Code of Conduct

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amplifyhealth

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MESSAGE FROM OUR CEO

Dear Amplifiers,

With our products growing in stature as well as our brand and influence in Asia healthcare, we are due an updated Code of Conduct, one that speaks of Amplify Health as a unique entity.

It's important that all of us at Amplify Health follow the Code of Conduct to deliver the highest level of excellence to our clients and to each other. This Code is guided by our operating philosophy of doing the right thing, in the right way and with the right people. From there, the right outcomes will naturally emerge.

The Code serves as a firm point of reference on ethical behaviour and integrity that all of us should rely on. It covers issues of bullying, harassment, safety, and privacy in our workplace. When working with business partners and prospective clients, the Code also touches on fair selection processes, the use of gifts and entertainment guidelines.

Should you find yourself in a contentious situation, there are many ways to voice your concerns. An ethics hotline is available 24/7 for submitting a case, anonymously if you wish. Our People & Culture team are also open to confidential discussions.

The Executive Committee and I will lead from the front, together with all of you, and we will keep this Code top of mind and apply the principles in our daily work. It's more than a set of rules as it captures the ideal values that the company strives to live by.

As always, my door remains open for anyone with concerns and/or feedback.

Onwards and upwards,
Axel

INTRODUCTION

At Amplify Health, we recognise the scale of the positive impact we can make to create a healthier, more sustainable future for Asia.

We aim to be a trusted custodian of Asia's largest repository of health data, unifying financial, clinical, operational, and behavioural data to empower our customers with insights that highlight opportunities to deliver better value and care outcomes.

Business Ethics - a clear and rigorous distinction between the right and wrong practice – must govern everything we say and do. This is fundamental to acting honestly and professionally, and we achieve this by living these principles at all times and by observing the standards and guidance set out in this Code.

The Operating Philosophy, together with Amplify Health's corporate policies, applicable regulations, and the laws to which we are bound, create the foundation for the Code of Conduct ("Code"). The Code specifies the standards of behavior to which every Amplify Health employee and stakeholder is expected to adhere. The Code guides us on compliance, ethics and risk issues and allows us to contribute positively to the societies in which we operate. It also defines how we intend to meet reasonable customer expectations.

We are all expected to uphold the high ethical standards of behavior that are embedded in the Code and Operating Philosophy.

Doing the Right Thing...
in the Right Way...
with the Right People...
and the Right Results will come

Each of us is responsible for understanding our role in identifying, assessing, managing, and accepting risk consistent with our Operating Philosophy, our risk management approach, and our governance requirements. We must be accountable for our role. We must be willing to constructively challenge decisions and behaviors, to ensure we live up to our Operating Philosophy and to deliver fair outcomes to our customers. We must be transparent in reporting incidents in an appropriate and timely manner.

WHO MUST FOLLOW THE CODE

The Code applies to all Amplify Health officers and employees. Our business partners, including contractors, subcontractors, suppliers, distribution partners, and others who act on behalf of Amplify Health are also required to apply the same standards and follow the same practices as Amplify Health employees. Codes of conduct for suppliers should support this expectation. Working towards finding a solution that is ethical and guided by our Operating Philosophy is the best way to handle a difficult or confusing situation.

Amplify Health is an organisation, united by our commitment to deliver on our promises. Each of us has a responsibility to live by the trust that is placed in us.

- Our fellow employees must trust us to value and respect them.
- Our customers and business partners must trust our integrity.
- Our shareholders must trust our stewardship.
- Communities around the region must be able to rely on us to act as responsible corporate citizens.

RESPONSIBILITIES UNDER THE CODE

As employees of Amplify Health, you are required to:

- Follow Amplify Health policies, standards, and procedures.
- Comply with applicable laws and regulations.
- Participate in compliance, ethics, and risk training.
- Demonstrate model behaviour. This means upholding the Code and Operating Philosophy in everything you do and decisions you make.
- Speak up promptly and report any misconduct or risk issue. Ask for help when you have a concern.
- Annually certify compliance with the Code.

