



Hospital Policies and Procedures Manual

CORPORATE GOVERNANCE		Document Code: MMC-HPP-GLD-004	Rev. Code : 02
Code of Business Conduct and Ethics		Effective Date: July 6, 2022	Page 1 of 23
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Approved by:			
<i>(original document signed)</i> Atty. German Q. Lichauco II Corporate Secretary	Jun/21/2022 Date Signed (MMM/DD/YYYY)	<i>(original document signed)</i> Manuel V. Pangilinan Chair, MDI Board of Directors	Jun/23/2022 Date Signed (MMM/DD/YYYY)

I. Makati Medical Center (MMC) and its Purpose to the Code of Ethics and Business Conduct

The Makati Medical Center Code of Ethics and Business Conduct expresses the commitment and a culture of good corporate governance of its Board of Directors, Management Committee, Physicians, Professional Staff and Corporate Employees to the values, principles and standards drawn from its mission and values.

It is these individuals' responsibility to ensure that his/her behaviors and activities are consistent with this Code.

II. Ethics Foundation: Principles and Values

In simple terms, the spirit of the Code means that all actions of Makati Medical Center, its directors, health professionals, officers and employees must, at all times, be consistent with the principles of compassion, service excellence, integrity, professionalism and teamwork. These principles are defined as follows:

A. Compassion – showing genuine concern and empathy through words and actions that lead to enhanced well-being of patients and colleagues.

Behavioral Statements:

- Always asks the patient about his/her condition and responds accordingly with kindness and encouragement.
- Acknowledges the patient's emotional state in the process of treatment.

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- Goes the extra mile for the good of others and the organization.

B. Service Excellence – providing competent, appropriate, safe and responsive health care services that result in positive patient outcome, highest level of satisfaction of patients and colleagues.

Behavioral Statements:

- Delivers healthcare services on time.
- Defines objectives, identifies measures and implements strategies to deliver exceptional results.
- Follows through and fulfills commitments made.
- Meets or exceeds the stakeholders’ needs and expectations consistent with MMC policies.
- Constantly seeks innovative ways to improve the quality of service.

C. Integrity – demonstrating sound moral and ethical principles at work; never compromising the name and ethical standards of the hospital.

Behavioral Value Statements:

- Continues to do the right thing even when no one is looking or watching.
- Communicates openly, honestly, and truthfully with others.
- Takes accountability for his/her own actions and decisions at all times.

D. Professionalism – upholding the code of conduct of the Hospital and ethical standards of one’s profession; consistently demonstrating competence in the performance of one’s duties.

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Behavioral Value Statements:

- Respects diversity (i.e., gender, ethnicity, religion, cultural and economic status).
- Inspires trust by delivering results at the highest levels of professionalism.
- Learns rapidly and adapts quickly to changing situations.
- Accepts willingly additional responsibilities in the face of challenging situations.
- Adheres strictly to and complies with established policies, procedures, and standards.

E. Teamwork – collaborating harmoniously and respectfully with the team towards a common goal.

Behavioral Statements:

- Encourages and values the ideas, expertise and contributions, including constructive criticism of all team members.
- Shares knowledge and expertise with team members.
- Holds team accountable for upholding MMC values.
- Provides the needed support and resources to achieve goals and objectives.
- Builds and maintains synergy with co-workers across the organization.

III. Code of Business Ethics and Conduct: Standards

A. Compliance to Rules, Laws, Legal & HealthCare Regulations

Makati Medical Center requires all employees, officers, and directors to conduct themselves in compliance with all local and, where applicable, international laws, rules and regulations and healthcare industry standards applicable to the hospital. All employees, officers, and directors:

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- A.1. Provide quality healthcare services, honest conduct in planning and management consistent with local laws and regulations. Demands brought on by prevailing business conditions or perceived pressures are not excuses for violating any law, rules or regulations.
- A.2. Avoid the direct or indirect commission of bribery and corruption of representatives of government or regulators to facilitate any transaction or gain any perceived or actual favor or advantage. This excludes permissible additional payments for routine government actions allowed by all applicable laws and regulations.
- A.3. Professional fees commensurate to the services rendered with due consideration to the patient's financial status, nature of the case, time consumed and the professional standing and skill of the physician in the community.
- A.4. Take care to assure that all billings to the patient, to local regulators and to private insurance payors, reflect accurate and true submissions and conform to all pertinent laws and regulations. False, fictitious or fraudulent claims for payment or approval are prohibited.
- A.5. Comply with local tax laws, regulations and guidelines relating to all cost reports.
- A.6. Deal with all survey or accreditation bodies in an open and honest manner. No action should ever be taken either directly or indirectly, in relationships with these survey or accrediting bodies that would mislead the members of the survey or accrediting team.
- A.7. Follow an emergency treatment process in providing emergency medical screening examination and necessary stabilization to all patients, *regardless of ability to pay. However, under the following conditions, patients may be transferred after stabilization:*

