

An hourglass with blue sand is shown against a dark, starry background. The sand is flowing from the top bulb to the bottom bulb. The hourglass is positioned on the left side of the frame, with the top bulb at the top and the bottom bulb at the bottom. The background is a deep black with numerous small, white stars scattered throughout.

PURSHALTH[★]

Key Policies
Memorandum

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1. Definitions

Affiliate Company: The company associated with another company under a cooperation and coordination contract.

Annual General Assembly: An annual meeting (General Assembly) of the Shareholders held to approve the items determined by virtue of the Commercial Companies Law.

Articles of Association: The articles of association of Pure Health Holding PJSC (as may be amended from time to time).

Board Member: Any member of the Shareholders appointed Board of Directors at Pure Health Holding PJSC, including the Chairman of the Board of Directors.

Board of Directors: The Shareholders appointed Board at Pure Health Holding PJSC.

Business Partners: Any supplier or commercial partner of Pure Health Group, excluding customers and potential customers.

Business Unit: The respective functions at Pure Health Holding PJSC, including its subsidiaries.

Capital Market Authority: A federal financial regulatory agency in the United Arab Emirates.

Code of Business Conduct & Ethics: Set of rules outlining the responsibilities of or proper practices to be applied through the Company's employees, including Committee members.

Commercial Companies Law: Federal Decree Law No. 32 of 2021 concerning commercial companies and any amendments thereto.

Company or PureHealth: Pure Health Holding PJSC.

Compliance: Guidelines, principals, processes and procedures related to the Company as well as its Employees compliance with the provisions of the law, and the regulations and decisions issued pursuant thereto, as well as with the Company internal policies and procedures.

Conflict of Interest: Conflict of interest is a situation in which a person has a competing professional or personal interest.

Delegation of Authority: The approved responsibility matrix at Pure Health Group. (if available)

Employees: Staff members of Pure Health Group.

Executives: Members of the Executive Management of the Company.

General Assembly: A meeting of Shareholders, which is not an Annual General Meeting.

Governance Rules: The Chairman of CMA Board Decision no. (3/Chairman) of 2020 Concerning Approval of Joint Stock Companies Governance Guide and any amendments made thereto or replacement thereof that are issued from time to time.

Group or Pure Health Group: Pure Health Holding PJSC and its subsidiaries.

Head of Department: The individual responsible for a specific/concerned department.

Independent Board Member: A member that has no relationship with the Company, any of its Executive Management persons or its auditor, parent company, subsidiaries, sister company, or affiliate company in a manner that may lead to financial or moral benefit that may affect its decisions. A member forfeits its independence capacity in these stipulated cases.

Internal Audit: A control, advisory, independent and objective activity designed to add value and improve level of the company processes.

Management: The respective Business Units CEOs, CxOs and HoDs across Pure Health Group.

Market or Abu Dhabi Securities Exchange: A market for trading securities; including shares issued by public joint stock companies, bonds issued by governments or corporations, exchange traded funds, and any other financial instruments approved by the UAE Capital Market Authority.

Material Information: Any information, event, decision, or fact that may directly or indirectly affect a company security price or trading volume or has an impact on an investor decision.

Non-Executive Board Member: A member that neither holds any position in the Company, nor receives a salary therefrom, and the remuneration it receives as a Board member shall not be considered as a salary.

Non-public Information: Any information that is not available to the public.

Risk Management: Guidelines, principals, processes and procedures related to risk management as determined by the Board of Directors.

Related Parties: The Chairman and members of the Board of Directors and their relatives, members of the Executive Management of the Company and their relatives and its staff, and the companies in which any one of those hold at least 30% or more of its capital.

Related Party Transaction: Includes all on-balance sheet and off-balance sheet exposures and dealings with related parties such as, but not limited to contracts, asset purchases and sales, lease or other agreements, derivative transactions, borrowings and write-offs, loans and claims. The term transaction incorporates not only transactions that are entered into with Related Parties, but also situations in which an unrelated party (with whom PureHealth has an existing exposure) subsequently becomes a Related Party; for disclosures must reflect all Related Party events and transactions for the financial period.

Relatives: Relatives: Father, mother, brother, sister, children, spouse, father-in-law, mother-in-law, and children of the spouse.

Sanctions: Sanctions are measures imposed by governments and international bodies to restrict dealings with certain countries, entities, and individuals.

Shareholder: Any person who owns at least one share in a company.

Sister Company: A Company that belongs to the same group to whom another Company belongs.

Stakeholders: Any person interested in the Company, such as the Shareholders, Employees, creditors, suppliers, and potential investors.

Subsidiary Company: A Company under the parent Company umbrella.