ADDITIONAL RESPONSIBILITIES FOR MANAGERS

If you are a manager at Amplify Health, you have additional responsibilities:

- Lead by example. Amplify Health's Operating Philosophy inspires similar behaviour in those who report to you. Never pressure others to compromise the Code or our Operating Philosophy.
- Keep an open door. You must be accessible for questions or concerns.
- Foster a culture of trust and transparency. Make it clear that people must not be afraid to come to you with concerns about risk or ethical behaviour.
- Be watchful. Do not ignore signs of possible misconduct or inappropriate behaviour. If you need help determining whether a problem exists, ask for a second opinion from another manager, Compliance, or Human Resources.

SPEAK UP - WHERE TO GET HELP OR ADVICE

Most concerns likely to be faced at work can be resolved by talking to and working with management, Human Resources or Compliance. Amplify Health employees may ask questions, raise concerns, or report instances of non-compliance with this Code, Amplify Health policies or applicable laws and regulations by submitting your case via this Ethics line which is available 24 hours a day, 7 days a week. Reports of misconduct and inappropriate behaviour will be handled via the Whistleblower Program. You can make a report in your own language and remain anonymous if you wish. Please provide as much detailed information as possible as this will help facilitate a more thorough investigation process.

NON-RETALIATION

Amplify Health prohibits retaliation against any employee for making a good faith report of an actual or suspected violation of this Code, laws, regulations or Amplify Health policy. (A report is made in good faith if you reasonably believe it is true, you provide all the information you have, and you make it in the best interests of Amplify Health). More protective non-retaliation standards and rules may apply under applicable laws. For more information can be found in the Whistleblowing Protection Standard.

DISCIPLINARY ACTION

Any breach of applicable laws, regulations, or this Code (including the Operating Philosophy) or Amplify Health internal policies, or encouragement of such breaches by others may result in disciplinary action. Failing to promptly report known violations by others may also be a violation of this Code. Disciplinary Action may include loss of employment-related benefits or termination of employment.

WAIVERS OF THIS CODE

From time to time, Amplify Health may amend or waive certain provisions of this Code. Any employee who believes that a waiver may be appropriate must discuss the matter with the Compliance officer. Only the Amplify Health Board of Directors or its nominated committee may grant a waiver of a specific provision of this Code for an executive officer of Amplify Health.

LAYING THE FOUNDATIONS

Amplify Health has always believed in the power of diverse, talented people to create value and deliver on our customer and shareholder expectations.

DIVERSITY AND OPPORTUNITY

Amplify Health seeks to hire and promote the best talent by providing a dynamic environment that brings people with diverse backgrounds, skills, and ideas together. An inclusive, diverse workforce fosters innovation and enhances our position as a global market leader.

Amplify Health relies on the contributions of people who best understand the cultures and operations in the countries and jurisdictions in which we do business. Amplify Health has always been committed to hiring people with the right expertise and talent.

Amplify Health provides employees with opportunities to learn, excel in their jobs, grow with the organisation and profit financially.

RESPECTING OTHERS

Treating others with respect means that we do not discriminate based on race, religion, gender, nationality, age, disability, military service, marital status, or sexual orientation. Decisions to hire, promote, terminate or to take other employment related action regarding individuals, are based on merit and performance, in accordance with a fair and equitable process.

Respect also means valuing each other's differences. We respect each other's opinions and do not treat others in a harassing or threatening manner.

- Provide employees with opportunities based on performance and requirements that are relevant to job performance.
- Abide by local labour and employment laws including those addressing discrimination or harassment.
- Provide a work environment free of bullying and harassment.

- Escalate concerns you may have regarding your workplace environment to a Human Resources or Compliance.

BULLYING AND HARASSMENT

- Setting unachievable deadlines for a disgruntled team member.
- A manager continuously providing insulting or derogatory feedback.
- Unwelcome gestures or physical contact.
- The display of sexually explicit or offensive pictures or other materials

SAFE, HEALTHY AND SECURE WORKPLACE

Amplify Health is committed to conducting business in a manner that protects the health, safety, and security of Amplify Health employees and customers while they are on Amplify Health premises. Situations that may pose a health, safety, security, or environmental hazard must be reported promptly to management as appropriate.

Avoiding security breaches, threats, losses, and theft requires that all employees remain vigilant in the workplace and while carrying out Amplify Health business. Notify management of any issue that may impact Amplify Health's security, fire and life safety or emergency readiness.

ALCOHOL AND DRUG USE

Using, selling, possessing, or working under the influence of illegal drugs at Amplify Health is prohibited. Excessive or inappropriate use of alcohol while conducting business for Amplify Health is also prohibited.