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- No rooms/beds available
- Patient request
- Physician request (higher level of care required)
- Insurance request
- Psychiatric admission without concurrent medical conditions requiring hospitalization

Patients who are acutely ill or injured and who need to be transferred to another unit within the facility are accompanied by competent hospital staff to ensure the continuity of optimum care.

B. Proper Business Practices and Conduct

To further Makati Medical Center’s commitment to the highest standards of business ethics and integrity, employees accurately and honestly represent Makati Medical Center and conduct business in an honest and ethical manner. Physicians of Makati Medical Center adhere to Philippine Medical Association and their specialties’ (as applicable) code of ethics. Other healthcare professionals likewise adhere to their profession’s code of ethics.

- B.1. Hospital staff acts in the best interest of Makati Medical Center in his/her dealings with suppliers, customers and government agencies. This includes those acts formalized in written contracts as well as everyday business relationships.
- B.2. Hospital staff conducts business in a manner that avoids conflicts of interest and the appearance of conflicts of interest.
- B.3. Hospital staff does not give or receive any form of payment, kickback or bribe to induce the referral or the purchase of any service.

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- B.4. Hospital staff does not offer any improper inducement or favors to patients, providers or others to encourage the referral of patients to the facilities or to use a particular product or service.
- B.5. Business transactions with vendors, contractors and other third parties shall be transacted free from offers or solicitations of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction.
- B.6. Individual employees shall not solicit tips, personal gratuities or gifts from patients or suppliers and vendors.
- B.7. Hospital staff complies with the laws regarding intellectual properties, including but not limited to patents, trademarks, copyrights and computer software. All employees are responsible in ensuring documents or computer programs are not improperly copied for personal use in violation of applicable copyright laws or licensing agreements.
- B.8. Hospital staff does not contract with persons or entities that have been sanctioned by any regulatory agency or excluded from participation in any government-funded healthcare program.
- B.9. Hospital staff complies with applicable antitrust and similar laws that regulate competition. Inappropriate discussions with competitors regarding business practices are avoided.
- B.10. Hospital staff does not make false or misleading statements to any patient, physician, person or entity doing business with Makati Medical Center.
- B.11. The hospital staff shall not use confidential business information obtained from competitors (i.e., customer lists, price lists, contracts or other information) in violation of any covenant not to compete or any prior employment agreements or

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in any other manner likely to provide an unfair competitive advantage to Makati Medical Center.

C. Quality Care and Respect for Patients

Makati Medical Center works together to deliver excellent, safe, competent compassionate, and quality healthcare regardless of the patient’s race, religion, sex, nationality, origin, age or disability. Further, MMC will provide the appropriate medical attention to patients under an emergency or serious situation in compliance with applicable government laws and regulations.

C.1. Hospital staff is committed to providing quality patient care in a healing environment.

A culture of safety is promoted throughout the hospital.

C.2. Hospital staff provides medical treatment and other healthcare services to patients based on patients’ medical needs, physical and emotional welfare and informed consent.

C.3. Hospital staff administers healthcare and related services with trust, sensitivity and empathy to patients, physicians and the community. Patients are treated with respect and professionalism at all times, keeping information confidential.

C.4. Hospital staff is committed to be sensitive to family, cultural and spiritual differences.

C.5. Hospital staff respects and provides each patient with a written statement of the Patient Rights and a notice of our Privacy Practices.

D. Accuracy of Business Information – Records and Documents

Accurate records are essential to assure the proper conduct of business and to ensure compliance with the law. All of Makati Medical Center’s transactions must be recorded

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accurately, completely, and in a timely fashion. All hospital staff are responsible for the accuracy, integrity and security of the organization’s documents and records (whether physically or electronically kept).

All assets and liabilities of the Hospital must be recorded in Makati Medical Center’s regular books of account using generally accepted accounting principles.

