

Code of Conduct

National Health Insurance Company – Daman

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Message from the CEO

Daman's mission is to protect the Nation's health through smart innovative solutions providing sustainable access to quality healthcare. Delivering excellent services for our members and customers is essential and we are proud to be a trusted partner of Government and a trusted provider of leading healthcare services for our members and customers.

At Daman, the team has worked hard to build the company's reputation as the UAE's leading health insurer by delivering excellent services and evolving to meet the needs of our customers. To maintain our high operational standards, we need to ensure business and affairs are conducted ethically, honestly and with full accountability. Our values at Daman lead our everyday work and we reflect these in all aspects of the business: Responsibility, Excellence, Pioneering, Team-spirit and Achievement.

This Code of Business Conduct and Ethics outlines the guiding principles that allows us to work towards our vision of insuring a healthy future for the Nation. Each one of us needs to:

- Understand and apply these principles regardless of our role
- Be committed to ensuring the highest business conduct and ethical standards

If you have any questions on our Code of Business Conduct and Ethics or ever have any queries regarding the right course of action, please reach out to your respective compliance or legal team for guidance.

Thank you for your ongoing support and commitment in striving towards excellence in everything we do as an organisation.

Hamad Al Mehyas

CEO

National Health Insurance Company - Daman



Introduction

What is the Code of Business Conduct & Ethics?

Daman’s Code of Business Conduct & Ethics (“the Code”) represents the standards of ethical conduct and expectations related to anyone who works for or with Daman. It supports the everyday application of Daman’s values and provides a foundation for all Daman’s policies and procedures, which should reflect the Code’s principles. It sets the minimal standards for our professional behaviour and allows us to grow stronger by ethically working together towards achievement of our objectives.

Who is Daman and what are Daman’s values?

Daman is a public joint stock company that was established in 2005 by the government of Abu Dhabi. Throughout this Code, Daman refers to our company (legally “National Health Insurance Company – Daman PJSC”) and Daman Controlled Subsidiaries, which are entities where Daman has more than 50% ownership or has management control.

Daman’s values define the kind of organisation we are. They are:



Excellence

We set the standard with our exceptional service through the creation and use of internationally recognised best practices.



Pioneering

We are pioneers in health insurance and continue to introduce innovative solutions as part of our vision to become the most trusted partner in health for the UAE community.



Team Spirit

We communicate openly and transparently; our departments and joint ventures collaborate seamlessly to unit as one organisation.



Responsibility

We support our people in enabling them to exceed the expectations of our members and stakeholders.



Achievement

We are motivated by an aspiration to achieve, which we channel both individually and collectively into providing an unparalleled level of service to make our members happy.



Introduction

Who does the Code apply to?

The Code applies to everyone who works for, with or represents Daman or Daman Controlled Subsidiaries, regardless of the person's position, role, status, experience, or formal relationship with Daman.

Daman expects third parties, including but not limited to suppliers, service providers, consultants, and business partners to follow the Code's spirit and comply with its principles.

Where there are local regulations which impose a higher standard on any subject matter within this Code, then Daman Controlled Subsidiaries are encouraged to amend the Code to ensure that the version adopted by them is aligned with such higher standard and tailored to their business activities. Any such amendments must be pre-discussed and approved by the Compliance team based in Abu Dhabi prior to implementation.

For Daman Controlled Subsidiaries, if there are inconsistencies in guidance from Daman's Code and your company's guidelines, please adhere to the stricter one to maintain the highest integrity.

How to apply the Code in practice?

Everyone is individually responsible for reading and understanding the Code as well as following it in every situation.

As the Code may be revised from time to time, users should ensure that they refer to its latest version by seeking it out on Daman's website (www.damanhealth.ae). In addition to the Code, other compliance policies and procedures also apply within Daman. This should also be complied with and referred to as necessary and relevant.

Although the Code describes all the key areas of Daman's compliance requirements, it does not cover every practical situation or dilemma which you may encounter in performing your daily work. If you are not sure about the right course of action in addressing any conduct risk, ask yourself:

- Is it legal?
- Does it seem right?
- Is it aligned with Daman's values?
- Is it in the best interests of Daman?
- Would I feel comfortable if I read about it in a newspaper or had to tell my leadership team about it in a meeting?

If you answer "No" to any of the above questions or you are not sure, then you should seek counsel from your Compliance or Legal representative. Such queries may be raised to Daman's Compliance team (compliance@damanhealth.ae).

What happens if somebody breaches the Code?

Any potential breach of the Code will first be investigated and verified. If confirmed, it may result in disciplinary and/or legal action against the involved Employees and/or legal action against any involved third parties. If you suspect that the Code might have been breached, please refer to the "How to report concerns?" section of the Code.