EMPLOYEE PRIVACY

Amplify Health respects the personal information and property of employees. Employees expect us to carefully maintain the personal information they provide Amplify Health. Employee trust must not be compromised by disclosing this information other than to those with a legitimate need to know.

Access to personal information or employee property is only authorised for appropriate personnel with a legitimate reason to access such information or property. From time to time, Amplify Health may access and monitor employee Internet usage and communications to assess compliance with laws and regulations, Amplify Health policies and behavioural standards. Subject to local laws, employees shall have no expectation of privacy about workplace communication or the use of Amplify Health information technology resources.

SHAPING ETHICAL PRACTICES IN THE MARKETS

Amplify Health is known for entrepreneurship. We compete vigorously to create new opportunities for our customers and ourselves BUT we seek competitive advantages only through legal and ethical business practices.

TREATING CUSTOMERS FAIRLY

Amplify Health's customers trust us. It is fundamental that customers are always treated fairly. Amplify Health's products, services and advice must be appropriate to meet customer needs. Marketing, advertising, and sales related materials and services must always be truthful and accurate. Misrepresenting, or attempting to mislead or deceive customers by use of unsupported or fictitious claims about Amplify Health products, or those of our competitors, is not acceptable and may result in disciplinary action.

We must provide high standards of service and respond promptly and fairly to customer feedback.

CUSTOMER PRIVACY AND DATA SECURITY

Our customers expect us to carefully handle and safeguard the business and personal information they share with us. Never compromise a customer's trust by disclosing information other than to those with a legitimate business need or regulatory authority to know.

The classification of information as personal information or business data may differ by country. Employees who handle customer information are responsible for knowing and complying with applicable information privacy and information security laws. In all cases we must maintain appropriate physical, administrative, and technical safeguards for personal information and business data.

We must be especially vigilant in following laws, regulations and policies when transferring personal information and business data across country borders. If you have any questions about information privacy and/or data security, consult your manager, legal counsel and/or compliance officer.

ARTIFICIAL INTELLIGENCE AND MACHINE LEARNING

With ever-increasing use of technology and the rapid evolution of machine learning capability, Amplify Health is committed to the principle that the development and use of artificial intelligence (AI) applications must be consistent with Amplify Health's Operating Philosophy.

Our goal is fairness to customers in the design and use of coordinated human-machine analytics and decision-making to avoid creating or reinforcing unintended bias. We seek to bring integrity and technical excellence into this space and incorporate confidentiality principles in the development and use of AI to respect personal privacy. Our view is that, harnessed properly, AI has the potential to enhance our customers' experience. If you have any concerns, please bring them to your manager.

CONFLICTS OF INTEREST – GENERAL

Your position at Amplify Health cannot be used for inappropriate personal gain or advantage to you or a member of your family. Any situation that creates, or even appears to create, a conflict of interest between personal interests and the interests of Amplify Health or its related entities must be appropriately managed. Conflicts of interest (whether potential or actual conflicts) must be reported via the Human Resources reporting platform. If this is not available for you, contact the Compliance officer.

Managers must take appropriate steps to prevent, identify and appropriately manage conflicts of interests of those they supervise. Managers and their reports from time to time should revisit potential conflicts to ensure arrangements for managing them remain appropriate and effective. You can seek guidance on managing conflicts from Compliance.

- Always make decisions in the best interest of Amplify Health and our customers – not to advance personal interest.
- Remain aware of how personal activities can lead to potential conflicts, such as taking a second job with, or making an investment in, an Amplify Health customer, vendor, or competitor.
- Discuss with your manager any situation that could be perceived as a potential conflict of interest.
- Proactively address situations that may put your interests or those of a family member or friend in potential conflict with Amplify Health.

CONFLICTS OF INTEREST – BUSINESS OPPORTUNITIES

Amplify Health employees are prohibited from taking for themselves, or directing to a third party, a business opportunity that is discovered using Amplify Health corporate property, information, or position and unless Amplify Health or its related entities has already been offered and declines the opportunity. Amplify Health employees are prohibited from using corporate property, information, or position for personal gain to the exclusion of Amplify Health, and from competing with Amplify Health.