Transaction: An event that may affect a listed public joint stock company assets, liabilities and net value in terms of transactions, contracts or agreements concluded by the company and any other transactions determined by the Authority from time to time under decisions, instructions or circulations issued thereby.

2. Abbreviations

- AoA:** Articles of Association
- ABC:** Anti-Bribery & Corruption
- ADX:** Abu Dhabi Securities Exchange
- AML:** Anti Money Laundry
- ARC:** Board Audit & Risk Committee
- BoD:** Board of Directors
- BU:** Business Unit
- CMA:** Capital Market Authority
- CSR:** Corporate Social Responsibility
- DoA:** Delegation of Authority
- ESG:** Environmental, Social, and Governance
- IC:** Board Investment Committee
- IP:** Intellectual Property
- MNPI:** Material Non-Public Information
- NRC:** Board Nomination & Remuneration Committee
- PHH:** PureHealth Holding
- PHG:** Pure Health Group
- PJSC:** Public Joint Stock Company
- SSI:** Sustainability & Social Impact

3. Introduction

Pure Health Group's ("PHG" or "Group") Public Disclosure of Key Policies Memorandum provides a concise and accessible overview of the core principles and overarching commitments that guide the Group in ensuring its operations and interactions are transparent, prudent, and reliable. The ethical and professional standards set forth herein are integral to PHG's standing as a progressive healthcare service provider. PHG remains dedicated to supporting the sustainable development of the UAE and seeks to serve as a benchmark for ethical practices and behaviours that contribute to positive outcomes for all Stakeholders.

Amid a growing and increasingly complex regulatory and operational environment, PHG recognises the value of clear and transparent communication concerning its primary policies. Accordingly, this Memorandum has been prepared to offer Stakeholders a fundamental understanding of the Group's approach to key aspects of its business.

4. Purpose

This Memorandum is not a stand-alone policy, but a consolidated reference that integrates several of PHG's key policies. This Memorandum aims to provide a high-level overview of the principal policy statements and procedural foundations that support the Group's commitment to the highest standards of integrity, transparency, and accountability. It sets out the essential disclosure elements that form a core part of the Company's Corporate Governance framework, operational integrity, and stakeholder engagement practices.

The Public Disclosure of Key Policies Memorandum outlines the overarching objectives of the Group's disclosure framework, which include, but are not limited to, the following:

- **Enhancing Transparency:** Presenting a clear and accessible summary of the Group's key policy commitments to ensure Stakeholders can easily understand the standards guiding PHG's operations.
- **Reinforcing Commitment:** Affirming PHG's dedication to ethical conduct, regulatory compliance, and responsible business practices across all areas of operation.
- **Promoting Awareness:** Providing a centralised reference point for the most critical policy statements that shape the Group's governance and operational environment.
- **Facilitating Understanding:** Offering a streamlined overview of PHG's internal frameworks and Corporate Governance policies to support effective Stakeholder engagement and oversight.

As this Memorandum forms an integral component of PHG's broader governance framework and applies to the extent relevant, if any inconsistency arises between its provisions and those of the Articles of Association (AoA) or applicable laws or regulations, the AoA, laws, or regulations shall prevail, as applicable.

5. Scope

The guidelines and disclosure provisions articulated herein extend to all entities, subsidiaries, employees, and operations across the Group, reflecting the organisation's commitment to

uphold the highest standards of conduct, governance, and performance across all jurisdictions and business lines.

6. Key Governance Interdependencies

The guidelines outlined herein present a consolidated strategic view and should be read as a high-level governance reference. They do not replace, replicate, or supersede the detailed provisions contained within the Group's full suite of internal policies, procedures, manuals, standards, and regulatory disclosures. Rather, they complement and operate in parallel with those documents, which collectively provide the operational, procedural, and technical specifications required for day-to-day implementation.

In alignment with the Group's governance architecture, these statements reaffirm PHG's commitment to the following foundational principles:

- **Integrity & Ethical Conduct:** Upholding honesty, fairness, and principled decision-making across all business and clinical activities.
- **Compliance & Regulatory Alignment:** Ensuring full adherence to applicable laws, regulatory directives, clinical governance standards, patient safety requirements, and data protection mandates issued by competent local and international authorities.
- **Patient & Customer Focus:** Stewarding a service model centred on equitable treatment, clinical excellence, and outcomes that prioritise patient welfare and stakeholder trust.
- **Risk & Control Discipline:** Maintaining a structured framework to proactively identify, assess, and mitigate risks, particularly clinical, operational, financial, and regulatory risks, across the enterprise.
- **Sustainability & Social Impact:** Operating responsibly and contributing positively to the communities served, while maintaining an environmentally conscious operational posture.

Collectively, these guidelines reflect PHG's ongoing commitment to consistency, excellence, and regulatory alignment across the Group. Subsidiaries remain accountable for applying and operationalising these principles within their respective environments, thereby ensuring cohesion, quality, safety, and compliance across the Group ecosystem.