How to behave and treat others

Respect and collaboration

Sustainable, long term success is always based on respect and collaboration between people. Daman fosters a work environment in which the contribution of each Employee is equally respected and valued. We do not tolerate any form of discrimination, harassment, or abusive behaviour of any kind.

We also firmly stand against any forms of forced and compulsory labour and of child labour. Maintaining such an environment is the responsibility of everyone who works for or with Daman.

What should you do?

- Treat everyone around you fairly and respectfully.
- Support others and share successes with your colleagues.
- Consider the views of others and communicate effectively.
- Take time to show others how to do things properly.
- Be honest and take accountability for your area of responsibility.
- Respect the regular working hours and always give your best when at work.
- Follow the UAE's cultural standards, including dress code, behaviour, professional and respectful language.
- Comply with all of Daman's policies and procedures such as but not limited to applicable human resources, communications, legal and compliance.
- Do not use or facilitate Daman communications tools (i.e. letters, e-mails, bulletin boards etc.) to advocate religious, ethnic, political or other potentially sensitive personal preferences.
- Do not create, disseminate or circulate malicious rumours and gossip, which affect fellow colleagues, thus creating an atmosphere of stress and employee disengagement.
- Do not ignore behaviours which go against these rules.



How to behave and treat others

Health, safety & environment

The responsibility for maintaining the Health, Safety and Environment standards is shared by all Employees by following the relevant requirements and reporting any incidents or hazards.

Daman is committed to meet and exceed the relevant laws and regulations related to the health and safety of our Employees and protecting the environment.



What should you do?

- Perform all work safely and follow any communicated safe work standards.
- Use personal protective equipment whenever required.
- Do not tolerate anyone working under the influence of illegal substances or alcohol.
- Always evaluate potential environmental impacts in your projects (if applicable).
- Reduce the use of resources wherever feasible.
- Immediately report any incidents or hazards and support any related investigations to your respective Occupational Health & Safety team.
- Take the recommended corrective actions in the area of health, safety and environment.
- Encourage our suppliers to meet our standards related to health, safety and environment.
- Comply with all applicable health, safety and environmental policies and procedures.



How to behave and treat others

Working with third parties

Any third parties working with us should respect the applicable laws, regulations and compliance standards, including the ethical commitments set out in this Code. Third parties should ensure that they act ethically and with integrity at all times.

Business relationships with external parties (such as suppliers, service providers, consultants, customers etc.) are established to support Daman in managing its activities efficiently and effectively. We select our suppliers based on fair and transparent procurement processes.

What should you do?

- Conduct adequate due diligence to make sure we work with reputable and ethical third parties, who are committed to following the principles of Daman's Code and all the relevant laws and regulations.
- If you participate in procurement processes, make sure that these are impartial, fair and transparent.
- Select suppliers on the basis of merit and competitiveness.
- Avoid actual or perceived conflicts of interest (please refer to "Conflicts of Interest" section).
- Respect the relevant procurement laws and regulations, including any applicable international trade and sanction legislation (please refer to "International trade laws" section).
- Ensure appropriate approvals prior to engaging with third parties.
- While cooperating with suppliers and customers, treat them fairly, ethically and with integrity.
- Protect Daman's and third party's confidential information.
- Comply with all applicable procurement and compliance policies and procedures.





How to behave and treat others

Working with Public Officials

Daman's interactions with Public Officials need to always be transparent and in line with legal requirements.

There are numerous, strict legal requirements which apply when working with government representatives, i.e. Public Officials. Public Officials include officers or employees of a government or any of its departments, agencies or enterprises. In some jurisdictions also the Employees of Daman may be treated as Public Officials because the Government of Abu Dhabi is our majority shareholder. These requirements include both legal and international legislation, which may apply to Daman due to our or ADQ's dealings with international partners.



What should you do?

- Understand the definition of a Public Official and always be aware when you are interacting with such persons.
- Always provide accurate and complete information to any government agencies or representatives.
- Never offer or provide any gifts, hospitality or entertainment to Public Officials without following an appropriate pre-approval process (please refer to “Gifts, hospitality and entertainment” section for more details).
- Immediately (if not possible immediately, maximum by the next working day) notify the Compliance team if you receive any unusual governmental requests for information and data or if you contacted about any non-routine governmental control.
- Ensure that any governmental requirements communicated to Daman are passed on to third parties working with us (to the extent that such requirements are applicable to the third parties) and that these requirements are also followed by the third parties, where applicable.
- Represent Daman in an appropriate and professional manner, always keeping your business dealings transparent and in line with the letter of the law. If you are not sure if the activity you engage in complies with the regulations, contact Compliance at compliance@damanhealth.ae for assistance.
- Contact your Compliance or Legal representative to clarify any questions in relation to working with the government or Public Officials.