CONFLICTS OF INTEREST – PERSONAL RELATIONSHIPS

If you have a family member working in, or about to join, an Amplify Health company, you must declare the relationship (through the HR reporting platform) right away.

Immediate family members, members of your household and individuals with whom you have a close personal relationship must never improperly influence business decisions.

When determining whether a personal relationship might lead to a conflict of interest, ask yourself the following questions:

- Does one of us have influence over the other at work?
- Does one of us supervise or report to the other?
- Could an outsider view the situation as a conflict of interest?
- If the answer to any of these questions is “yes”, you must immediately discuss your concerns with your manager.

CONFLICTS OF INTEREST – OUTSIDE ACTIVITIES

On occasion, outside activities can create a potential conflict of interest. The following activities may be considered conflicts and must be reported and pre-approved (through the HR reporting platform):

Service with an outside business, whether as an employee, board member, director, officer, trustee, partner, or consultant, and especially any business that currently does or seeks to do business with Amplify Health or competes or seeks to compete with Amplify Health and its related entities. Prior written approval from your manager is required before engaging in this type of outside activity.

- Service with a foundation, charity, or non-profit organisation where an employee will be paid for his or her service. Prior written approval from your manager is required before engaging in this type of outside activity.

- Service with a foundation, charity or non-profit organisation that has a business relationship with Amplify Health and its related entities. The relationship must be reported. No approval for this type of outside activity is required provided that the employee will not be paid and there is no actual, potential, or perceived conflict of interest. If you have a question about whether there is a potential conflict, discuss it with your manager or Compliance officer.
- Serving as a public official or running for elected office. Prior written approval must be obtained from Amplify Health's Head of Legal or their designee to serve as a public official or run for elected office.

To avoid the appearance of any conflict with Amplify Health's interests, employees who participate in community support efforts outside of Amplify Health-sponsored programmes and those who run for elected or public office must never imply Amplify Health endorsement of the effort.

GIFTS AND ENTERTAINMENT

Modest gifts and appropriate entertainment help build goodwill and express our appreciation to customers and stakeholders. However, whether given or received, gifts and entertainment must never improperly influence business decisions. If gifts are intended to improperly influence business decisions they must never be given or received, regardless of their value. Managing the frequency and value of gifts and entertainment given or received is important so as not to give rise to perceptions of inappropriate business relationships. The general organisation wide threshold for offering or accepting gifts and entertainment is US$200 per recipient per occasion.

Appropriate gifts or entertainment, whether given or received, must:

- Have a legitimate business purpose.
- Be in good taste and not extravagant or excessive.
- Not be exchanged frequently with the same source / recipient.
- Be allowed by policies of Amplify Health and the exchanger's organisation.
- Be reasonable, ordinary, customary, and lawful in the country or region where they occur.
- Not be solicited. Never ask for gifts, favours, or entertainment, including vendor-sponsored travel.
- Be respectful of local and cultural sensitivities.
- Be reported or approved via the HR reporting platform (or other reporting methods as directed) as per the required standards.

If you are offered a gift that does not meet all the above criteria, you must politely decline. However, if your refusal would be offensive or harmful to the business relationship, accept the gift on behalf of Amplify Health (unless you know it to be unlawful) and follow the reporting process. Your manager will determine what to do with the gift, in consultation with Compliance.

If an employee is compensated for a presentation, talk, or service on a panel in which an honorarium is offered, they must notify their manager in writing of any fees received and may be required to give the fees received to Amplify Health.

- Gifts and entertainment provided to and received from Government Officials are strictly prohibited.
- Gifts and entertainment must be reported in accordance with the Code. Approval must be received from both your manager and CEO (via the HR reporting platform) for all gifts given or received which exceed the specified threshold.
- Gifts and entertainment connected with sponsorship activities (e.g., giving or receiving tickets to the theatre, concert or sporting events sponsored by Amplify Health or our business partners) are subject to the same gift restrictions, reporting and approval process.
- General sponsorship activity (e.g., covered by a marketing plan and not involving a gift to an individual) does not require approval under this Code. Marketing and promotional gifts and activities for our customers and distributors are not considered as reportable gifts under the Code. However, we must ensure they comply with all applicable regulations and our commitment to treat our customers fairly.
- Cash or cash equivalents (such as gift certificates, cheques, travellers' cheques or money orders, payment of credit card charges, vouchers or a gift that is substantially the same as cash) must not be provided or accepted. This prohibition includes where seasonal cash offerings such as "Red Packets" are widespread and customary. You should not under any circumstances solicit Red Packets. You are required to comply with local law and Anti-Bribery/Corruption Standard.
- Charitable Contributions are not considered as reportable gifts under the Code. However, they must be made according to the Anti-Corruption Policy. All activities involving Amplify Health branding, including charitable sponsorship, must conform to Amplify Health brand guidelines.