7. Review & Update

Periodic reviews shall be undertaken to ensure that this Memorandum remains current, accurate, and aligned with PHG's evolving strategic priorities, regulatory obligations, and operational practices. Amendments, once approved through the appropriate internal governance channels, shall be communicated accordingly.

8. Policy Disclosure Statements

To enable disciplined, transparent, and accountable leadership across the Group, PHG has established a set of key governance dimensions that collectively define how the organisation upholds effective oversight, ethical conduct, regulatory compliance, and responsible management. These components reflect the critical areas through which PHG ensures alignment with applicable laws, regulatory expectations, international best practices, and stakeholder requirements across all jurisdictions in which the Group operates.

Each Governance dimension serves as:

- **A Structural Element** defining an area of governance responsibility;
- **A Behavioural Expectation** guiding how Directors, Employees, and relevant stakeholders must act; and
- **A Compliance Reference** point linking to the corresponding policies, procedures, and regulatory frameworks.

While *not exhaustive*, these dimensions represent PHG's overarching governance posture and set the minimum expectations applicable across all subsidiaries and operating entities.

Overview of PHG's Key Governance Dimensions

- Articles of Association
- Board & Committee Governance
- Sustainability & Social commitment
- Corporate Social Responsibility
- Employee Code of Business Conduct and Ethics
- Supplier Code of Conduct
- People & Organisation
- External Audit
- Data Privacy & Information Security
- Anti-Money Laundry & Anti-Bribery & Corruption Controls
- Whistleblowing
- Conflict of Interest
- Sanctions Compliance
- Insider Trading
- Investor Relations

8.1 Articles of Association

On October 20, 2023, the General Assembly (GA) of Pure Health Holding (PHH) approved, through a special resolution, the conversion of the legal form of the Company into a Public Joint Stock Company (PJSC) and the listing of its shares on the Abu Dhabi Securities Exchange (ADX). Subsequently, PHH was listed on ADX on December 20, 2023.

The Articles of Association (AoA) were issued to serve as the primary constitutional instrument of the Company, establishing its legal identity, governance structure, and the respective rights and obligations of Shareholders, the Board of Directors, and Executive Management.

PureHealth ensures full compliance with the provisions set forth in the AoA to ensure that all corporate decisions and actions remain legally aligned and appropriately governed.

Any amendment to the AoA is executed with due care, transparency, and in accordance with the procedural requirements prescribed under the UAE Commercial Companies Law and the Capital Market Authority (CMA) regulations applicable to Public Joint Stock Companies. Such amendments require approval through General Assembly resolutions and, where applicable, confirmation by relevant regulatory bodies. This process ensures that modifications remain consistent with the Company's strategic direction while upholding regulatory obligations and protecting shareholder interests.

For further reference, the AoA and related Company disclosures may be accessed through the ADX platform - [Company's Disclosures](#).

8.2 Board & Committees Governance

PHG maintains a comprehensive corporate governance framework designed to enable effective, ethical, and strategically aligned leadership. Board composition is structured in accordance with applicable regulatory requirements to ensure a balanced, competent, and independent Board of Directors, reflective of the skills, expertise, and diversity necessary for sound oversight and decision-making. For Group entities holding international assets or incorporated in non-UAE jurisdictions, governance structures and committee mandates also reflect the regulatory requirements applicable in the country of registration, ensuring unified compliance across the PHG ecosystem.

Board selection is undertaken through a structured and merit-based process, considering professional qualifications, sectoral expertise, integrity, and independence criteria. Directors are appointed for defined terms pursuant to the Company's AoA and may be re-nominated, replaced, or renewed in accordance with applicable governance provisions. To uphold continued effectiveness, the performance of the Board, its committees, and individual Directors is evaluated annually, ensuring ongoing alignment with strategic priorities and governance expectations.

To fulfil its mandate, the Board is responsible for setting the overall strategic direction, overseeing risk management and internal control systems, ensuring compliance with applicable laws and regulations, protecting Stakeholder interests, and promoting long-term sustainability and value creation. The Board achieves this through disciplined oversight, transparent decision-making, and effective delegation of authority.

The Board discharges its oversight responsibilities through specialised committees, including the Audit and Risk Committee (ARC), Nomination and Remuneration Committee (NRC), and Investment Committee (IC), each operating under approved charters and defined terms of reference. The committees provide focused oversight on critical governance domains such as financial integrity, risk management, executive succession, remuneration, investment evaluation, and regulatory compliance. Through independent judgment, enhanced scrutiny, and informed recommendations, these committees strengthen the Board's ability to govern effectively, safeguard organisational resilience and ensure disciplined stewardship of PHG's strategic objectives.