How to behave and treat others

External communications

Any release of information or public representation of Daman needs to be approved and disseminated by authorised personnel to ensure that Daman's external communications are properly coordinated, timely and accurate. Daman employees are required to adhere to the relevant Corporate Communications policies and procedures in this regard.

Communicating with external stakeholders plays an important role in protecting the reputation of Daman. This includes publication of information or releasing statements on behalf of Daman or Daman Controlled Subsidiaries.



What should you do?

- Do not do or say anything that may harm the reputation of Daman or Daman Controlled Subsidiaries.
- Do not release any Daman information externally or make any statements on behalf of Daman to the media and public. All information about Daman, and distribution of that information, must be approved by Daman's Corporate Communications Department.
- Do not reveal any Daman confidential information when communicating externally or using social media (please refer to "Confidential information" section for more details).
- Comply with all applicable communication policies and procedures including Daman's communications and branding guidelines.
- Contact your Corporate Communications team to clarify any questions related to external communications.



How to behave and treat others

Conflicts of Interest

You have a duty to avoid, to the extent possible, activities that could create an actual Conflict of Interest or give the appearance of a potential or perceived Conflict of Interest.

Conflict of Interest is a situation in which a person has a competing professional or personal interest, which may make it difficult for this person to fulfil his or her professional duties at Daman impartially.

Identifying potential or perceived Conflict of Interest may not always be clear cut. The following situations might reasonably be expected to give rise to an actual, potential or perceived Conflict of Interest, and should be disclosed to the Compliance team on an annual basis or ad hoc if any changes occur to previous declarations:

- Personal relationships (e.g. your Close Family Member works in the same company (e.g. Daman) or for any of the company suppliers, for an insurance broker (within the UAE), healthcare provider (within and outside the UAE), another insurance company (within the UAE)).
- Outside business involvement (e.g., you receive remuneration for professional activities outside of Daman, such as but not limited to consultation services, board memberships in other companies, volunteering, external employment etc.)
- Personal investments (e.g., you or your Close Family Member holds investments (i.e. shareholdings) related to Daman, Daman Controlled Subsidiaries or our shareholders).
- Related parties and related party transactions (e.g., you hold 30% or more of shareholdings of any company, regardless of the industry or licensed activities).
- Benefits and inducements (e.g., you accept gifts or hospitality from any third party which may influence or appear to influence, your ability to make decisions and/or perform your duties at Daman).

What should you do?

- Understand and be able to identify potential, perceived or actual Conflicts of Interest.
- Avoid potential, perceived or actual Conflicts of Interest whenever possible.
- Complete the annual Conflict of Interest (related parties' disclosure) form within the deadline stipulated by the Compliance team, even when you have nothing to disclose.
- Ensure that any changes to your Conflict of Interest (related parties' disclosure) is updated within a maximum of three (3) working days of any changes occurring or upon you becoming aware of the change.
- Manage Conflict of Interests in line with the recommendations provided by your Compliance or Legal representative (e.g., by withdrawing from the conflicting activity).
- Seek guidance from your Compliance or Legal representative if you are not sure whether your action would lead to a potential, perceived or actual Conflict of Interest.
- Daman employees may refer to the Conflict of Interest and Related Party Guideline for further details, including actions to be taken for failure to disclose Conflict of Interest.
- Comply with all relevant compliance policies and procedures related to this matter such as but not limited to the Conflict of Interest and Related Party Guideline.





How to behave and treat others

Gifts, hospitality, and entertainment

Giving and receiving Gifts, Hospitality and Entertainment (“GHE”) may be helping to foster healthy business relations. But this should only happen when the gifting is an appropriate and transparent process without any corrupt intent or purpose. In particular, any GHE should meet all of the following minimum requirements:

- It is not given in cash or cash equivalents;
- It is clearly given as an act of appreciation or common courtesy associated with normal business practice;
- Its nature is appropriate to the relationship;
- It does not place the recipient under any obligation or expectation of return benefit;
- It is made publicly, not secretly and/or in an undocumented fashion;
- Its value is small and in accordance with normal business practice and policies and procedures as detailed in the Anti-Bribery and Corruption Guideline; and
- It complies with relevant laws.

What should you do?

