

# Code of Conduct

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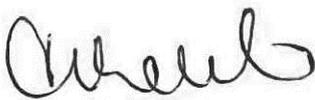
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## HISTORY AND ISSUE CONTROL

Date	Version	Revision Description	Review Date
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## AUTHORISATION

Author	Responsibility	Authorisation
		
<b>Hubert Mugliett</b> Head of SHRM	<b>Hubert Mugliett</b> Head of SHRM	<b>Ms Maria Melillo</b> CEO

## 1. AIM

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The Code of Conduct describes Medilink International's commitment and requirements in connection with issues of an ethical nature that relate to business practice and personal conduct.

At Medilink, we require that all of our staff conduct themselves according to the highest standards of ethics, integrity, and behaviour when dealing with our clients, colleagues, and other stakeholders. This includes, but is not necessarily limited to, full compliance with all legal obligations imposed by statute or any other source of law. This also includes the strict observance of our policies and procedures as these reflect our ethos as a company and the way we conduct our business globally.

## 2. PURPOSE

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This Code establishes the standards of behaviour that must be met by all Staff. Where these standards are not met, appropriate disciplinary action will be taken. In cases where the breach involves serious misconduct, this may result in summary dismissal. In cases where a breach of the policy involves a breach of any law, then the relevant government authorities or the police may be notified.

The purpose of this document is to make it clear what the Company expects from staff, and that staff are required to be familiar with and comply with these terms at all times. Failure to do so may result in disciplinary action, including potential termination of engagement or employment.

The Company may unilaterally introduce, vary, remove, or replace this document at any time.

## 3. DEFINITIONS

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## 4. REFERENCES AND RELATED PROCEDURES

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- POL\_FINMST01 - Anti-Bribery, Anti-Corruption Practices & Anti-Money Laundering Policy
- SOP\_HRRMST07 - SOP for Recruitment of Company Staff
- POL\_HRRMST07 - Whistleblower Policy (EN)
- POL\_HRRMST01 - Equal Opportunities Policy
- POL\_HRRMST04 - Harassment policy and procedure
- POL\_ITSMST01 - Data Security Policy
- SOP\_QMSMST02 - SOP for Outsourcing

## 5. ROLES AND RESPONSIBILITIES

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STAFF	All Staff must ensure that they are familiar with and perform their duties in accordance with the requirements set out in this document and applicable laws and regulations
DEPARTMENT MANAGERS	Department Managers must ensure that activities within their area of responsibility are carried out in accordance with the requirements set out in this document. They are also responsible for ensuring their staff is familiar with this document and for providing advice with respect to the interpretation and application of the rules.
HR DEPARTMENT	Is responsible for implementing this code of conduct and keeping it up to date

## 6. CODE OF BUSINESS CONDUCT

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- 6.1. Medilink International's ability to create value is dependent on applying high ethical standards as the basis for a trust-based and binding relationship with the community and the Group's owners, staff, partners, customers, and suppliers.
- 6.2. Medilink International will maintain an open dialogue on ethical issues, internally and externally.
- 6.3. The Code of Conduct describes Medilink International standards and requirements that are ethical and promote trust and integrity in all our actions and operations. The intention is to be as clear and direct as possible in terms of difficult issues any individual may face in their work within The Company. It is important all staff follow a number of simple guidelines.
- 6.3.1. Making sure one's actions are within the law and comfortably within the Company's own conduct requirements. Operating in a grey zone increases the risk of things going wrong.
  - 6.3.2. Being open with regard to issues of conduct.
  - 6.3.3. If in doubt, staff should raise the issue with their superior.
  - 6.3.4. Spending sufficient time on difficult decisions. The wrong decisions are often taken when things have not been thought through properly, and the individual allows themselves to be pressured into taking a rash decision.
- 6.4 Medilink International shall be known for its high ethical standards and integrity in the way it conducts business. Breaches of laws and ethical requirements are therefore a threat to the Group's competitiveness and reputation and may lead to disciplinary action including dismissal.

