

CODE OF ETHICS  
AND BUSINESS CONDUCT

EASTWEST  
HEALTHCARE, INC.

## **I. INTRODUCTION**

1. The Board of Directors (the “Board”) of Eastwest Healthcare, Inc. (the “Company”) has adopted this Code of Ethics and Business Conduct (“the Code“).
2. This Code applies to the Company and all of its employees, directors and officers, including its Chief Executive Officer, Chief Financial Officer, President, its agents and persons performing similar functions, and also include other organizations who do business with us.
3. The purpose of this Code is to set out those legal and ethical standards of conduct that the Company believes are reasonably designed to deter wrongdoing and to promote the conduct of all Company business in accordance with high standards of integrity and in compliance with all applicable laws and regulations.
4. The success of our business is based on the trust we earn from our employees, clients, stakeholders and shareholders. We gain credibility by adhering to our commitment to fairness and reaching our goals solely through ethical conduct. All employees are expected to adhere to this Code in their professional, as well as personal conduct, treat everyone with respect, honesty and fairness.
5. Non-compliance to this Code considered as a misconduct that could warrant disciplinary action, including termination of employment or other contract in deserving cases

## **II. COMPLIANCE WITH APPLICABLE GOVERNMENT LAWS, RULES AND REGULATIONS**

1. The Company requires that all Employees comply with all laws, environmental and safety laws, and all rules and regulations applicable to the Company. Our commitment to integrity begins with complying with laws, rules and regulations.
2. All employees must follow applicable laws and regulations, including this Code at all times and must ensure compliant operation.

## **III. HUMAN RIGHTS**

We are committed to respect human dignity and rights of each individual and community whom we interact with during the course of work. We shall not, in any way, cause or contribute to the violation of human rights. Our employees shall treat everybody with dignity, respect and care and uphold human rights.

#### **IV. FAIR LABOR PRACTICES AND WORKING CONDITIONS**

1. We are committed to promote equality in our employment practices and to fair employment and remuneration policy in compliance with applicable laws. We condemn all forms of illegal, unfair, and unethical labor practice. Our employees shall act with integrity and treat their colleagues and others through the work with full respect.

#### **V. DISCRIMINATION AND HARASSMENT**

1. We provide equal opportunity in employment and we do not tolerate any discrimination or harassment or any type from abuse. No direct or indirect discrimination shall take place based on any professionally non-relevant trait or circumstance, like gender, marital status, age, national or social or ethnic origin, color, religion and political opinion, disability, sexual orientation, employee representation, property, birth or other status. Any kind of discriminatory behavior, harassment, and bullying is prohibited.
2. All employees are expected to follow the highest standards of conduct in all verbal and written communication based on mutual respect, and must refrain from any form of harassment, slander or any behavior that could be taken as offensive, intimidating, humiliating, malicious or insulting.

#### **IV. HEALTH, SAFETY, AND ENVIRONMENT**

1. We provide clean, safe and healthy work conditions and we are dedicated to maintaining a healthy environment. All employees must follow and comply with every relevant health, safety and environmental protection laws, regulations and rules all times.

#### **VII. FAIR COMPETITION AND BUSINESS CONDUCT**

1. Our relationships with business partners are built upon trust and mutual benefits compliant with competition law. We are dedicated to ethical and fair competition, as we sell products based on their quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities, nor will we engage or assist in unlawful boycotts of particular clients.
2. Our employees are responsible for ensuring fair business during their job and adhere to every competition, client protection and fair marketing rule. Clients and

business partners shall be treated fairly and equally, products shall be displayed in a manner that is fair and accurate, and that discloses all relevant information.