- Before offering any GHE to third parties make sure you understand the recipient’s gift policies, so that you do not breach any rules and/or place them in an uncomfortable situation.
- Comply with all applicable compliance policies and procedures in your company regarding gifts, including any requirements to obtain gift approvals and/or gift registration as detailed in the Anti-Bribery and Corruption Guideline.
- Never accept or offer any GHE with corrupt intent or with the expectation of a return benefit. If you encounter any such instance, please notify your Compliance or Legal representative immediately or maximum by the next working day.
- Never offer any GHE to Public Officials without obtaining the required pre-approvals as per Daman’s Anti-Bribery and Corruption Guideline. Please be aware that offering GHE to Public Officials might now only be inappropriate, but also illegal.





How to behave and treat others

Bribery / corruption

Daman takes a zero-tolerance approach to Bribery and Corruption and is committed to acting professionally, and with integrity in all its business dealings and relationships, these include, without limitation, laws covering the marketing of products, bribery and kickbacks.

Our intention is to comply with all applicable local and international anti-bribery legislation and conduct our business transparently. These obligations extend to any third parties acting in cooperation or on behalf of Daman or Daman Controlled Subsidiaries (e.g., agents, consultants, brokers).

What should you do?

- Never engage in any corrupt practices or offer, solicit, give or receive any improper payments or bribes, either directly or indirectly (i.e., by involving a third-party intermediary).
- Never offer or accept any Facilitation Payments.
- Never accept any inappropriate / excessive GHE, whether in cash, in-kind or otherwise, as per Daman's Anti-Bribery and Corruption Guideline.
- Never accept any GHE that could appear to influence your objectivity.
- Make sure you keep accurate records, books and documents reflecting your business activities, including any payments made to thirds parties.
- Conduct appropriate due diligence to ensure that Daman cooperates only with reputable and ethical third parties (including agents, consultants and brokers).
- Monitor the activity of third parties representing Daman and be alert to any signs of inappropriate practices.
- Immediately or maximum by the next working day, report any suspected Bribery, Corruption or inappropriate payments to your Compliance or Legal representative or using the other Whistleblowing channels available in Daman (please refer to "How to report concerns?" section).
- Comply with all applicable compliance policies and procedures in your company regarding Bribery and Corruption.
- Comply with all relevant laws such as but not limited to the UK Anti-Bribery Act 2015, FCPA, UAE Penal Code etc.





How to protect our assets

Safeguarding company assets

Everyone who holds, controls, manages or supervises company assets has a duty to care for them while maximizing the efficiency of their use to the benefit of Daman and its stakeholders.

Daman's assets (including but not limited to its fixed assets, financial resources, equipment or materials) have been entrusted to Employees to enable achievement of business goals.



What should you do?

- Protect company assets, safeguarding them from loss, damage, theft, waste and improper or illegal use.
- Make sure you use the assets in line with their purpose and for the benefit of the company.
- Report any security gaps you notice and protect sensitive assets and information from access of third persons.
- Be aware that the time we spend at work is also an asset for Daman. Make sure you always give your best and spend the time at work efficiently and effectively to the benefit of the company.
- Do not dispose of company assets without having the appropriate authorisation to do so.
- Comply with all applicable IT and Information Security policies and procedures to ensure the protection of company assets.
- Ensure full and transparent documentation supporting any costs and expenses.
- Do not engage in unnecessary, extravagant or improperly approved purchases.
- Do not use company assets for personal purposes.



How to protect our assets

IT resources and cybersecurity

IT resources are critical in today's digitalised world and their safe operations enable us to meet our business objectives.

All persons utilising, supervising or having access to Daman IT resources, including all the company hardware and software, have the responsibility to protect them and use them responsibly for company business purposes.



What should you do?

- Use the company's IT resources for business purposes in line with the law and internal policies and procedures.
- Be aware that any communication or files you create, send, download or store using company IT resources (computers, phones, mobile devices etc.) is considered company property and may be subject to monitoring and / or compliance investigations.
- Never utilise the company's IT resources to engage in inappropriate communication (including sharing offensive materials or chain letters) or to access web content that is offensive or obscene.
- Respect the licensing requirements of IT software, including the tools and applications that have been made available for your company's business use.
- Do not try to download or install any files, apps or software from unknown sources or that might endanger the IT security of the company. Always use proper judgement and contact your IT team in case of questions.
- Protect your IT passwords and change them as required by the relevant IT policies and procedures.
- Do not use company IT resources for personal use.
- Be aware of cybersecurity threats (e.g., viruses/ trojans, hacking attempts, phishing, password leaks) and comply with all Information Security requirements in the company. Report any unusual activity or suspected Information Security risks to your Information Security team immediately.
- Do not use information and communications technologies, including networks, to carry out hostile activities or acts of aggression, pose threats to national peace and security or proliferate information regarding weapons or related technologies.
- Comply with all applicable IT and Information Security policies and procedures.



