



MARY MEDIATRIX MEDICAL CENTER

The Hub of Healthcare Experts

J.P Laurel Highway, Lipa City, Batangas, Philippines, 4217 Tel. (043) 773-6800



CODE OF BUSINESS CONDUCT AND ETHICS

Policies on the Following Business Conduct and Ethics Affecting Directors, Senior Management and Employees

Section 1. Scope

This Code of Business Conduct and Ethics ("Code") applies to all Mary Mediatrix Medical Center, Inc. ("Corporation" or "MMMC") directors, officers, and employees. Such directors, officers, and employees are collectively referred to herein as the "Covered Parties." For purposes of this Code, members of a Covered Party's family include his or her family members up to the second degree of consanguinity.

Section 2. Purpose

The Corporation strives to continue in upholding the highest levels of business ethics and personal integrity in all types of transactions and interactions. Thus, this Code serves to: (1) emphasize the Corporation's commitment to ethics and compliance with the law, (2) set forth basic standards of ethical and legal behavior, (3) provide reporting mechanisms for known or suspected ethical or legal violations, and (4) help prevent and detect wrongdoing.

Section 3. Ethical Standards

A. Conflict of Interest.

1. A conflict of interest exists when:
 - a. A person's private interest interferes in any way with the interest of the Corporation;
 - b. A Covered Party takes actions or has interests that may make it difficult to perform his or her work for the Corporation objectively and effectively; and
 - c. A Covered Party, or members of his or her family, receive improper personal benefits as a result of his or her position at the Corporation.
2. All Covered Parties are expected to avoid situations of conflicts of interest or impropriety.
3. *Examples of Potential Conflicts.* Some areas where a conflict may arise include:
 - a. Employment with a competitor, regardless of the nature and status of the employment, while still employed by the Corporation;
 - b. Placement of business within the Hospital premises wherein a Covered Party or any member of the Covered Party's family is still currently employed or engaged with the Corporation;
 - c. Making endorsements or testimonials for third parties in exchange for personal gain;
 - d. Disclosing the Corporation's confidential information to a third party (other than as permitted in accordance within one's departmental policy) without the prior consent of the Board;
 - e. Use of the Hospital's facilities, materials, vehicles, equipment and supplies for one's personal purpose;

- f. Doing business with any members of a Covered Party's family, or with any firm or institution wherein any Covered Party owns any interest therein, whether directly or indirectly;
 - g. Improper or illegal use of the Corporation's intellectual property; and
 - h. Other situations where a conflict of interest may arise.
 4. A Covered Party who has a personal or pecuniary interest in any enterprise with which the Corporation has an existing or intended transaction shall fully disclose the relevant facts of the situations.
- B. Corporate Opportunities.
 1. All Covered Parties are prohibited from taking for themselves opportunities that are discovered through the use of corporate property, information, or position without the consent of the Board of Directors of the Corporation.
 2. No Covered Party may use corporate property, information, or position for improper personal gain, and no employee may compete with the Corporation directly or indirectly.
 3. All Covered Parties owe a duty to the Corporation to advance its legitimate interests whenever possible.
- C. Conduct of Business and Fair Dealings.
 1. All Covered Parties shall behave honestly and ethically at all times and with all people. They shall act in good faith, exhibit respect, due care, integrity, professionalism, and integrity at all times.
 2. All Covered Parties shall engage only in fair and open competition.
 3. All Covered Parties shall not take undue advantage through misrepresentation of material facts, concealment, manipulation, abuse of privileged communication, or any other form of unfair dealing practice.
 4. All Covered Parties are prohibited from stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other entities.
- D. Receipt of Gifts and Entertainment.
 1. The Hospital objective is to deter providers of gifts or entertainment from seeking or receiving special favors from Covered Parties in connection with activities performed by or for, or business relationships established with MMMC.
 2. No gift or entertainment should ever be offered or accepted by a Covered Party or any family member of a Covered Party, unless it:
 - i. Is consistent with customary business practices;
 - ii. Is not excessive in value;
 - iii. Cannot be construed as a bribe or payoff; and
 - iv. Does not violate any laws or regulations.
 3. Gifts of more than a nominal value may cause any Covered Party to be put in a position of "obligation" and/or give the appearance of a conflict of interest. Hence, the ethics of acceptance of gifts and tokens to be given by

hospital suppliers and contractors should be observed by the Covered Parties. All gifts with a value of P500 and above shall be registered with the Materials Department and turned-over to the Human Resource Department. These gifts will be raffled-off to all employees during the Hospital Christmas Party.

