

<b>Name of the standard</b>	Codes of Business Conduct
<b>Scope</b>	Global
<b>Type</b>	Policy
<b>Supervision</b>	Board of Directors
<b>Date of approval</b>	
<b>Version</b>	1.2.3

# Code of Business Conduct (COBC)

## 1. General integrity and accountability:

The Code of Business Conduct (COBC) applies to everyone, whatever their role or seniority. Everyone in CMED shall comply with the COBC along with the local law and regulations which apply to the Company, the industry and the people. CMED shall always act with high standards of integrity and conduct business in a truthful, honest, diligent, transparent, and ethical manner.

### 1.1. The line managers should-

- 1.1.1. Know the corporate values, stand up for what is right.
- 1.1.2. Coach the team to ensure team members know and recognise consistently appropriate behaviors.
- 1.1.3. Promote respect in the workplace
- 1.1.4. Foster an environment in which concerns are freely raised without fear
- 1.1.5. Raise concerns to higher management and/or concerned authority when appropriate to do so

1.2. No line manager has the authority to order or approve any action contrary to the COBC, or against the law.

1.3. Everyone shall and is expected to report any suspected wrongdoings and inappropriate conduct in breach of the COBC by anyone working with the Company.

1.4. Disciplinary actions will be taken for conduct that breaches the COBC or is illegal, including termination of employment for serious breaches or misconduct. Breaches of the COBC, or the law, can have severe consequences for the Company and those involved.

## 2. Respectful behavior at the workplace:

Respectful behavior means that everyone - irrespective of religion, race, financial condition, social status, gender, age, or seniority – have a right to receive respect, dignity, privacy and deserve professional amicable behavior.

2.1. CMED values Diversity and employ and/or partner with individuals and organizations from a diverse range of backgrounds, cultures, and races to ensure an open, inclusive and discrimination-free workplace.

2.2. CMED fosters a culture nurturing a positive workplace environment in which all employees are treated with respect and dignity with more sincerity and thought to the woman, disabled and minorities.

2.3. CMED strongly encourages friendly and respectful relationships within the colleagues and appreciates maintaining this relationship within official decorum and modesty. Personal relationships can not impact the work environment and should be limited within generally acceptable social norms. Within the office environment, everybody shall follow socially acceptable values and beliefs while maintaining personal relationships or in his/her attire.

2.4. No one shall belittle others based on physical appearance – including obesity, thinness, height, stuttering, physical deformity of any kind, social status or institutional representation, attires, accessories, personal characteristics etc – unless it directly harms the brand image of the company or hurts the sentiment of others or hinders proper work environment.

2.5. Personal characteristics/habits also shall be treated with respect and care. No employee should be belittled by anyone due to personal preferences which includes but is not limited to - eating habits, affiliation with sports, inclination towards culture, devotion towards religion etc.

2.6. Each department shall treat other departments with respect. Any work-related complaint/grievances/issues should be notified to the respective line manager.

### **3. Sexual Exploitation and Abuse/Harassment:**

Sexual exploitation and abuse are forms of gender-based violence, which describes any harmful act perpetrated against a person's will that is based on socially-ascribed differences between men and women. CMED follows a zero-tolerance policy against SEA.

3.1. Sexually exploitative and abusive/harrassing behavior includes but is not limited to - attempted or actual sexual assault, including rape; sharing or displaying sexually inappropriate images or videos in any format; sending sexually suggestive communications in any format; sharing sexual jokes; making inappropriate sexual gestures; unwelcome touching, including pinching, patting, rubbing, or purposefully brushing up against another person; staring in a sexually suggestive manner; repeatedly asking a person for dates or asking for physical relationship; rating a person's sexuality; making sexual comments about appearance, clothing, or body parts; name-calling or using slurs with a gender/sexual connotation; making derogatory or demeaning comments about someone's sexual orientation or gender identity, taking pictures without consent.

3.2. If anyone witnesses or experiences any kind of Sexual Exploitation and abuse, including, but not limited to, bullying and harassment at the workplace, or any behavior that is unacceptable in any other way, he/she shall immediately report to his/her respective line manager.

3.3. In case of any SEA allegation, CMED shall ensure a survivor-centered approach with the aim to empower SEA survivors and promote their recovery by prioritizing their rights, needs and wishes.

3.4. Depending on the severity of the SEA allegation, CMED shall escalate the issue to be dealt with by an assigned neutral committee to ensure a prompt and justified approach. The Committee shall investigate the issue from the angles of supervisors, subordinates, peer group workers and even outsiders in case required. Identity of the survivor/victim shall not be disclosed until it is required for the sake of

investigation. Based on the committee's report, the higher management and HR of CMED shall take necessary actions. All concerned shall provide prompt, unfiltered, genuine responses in such cases.

#### **4. Conflicts of Interests:**

Conflicts of interest may arise if organizational decisions- including business dealing, recruitment, partner selection, promotional endeavor etc but limited to - taken by anyone related to the company is taken to ensure personal benefits and/or the decision goes/may go against the betterment of the company. Nepotism and Political enforcement shall have no place in the case of recruitment, decision making, downstream partner selection, and promotion in this organization.

4.1. CMED or any of its representatives (employees/owners) engagements with internal and external stakeholders shall be conducted with transparency, openness and integrity. Meanwhile, employees and others concerned with/related to CMED shall make all work-related decisions based on the objective and fair assessment of CMED's interest, without being impacted by any other considerations.