How to protect our assets

Intellectual Property

We should protect our intellectual property as well as any IP of third parties in use at Daman. Failure to do so may result in legal disputes or fines as well as reputational damage.

Intellectual property (“IP”) is another asset subset that encompasses our creations, inventions and technology, which may give Daman strategic advantage in the market. IP includes our copyrights, know-how, patents, trademarks and trade secrets.



What should you do?

- Be aware of the IP you have access to and use while working in Daman, including both our own as well as third party IP. As a general rule, the IP you create while working for Daman belongs to Daman.
- If you create or supervise IP in Daman make sure you always introduce appropriate legal measures to protect it, including introducing copyrights, patents, trademarks or ensuring that the third parties having access to it are subject to relevant Non-Disclosure Agreements. Consult with your Legal team if you have questions regarding the appropriate measure to apply in a specific situation.
- Never use any third-party IP without the proper authorisation to do so. Once obtained, make sure you respect the conditions of that authorisation.
- Always follow the relevant security measures and requirements in line with your company physical access and Information Security policies and procedures.



How to protect our assets

Confidential information

You must always respect and protect the confidential information of Daman.

Confidential information refers to any type of information that Daman chooses not to make public as per Daman's information security policies. When working for, with or representing Daman you may have access to different types of confidential information, including business secrets, business plans, databases, intellectual property, information regarding mergers and acquisitions, proprietary data, process details, personal data, financial information, management changes, technical specifications, pricing proposals or other business information. Protection and processing of data is also subject to various laws and regulations (including international laws that may have an impact on Daman).



What should you do?

- Know what confidential information you have access to. Share the information only when having the appropriate authorisation to do so and solely on a “need to know” basis, that is only with Employees for whom access to it is necessary to perform their duties at Daman.
- Protect Daman's confidential information at all times, including outside the workplace and working hours.
- Never leave confidential information unattended, in particular if it may be accessed by third parties. Maintain a “clean desk” policy and keep any confidential information under lock and key after your working day. Immediately or maximum by the next working day, report any loss, unauthorised use or unintended disclosure of confidential information to your Compliance or Legal representative.
- You should also know which external communications require authorisation. Do not release any external statements or communication on behalf of or referencing Daman to the media or the public. Please refer to “External communications” section for more details.
- Personal data, including age, gender or health, requires additional protection. Do not transfer any personal data to different jurisdictions without obtaining guidance from the Information Security team.
- Never discuss confidential information with third parties without signed non-disclosure agreements and /or confidentiality clauses in the relevant agreements.
- Do not seek access to third party confidential information. If you receive or gain access to confidential third-party information which you clearly should not have, immediately consult with your Legal team.
- Retain or discard records only in accordance with any internal record retention policies. In this regard, do not dispose of any records that are subject to a legal hold notice, even if they exceed the required retention periods.
- Comply with all relevant laws regarding confidentiality of member data.
- Comply with all applicable Information Security policies and procedures.

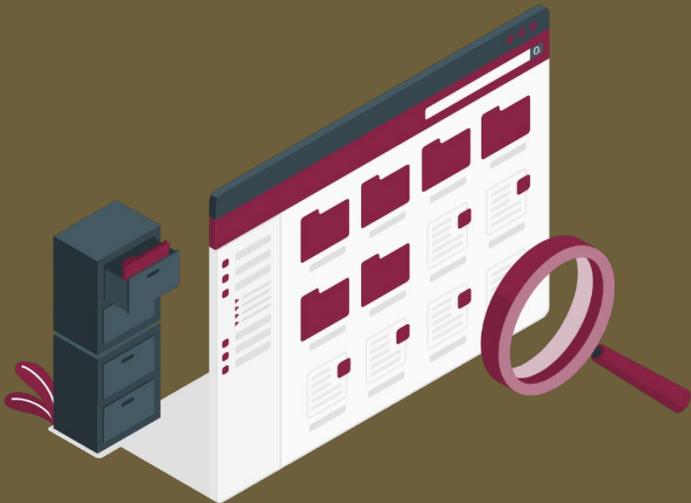


How to protect our assets

Records, documents, and controls

It is the responsibility of all Employees and parties working with or representing Daman to ensure integrity of our internal controls and documentation.

Management of business documentation, including all paper and electronic records, is crucial for Daman. Policies and procedures form the basic framework in which we operate. These documents, along with the appropriate delegations of authority, support the existence of internal controls, which define the responsibilities of individuals and their authorisation to engage in specific business operations. They also support us in maintaining compliance with laws, regulations and reporting requirements.



What should you do?