RELATIONS WITH OUR BUSINESS PARTNERS

Our business partners serve as extensions of Amplify Health to the extent that they operate within contractual relationships with our organisation. When working on behalf of Amplify Health and its related entities, business partners are expected to adhere to the spirit of this Code, and to applicable contractual provisions.

Business partners must not act in a way that is prohibited or considered improper for an Amplify Health employee. We must all ensure that customers, and suppliers do not exploit their relationship with Amplify Health or use Amplify Health's name in connection with any fraudulent, unethical, or dishonest transaction.

Amplify Health business partners are expected not to create incentives for Amplify Health employees or others who do business with Amplify Health to violate this Code's standards.

- Be aware of business practices of Amplify Health business partners to ensure that proper methods are used to deliver our services.
- Perform appropriate due diligence regarding potential suppliers, consultants, and independent contractors prior to engaging their services.
- Never pressure or encourage Amplify Health suppliers to engage in improper activities.
- Treat suppliers, and business partners with respect and consideration.

SUPPLIER SELECTION

Suppliers and vendors are selected based on performance and merit in accordance with a fair and transparent process. We must adhere to the sourcing standards and guidelines. Requirements for suppliers and vendors to follow the standards in the Code must be included in the vendor management programme.

FAIR DEALING

Amplify Health seeks competitive advantages only through legal and ethical business practices. Each of us must conduct business in a fair manner with our customers, service providers, suppliers, and competitors. Do not disparage competitors or their products and services. Improperly taking advantage of anyone through manipulation, concealment, abuse of privileged information, intentional misrepresentation of facts or any other unfair practice is not tolerated at Amplify Health.

ANTI-COMPETITIVE CONDUCT

Amplify Health competes vigorously and fairly. We maintain and grow our business through superior products and services - not through improper or anti-competitive practices. We comply with competition laws. These laws are complex. Employees who are unsure of appropriate practices must consult with Compliance for additional information and clarification. Care should be taken by those involved in industry associations. The following guidelines will help ensure fair business conduct and appropriate competition.

Don’ts

- Agree formally or informally with a competitor to fix prices or other terms of sale or purchase, rig bids, set production or sales levels, or allocate customers, markets, or territories.
- Discuss any of the following with a competitor: prices, bids, customer sales, commissions and terms of sale, profits, margins, costs, production, inventories, supplies, marketing plans or other competitively sensitive information.
- Attend meetings with competitors at which competitively sensitive information, including the subjects mentioned in the above two points, is discussed.
- Agree with others outside of Amplify Health as to which suppliers or customers to do business with or to rig any bid or tender.
- Make unsubstantiated or untruthful comparisons to competitors or comments about their products or services.
- Obtain competitively sensitive information from Amplify Health’s competitors or those known to have a duty of confidentiality to such competitors.

Do’s

- Compete vigorously and lawfully in every market in which Amplify Health participates, making all business decisions independently in the best interest of Amplify Health.
- Obtain competitively sensitive information about Amplify Health’s competitors only from lawful and appropriate sources.
- Comment on competitors or their products or services based only on factual information and complying with applicable regulations.

FAIR COMPETITION VIOLATIONS

Fair competition laws vary from country to country. These variations result in certain actions potentially being permitted in some countries and prohibited in others. If you encounter any of the activities detailed below and are not sure whether these activities are lawful, contact Compliance for advice on how to proceed:

- Attempts to dictate or control a customer's resale prices.
- Making the sale of any product or service conditional on a customer's purchase of another product.
- Offering a customer prices or terms more favourable than those offered to a similarly situated competitor of the customer.
- Restricting a customer or supplier from dealing with a competitor.
- Selling products or services below cost or other unfair pricing or promotion practices.