- D.1. Hospital staff may not alter or falsify information on any record or document.
 - Hospital books and records shall not contain false or misleading information.
 - Understating or overstating reports of sales or expenses, or altering any documents used to support any corporate reports are prohibited.
- D.2. Hospital staff shall retain and dispose of records in the time and manner provided by the MMC’s hospital Policy on Retention Time and Disposal of Patient Medical Records, pursuant to Department of Health Department Circular No. 2021-0226 Records Disposition Schedule (RDS) and National Archive of the Philippines.
- D.3. Hospital staff maintains electronic systems intended to connect with the Philippine Health Information Exchange as provided in the Health Privacy Code of Joint Administrative Order No. 2016-0002, otherwise known as the “Privacy Guidelines for the Implementation of the Philippine Health Information Exchange.”
- D.4. Hospital staff maintains medical and business documents and follows the record retention policy in accordance with applicable laws, health insurance and other applicable guidelines.
- D.5. Hospital staff communicates honestly and candidly with Makati Medical Center legal counsel and auditors.

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- D.6. Hospital staff releases medical, clinical or business information only when such release is supported by a legitimate clinical or business purpose and is in compliance with Makati Medical Center’s notice of Privacy Practices, other policies and procedures and applicable laws, rules and regulations.
- D.7. Hospital staff respects the privacy of the patients, co-workers and customers and safeguard patient, employee, and customer information from loss, and unauthorized amendment and access.
- D.8. Hospital staff exercises care to ensure that confidential and proprietary employment-related information (salary, benefits, payroll, personnel records) are carefully maintained and managed to protect its value and integrity.

E. Privacy and Confidentiality of Medical and Business Information

All Makati Medical Center patients have the right to expect those affiliated with the organization (i.e., employees, physicians, board members, nursing students, residents, interns, contractors, and others) to safeguard their privacy at all times and in all situations.

Confidential information may only be reviewed, shared or discussed when it is necessary to provide patient care, to perform and improve our services or for research. Medical information may only be disclosed when patients authorize it or when it is required by law in accordance to Data Privacy Act of 2012.

The hospital staff takes responsibility for safeguarding patients' personal and medical information. It is a legal and ethical responsibility, and it is vital to patients' well-being and to the hospital's conduct of quality healthcare. The hospital staff is committed to

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maintaining the privacy and confidentiality of patient information in accordance with legal and ethical standards.

All the information at Makati Medical Center is proprietary. Proprietary information is a valuable corporate asset and must remain confidential. Proprietary information includes, without limitation, information relating to our products or business plans such as technical data, trade secrets and know-how, customer lists, vendor lists, future plans, sales and marketing strategies, patent applications, inventions, regulatory data or plans, manufacturing processes, formulas and formulations, finance or capitalization, and research and development. Unauthorized release of such proprietary information through, for example, discussion with individuals outside the Hospital or faxing or e-mailing the information to outsiders, can have adverse consequences to Makati Medical Center and potentially to the employee, physician, board member or any individual within the organization.

Individuals within the organization (including trainees and contracted service providers) must safeguard all proprietary information and ensure that any access to such information given to a third party (outside of Makati Medical Center) is restricted by the use of a confidentiality agreement approved by our Legal Counsel and limited to those with a business need to know the proprietary information, unless further disclosure is appropriate and in the best interests of Makati Medical Center. Employees must, for instance, exercise care as to how telephone, fax, copy machines and e-mail are used, to avoid releasing proprietary information outside the Hospital.

Employees also should not disclose proprietary information to others within the Hospital without first ascertaining that the employees have a need to know the information. To

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the extent, records may be disposed of under the Hospital’s records retention policy. Employees should be careful when disposing of materials containing proprietary information to ensure that such information has been disposed of in a manner that protects the proprietary nature of the information. Makati Medical Center also respects the proprietary nature of information of other companies, including competitors. Employees may obtain proprietary information regarding another company from prescribers or even from a competitor, but such information must not be shared or used in any way without the consent of the other hospital, unless it is publicly available (e.g., from the newspaper, from the other hospital’s website, etc.). Any questions regarding proprietary information, may be clarified through the hospital’s Legal Counsel.

F. Information, Communication and Technology

- F.1. Hospital staff maintains computer passwords and access codes in a confidential and responsible manner. Sharing of passwords is prohibited.
- F.2. Hospital staff maintains and monitors security systems, data backup systems and storage capabilities. This ensures that information is maintained safely and securely in accordance with policies and procedures, and with local regulatory requirements.
- F.3. Hospital staff ensures all channels of communication – such as fax, mobile phones, emails and other electronic means are not used other than for business purposes and/or for aiding in providing the proper medical care for patients.