## 6.5 CORRECT INFORMATION, ACCOUNTING AND REPORTING

- 6.5.1 Medilink International's business will be communicated accurately and fully, both internally and externally.
- 6.5.2 All accounting information must be corrected, registered, and reproduced in accordance with laws and regulations, including relevant accounting standards.
- 6.5.3 Staff, particularly senior executives, and financial officers are expected to exercise the highest standard of care in preparing such materials.
- 6.5.4 Any intentional act that results in a material misstatement in financial statements will be treated as fraud.

## 6.6 FAIR COMPETITION AND ANTI-TRUST LAWS

- 6.6.1 Medilink International will compete in a fair and ethically justifiable manner within the framework of the anti-trust and competition rules in all markets in which the Group operates. This applies in relation to competitors, customers, and suppliers.

## 6.7 COMBATING CORRUPTION

- 6.7.1 Corruption includes bribery and trading in influence. Corruption undermines legitimate business activities, distorts competition, ruins reputations, and exposes companies and individuals to risk. Medilink International is against all forms of corruption and will make active efforts to ensure that it does not occur in the Group's business activities.
- 6.7.2 All staff is expected to adhere to the Anti-Bribery, Anti-Corruption practices and Anti-money laundering policy (*POL\_FINMST01*).

## 6.8 COMBATING BRIBERY, CORRUPTION AND MONEY-LAUNDERING

- 6.8.1 Medilink International has implemented measures to mitigate such risks and will, in all contractual relations, commit third parties to adhere to the same rules and procedures as apply to Medilink International. These are encapsulated in Medilink's Anti-Bribery, Anti-Corruption practices and Anti-money laundering policy (*POL\_FINMST01*) which all staff and suppliers are charged to be familiar with and adhere to.

## 6.9 RELATIONS WITH SUPPLIERS, PARTNERS, AND CUSTOMERS

Medilink International will conduct its business in such a way that suppliers, partners, and customers can have trust in the Group. Suppliers and partners are expected to adhere to ethical requirements and the Company's Code of Business Conduct.

## 6.10 USE OF INTERMEDIARIES

- 6.10.1 Intermediaries include agents, consultants, and others who, in the Group's business activities, act as links between Medilink International and a third party.
- 6.10.2 Before intermediaries are hired, the manager in question must ensure that the intermediary's reputation, background, and abilities are appropriate and satisfactory as per Company policies and guidelines: *SOP\_HRRMST07 - SOP for Recruitment of Company Staff*.

## 6.11 MANDATORY INTEGRITY DUE DILIGENCE

- 6.11.1 Business relationships with any entity or individual shall only be entered into after a proper and successful due diligence exercise is conducted as per SOP for Outsourcing (*SOP\_QMSMST02*).
- 6.11.2 Medilink International expects that intermediaries act in accordance with its ethical requirements and this condition must be included in the intermediary's contract with Medilink International.
- 6.11.3 Agreements with intermediaries must be made in writing and describe the true relationship between the parties. The agreed compensation must be proportionate to the service rendered. Payments must only be made against satisfactory documentation and must be accounted for in accordance with generally accepted accounting principles.
- 6.11.4 The performance of the intermediary relative to Medilink International ethical requirements and Code of Conduct should be regularly monitored and remedial action should be taken if performance falls short.

## 6.12 POLITICAL ACTIVITY

- 6.12.1 Medilink International does not support individual political parties or individual politicians. Medilink International may participate in public debate when this is in the Group's interest.
- 6.12.2 Staff is free to participate in democratic political activities, but this must be without reference to, as representatives of or, in connection with their relationship with Medilink International.