COMPETITOR INFORMATION

Amplify Health prohibits using illegal or unethical means to obtain confidential information, including trade secrets from competitors or suppliers.

Obtain competitive information about Amplify Health competitors only from lawful and appropriate sources. Do not obtain competitively sensitive information from those known to have a duty of confidentiality to such competition.

INAPPROPRIATELY OBTAINING COMPETITOR INFORMATION

- Retaining documents or computer records from prior employers.
- Pressuring or encouraging new employees to discuss confidential information from previous employers.
- Obtaining information through any behaviour that could be considered espionage, spying or which you would not be willing to fully disclose.
- Unreasonably relying on third parties' claims that business intelligence was obtained properly.

PRESERVING SHAREHOLDERS' ASSETS

FINANCIAL REPORTING

Shareholders, business partners, regulators and the public rely on our financial reports to make decisions. Our financial reports must be truthful, complete, timely, fair, accurate and understandable. To ensure that we consistently meet these standards, only authorised employees may provide financial reports to external parties.

ACCURATE BUSINESS RECORDS

Business records must always be prepared honestly and accurately. Information on business records must never be falsified or altered. We must never be dishonest or deceptive in maintaining Amplify Health records, or otherwise attempt to mislead Amplify Health's management, auditors, regulators, or

shareholders. Business records include information in any medium, including hard copies, electronic records, e-mails, instant messages, video, and backup tapes.

Amplify Health employees must never commit fraud. If you notice or suspect any case of fraud, including expense claims, procurement, auditing, or accounting irregularities, etc., or you experience pressure to alter any financial records, you must discuss the situation with Compliance, another qualified resource, such as Internal Audit or report via the Ethics line. Amplify Health takes a zero-tolerance approach to Fraud and staff found to have committed fraud will be subject to the appropriate disciplinary measures and consequence management which may include reporting to external authorities depending on the nature of the conduct.

AUDITS AND INVESTIGATIONS

If requested, Amplify Health employees will cooperate with auditors and investigators conducting an internal or external audit or investigation of activities at Amplify Health. Acts or non-cooperation apparently intended to hamper the effectiveness of an audit or investigation (including failure to keep details of the investigation confidential e.g., by advising the subject persons of the investigation) may result in disciplinary action.

DOCUMENT RETENTION

We must always comply with all applicable records management policies. These policies apply to information in any medium, as described above.

We must maintain essential information used for reporting, auditing, and other critical purposes in a recoverable format for the duration of assigned retention periods. Information that is of transitory value, with no ongoing importance, or whose retention period has expired according to the applicable records management policies must be discarded.

Amplify Health may suspend destruction of documents, records, or data due to possible or pending litigation, audits, investigations, or regulatory inquiries via a document preservation notice issued to those Amplify Health employees believed to have relevant materials in their possession, custody, or control. It is every Amplify Health employee's duty to quickly review any document preservation notice received and follow its instructions carefully.

Information subject to a document preservation notice issued by Amplify Health must be retained until otherwise instructed, regardless of the time frame set forth in the applicable records management standards.

Any questions about how to comply with a document preservation notice must be raised as soon as possible with the contact person identified in the preservation notice. Failure to maintain required documents, records, or data may lead to disciplinary action including, termination of employment and/or civil and criminal liability for Amplify Health and responsible individuals.

SAFEGUARGING AMPLIFY HEALTH RESOURCES

To best serve our customers and shareholders, it is vital that we demonstrate proper care and use of our resources.

PHYSICAL PROPERTY

Amplify Health property, including real estate, equipment, and supplies, must be protected from misuse, damage, theft, or other improper handling.

Amplify Health property is meant solely for Amplify Health business, though incidental personal use, such as local telephone calls, appropriately limited personal use of e-mail, minor photocopying or computer use is permitted.

INTELLECTUAL PROPERTY

Amplify Health intellectual property consists of any business ideas or information that Amplify Health owns, such as unique products and methodologies. Amplify Health protects its intellectual property through patents, trademarks, and copyrights. Each of us is required to safeguard the confidential information and trade secrets belonging to Amplify Health and its business partners.

- Never improperly use Amplify Health intellectual property.
- Never disclose non-public intellectual property without approval.
- Protect Amplify Health intellectual property by obtaining, or helping others obtain, patents, trademarks, or copyrights as appropriate.
- Never use a previous employer's intellectual property without permission.
- Never use or copy software or documentation, except as specified in the licensing agreement. Amplify Health respects the limitations placed upon software by the developer or distributor.