8.3 Sustainability and Social Impact

A comprehensive Sustainability and Social Impact (SSI) approach is embedded into the Group's strategic direction and operational practices, ensuring that environmental stewardship, societal contribution, and governance discipline remain core to long-term value creation. The organisation is committed to advancing environmental and climate resilience, strengthening social well-being, and maintaining the highest standards of ethical conduct and corporate responsibility. As a leading healthcare platform, the Group recognises its influence in shaping sustainable outcomes for communities and future generations.

Sustainability oversight, performance monitoring, and disclosures are governed through clearly defined internal controls and reporting mechanisms, ensuring accuracy, accountability, and transparency in the communication of progress and impact. Periodic reporting on Sustainability and Environmental, Social, and Governance (ESG) related indicators is presented to Executive Management with external disclosures made, where required, to Shareholders, regulators, and broader Stakeholders, enabling the evaluation of performance against defined priorities, continuous improvement commitments, and broader socio-environmental objectives.

The Group aligns its sustainability and impact commitments with recognised international principles, widely accepted environmental and social frameworks, and key UAE strategic initiatives, including but not limited to:

- The UAE First Long-Term Strategy (LTS) (Demonstrating Commitment to Net Zero 2040), UAE Circular Economy Landscape, The UAE Green Agenda 2030, etc.
- Globally recognised frameworks and initiatives, including the UN Sustainable Development Goals (SDGs), Global Reporting Initiative (GRI), and International Labour Organisation (ILO) core principles.

Performance disclosures, ESG indicators, and SSI reporting are available on the Group's official website for Stakeholder review, including dedicated ESG/SSI publications and relevant sustainability disclosures supporting transparency and informed engagement. [Longevity of the Planet – Sustainability](#)

8.4 Corporate Social Responsibility

The Corporate Social Responsibility (CSR) Policy establishes a governance structure that clarifies oversight, decision-making, and execution responsibilities across the Group to ensure that CSR initiatives are aligned with Pure Health's strategy, vision, values, and objectives.

The General Assembly approved this policy in its meeting held on April 2nd, 2026, and delegated authority to the Board of Directors ("Board") to oversee and monitor the implementation of the CSR Policy. Through this delegation, the General Assembly ensures that CSR governance is monitored by the Board while maintaining overall accountability for the Group's social responsibility commitments.

The Board responsibilities include approving the Group CSR strategy, setting relevant objectives, performance indicators, targets, and initiatives, and approving the annual social contributions budget and allocation methodology. The Board also approves all social

contributions, whether financial or in kind, including donations, sponsorships, partnerships, endowments, and multi-year commitments within the profits' allocation approved by the General Assembly. In addition, the Board oversees the implementation of CSR initiatives, ensuring alignment with the Group's strategic objectives, values, and applicable laws and regulations.

The Executive Management, led by the Group Chief Executive Officer (GCEO), is responsible for driving and championing CSR commitments across the Group. Management develops the Group-wide CSR strategy, including objectives, Key Performance Indicators (KPIs), initiatives, and targets, in collaboration with relevant stakeholders. The GCEO ensures effective implementation through appropriate internal policies, procedures, and controls, monitors progress and ensures regular reporting and disclosure. Management also ensures that CSR principles are communicated across the organization and that awareness is promoted internally and within the wider community.

Together, these governance layers ensure effective oversight, disciplined execution, and continuous improvement of CSR activities across the Group and its subsidiaries.

8.5 Employee Code of Business Conduct and Ethics

The Employee Code of Business Conduct and Ethics ("the Code") establishes the ethical standards and behavioural expectations applicable to Board members, Employees, contractors, suppliers, and relevant third parties. It sets out the minimum principles governing professional conduct across all business activities and interactions. Adherence to the Code ensures consistent alignment with organisational values and reinforces responsible and ethical decision-making. Where required, the Code is supported by internal policies, guidelines, and procedures to address specific matters in more detail. To ensure its continued relevance, the Code undergoes periodic review and is reaffirmed annually by Employees as part of their ongoing commitment to its principles.

The Group reinforces a culture founded on integrity, responsibility, and accountability, embedded within the following guiding principles:

1. The Code serves as the foundation of the Group's ethical conduct framework, defining standards of integrity, respect, fairness, and Human Rights protection in all professional dealings.
2. A safe, healthy, and secure work environment is maintained, and environmental impacts are minimised through responsible operational practices.
3. Unfair treatment, discrimination, harassment, exploitation, and any form of abuse are prohibited and addressed through clear governance and escalation pathways.
4. Sustainability initiatives are integrated into operations to support environmental efficiency and responsible resource utilisation.
5. All applicable laws and regulations are observed, including those addressing Anti-Corruption, Fraud, Bribery, Anti-Money Laundering, Counter-Terrorist Financing, Insider Trading, Trade Controls, and Sanctions compliance.
6. Conflicts of Interest are declared, documented, and appropriately managed to preserve impartiality in decision-making.
7. Financial integrity is upheld through strong internal controls, accurate record-keeping, and disciplined reporting practices.