G. Workplace and Employment Environment/Maintenance of a Drug and Alcohol-Free Workplace

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Makati Medical Center strives to create and maintain a work environment in which employees are treated with respect, diversity is valued and opportunities are provided for development.

- G.1. Hospital staff complies with all applicable workplace health, safety and environmental laws and regulations. All employees are expected to handle general and hazardous materials and wastes according to established control, storage and disposal policies and procedures.
- G.2. Hospital staff provides equal employment opportunities to prospective and current employees. Makati Medical Center shows respect and does not discriminate in employment opportunities or practices on the basis of race, color, religion, gender, marital status, nationality, age, physical or mental ability, sexual orientation, or any other status protected by law.
- G.3. Hospital staff supports and observes a workplace free of alcohol and drugs.
- G.4. Hospital staff does not engage with persons who have been sanctioned by any regulatory agency. At the discretion of MMC management, in the case a person is sanctioned by regulatory agency, the severity of such sanction and the relevancy of the same to the scope of work to be performed by said person shall be taken in consideration.
- G.5. Hospital staff does not tolerate any act of retaliation or retribution against any employee who in good faith reports suspected violations of law, regulation, Makati Medical Center policy or this Code. Hospital staff cultivates a management team that fosters an "open policy" and creates a work environment in which ethical concerns will be addressed.

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G.6. All Makati Medical Center employees receives appropriate training and orientation and have the proper experience and expertise to perform their duties and to meet the needs of patients and their family members.

H. Conflict of Interest and Corporate Opportunities

H.1. Hospital staff avoids any actual or apparent conflicts of interest between the officers' and employees' private interest, including the private interest of a member of their family, and the interests of the Hospital, unless prior approval by the President/CEO is obtained. Conflict of interest of Directors and Executives should be approved by the Board of Directors.

H.1.1. The President/CEO shall first confer with the Compliance Officer of the Medical Doctors Incorporated (MDI) for any actual or apparent conflict of interest, and any material transaction or relationship that could reasonably be expected to give rise to a conflict of interest.

H.1.2. The President/CEO shall present the index perceived, apparent or actual conflict of interest issue to MDI Board of Directors during the next immediate regular board meeting or special meeting convened for the purpose.

H.2. Hospital staff avoids activities and interests that could significantly affect the objective or effective performance of duties and responsibilities in the Hospital, including business interests or unauthorized employment outside the Hospital, the receipt from and giving of gifts to persons or entities with whom the Hospital relates as well as insider dealing.

H.3. Hospital staff is loyal to the Hospital. As such, all business decisions and actions must be based on the best interest of the Hospital and must not be motivated by

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personal considerations and other relationships, which may interfere with the exercise of independent judgment.

H.4. Hospital staff advances the Hospital’s legitimate interests when the opportunity arises. All directors and officers should disclose any possible conflict which may arise before acting or passing any resolution related to the said conflict. Hospital staff refrains from taking advantage of Hospital assets, information or position, or opportunities arising from these, for personal gain, to compete with the Hospital, or act against the best interest of the Hospital, directors, officers and employees who intend to make use of Hospital assets or services in a manner not solely for the benefit of the Hospital should consult beforehand with the Board of Directors.

H.5. Hospital staff refrains from the direct or indirect, grant or arrangements of loans to any director or officer, including loans granted or arranged by the Hospital’s subsidiaries and affiliates, unless such grant or arrangement is allowed by all applicable laws and regulations.

H.6. A “conflict of interest” arises when an employee’s personal, social, financial, civic, charitable or political activities interferes with or has the potential to interfere with his or her loyalty and duty to Makati Medical Center. The following are several types of conflicts of interest.

H.6.1. **Outside Employment.** Makati Medical Center policy requires that all employees devote their full time and attention to the affairs of the Hospital and not engage in any other work, employment or business activity unless such employee has submitted a “Declaration of Outside Interest and Employment form” and obtained the hospital’s express written consent. Furthermore, concerned employee abides by confidentiality and other obligations to Makati Medical Center.

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H.6.2. **Personal Investments or Transactions.** Makati Medical Center respects the right to manage personal investments. At the same time, hospital staff is responsible for avoiding situations that present — or create the appearance of presenting — a potential conflict between personal financial interests and the interests of the Hospital.