4.2. All Employees shall safeguard and make appropriate use of CMED assets or situations, which includes but is not limited to - funds, equipment, patents and copyrights, commercially sensitive information, trade secrets and patient records, salary & wage related information, personal records, in-office disputes, fund crisis etc.

4.3. If anyone witnesses or experiences any kind of situations where conflicts of interest prevails or may arise, he/she shall immediately report to his/her respective line manager.

4.4. In case any CMED personnel is in a decision-making position of another entity outside CMED and where his/her individual or collective decisions may affect CMED in any way, declaration about the possibility of such decisions should be given prior to enactment of such decisions.

#### **5. Risk Management:**

Risk management is an integral part of CMED Health Limited, which ensures proper recovery after any type of hazardous situation regarding investment decisions, strategic steps, and HR selection. This organization has a risk analysis framework matrix - RAFM\_V\_2022 , which enables safety and security from all perspectives.

#### **6. Child Protection:**

To ensure child protection and eradicate child labor, CMED abides by the Bangladesh Labour Act, 2006, the Children Act 2013 & UN Convention on the Rights of the Child. CMED treats Children with respect regardless of race, color, gender, language, religion, political or other opinion, national, ethnic or social origin, property, birth, or other protected and/or irrelevant characteristic and has Zero tolerance for child exploitation, child labour and abuse.

#### **7. Modern Slavery, Human Trafficking and Terrorism:**

CMED strictly oppose modern slavery and human trafficking and abide by the corresponding legislation of Bangladesh. In 1972, Bangladesh ratified both ILO Convention No. 29 (1930), the Forced Labor Convention and ILO Convention No. 105 (1957), the Abolition of Forced Labor Convention which prohibits forced or bonded labor, and the Factories Act and Shops and Establishments Act provide for inspection mechanisms to strengthen laws against forced labor. Bangladesh prohibits trafficking in persons under the Repression of Women and Children Act of 2000 (amended in 2003).

## **8. Procurement:**

CMED believes in fair competition and competes honestly, transparently, and fairly for business opportunities. We should treat suppliers fairly and equally. The supplier should follow CMED's principles of supplier conduct. The CEO and the Chairperson have the authority to purchase or award contracts for organizational needs. There are different spending limits for each department head. No gifts, hospitality expenses or conflict of interest is permissible. Also, the suppliers must never ask for or receive preferential treatment or special privileges or make use of the information they are not authorized to have, including non-public documents or other proprietary data, including information released to the Company under Non-Disclosure Agreements.

## **9. Occupational Health and Safety:**

Occupational safety and health is identified as the activities dealing with the prevention of work-related injuries and diseases as well as the protection and promotion of the health of workers. It aims at the improvement of working conditions and environment.

9.1. CMED strongly believes that occupational health and safety is at the basis of its ethical culture and its corporate principles and values. For such reasons, the Company is committed to continuously improving health, safety and welfare conditions at the workplace of all employees.

9.2. CMED expects from all the employees and external parties to whom this Policy has been disclosed to undertake to keep and safeguard appropriate health and safety conditions at their work environments.

## **10. Dealing with violation of COBC :**

If any employee's behavior does not meet the standards set out in the COBC, his/her line manager will take appropriate action to stop the misconduct from continuing and to prevent it from happening in the future. Managers will use the disciplinary procedure when necessary. If the personnel keeps breaking the COBC policy repeatedly or breaks it in a serious way they shall receive a formal warning or be dismissed without notice.

The usual procedure for the actions taken against any breach is given in below steps -

10.1. Initial Discussion with HR/Line manager/appointed authority

10.2. Verbal warning from Line manager

10.3. Written warning from Line manager

10.4. Formal investigation by appointed internal committee

10.5. Written communication from the Management Committee with specifications about (any of the following)

10.5.1. Further Observation period

10.5.2. Financial Restrictions (Withholding/postponing/canceling bonus, salary, promotion, other compensation/benefits etc)

10.5.3. Temporary Suspension

10.5.4. Termination notice (Before deciding whether to terminate, the company will give the employee seven working days to respond to any allegation of misconduct. If the explanation is not accepted, the organization will determine whether the contract should be terminated.)

10.5.5. Immediate termination

10.5.6. Arbitration with the presence of a third party in case the issue cannot be handled only internally.

10.5.7. Legal case against the offender in case arbitration fails.

## **11. Whistle-blowing:**

Any violation of the COBC can be put into the attention of the Board of directors by providing information through the designated emailing address: [COBC@cmmedhealth.com](mailto:COBC@cmmedhealth.com). All CMED personnel shall utilize the stated communication channel as and when appropriate. Anyone reporting violation of any/all clauses in COBC believing the violation to be illegal, dishonest, unethical, immoral or otherwise improper - shall be protected under the CMED Whistle-blower policy

11.1. CMED shall not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Human Resources immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

11.2. Whistleblower protections are provided in two important areas: confidentiality and retaliation. The confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law, and to provide accused individuals their legal rights of defense.

11.3. Whistle-blower shall, in case of lack of credibility, viability, accessibility of other channels, contact directly via email, phone or physical presence with the CEO of CMED to report violation of any/all clauses.

## **12. Amendments & other changes related to COBC**

The COBC policy is designed, approved and declared available in the year 2022 and shall be followed unless any further amendment is declared.