8. Individuals who raise concerns in good faith are protected, and retaliation against whistleblowers or those participating in investigations is strictly prohibited. Reporting concerns may be made through the designated whistleblowing channel available via the Group's digital platform '[Speak Up - My Voice](#)'.
9. Suppliers and partners are expected to comply with all governing laws, standards, and ethical commitments throughout the duration of their engagement, including labour and Human Rights expectations.
10. Personal Data is protected with appropriate safeguards in accordance with applicable Data Protection and privacy requirements.
11. Confidential information, proprietary data, and Intellectual Property (IP) belonging to the Group or third parties are protected against misuse, disclosure, or unauthorised access.
12. Information technology systems and digital assets are used responsibly, with appropriate controls maintained to ensure cybersecurity and protect the integrity of digital infrastructure.

All individuals covered by the Code are required to review and formally acknowledge their understanding of, and commitment to, its principles upon joining the Group and at designated intervals thereafter. This acknowledgment confirms their responsibility to act in accordance with PHG's ethical standards, internal policies, and applicable legal obligations.

The Code is accessible through the Group's digital platforms, and each person is expected to remain familiar with its requirements and uphold them in all professional dealings. Any breach of the Code, or of the Group's broader policies, procedures, or regulatory expectations, may result in corrective or disciplinary action proportionate to the severity of the violation and will be ascertained on case-to-case basis. Individuals are obligated to report suspected misconduct or unethical behaviour through established reporting channels, '[Speak Up - My Voice](#)' while managers are responsible for reinforcing the Code within their teams and monitoring adherence to its behavioural expectations.

8.6 Supplier Code of Conduct

The Group is committed to delivering high-quality, accessible healthcare solutions to the communities it serves, and recognises its responsibility in shaping sustainable outcomes for people and the environment. The Supplier Code of Conduct "Supplier Code" reflects this commitment by extending the Group's ethical, social, and sustainability expectations to third-party vendors, service providers, and business partners operating within its supply chain.

The Group's dedication to responsible healthcare practices extends beyond internal practices and encompasses all external engagements. Suppliers are therefore expected to uphold the standards set out in the Supplier Code, which establishes minimum requirements in key areas including anti-corruption, ethical conduct, Human Rights, workplace health and safety, and environmental stewardship. Through adherence to these requirements, suppliers contribute to a responsible, transparent, and sustainability-aligned value chain.

The Supplier Code sets clear expectations for all suppliers in respect of the following areas:

1. Conflict of Interest, including matters relating to Gifts, Benefits, and Hospitality
2. Anti-Bribery and Corruption

3. Sanctions Compliance
4. Human Rights and fair labour practices
5. Environmental responsibility
6. Health and Safety obligations
7. Management Systems supporting compliance and continuous improvement

Suppliers and their employees are encouraged to raise any concerns related to potential or actual misconduct by their organisation, their personnel, or any PHG representative through the Group's designated whistleblowing channels, '[Speak Up - My Voice](#)' which ensure confidentiality and independent handling of reported matters. For further guidance on expected ethical standards and compliance obligations, suppliers may access the full Supplier Code of Conduct through the Group's official website.

8.7 People & Organisation

PHG recognises that its people are central to sustained performance and innovation. A supportive, inclusive, and work-life balanced environment is maintained to enable everyone to contribute effectively and grow professionally. The Group's workforce strategy is tailored to attract, develop, and retain high-calibre talents, safeguarding organisational sustainability while advancing individual success. This commitment extends across all facets of the Employee lifecycle, underpinned by the following principles of fairness, equity, and continuous improvement:

1. Ethical Labour Practices:

PHG operationalises ethical labour standards through rigorously controlled employment processes that ensure fair treatment, lawful hiring, and safe working conditions across all entities. Recruitment, onboarding, and workforce management are governed by documented procedures designed to prevent discrimination, exploitation, child labour, or any form of forced or compulsory labour, or unethical practices. Periodic monitoring, compliance checks, and mandatory trainings are implemented to ensure adherence to applicable labour regulations across all regions where PHG operates, while fostering responsible workforce behaviour.

2. Employee Onboarding and Orientation:

PHG implements a structured onboarding process to ensure the effective integration of new employees into the organisation. This includes formal orientation sessions that introduce employees to PHG's values, code of conduct, policies, and workplace practices, as well as role-specific induction and health and safety briefings. The onboarding process is designed to support early engagement, role clarity, and compliance, while enabling new hires to transition efficiently and confidently into their responsibilities.