FUNDS

Amplify Health funds are to be used responsibly and solely for Amplify Health business. Corporate credit cards issued to employees for payment of business expenses may not be used for personal expenses. Each of us has a responsibility to safeguard Amplify Health funds from misuse or theft and ensure that Amplify Health receives good value when spending Amplify Health funds. We must only seek reimbursement for actual, reasonable, and authorised business expenses.

PROPRIETARY AND CONFIDENTIAL INFORMATION

Amplify Health's proprietary and confidential information must always be appropriately classified, handled, secured, maintained, and disposed of in day-to-day operations to comply with Amplify Health Policies and applicable laws and regulations. We must comply with the applicable Information Technology and Data Handling requirements to ensure sufficient operational controls are in place to ensure the confidentiality, integrity, and availability of our information assets.

INFORMATION TECHNOLOGY SYSTEMS

Amplify Health's information technology systems include computers, networking resources, e-mail systems, telephone, voice systems and other computer- processed information. Each of us has a responsibility to protect these systems and the data on these systems, from improper access, damage,

or theft. We must avoid writing anything that might embarrass us or reflect poorly on Amplify Health and its related entities.

Subject to applicable local laws, Amplify Health may have the right to review all e-mail and other electronic information to determine compliance with this Code, laws, regulations or Amplify Health policy. All information within Amplify Health computers and all electronic information, including without limitation e-mails, instant messages, and voicemails sent or received from an Amplify Health computer, handheld device or workstation may be subject to review, including by regulators.

The e-mail system is Amplify Health property and is intended for business purposes. Occasional, incidental, appropriate personal use of the e-mail system may be permitted if the use does not interfere with an employee's work performance, have undue impact on the operation of the e-mail system, or violate any other Amplify Health policy, guideline, or standard.

E-mail messages and any other communications sent or received using Amplify Health's information technology systems must not be used to create, store, or transmit information that is hostile, malicious, unlawful, sexually explicit, discriminatory, harassing, profane, abusive, or derogatory. These systems also are not to be used to intentionally access web sites which contain illegal, sexually explicit, or discriminatory content.

PROTECTING OUR SENSITIVE INFORMATION

- Discussing confidential information loudly or openly when others might be able to hear.
- Discussing Amplify Health proprietary information with third parties without authorisation and a non- disclosure agreement in place.
- Discussions about Amplify Health proprietary information with customers or suppliers without proper approval and knowledge of the confidential or public status of the relationship as confidential or non-confidential.
- Improperly discarding confidential drafts and notes.
- Sending or storing confidential, proprietary information to your personal email account or outside the Amplify Health network, without a valid business reason, is strictly prohibited.

EXERCISING GOOD CORPORATE CITIZENSHIP

Through our products, services, and responsible business practices, Amplify Health strives to improve the quality of life in every country where we do business. Promoting compliance with the laws and regulations that apply to our business is at the foundation of good corporate citizenship.

TRADING IN SECURITIES

In conducting business, we often learn of material non-public information about Amplify Health, suppliers, and other companies. It is our duty to safeguard this information from improper use. It is against Amplify Health's policy, and in many countries, it is illegal, to:

- Trade securities while in possession of material non-public information.
- Pass material non-public information to anyone who may trade securities based on it or give other recommendations to trade securities.

Material, non-public information is any confidential data that could affect a reasonable investor's decision to trade in securities and may include the following:

- Projected earnings and losses.
- New business relationships.
- Changes in senior management.
- Significant developments in products or services.
- Unpublished quarterly, half-yearly, and annual results.
- Dividend increases or decreases.
- Major litigation.
- Significant merger or acquisition proposals, or transactions.

Additionally, employees may not:

- Engage in speculative trading in securities of Amplify Health's majority shareholder.
- Engage in hedging transactions using securities of Amplify Health's majority shareholder.
- Short sell securities of Amplify Health's majority shareholder.
- Trade derivative securities, such as "put" or "call" options, "swaps" or "collars", related to securities of Amplify Health's majority shareholder.
- Trade in securities of Amplify Health's majority shareholder during blackout periods.