- Comply with all applicable regulations concerning integrity, accuracy and timeliness of recording and reporting of financial and non-financial information. Follow and comply with any internal policies and procedures which relate to this subject.
- Follow the relevant delegation of authority/authority matrix and the requirements of the company's internal controls. Always act within your authority and never circumvent/ignore the requirements of internal controls. Immediately or maximum by the next working day, report any potential weaknesses of internal control to your Finance, Corporate Risk Management, Legal or Compliance representative.
- Prior to signing or approving any document, make sure you verify its accuracy and correctness, irrespective of the number of other, previous signatures it already contains.
- Appropriately manage all documents in your area of responsibility from the moment of their creation to their disposal. Follow any guidelines, policies and procedures related to protection, retention and disposal of documents, especially those subject to litigation, financial scrutiny, audits or investigations.
- Never engage in any illicit activity concerning Daman's documents and records, including any unauthorised document alteration or destruction. Report any concerns related to integrity of documents to your Finance, Legal or Compliance representative.
- Cooperate fully and transparently with any internal or external auditors, investigators or compliance experts.



How to do our business

Competition laws

You need to ensure that Daman's activities are in full compliance with the relevant competition laws and appropriately address any risk of breaching them.

Laws and regulations which relate to unfair competition and antitrust may result in severe penalties for the companies as well as individuals who are found breaching them. Some of these laws, despite their international application, may also cover the activities of companies in the UAE.



What should you do?

- Make sure you understand the scope and specific requirements of the competition laws that apply to your business operations. When in doubt reach out to your Legal or Compliance representative.
- Do not engage in any agreements or activities that limit fair competition, including but not limited to price fixing, dividing territories, dumping or undercutting.
- Do not undertake activities to unethically or illegally impact the activities of our competitors; for example, by issuing false statements, misusing trade secrets or other intellectual property or inducing third parties to break their contracts with competition.
- Comply with any relevant laws which may concern the required pre-clearance of acquisitions or joint ventures.
- Be very careful not to share or discuss any competitive information with competitors, including business strategies, pricing frameworks, market shares, production or service levels, etc.



How to do our business

International trade laws

We expect all Daman Employees as well as any persons and entities working for, with or representing Daman to comply with all relevant domestic and international trade laws.



What should you do?

- Make sure you understand the scope and specific requirements of the trade laws that apply to your business operations. When in doubt reach out to your Legal or Compliance representative.
- Get to know your business partners, customers and suppliers by performing adequate due diligence (and enhanced due diligence whenever necessary) to avoid dealing with territories, entities or individuals, who are subject to trade sanctions, embargoes or other types of restrictions.
- Understand the technology, goods, services and technical information you are dealing in to identify any requirements related to their sale, export or transfer, especially if any of the technology is subject to any dual use goods regulations (i.e. regulations concerning technology that may have both civil and military use).
- Remember that international trade laws apply to both direct and indirect dealings. Make sure that any agents, brokers and representatives of Daman understand their responsibilities and comply with the relevant laws.
- Be careful when discussing or sending any know-how or information (including both traditional and electronic channels) concerning restricted technologies. Such exchange may also be subject to international trade laws.
- Maintain all records or all trade, in particular import and export transactions, including due diligence results, purchase orders, agreements, invoices and payment information.
- Comply with any additional procurement, legal and compliance policies and procedures concerning international trade, due diligence and sanctions compliance.
- Immediately or maximum by the next working day, inform your Compliance or Legal representative if you suspect any potential breach of international trade regulations, or, upon becoming aware of any claim, providing them with details of formal notice or investigation concerning international trade and sanction regulations involving Daman or any of its subsidiaries.



How to do our business

Insider trading

Trading activities of insiders are strictly regulated and breaching these requirements, that is using the “inside” information for trade (either directly or by cooperating with others), is illegal.

Insider trading is the process of buying, holding or selling of a publicly traded investment/security by someone who has non-public information about that security. By working for or with Daman you may acquire such non-public information (i.e., “inside” information) and through it gain an unfair advantage versus other market players.

Trading activities of insiders are strictly regulated and breaching these requirements, that is using the “inside” information for trade (either directly or by cooperating with others), is illegal. It may also have a detrimental effect on investor confidence and as a result negatively reflect on Daman and its shareholders.

What should you do?

- Never engage in any trading activity in breach of insider trading rules and regulations.
- Do not disclose, use or allow other to use insider information related to Daman, its companies or any other third parties, obtained in the course of performing your job or service requirements with Daman.
- Be aware that discussing or sharing any confidential non-public information to a Close Family Member, friends or anyone else is also prohibited.
- Comply with any additional Daman policies and procedures concerning capital markets and insider trading.
- Be aware of potential, perceived or actual conflicts of interest that may arise due to your access to confidential and insider information.
- When in doubt seek guidance from your relevant company functions, including your Legal or Compliance representative.