3. Diversity, Equity, and Inclusion:

To foster a workplace built on fairness, respect, and equal opportunity, PHG embeds these values across recruitment, talent assessment, leadership development, and employee engagement practices. Structured hiring and promotion processes are merit-based and supported by bias-mitigation practices, ensuring decisions are transparent and non-

discriminatory. Leadership teams are accountable for embedding inclusive behaviours, promoting representation, and maintaining an environment where all employees feel respected and empowered to contribute.

4. Talent Development and Performance:

PHG executes a comprehensive talent development framework focused on continuous learning, capability building, and performance excellence. Employees participate in regular performance discussions, development planning, and structured learning programmes to ensure alignment between individual growth and organisational priorities. National talent development is a strategic priority, supported through targeted career pathways, mentorship initiatives, and leadership preparation programmes that build long-term workforce depth and capability.

Furthermore, the Total Rewards Framework (TRF), which includes Short-Term Variable (STV) Pay as performance-linked incentives, is established at the Group level and is approved and monitored by the Nomination and Remuneration Committee (NRC). The NRC is responsible for reviewing, approving, and governing all matters related to remuneration and benefits in line with approved policies and governance standards. Additionally, the NRC oversees the remuneration of both Executive Management and Board members.

5. Employee Well-being and Work life Balance:

Employee well-being is advanced through coordinated programmes that address physical, mental, and emotional health needs. PHG implements wellness initiatives, counselling support, flexible work arrangements where feasible, and engagement activities that contribute to a positive and supportive work environment. The Group also provides structured leave entitlements, including annual leave, parental leave, and other statutory and policy-driven leave arrangements, to support work-life balance, family responsibilities, and employee well-being across the workforce. These measures are integrated into the broader human capital strategy to strengthen retention, resilience, and workforce satisfaction.

6. Succession and Leadership Continuity:

The Group maintains structured succession planning processes to ensure stability in key positions and continuity of leadership capability. High-potential talent is systematically identified and assessed for readiness, while development actions and knowledge-transfer mechanisms are embedded into annual human capital planning. These measures support leadership continuity, mitigate key-person risks, and reinforce organisational resilience.

8.8 External/Statutory Audit

PHG maintains rigorous financial oversight and reporting transparency through the appointment of independent external auditors. The external audit mandate encompasses periodic, comprehensive assessments to validate the integrity of financial statements, ensure alignment with International Financial Reporting Standards (IFRS), and support adherence to applicable governance and disclosure requirements for Public Joint Stock Companies (PJSC). To safeguard auditor independence and avoid any potential conflict of interest, non-audit

services provided by the appointed external auditor are restricted and monitored, ensuring that assurance activities remain objective, unbiased, and free from undue influence.

8.9 Data Privacy and Information Security

The Group remains committed to safeguarding the privacy and security of all personal and sensitive information, particularly patient health data. The Group's data handling and protection practices align with applicable data protection regulations, including the UAE Personal Data Protection Law (PDPL) and the Abu Dhabi Healthcare Information and Cyber Security Standard (ADHICS).

A comprehensive Information Security Management System (ISMS) is maintained to protect information assets against unauthorised access, misuse, disclosure, disruption, alteration, or loss. These controls are aligned with international standards, including ISO 27001, ensuring the confidentiality, integrity, and availability of critical information and supporting ongoing operational resilience.

Additionally, the Group has implemented a comprehensive Information Security Incident Management (ISIM) policy and supporting mechanisms to prevent, detect, respond to, and recover from security incidents that may disrupt operations or compromise information assets. The policy provides a consistent process for managing incidents and communicating security events and vulnerabilities. It applies to all users with authorised access to information and related assets, ensuring timely identification, assessment, and mitigation to minimise impact.

To support the delivery of high-quality healthcare services and ensure compliance with applicable data protection regulations, PHG collects and processes personal and sensitive data that enables the identification of patients, customers, and service users. All data is handled in accordance with the UAE PDPL, ADHICS requirements, and the Group's internal information security and privacy controls. PHG collects only the data necessary for lawful and clearly defined purposes directly related to healthcare provision, operational effectiveness, regulatory reporting, and patient safety. Examples of the data collected may include, but not limited to:

- Full name;
- National identification or passport details;
- Contact information such as mobile number, telephone number, or email address;
- Health-related information required for clinical assessments and treatment; and
- Biometric data where applicable and legally permissible.

Personal and patient data is collected through transparent processes that clearly communicate the purpose, scope, and implications of data use, ensuring compliance with consent requirements under applicable laws. Consent mechanisms are designed to be clear, accessible, and adaptable to individual needs, with additional safeguards applied when dealing with minors or individuals of determination. PHG processes personal data solely to support the effective delivery of healthcare services, maintain accurate medical records, meet regulatory and clinical governance obligations, and enhance overall patient experience and care quality.