## 6.13 EQUALITY AND DIVERSITY

- 6.13.1 Medilink International will show respect for all individuals and make active efforts to ensure a good working environment characterised by equality and diversity.
- 6.13.2 All staff shall be familiar with and adhere to the Company's Equal Opportunities Policy (*POL\_HRRMST01*).
- 6.13.3 Medilink International does not accept any form of discrimination of its own Staff or others involved in Medilink International activities and empowers all through its

various policies such as the Whistleblower policy (*POL\_HRRMST07*), the Harassment Policy and Procedure (*POL\_HRRMST04*) and the Equal Opportunities Policy (*POL\_HRRMST01*) to report any untoward discrimination or activity.

## 7. CODE OF PERSONAL CONDUCT

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- 7.1 Medilink International sets high standards of conduct, ethics, and integrity for everyone who acts on behalf of the Group. Any individual or entity so doing must abide by applicable laws and regulations and carry out their duties in accordance with the requirements and standards that apply in Medilink International. They shall not assist in any breach of laws by business associates.
- 7.2 Medilink International expects all staff to treat everyone with whom they come into contact through their work, or work-related activities, with courtesy and respect. All staff must refrain from any conduct that can have a negative effect on colleagues, the working environment, or the Company.
- 7.3 This includes any form of harassment, discrimination or, other behaviour that colleagues or business associates may regard as threatening or degrading. Staff must not behave in a manner that can or may offend local customs or culture.
- 7.4 PROTECTION OF MEDILINK INTERNATIONAL PROPERTY AND ASSETS
- 7.4.1 The use of Company time, materials, financial assets or, facilities for purposes not directly related to the Company's business is prohibited without authorisation from a relevant Company representative. The same applies to the removal or borrowing of Company assets without permission.
- 7.4.2 All staff members must protect the Company's property and assets, material, reputational, intellectual or, otherwise, against loss, damage, and abuse.
- 7.5 CONFIDENTIALITY
- 7.5.1 Staff members have a duty of confidentiality and are charged with actively taking security measures to prevent unauthorised persons or entities from gaining access to information that may harm the Company's Business or reputation or compromise the security of any data, personal or otherwise, held in trust by the Company.
- 7.5.2 All staff members are charged with being familiar with and observing the Company's Data Security Policy (*POL\_ITSMST01*).
- 7.5.3 This duty extends also to the protection of an individual's privacy and integrity. Careful consideration should therefore be given to how, where and with whom Company-related matters are discussed, in order to ensure that unauthorised persons do not gain access to internal Company information. Staff must comply with the requirements for confidential treatment of all such information, except when disclosure is authorised or required by law.

- 7.5.4 Information classified as “confidential” or “internal-restricted distribution” must not be disclosed to or discussed with unauthorised personnel within or without the Company who are not authorised to have access to or be privy to such information.
- 7.5.5 This also applies to sensitive information concerning security, individuals, commercial, technical, or contractual matters and to information protected by law.
- 7.5.6 The duty of confidentiality continues to apply after the termination of the staff member’s relationship with the Company or after an assignment has been completed.
- 7.5.7 Information other than general business knowledge and work experience that becomes known to the individual in connection with the performance of their work shall be regarded as confidential and treated as such.

## 7.6 CONFLICT OF INTEREST

- 7.6.1 All staff members must behave impartially in all business dealings and not give other companies, organisations, or individuals improper advantages. Staff must not become involved in relationships that could give rise to an actual or perceived conflict with Medilink International’s interest or could in any way have a negative effect on their own or other staff’s freedom of action or judgment.
- 7.6.2 Staff members are barred from being involved with any matter in which they themselves, their spouse, partner, close relative, or any other person with whom they have close relations, has a direct or indirect financial interest when such interest is in competition with, renders a service to or is a client of Medilink. Likewise, staff members may not work on or deal with any matter where there are other circumstances that might undermine trust in the staff member’s own impartiality or integrity or that of the Company or any of its officers or representatives.
- 7.6.3 A Staff member must not use the Group’s property or information acquired in their position for personal advantage or for the purpose of competing with the Group.
- 7.6.4 Any suspicion of a conflict of interest should be reported to a superior using the Company’s internal policies and procedures such as the Whistleblower Policy (*POL\_HRRMST07*).