H.6.3. **Personal Relationships.** The Hospital permits the employment of relatives of employees where such employment does not create an actual or perceived conflict of interest. Employment of relatives are reviewed by the Human Resources Management and Development Division and as need by the Legal Counsel to determine if it is appropriate under the circumstances.

H.6.4. **Acceptance of Gifts, Meals, Entertainment, or Other Favors.**
Makati Medical Center treats fairly and impartially all persons and firms which it has business relationships with. The acceptance or provision of gifts, meals, entertainment, favors, and similar gratuities might influence or raise doubts as to the impartiality of the recipients, and might damage the reputation of the Hospital for fair dealing. It should be made clear that the Hospital and its representatives transact business on an ethical basis and do not seek or grant special consideration.

I. Risk Management

I.1. Hospital staff restricts or minimizes undertaking of risk so as not to jeopardize shareholder value.

I.2. Hospital staff fully assesses and manages risks involved in undertaking strategies, acquisitions, activities, products, services and other business endeavors of the Hospital.

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J. Disclosure

- J.1. Hospital staff publicly discloses to authorized parties all material information (i.e. anything that could potentially affect share price, as well as other information), including earning results, corporate strategy, related party and off-balance sheet transaction.
- J.2. To the extent relevant to the area of responsibility, the hospital staff complies with the hospital's disclosure controls and procedures and internal controls to ensure that (i) financial and non-financial information is properly recorded, processed, summarized and reported and (ii) the hospital's public reports and documents, including the reports filed with appropriate government agencies and comply with the applicable laws and rules.
- J.3. Each director or officer, to the extent appropriate within his or her area of responsibility shall consult with other Hospital officers and employees and take other appropriate steps regarding the above-mentioned disclosures with the goal of making full, fair, accurate, timely and understandable disclosure.
- J.4. Hospital staff is familiar with the disclosure requirements applicable to the Hospital as well as the business and financial operations of the Hospital.
- J.5. Hospital staff does not knowingly misrepresent, or cause others to misrepresent, facts about the Hospital to others, whether inside or outside Hospital, including to the Hospital's independent auditors, governmental regulators and regulatory organizations.
- J.6. Hospital staff properly review and critically analyze proposed disclosure for accuracy and completeness (or, where appropriate, delegate this task to others).

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J.7. Hospital staff assesses the effectiveness of the disclosure controls and procedures and internal controls and takes corrective actions with regard to any identified weaknesses or deficiencies.

K. Protection and Proper Use of Corporate/Hospital Assets

Employees, physicians, officers and board of directors should seek to protect the hospital's assets. Theft, carelessness and waste have a direct impact on the hospital's financial performance. Everyone must use the hospital's assets and services solely for legitimate business purposes of the Hospital and not for any personal benefit or the personal benefit of anyone else. Employees, officers and directors must advance the Hospital's legitimate interests when the opportunity to do so arises. Hospital staff must not take personal opportunities that are discovered through his/her position with the Hospital or the use of property or information of the Hospital.

K.1. Hospital staff maintains and safeguards the confidentiality of information entrusted by the Hospital, its subsidiaries, patients, business partners, or such other parties with whom the Hospital relates, except when disclosure is authorized or legally mandated by law.

K.2. Hospital staff ensures that records are not altered, concealed, destroyed or falsified to impede; obstruct or influence any investigation by, or proceeding before any official Hospital committee or body, governmental, regulatory or judicial body having jurisdiction.

K.3. Hospital staff uses hospital assets and resources, including Hospital time, supplies and software, efficiently, responsibly and only for legitimate business purposes.

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L. Relations with Shareholders and Investors

- L.1. Hospital staff adopts strategies, actions, decisions, and transactions based on increasing shareholder value.
- L.2. Hospital staff adopts international best practices of good corporate governance in the conduct of the business.
- L.3. Hospital staff keeps business and accounting records which accurately reflect the financial position of the business and issue financial statement to ensure transparency of information.
- L.4. Hospital staff ensures an independent audit of the Hospital's financial statements by external auditors selected by the Hospital's Audit Committee.
- L.5. Hospital staff communicates truthfully and regularly business policies, achievements and prospects.