All information is handled strictly for the purposes disclosed at the time of collection and is protected through robust confidentiality, security, and privacy controls embedded within the Group's ISMS.

Further information on PHG's data privacy practices is available in the Privacy Statement published on the PureHealth's website, accessible via the following link [Privacy Policy - PureHealth](#).

8.10 Anti-Money Laundering (AML) & Anti-Bribery and Corruption (ABC)

A strict zero-tolerance approach governs all financial crime risks across the Company, including money laundering, terrorist financing, bribery, and corruption. Controls are designed to prevent any misuse of services or platforms for illicit purposes while ensuring full compliance with applicable Anti-Money Laundry (AML) and Anti-Bribery and Corruption (ABC) regulations in every jurisdiction of operation. This discipline not only preserves institutional integrity but also protects against legal, financial, and reputational exposure, reinforcing stakeholder confidence in ethical conduct.

Within the healthcare environment, engagements with Healthcare Professionals, medical institutions, and third-party intermediaries are subject to additional scrutiny. Defined parameters on gifts, hospitality, sponsorships, and benefits are implemented to avoid conflicts of interest and ensure all interactions remain transparent and compliant. All Directors, Employees, and associated third parties are prohibited from:

- Offering, agreeing to offer, providing, requesting, or indicating a willingness to provide any form of improper payment or advantage.
- Seeking or accepting any benefit intended to influence a decision, secure confidential information without authorisation, or prompt an action or inaction that would otherwise not occur.
- Providing, promising, or granting anything of value to a government official or representative with the purpose of securing or maintaining business or obtaining an undue advantage for the Company.
- Engaging third parties, agents, or intermediaries to carry out, conceal, or support any conduct of the nature described above.
- Receiving or keeping gifts or hospitality that have not been properly disclosed or approved.
- Working with suppliers, partners, or service providers that fail to uphold robust anti-bribery, anti-corruption, or ethical compliance standards, or those known or suspected to engage in corrupt practices.
- Conducting or facilitating transactions involving funds whose source cannot be reasonably verified, or that appear to be structured to obscure beneficial ownership, in violation of anti-money laundering requirements.
- Entering business relationships or financial dealings with individuals or entities that appear on sanctions, watchlists, or exhibit red flags associated with money laundering activities.

To ensure that the Group remains proactive in identifying, managing, and mitigating all potential risks associated with bribery, corruption, and financial crime, PHG has established a structured set of measures designed to uphold transparency, strengthen internal controls, and maintain regulatory compliance. The Group's ABC and AML risk-management framework is structured around the following control and oversight mechanisms:

- Preventive Measures and Controls

- Governance and Oversight Responsibilities
- Investigation Protocol
- Training and Awareness

1. Preventive Measures and Controls

PHG has implemented comprehensive preventive measures to minimise exposure to bribery, corruption, and financial crime risks. This includes strict enforcement of conflict-of-interest disclosures, adherence to approval authority matrices, and layered internal controls governing material transactions, supported by rigorous assessments of strategic vendors and outsourced service providers. Accountability is reinforced through strong oversight mechanisms and compliance with applicable regulatory requirements, while subsidiaries and relevant entities may adopt supplementary AML and ABC procedures to address local obligations and ensure consistent, enterprise-wide risk mitigation.

2. Governance and Oversight Responsibilities

All directors and employees share responsibility for complying with the Group's Anti-Bribery, Anti-Corruption, and AML standards. PHG maintains a whistleblowing infrastructure to facilitate confidential reporting of suspected misconduct, including bribery, corruption, or financial crime. Management is accountable for promptly escalating any concerns, irregularities, or behaviours that may warrant review or formal investigation.

3. Investigation Protocol

Where allegations or suspicions of bribery, corruption, or related misconduct arise, department heads are responsible for initiating a preliminary assessment. Formal investigations, when warranted, are carried out by the Group's Compliance team. These investigations focus on determining root causes, identifying control failures, and recommending enhancements to prevent recurrence and strengthen the overall control environment.

4. Training and Awareness

PHG provides Employees with training and awareness programmes tailored to their responsibilities to ensure a clear understanding of ABC and AML requirements. Both new and existing Employees receive ongoing education on ethical conduct, prohibited practices, reporting obligations, and the internal controls that support effective compliance.

8.11 Whistleblowing

PHG is dedicated to upholding the highest standards of ethics, integrity, and responsible business conduct and fosters a transparent and accountable environment where Employees and Stakeholders are empowered to report concerns about misconduct, unethical behaviour, or non-compliance without any fear of retaliation. An established Whistleblowing framework ensures that all submissions are received in confidence, reviewed objectively, and addressed through appropriate corrective measures.