For more information, including trading restrictions based on your role or knowledge, please see the Prevention of Insider Trading and Market Misconduct Policy.

ANTI-MONEY LAUNDERING AND COUNTER TERRORIST FINANCING

Amplify Health is committed to meeting its responsibilities to help prevent money laundering and terrorist financing.

These responsibilities generally include conducting Customer Due Diligence, monitoring customer activity, and reporting suspicious or unusual activity consistent with applicable laws. Employees are required to abide by anti-money laundering programmes established by Amplify Health. Suspicious activity reporting requirements are time sensitive. Contact your manager or Compliance as soon as you have a concern that an activity might be unusual or suspicious.

ECONOMIC SANCTIONS

To comply with applicable economic sanctions regimes, certain prohibitions/ restrictions are applicable in respect of conducting business with or providing benefits to designated governments, individuals, and entities (such as suspected terrorists and narcotics traffickers) as well as individuals and entities that are in, have certain dealings with or are nationals of particular countries. To determine if a government, individual or entity is subject to these restrictions, consult with Compliance.

Promptly report to Compliance if any customer, staff member, or other business partner or counterparty, is found to be on the applicable sanctions lists. For more information, please see the Economic Sanctions Standard.

COMMUNICATING WITH REGULATORS AND OTHER GOVERNMENT OFFICIALS

Inquiries from regulators must be reported immediately to Compliance or a designated Amplify Health Legal Counsel before a response is made. Financial reporting related inquiries may be responded to by authorised finance colleagues. Responses to regulators must contain complete, factual, and accurate information.

During a regulatory inspection or examination, documents must never be concealed, destroyed, or altered, nor must lies or misleading statements be made to regulators. Requests from auditors are subject to the same standards.

ANTI-CORRUPTION AND BRIBERY

We must never use improper means to influence another person's business judgment. No Amplify Health employee, or independent contractor may provide bribes or other improper benefits to another person to obtain or retain business or an unfair advantage in any business interaction that involves Amplify Health, our customers, or employees.

Payments or promises to pay something of value to obtain or retain business or otherwise secure an improper advantage must never be made to a government official. The Anti-Corruption Standard defines the term 'Government officials', which include employees of enterprises that are controlled or owned in whole or in part by a government.

Anti-corruption laws also prohibit the creation of inaccurate or false books and records, and they require companies to develop and maintain adequate controls regarding corporate assets and accounting. All Amplify Health employees and officers are required to comply with Anti-Corruption Standard.

Any Amplify Health employee who has knowledge of, or in good faith suspects, a violation of any of these laws, regulations or policies must report them promptly to Compliance or otherwise as set out in the Speak Up section. For more information, please see the Anti-Corruption Standard.

SOCIAL AND ENVIRONMENTAL RESPONSIBILITIES

Through sustainable practices, each of us can do our part to help Amplify Health make a positive contribution to society and the environment.

Amplify Health is committed to reducing the impact of its operations on the environment and raising awareness about sustainability by taking part in activities that highlight these issues.

Do not use Amplify Health funds or assets to promote personal causes or make personal donations in the company's name without prior authorisation.

COMMUNICATING WITH THE PUBLIC

Only persons who are authorised to do so must speak on behalf of Amplify Health, and the information they provide must be full, fair, accurate, timely and understandable. All requests from investors, analysts and the media must be referred to Amplify Health's Marketing & Communications.

Never give the impression that you are speaking on behalf of Amplify Health in any personal communication, including user forums, blogs, chat rooms and bulletin boards. When you publicly express your personal views, you must ensure it is done in circumstances that will not reflect poorly on Amplify Health, and where it is clear the views expressed are your own personal views.

SOCIAL MEDIA

Amplify Health recognises the rapid expanding scope and significant value of social media to engage with stakeholders in innovative and interactive ways. When using social media in our personal lives, we must conduct ourselves professionally and in accordance with Amplify Health guidelines.

SOCIAL MEDIA GUIDE

- Do not communicate on social media on Amplify Health's behalf unless you are designated to do so.
- Do not use social media to harass or disparage our co-workers, customers, competitors, or others, or express any opinions or ideas attributed to Amplify Health or its related entities.
- Do not discuss sensitive information, including confidential and material non- public information on social media.
- Please refer to the Social Media Standard for Employees for additional information.