## **VIII. ANTI-CORRUPTION**

1. We firmly condemn and do not tolerate all forms of corruption. It is prohibited directly or indirectly offering, promising, giving, asking, soliciting or accepting any unfair advantage or benefit, in order to obtain, retain or facilitate in any way the business. An unfair advantage or benefit may include cash, gift, credit, discount, travel, personal advantage, accommodation or services. We do not permit facilitation (or “grease”) payments to government officials or private business in order to secure or speed up routine actions. Corruption also covers the misuse of function or position as well, when someone makes that false appearance that he improperly influences a decision maker.
2. Corruption for either to obtain or retain business, or to obtain or retain an advantage in the conduct of business is considered gross misconduct. Similarly accepting or allowing another person to accept a bribe is considered gross misconduct. Our staff’s has to account for all benefits received in the course of doing business and must to not give or receive bribes or otherwise act corruptly.

## **IX. SECURITY, PROTECTION AND PROPER USE OF COMPANY ASSETS**

1. We are responsible for the security, protection and for the economic use of company resources. Our resources, including time, material, equipment and information are provided for legitimate business use only. Occasional personal use is permissible as long as it is lawful, does not affect job performance or disrupts workplace morale.
2. All employees are obliged to follow appropriate security measures and they should treat company property, whether material or intangible, with respect and shouldn’t misuse company assets or use it carelessly.

## **X. CONFIDENTIALTY INFORMATION SECURITY, PROPRIETARY INFORMATION, AND INTELLECTUAL PROPERTY**

1. We are committed to business information confidentiality, integrity and accessibility, we implement proper security measures this it is our employee’s obligation to uphold this. Proprietary information includes all non-public information that might be harmful to the company or its clients, business partners

- if disclosed to unauthorized parties. All employees must handle any such information as confidential.
2. We respect the property rights of others. We will not acquire or seek to acquire trade secrets or other proprietary or confidential information by improper means. We will not engage in unauthorized use, copying, distribution or alteration of software or other protected intellectual property.

## **XI. BOOKKEEPING, TRUE REPORTING AND FINANCIAL INTEGRITY,**

1. Our books, records, accounts and financial statements must be maintained in appropriate detail, must truly and properly reflect our transactions. We condemn all forms of money laundering, so we are committed to do business with partners involved in legitimate business activities with funds derived from legitimate sources.
2. All employees must follow accounting procedures, ensure that business transactions are recorded and documented appropriately and make certain that all disclosures made in financial reports are full, honest, accurate, timely and understandable. All employees must not improperly influence, manipulate or mislead any audit.

## **XII. ANTI-FRAUD**

1. Fraud which is the act or intent to cheat, steal, deceive or lie is both unethical and, in most cases, criminal. Fraud in every form, (including e.g. submitting false expense reports; forging or altering financial documents or certifications; misappropriating assets or misusing company property; making any untrue financial or non-financial entry on records or statements) is prohibited.

## **XIII. CONFLICT OF INTEREST**

1. Our decisions shall be based on objective and fair assessments avoiding the possibility of any improper influence. A "conflict of interest" exists when an employee's personal interest (that can be linked to e.g. friends, family, or client, competitor, supplier, contractor entity, as well) interferes or potentially interferes with the best interests of the Company. Determining whether a conflict of interest exists is not always easy to do, thus anyone with a conflict of interest question should seek advice from management.
2. Conflicts of interest could arise:
  - Being employed (you or a close family member) by, or being in economic relation with an actual or potential client, competitor, supplier or contractor.

- Hiring or supervising family members or closely related persons.
- Serving as a board member for an other company or organization.
- Owning or having a substantial interest in a client, competitor, supplier or contractor.
- Having a personal interest, financial interest or potential personal gain in any company transaction.

#### **XIV. PRIVACY AND PERSONAL DATA PROTECTION**

1. We respect people's privacy and we acknowledge clients, employees and other natural persons' need to feel confident that their personal data is processed appropriately and for a legitimate business purpose. We are committed to comply with all personal data protection laws. We only acquire and keep personal information that is necessary and we give proper information on these activities to data owners. We implement proper security measures to assure confidentiality, integrity and availability of personal information.
2. Our employees must observe the legal requirements, apply compliant practices and follow related procedures to ensure legality of personal data handling and processing activities.