for the personal benefit of anyone other than NHC, especially benefits that do not demonstrate business purpose. Gifts of cash or cash equivalent are expressly prohibited.
- On a case-by-case basis, NHC may approve other circumstances, not described herein, in which employees may accept something of value in connection with NHC business, approval may be given by the Audit & Corporate Governance Committee on the basis of a full written disclosure of all relevant facts submitted by the employee.

# 9 Confidentiality

## 9.1 Confidential Information

- Maintaining the confidentiality of the information entrusted to NHC is at all times expected, except where disclosure is required by law. All non-public information should be considered confidential information.
- Confidential information may include, but is not limited to such items as:
  - Trade secrets;
  - Business plans;
  - Marketing plans;
  - Investment portfolios;
  - Payroll records; and
  - Any unpublished financial data.
- In addition, this includes all non-public information that might be of use to an outside party in a manner that is disadvantageous to NHC or its employees, suppliers, or customers. Every NHC employee shall maintain and protect the confidentiality, integrity and security of confidential information regarding employees, suppliers and customers in their possession. The obligation to preserve confidential information continues even after employment ends.

## 9.2 Insider Trading

- It is paramount that all employees understand the implications of "Insider Trading" and avoid any kind of conflict between personal dealings and those of the Company or its clients.
- NHC must conduct its business in strict compliance with the insider trading laws and regulations of the Kingdom of Bahrain.
- Insider trading can generally be described as dealing in securities whilst in possession of inside information. Inside information is confidential, non-public, price sensitive information in relation to securities. Laws prohibiting insider trading generally also extend to improper tipping.
- Inside information is material, non-public information about the listed securities, activities or financial condition of a corporation, public entity or other issuer of securities. Material, non-public information concerning market developments shall also be construed to be inside information.
- Information is material when it could have an impact on the market price of the securities involved, i.e. if it is likely that a reasonable investor would consider the information important in deciding whether to purchase or sell the securities. Information shall be material to certain securities of an issuer but not material to all securities of that issuer (e.g. to equity but not to debt). Examples of information that could be material include (but are not limited to):
  - Projections of future earnings or losses;
  - News of a pending or proposed merger or acquisition, restructurings;
  - Tender offer or exchange offer;
  - News of a significant sale of assets or the disposition of a subsidiary;

- Changes in dividend policies or the declaration of a stock split or the offering of additional securities;
- Significant changes in management;
- Significant new products or discoveries; or
- Significant shifts in operating or financial circumstances, such as cash-flow reductions, major write-offs, changes in accounting methods and major strikes
- Voluntary calls of debt or preferred stock issues.
- Significant litigation or governmental developments that could affect securities markets.

It should be noted that either positive or negative information may be material.

- An employee in possession of "material non-public information" shall not pass that information on to others, and shall not purchase or sell a security or recommend a security transaction of his / her own account, the account of a family member, the account of client of NHC, or any other person. NHC employees should not trade in NHC related securities, based upon possessing "material non-public information" except after the information is publicly disclosed through appropriate channels to allow for public dissemination and evaluation of the information.

## 10 Communication and Annual Confirmation of Compliance

- The Code of Ethics should be communicated to all NHC employees. This communication should educate employees and motivate them to report their concerns. This message could be delivered through posters in break rooms, emails, or articles in employee newsletter.
- Every employee will be required to sign a declaration statement (CE 10 – 01) at the time of employment, indicating that he or she has read this Code and understands its provisions and agrees to abide by them. This declaration should be signed by each employee within a period not exceeding three (3) months from the date of joining the employment.
- NHC employees are further required to sign the declaration statement (CE 10 – 01) on an annual basis, or as needed, to confirm the compliance with the Code of Ethics.
- The amendments to the Code shall be properly communicated and the amended Code shall be distributed to all NHC employees, directors and consultants.

# APPENDICES

## CE (10 – 01)

### Code of Ethics Confirmation

Date:

The CEO

This is to confirm that I have read NHC Code of Ethics and I am aware of:

- My duty to abide by NHC Code of Ethics;
- My duty to report any potential fraudulent, illegal, or unethical act or other violation of NHC Code of Ethics, as soon as they come to my attention and knowledge; and
- My duty to report any potential conflict of interest on my part to management.

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(Employee's Signature)

(Name of Employee)

(Designation)

(Department)