How to do our business

Anti-money laundering

Daman is committed to compliance with relevant anti-money laundering regulations and conducting business with reputable partners using funds from legitimate sources.

Money laundering is the processing of criminal proceeds to disguise their illegal origin. Criminals do this by disguising the sources, engaging in various transactions, changing the form or moving the funds to a place where they are less likely to attract attention.



What should you do?

- Conduct thorough due diligence processes to know your customers, partners and suppliers. Perform enhanced due diligence if you identify any red flags (i.e. indications of suspected wrongdoing).
- Co-operate with reputable partners and engage in transparent business transactions only.
- Understand the origin of the funds used in your company transactions and report any irregular or suspicious activity, including but not limited to:
 - Third parties resisting due diligence or providing inconsistent / incorrect information;
 - Any unusual or large cash payments from third parties not subject to due diligence;
 - Overpayment for goods and services followed by a refund request;
 - Purchases of goods or services inconsistent with the business profile of the partner;
 - Any requests to redirect funds into bank accounts of third parties;
 - Transactions originating from or directed into countries not directly linked with the business partner or countries subject to any sanctions or embargoes.
- Follow any additional guidance, policies and procedures released by your company in relation to due diligence, sanction compliance and anti-money laundering.
- Contact your Legal or Compliance representative if you have any concerns or questions about money laundering or sanctions.



How to do our business

Specific sector and industry regulations

Daman aims to meet and exceed industry compliance standards and set best practices across all of its activities. Daman companies may be subject to laws and regulations specific to their business sector and industry. It is the responsibility of the particular company management teams, supported by their Legal and Compliance functions, to recognise the specific requirements and ensure adequate resources allowing full adherence.



What should you do?

- Make sure you understand the scope and specific requirements of the industry laws and standards that apply to your business operations. When in doubt reach out to your Legal or Compliance representative.
- Track the latest developments in compliance laws, regulations, and best practices. Stay ahead of the curve, set the best compliance standards in your industry when implementing them in your company.
- Work transparently and address any requests of your regulators in a timely manner, providing them with all the required explanations and documentation.
- Interact with corporate Daman partners and fulfil your reporting requirements. Make sure to flag any significant compliance risks or challenges your business might be facing.
- If you identify any non-compliance risks related to your company's specific requirements report them immediately within your company for appropriate follow-up. You also have the possibility of escalating it to the attention of Daman. Please refer to "How to report concerns?" section for more details.



Final Messages

How do we implement the Code?

Daman is committed to compliance with all applicable local and international laws and regulations which relate to our business. Daman's responsibility is to ensure that an effective compliance and ethics programme is designed for the group and its requirements are properly communicated to ensure awareness across Daman companies.

Implementation of the programme's requirements as well as ensuring adequate compliance resources to make it effective rests with Daman's senior management and the senior management of Daman companies. The progress and adequacy of the solutions implemented will also be regularly verified by Daman's Audit Committee and the relevant company Boards of Directors.

Daman's compliance function, led by the Manager, Compliance, is the custodian of the Code and is responsible for supervising its appropriate implementation. The Manager, Compliance will also ensure annual review of the Code and any updates as required. Ensuring implementation and compliance with particular areas of the Code remains the responsibility of individual process owners (e.g., financial reporting with Finance, external communication with Corporate Communications, etc.).

Daman companies are requested to follow the requirements of the Code and treat it as a minimum standard to comply with and to adopt adequate solutions ensuring adequate implementations of Daman's Code.

Every manager in Daman is responsible for making sure that the Employees within his or her area of responsibility understand and follow the requirements of the Code. Furthermore, we expect our managers to behave in a way that serves as an example of commitment to Daman's Values and Code requirements.

Everyone is individually responsible for complying with Daman's Code of Business Conduct. In case of any doubts, concerns or questions it is your responsibility to raise them accordingly and inform of any potential non-compliance you are aware of.

How to report concerns?

Daman believes in and encourages a "Speak Up" culture – that is reporting any Code violation concerns or raising questions regarding the practical scope or application of the Code requirements.