To uphold the Group's ethical, legal, and regulatory requirements, all Directors, Employees, and third-party stakeholders must report, in good faith, any suspected or actual misconduct that could compromise the Group's compliance with applicable obligations. Reportable concerns include, but are not limited to, breaches of applicable laws or regulations, violations of the PHG Code of Conduct, misuse of confidential information, workplace harassment or safety risks, market abuse (including insider trading and manipulation), money laundering, terrorist financing, theft, fraud, bribery, corruption, or any irregularities in financial or non-financial reporting.

Concerns may be raised through designated reporting channels, including the confidential whistleblowing platform '[Speak Up - My Voice](#)', the secure reporting mailbox monitored by the Group Compliance function, or the dedicated hotline. Reports may be submitted anonymously, and where a whistleblower's identity is known, it is treated with strict confidentiality and disclosed only on a need-to-know basis.

The Group is firmly committed to protecting individuals who report concerns in good faith against any form of retaliation. Any retaliatory behaviour is subject to disciplinary action in accordance with the Group's People & Organisation and compliance policies.

Group Compliance ensures that all reports are assessed independently and that any resulting investigations are conducted by appropriate stakeholders, with due regard to objectivity and the avoidance of conflicts of interest. To reinforce a culture of transparency and ethical accountability, the Group provides regular communications and mandatory training to ensure Employees understand the purpose of whistleblowing, the available reporting channels, and their rights and obligations under this policy. External parties, including suppliers and other third parties, may also utilise these channels to report concerns relating to misconduct.

8.12 Conflicts of Interest

As a leading healthcare organisation, PHG is committed to conducting all the business operations in a fair and transparent manner. To ensure that the company's business practices are conducted with integrity, transparency, and in the best interest of its Stakeholders, PHG has established a Conflict-of-Interest policy.

The policy reinforces ethical conduct, protects institutional credibility, and sustains stakeholder confidence by ensuring that decisions are made impartially and solely in the interest of patients, customers, and operational fairness. Defined procedures for declaration, assessment, and mitigation support consistent handling of conflicts and safeguard objectivity across all business interactions.

Clear parameters are established, including an automated tool for the annual declaration of Conflict-of-Interests by all parties, to identify, disclose, and appropriately manage any actual or perceived conflicts that may arise in the course of their duties. Additional scrutiny applies to situations with potential implications for patients' safety, clinical judgment, research independence, or healthcare delivery integrity.

8.13 Sanctions Policy

Compliance with applicable economic sanctions, embargoes, and related restrictive measures is regarded as a fundamental requirement within the Group's operating framework. Sanctions encompass governmental or multinational directives that restrict business dealings, financial transactions, and other forms of engagement with designated countries, entities, or individuals deemed to contravene international obligations or pose risks to global stability and security. Such measures may include trade prohibitions, asset freezes, travel bans, and other punitive measures.

Sanctions governance is implemented through a formal screening process overseen by the Group's Risk & Compliance function. Counterparties and transactions are screened at onboarding and on a periodic basis thereafter, with ongoing monitoring against recognised sanctions lists to identify any subsequent changes. Potential matches are escalated for review, enabling timely intervention and the prevention of restricted dealings.

8.14 Insider Trading

The Insider Trading Policy forms an essential element of the Group's governance and compliance framework, supporting market integrity and protecting the organisation and its Stakeholders from legal, financial, and reputational exposure. The policy prohibits the use or disclosure of Material Non-Public Information (MNPI) by individuals granted access to such information, including Board Members, Executives, Employees and their Relatives, and any other designated Insiders, when dealing in the Company's securities.

Its purpose is to prevent illicit trading based on confidential information, ensure alignment with applicable regulatory obligations, and reinforce ethical conduct and transparency in all securities dealings. Clear guidance is provided on permissible actions and required safeguards for handling MNPI, thereby supporting responsible governance practices, maintaining a fair-trading environment, and preserving investor confidence.

To ensure adherence to the guidelines', structured controls are applied on an ongoing basis. These include:

- Maintaining an updated Insider register list,
- Implementing pre-clearance requirements for all proposed trading activities by designated individuals,
- Monitoring trading during blackout periods, and
- Enforcing system access restrictions to confidential financial and operational data.

Regular disclosure reminders, acknowledgment renewals, and MNPI handling protocols are also embedded into daily workflows to prevent misuse, accidental disclosure, or selective information release.

8.15 Investor Relations

The Investor Relations policy reflects the Group's commitment to clear, timely, and accurate communication with shareholders and the wider financial community. It ensures full adherence to applicable disclosure obligations, promotes fair and simultaneous access to material information for all market participants, and supports the development of sustained investor confidence and trust.