M. Reporting Ethical Concerns

Every employee, officer and director have the responsibility to ask questions, seek guidance, report suspected violations and express concerns regarding compliance with this Code. Any employee, officer or director who knows or believes that any other employee or representative of the hospital has engaged or is engaging in Hospital-related conduct that violates applicable law or this Code should report such information to his or her supervisor or to the hospital's Compliance Officer, as described below. Hospital staff may report such conduct openly or anonymously without fear of retaliation. The Hospital does not discipline, discriminate against or retaliate against any employee who reports such conduct or who cooperates in any investigation or inquiry regarding such conduct. This is unless the report was made with knowledge that it was false. Any

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supervisor who receives a report of a violation of this Code must immediately inform the Compliance Officer (refer to Policy on Whistleblowing).

IV. Management and Application of this Code

Makati Medical Center expects all hospital staff, to whom this Code applies to, abide by the principles and standards set forth and to conduct the business and affairs of Makati Medical Center in a manner consistent with the general statement of principles set forth.

Failure to abide by this Code or the guidelines for behavior that the Code represents may lead to disciplinary action, up to and including termination. Failure to report a known violation of this Code may also lead to disciplinary action. Reporting of violations to this Code follows the policies set forth under the Code of Discipline Policy of the hospital.

1. Medical Doctors Incorporated (MDI) Board of Directors, Physicians, Directors, Officers, and employees of Makati Medical Center commit to comply with both the letter and spirit of this Code and of the hospital's endeavors to obtain the same commitment from its business partners. In this connection, physicians, directors and officers should explain to employees and business partners the hospital's principles and values set forth in this Code, and emphasize the importance of conducting themselves in accordance with the standards set by this Code and to deter wrongdoing.
2. The Makati Medical Center President/CEO together with the Medical Director and Compliance Officer are responsible for applying this Code to specific situations in which questions or concerns may arise, and has the authority to interpret and decide on such issues arising from the implementation of the Code.
3. There shall be no waiver of any of the provisions of this Code in favor of any physician, director, officer or employee, except when (i) expressly granted by the Board of Directors

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as endorsed by Corporate Governance and Compliance Committee; (ii) by the Medical Director or Compliance Officer for Doctors/Physicians; (iii) by Makati Medical Center’s President & CEO and/or Compliance Officer for directors and officers; and by the VP of Human Resources Management and Development, the President & CEO and/or Compliance Officer as indicated in specific corporate governance policies. Any such waiver for any director or executive officer or any material amendment to the Code must be promptly disclosed to the Board of Directors of the Hospital through the Corporate Governance and Compliance Committee of the Board.

4. Any director, officer or employee is encouraged to contact the Makati Medical Center’s Compliance Officer or the President & CEO or Medical Director, when in doubt about the best course of action in a particular situation relating to a subject matter of the Code.
5. Any director, officer or employee who is aware of any existing or potential violation of the Code is required to notify Makati Medical Center following the Policy on Whistleblowing, promptly. Together with the Legal Counsel, Makati Medical Center shall take all action it considers appropriate to investigate any violations reported to it. If a violation has occurred, the Hospital shall take such disciplinary or preventive action as it deems appropriate.
6. Disciplinary action against violators includes measures such as dismissal and/or the filing of appropriate civil and criminal actions. For purposes of this Code, “violation” is defined as a) a person who commits prohibited acts or who fail to implement prescribed acts when there is an obvious opportunity to do so; b) employees who knowingly abet such acts of commission or omission or who fail to report such acts that violate the Code; and c) a person of authority who fails to impose the necessary disciplinary measures against violators.

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7. Retaliation or discrimination, whether direct or indirect and in any form, against any director, officer, or employee who reports, honestly and in good faith, any violation or perceived violation of this Code shall not be tolerated.
8. All policies, systems practice, unless, and similar official corporate issuance, whether existing or to be issued shall be revisited and revised as soon as practicable in order to be consistent with the letter and spirit of this Code. Pending the finalization of such amendments, the provisions of this Code shall prevail over any policies, systems practice, orders, and similar official corporate issuances inconsistent with this Code.

RELATED POLICIES:

Policy on Anti-Bribery and Anti-Corruption

Policy on Conflict of Interest

Policy on Gifts, Donations, Sponsorship and Grants

Policy on Third Party Risk Management

Policy on Government Interaction

Policy on Whistleblowing

Policy on Petty Cash

Policy on Travel and Per Diem

REVIEW:

This Code shall be reviewed at least once every three (3) years or such other frequency as may be determined by the administration and/or the Makati Medical Center President/CEO.

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Hospital Policies and Procedures Manual

CORPORATE GOVERNANCE	Document Code: MMC-HPP-GLD-004	Rev. Code : 02
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