There are several channels you may utilise to report any suspected Code violations. When deciding which channel to use, consideration should be given to the nature of the concern, the individuals involved, and the whistle-blower's comfort level. We encourage you to reach out to your direct line manager first. However, if for any reason you are not comfortable with such a communication, you may refer to any other of the below options, in the order of listing:

- The Employee's direct line manager;
- The Employee's division head;
- Your company Compliance or Legal representative;
- Daman's Compliance team (send email to compliance@damanhealth.ae with your contact information or anonymously, if you prefer);
- Any additional whistleblowing channels available at Daman (please refer to Daman's website)



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Please also be aware that:

- You should promptly report any suspected or potential wrongdoing you believe has taken place, is taking place or will take place. Lack of speaking up if you are aware of a possible Code violation may be considered a breach of the Code itself.
- Daman encourages the reporting of any Code concerns directly and openly. It is also possible to report a concern anonymously; however, anonymous reporting may make any investigation more complex and may prevent appropriate action being taken.
- Stakeholders are asked to submit reports of concerns to Daman without making any form of public or private statements, unless required to do so by law.
- Daman takes all reports of potential Code violations seriously and is committed to conduct investigation and verification of all allegations as required in given circumstances.
- Whether anonymous or not, all reports of Concern will be handled in a confidential manner. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate investigation of the concern and to implement any subsequent corrective and/or remedial measures.
- We expect stakeholders to report concerns in good faith and will not tolerate intentionally false reports or reports made through malice. Making a report in good faith means you will be protected against retaliation. If a stakeholder reports a concern that he/she knows or reasonably should know to be false, he/she will be subject to disciplinary action and/or repercussions leading to civil or criminal prosecution.
- Any whistle-blower who reports a concern, which the whistle-blower reasonably believes, or may reasonably believe to be true, will be afforded protection for such reporting. This protection means that Daman will not discharge, demote, suspend, threaten, harass or in any manner discriminate against the whistle-blower in the terms and conditions of employment or contract for raising a concern or cooperating with an investigation.
- Daman does not tolerate any form of threat, retaliation or other action against a whistle-blower who has made or assisted in the making of a report of a Concern. Any such threat, retaliation or other action should immediately be reported to your respective Compliance or Legal representative.
- You may refer to any additional Whistleblowing guidelines issued in your company, your company webpage or your Compliance/Legal representatives to seek additional clarification regarding the reporting process.





Violations & Enforcement

- Any employee found to have violated this policy shall be subject to further disciplinary action which may include termination of employment as per the HR Disciplinary Policy.
- Violations shall be notified directly to the Whistleblowing reporting channel available on D-Pulse.
- Strict confidentiality shall be maintained on all notified violations.





Definitions

Term	Definition
Bribery	Bribery is the act of offering, giving, receiving or soliciting money, a favour, or anything of value to influence the judgement, conduct, official act or business decision of a position of trust. Bribes can be in many forms including but not limited to facilitation payments, gifts, entertainment and charitable giving which typically involve corrupt intent. A kickback is a type of bribe in which a person usually gets a favourable financial, commercial or business benefit/ in return for granting a contract or subcontract.
Close Family Member	Father, mother, brother, sister, children, spouse, father-in-law, mother-in-law, and children of the spouse.
Code	Daman’s Code of Business Conduct and Ethics
Compliance Team	Team responsible for supervision of the regulatory and ethical compliance in a given company. If no separate compliance function exists, please refer to your legal team for guidance.
Conflict of interest	Conflict of interest is a situation in which a person has a competing professional or personal interest. Such competing interests can make it difficult to fulfil his or her duties impartially.
Corruption	Corruption is a dishonest action or abuse of one’s duties or power for private gain. Typical forms of corruption include giving or accepting bribes or inappropriate gifts, illegal gratuities, double-dealing, under-the-table transactions, economic extortion and undisclosed Conflict of Interests.
Daman or We	National Health Insurance Company – Daman PJSC and entities where the company has more than 50% ownership or has management control.
Daman Controlled Subsidiaries	Entities where Daman has more than 50% ownership or has management control.
Employee	Full-time and part-time employees of Daman and Daman controlled subsidiaries, as well as any other person that has been issued a Daman Employee ID number (including but not limited to temporary agency staff, interns and/or trainees).
Facilitation Payment	A form of bribery made for expediting or facilitating the performance of a Public Official in a routine governmental action. For example, payments made for expediting processing papers, permits and other actions conducted by an official.
GHE	Gift, hospitality or entertainment.
Manger, Compliance	Daman’s compliance senior manager responsible for the compliance function. Reporting operationally to the Head of Legal & Compliance.
Public	Ordinary people in a society, who are not members of a particular organisation or who do not have any special type of knowledge.
Public Official	Any officer or employee of a government or any department, agency, or instrumentality (i.e. entity or enterprise) thereof, or of a public international organisation, or any person acting in an official capacity for or on behalf of any such government or department, agency, or instrumentality, or for or on behalf of any such public international organisation.
Whistleblowing	Whistleblowing is the act by an individual (the ‘Whistle-blower’) of making a confidential disclosure in good faith of any concern encountered in the workplace for a perceived wrongdoing.
You	The reader of this Code, being at the same time subject to its requirements due to working for, with or representing Daman.

Thank you