## 7.8 DIRECTORSHIPS, EMPLOYMENT OR, OTHER ASSIGNMENTS

- 7.8.1 All directorships, employment or other assignments held or carried out by the Company’s staff in other enterprises which have, or may expect to have, commercial relations with Medilink International, must be approved by Medilink International’s Chief Executive Officer of the Board of Directors.
- 7.8.2 Company staff must not engage in other paid, or unpaid directorships, employment or, assignments of any significance outside Medilink International except by agreement with Medilink International. Should a conflict of interest arise, or if the Staff’s ability to perform their duties or fulfil their obligations to Medilink

International is compromised, such approval will not be granted or will be withdrawn.

## 7.9 INSIDER INFORMATION

- 7.9.1 Insider information is information that is not publicly available or generally known to the market.
- 7.9.2 No Staff member may use, or contribute to others using, insider information about Medilink International or other companies for personal gain.

## 7.10 MAINTAINING RECORDS

- 7.10.1 Medilink International is committed to transparency and accuracy in all its dealings while respecting its confidentiality obligations. All staff members, therefore, have the responsibility to maintain necessary records of Medilink International business and business relations and to document business-related communication through the Company's designated systems and processes.
- 7.10.2 No false, misleading, or artificial entries may be made on the Company's books and records. All transactions must be fully and completely recorded in the Company's accounting records.

## 7.11 INFORMATION AND IT SYSTEMS

- 7.11.1 The Staff member's use of information, IT systems, and in particular internet services must be governed by the needs of the business and not by personal interests.
- 7.11.2 Information produced and stored on Medilink International IT systems is regarded as Company property. The Company, therefore, reserves the right to access all such information except where limited by law or agreement.
- 7.11.3 Staff is responsible for maintaining electronic files and archives in an orderly manner and as detailed in relevant Company procedures. Private use is only permitted for the processing of ordinary information to a limited extent.
- 7.11.4 Information that may be considered illegal, offensive, or inappropriate must under no circumstances be processed, downloaded, stored, or disseminated. Any downloading, storing, or disseminating in breach of any copyright law or provision is prohibited and may lead to disciplinary action.

## 7.12 MANDATORY INTEGRITY DUE DILIGENCE

- 7.12.1 Business relationships with any entity or individual shall only be entered into after a proper due diligence exercise is conducted as per SOP for Outsourcing (*SOP\_QMSMST02*).

7.12.2 A business relationship with a potential counterparty shall only be established or amended if the resulting relationship satisfies the Company's requirements for Integrity Due Diligence.

7.12.3 Potential Company counterparts including the counterparties of operators may include partners, operators, suppliers, agents, intermediaries, lobbyists, consultants, and customers, as well as parties to merger, acquisition, and divestment transactions.

7.12.4 Local affiliates of international corporations shall be treated in the first instance as separate entities for Integrity Due Diligence purposes.

### 7.13 HANDLING CASES OF DOUBT AND BREACHES OF THE RULES

7.13.1 If a staff member comes across cases of ethical doubts or breaches of the Company's Code of Conduct, such concerns must be reported immediately. Staff are required to report the concern and may do so through regular channels; to their superior, to their superior's superior, or to the internal entity whose duty it is to follow up such matters. A manager who receives such a query must consult their own superior in cases of doubt.

7.13.2 Medilink International will not implement sanctions of any form against any individual who, in a responsible manner, informs persons in positions of responsibility, internal entities, or relevant authorities about possible breaches of Company ethical guidelines, applicable laws, or other blameworthy circumstances in Company business.

## 8. REFERENCE STANDARDS AND GUIDELINES

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- POL\_FINMST01 - Anti-Bribery, Anti-Corruption Practices & Anti-Money Laundering Policy
- SOP\_HRRMST07 - SOP for Recruitment of Company Staff
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## 9. APPENDICES

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