



**FORTICARE**  
HEALTH SYSTEMS INTERNATIONAL, INC.

**CORPORATE CODE OF BUSINESS  
CONDUCT AND ETHICS**  
[www.forticareph.com](http://www.forticareph.com)



<b>Corporate Code of Business Conduct and Ethics</b>	
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Approved By / Date	Board of Directors

Forticare Health Systems International, Inc. (FORTICARE) is committed to conducting business with the highest ethical standards. Our directors, officers, and employees uphold a culture of good corporate governance by embodying core values of accountability, integrity, fairness, and transparency in their interactions with colleagues, customers, suppliers, competitors, business partners, government entities, regulators, and the public.

Forticare consistently affirms its dedication to ethical business practices, ensuring that all decisions and actions align with its core values.

All directors, management, and employees must adhere to Forticare’s Code of Discipline and Conduct.

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## **STANDARDS OF BUSINESS CONDUCT AND ETHICS**

Below are the commitments expected of Forticare’s directors, officers, and employees in their professional conduct and business dealings.

### **1. COMPLIANCE**

- 1.1 Engage in honest conduct and comply with all applicable laws, rules, and regulations, including prohibitions on insider trading, in both letter and spirit. Business conditions or pressures are not valid justifications for violating any legal or regulatory requirements.
- 1.2 Adhere to the standards and restrictions set forth by laws, rules, and regulations.
- 1.3 Refrain from direct or indirect bribery and corruption of government representatives or regulators to facilitate transactions or gain undue advantages, except for permissible payments for routine governmental actions as allowed by law.

### **2. COMPETITION AND FAIR DEALING**

- 2.1 Avoid taking unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation, or other unfair practices.
- 2.2 Treat Forticare’s customers, service providers, suppliers, competitors, and employees fairly and ethically.

### **3. CONFIDENTIALITY OF INFORMATION AND PROPER USE OF COMPANY PROPERTY**

- 3.1 Safeguard confidential information entrusted to Forticare, including non-public data that could benefit competitors or harm Forticare and its affiliates if disclosed. Disclosure is only permitted when authorized or legally required.
- 3.2 Comply with company policies and legal requirements regarding business records retention. Ensure records are not altered, destroyed, or falsified to obstruct investigations or legal proceedings.
- 3.3 Use company property, time, supplies, and software responsibly and solely for legitimate business purposes.
- 3.4 Protect Forticare’s assets from loss, damage, misuse, or theft.

#### **4. CONFLICTS OF INTEREST AND CORPORATE OPPORTUNITIES**

- 4.1 Avoid conflicts of interest between personal interests (including those of family members) and Forticare's interests. Obtain prior approval from the designated approving authorities in case of any potential conflict.
- 4.2 Avoid activities or relationships that may impair objective decision-making, including unauthorized external business interests or employment, receiving or giving gifts to individuals or entities affiliated with Forticare, and insider dealing.
- 4.3 Act in Forticare's best interests, ensuring business decisions remain free from personal bias or external influence.
- 4.4 Seek to advance Forticare's legitimate interests and avoid engaging in business activities that compete with the company. Do not use company property, information, or position for personal gain.
- 4.5 Refrain from granting or arranging loans for any director or officer unless permitted by applicable laws and regulations.

#### **5. DISCLOSURE**

- 5.1 Publicly disclose all material information, including earnings, corporate strategy, and related party transactions.
- 5.2 Ensure compliance with Forticare's disclosure controls and internal procedures to guarantee accurate and timely reporting.
- 5.3 Consult with appropriate company officers and employees to ensure full, fair, and accurate disclosure of information.
- 5.4 Understand Forticare's disclosure obligations and its business and financial operations.
- 5.5 Do not knowingly misrepresent facts about Forticare to internal or external parties, including auditors and regulators.
- 5.6 Critically review and verify the accuracy and completeness of disclosures before publication.
- 5.7 Assess and enhance disclosure controls and procedures, taking corrective action when necessary.

#### **6. IMPLEMENTATION AND MONITORING**

- 1. Directors, officers, and employees must comply with both the letter and spirit of this Code. Forticare expects the same commitment from its business partners.
- 2. The Human Resources Department (HRD) is responsible for interpreting and enforcing the Code in response to any questions or concerns.
- 3. Waivers for any provisions of this Code may only be granted by the Board of Directors or the Governance and Nomination Committee for directors and officers, and by the Human Resources Department for employees.

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This Code serves as a guide for Forticare's ethical business conduct, ensuring the integrity of our operations and relationships with stakeholders.