



LIFECARE

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**CODE
OF
CONDUCT**



1. Introduction

The purpose of this Code of Conduct (the "Code") is to promote ethical behavior and to provide guidance to all employees, officers, and directors of the company (collectively, "Personnel") on how to conduct themselves in an ethical and responsible manner. Lifecare is committed to the highest ethical standards, operating with respect and in compliance with applicable laws and international standards for responsible business conduct.

We act with integrity and work to prevent corruption, fraud, and undue influence in all forms. We hold ourselves accountable and maintain transparency in our decisions and practices.

2. Scope

The Code applies to all employees, contractors, volunteers, partners, and any individuals representing or acting on behalf of Lifecare Group.

3. Principles of Conduct

- a. Integrity: Personnel must act with integrity and maintain the highest ethical standards in all their dealings, both within and outside the company.
- b. Respect: Personnel must respect the rights and dignity of others and treat all people fairly and with dignity.
- c. Responsibility: Personnel must take responsibility for their actions and decisions and ensure that their work meets the company's standards for quality and performance.

4. Conflicts of Interest

- a. Definition: A conflict of interest occurs when an individual's personal interests or obligations interfere with or appear to interfere with their ability to perform their job responsibilities objectively and in the best interests of the company.
- b. Disclosure: Personnel must disclose any actual or potential conflicts of interest to a member of the management team.
- c. Avoidance: Personnel must avoid engaging in activities that present a conflict of interest, unless they have received prior approval from a line manager or the CEO.

5. Compliance with laws and regulations

- a. Laws: Compliance with all relevant legal and regulatory requirements is fundamental to our operations. All personnel are expected to comply with all applicable laws, regulations, and industry standards. Engaging in any form of illegal or unethical conduct is strictly prohibited and will not be tolerated under any circumstances.



- b. Reporting: Personnel must report any suspected violations of the law or this Code to the company's management.

6. Ethics

- a. Workplace: We are committed to fostering a diverse and inclusive workplace that is free from discrimination and harassment.
- b. Job duties and authority: Employees are expected to perform their job duties with diligence, competence, and professionalism, in alignment with the organization's goals and values. Each employee is responsible for fulfilling the specific responsibilities outlined in their job description, contributing to the overall success of the company. Authority granted to employees must be exercised responsibly and within the scope of their role.

Abuse of authority or actions outside assigned responsibilities will not be tolerated. Employees must respect the roles and authority of others and seek guidance when needed to ensure decisions align with the organization's best interests.

Employees are expected to work collaboratively, respect the roles and authority of colleagues, and seek guidance when necessary to ensure decisions are made in the best interest of the organization.

- c. Communication: All employees must communicate respectfully and professionally, avoiding language or behavior that is offensive, discriminatory and constructively.
- d. Company image: Respectful conduct is essential to upholding the company's reputation and image, including punctuality in business meetings, and professionalism in all interactions with business partners.
- e. Adherence to Policies: Employees must comply with all organizational policies, procedures, and guidelines to ensure consistent and ethical conduct.
- f. Confidentiality: Employees are required to maintain strict confidentiality regarding all sensitive information obtained during the course of their work, including but not limited to company data, client and personnel information, and proprietary materials. This obligation extends beyond the duration of employment and includes not disclosing, sharing, or using confidential information for personal gain or any unauthorized purpose.

Failure to adhere to confidentiality requirements may result in disciplinary action, up to and including termination of employment.



- g. Discrimination: Personnel must not discriminate against others on the basis of race, color, religion, sex, age, national origin, disability, sexual orientation, or any other characteristic protected by law.
- h. Harassment: Personnel must not engage in any form of harassment, including sexual harassment.
- i. Corruption: Employees must comply with the Anti-corruption Policy, which prohibits bribery, kickbacks, and unethical financial practices.

Commitment to professional behavior extends beyond mere compliance with policy.

7. Protecting company assets

Employees are responsible for safeguarding all company assets, including physical property, intellectual property, equipment, financial resources, and confidential information. This includes maintaining the confidentiality of proprietary information and trade secrets, ensuring such information is not disclosed to unauthorized parties.

All assets must be used exclusively for business purposes and in a manner that supports the organization's objectives. Employees are expected to take reasonable precautions to prevent loss, theft, or misuse of company assets. Additionally, they must not use these assets for personal gain or any unauthorized purpose. Any suspected misuse or damage must be reported immediately to management.

8. Raise concerns

We foster a culture of trust and integrity, where open and honest communication is encouraged. Speaking up about ethical or compliance concerns helps us address potential issues and strengthens our ethical culture. Employees are encouraged to report any actual or potential violations of the Code of Conduct, with zero tolerance for retaliation.

9. Disciplinary Action

The company will enforce this Code of Conduct and may impose disciplinary action on any personnel who violates its provisions. Violation will result in appropriate disciplinary measures, in accordance with the organization's policies. Disciplinary measures may include, but are not limited to, verbal or written warnings, suspension, demotion, or termination of employment.

10. Conclusion

This Code is not exhaustive and does not cover every situation that may arise. Personnel are expected to use their best judgment and to seek guidance from their supervisor or the company's management when necessary. The company will enforce this Code and may take disciplinary action against any Personnel who violate its provisions.