

STATEMENT OF ETHICS & BUSINESS PRACTICES

The following ‘Statement of Ethics’ & ‘Statement of Business Practices’ apply to all employees of **Allianz EFU Health Insurance Ltd.** and serve as a minimum standard.

Statement of Ethics

All Managers and Staff are required to:

- TM Act with honesty, integrity, and dignity as well as in an ethical manner towards Allianz-EFU, Joint Venture partners, other employees of Allianz-EFU, their customers and other business partners as well as to adhere to the legal requirements in each jurisdiction. All employees should enhance the image of Allianz-EFU and help to avoid conflicts of interests.
- TM Protect the confidentiality of client information at all times except when required by law to disclose it. The dissemination of information to the public concerning the Company is to be handled by authorized persons only.
- TM Protect the confidentiality of information relating to the company both during the course of employment and after its termination (regardless of reason). Data secrecy must be protected. Employees are prohibited from forwarding, processing or using personal data of others without authorization.
- TM Obtain written permission from the company’s Compliance Officer (or the Managing Director in the event that the Compliance Officer is unavailable) to hold any position (paid or unpaid) with any outside party, firm or organization. For clarity, positions covered include but are not limited to consultant, employee, representative and agent. Senior Management is exempt from this requirement. Furthermore all newly enrolled staff must disclose in writing to the Company, any such positions they or their immediate family members (i.e. parents, spouse or children) currently hold in companies of business partners or competitors that could lead to a conflict of interest, at the time of signing this statement.
- TM Maintain accurate records of business transactions related to the Company and its clients.
- TM Report all business or professional activities or any beneficial interests that may result in a conflict with or be competitive with the interests of the company.
- TM Reports any person or activity to the Compliance Officer or CEO that in their opinion is in violation with or be competitive with the interests of the Company.
- TM Show no discrimination against any other employee, especially with regard to origin, religion, sex or handicap.
- TM Refrain from distribution of gifts and other gratuities to private third parties in the course of the employee's duty. If considered necessary then gifts and gratuities must remain within customary limits and be of nominal value.

- ™ Refrain from demanding or accepting gifts and gratuities or other favors, neither for themselves nor for a third party, where such conduct may affect or appear to influence their business judgment or which exceed the customary limit of nominal value. In case of doubt, prior approval of the Company must be obtained.
- ™ Refrain from the usage of business documents, work tools and other valuable material & intellectual property of the Company, for personal purposes nor provide to third parties to the extent, which would negatively affect the interests of the Company.
- ™ Remain within the framework of the respective legal system and require prior approval of the Board of Management for political and charitable contributions from Company assets.

Statement of Business Practices

We believe in:

- ™ **Uncompromising integrity.** Our business is founded on trust and we manage it ethically, lawfully and fairly.
- ™ **Clients first.** Nothing we do is more important than protecting and preserving our clients interests. We hold responsibilities towards our clients in the highest regard.
- ™ **Entrepreneurship.** We work hard every day to hire the best people, motivate them, reward them and encourage them to innovate. We are a meritocracy and an equal opportunity employer.
- ™ **Passion for performance.** We contribute towards our Company's financial goals and concentrate on achieving superior results.
- ™ **A culture of excellence.** We measure our performance on every task we undertake not just by the results but also by the quality of the work.
- ™ **A tradition of success.** While we are fair and ethical at all times, we compete aggressively by providing excellent service to our clients.