4. These are examples of gifts and tokens indicated above but are not limited to the following:
 - Gift Certificates;
 - Cash;
 - Gold or other precious metals, gems or stones;
 - Appliances;
 - Gadgets;
 - Concert/sporting/entertainment events ticket;
 - Trip tickets - local or abroad and
 - Other tokens.
6. Gifts of food and other perishable items that may arrive during holidays or any other events should be shared to the entire staff even if addressed to a single employee.
7. All Covered Parties should not solicit any third party for any gift, gratuity, entertainment or any other item regardless of its value outside the legitimate solicitation coverage.
8. All Covered Parties should not seek or accept any payments, fees, loans, services or similar items from any person or entity, as a condition of doing business with the Corporation.
9. All Covered Parties may neither accept nor offer cash gifts.
10. All Covered Parties shall discuss with their supervisors, managers, or appropriate personnel any gifts or proposed gifts which they think may be inappropriate

D. Confidentiality.

1. All Covered Parties must maintain the confidentiality of confidential information entrusted to them, except when disclosure is authorized by an appropriate legal officer of the Corporation or required by laws or regulations.
2. Confidential information includes all non-public information that might be of use to competitors or harmful to the Corporation or its clients and customers if disclosed.
3. The obligation to preserve confidential information shall continue even after employment ends.
4. The provisions in MMMC's Code of Discipline shall apply in matters relating to the disclosure of confidential information. These are all detailed in MMMC's Confidentiality and Non-Disclosure Agreement which are signed by all employees upon assumption of duty.
5. All Covered Parties must secure and protect all personal information processed by the Corporation. All matters related to the disclosure of Confidential

Information shall seek consultation with the hospital's Data Privacy Officer (DPO) to ensure that the Corporation's data privacy policies are strictly implemented. All Covered Parties shall strictly comply with the Data Privacy Act of 2012.

E. Respect for Trade Secrets/Use of Non-Public Information.

1. All Covered Parties shall strictly observe the rules of the Corporation that provide for restrictions to access to classified information and controls on the release of such information to other companies, agencies, parties, or to the general public.
2. All Covered Parties shall not release classified information, unless authorized by Management.
3. All Covered Parties shall maintain the integrity of all of the Corporation's documents and records and protect them against unauthorized or improper alteration, forgery, concealment, or destruction.

F. Protection and Proper Use of Corporation Assets and Resources.

1. All Covered Parties shall endeavor to protect and ensure the efficient use of the Corporation's assets and resources, which include, but are not limited to, information, facilities, equipment, software, vehicles and supplies owned or leased by the Corporation or are otherwise in its possession.
2. The obligation of Covered Parties to protect the Corporation's assets and resources includes its proprietary information. Proprietary information includes intellectual property, such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information, and any unpublished financial data and reports. The unauthorized use or distribution of this information is illegal and shall result in civil and/or criminal penalties.
3. All Covered Parties shall use the Corporation's assets and resources efficiently, responsibly, and for legitimate business purposes only.
4. All Covered Parties shall report and suspected incident of fraud or theft for investigation.
5. The Corporation's equipment shall not be used for non-Corporation business, though incidental personal use is permitted.

G. Compliance with Laws, Rules, and Regulations.

1. The Corporation expects all Covered Parties to conduct business in accordance with Philippine laws and regulations.
2. Employees are encouraged to consult with the Corporate Governance Committee and the Corporate Secretary/Corporate Legal Counsel whenever there is any doubt concerning the legality of any matter.

3. Any suspected criminal violations will be reported to the appropriate authorities. Non-criminal violations will be investigated and addressed as the Corporation may deem appropriate.

H. Timely and Truthful Public Disclosure.

1. The Covered Parties involved in the preparation of reports and documents to be filed with or submitted with the Securities and Exchange Commission, and other regulators of the Corporation, as well as in other public communications made by the Corporation, shall make disclosures that are full, fair, accurate, timely, and understandable. Where applicable, these Covered Parties shall provide thorough and accurate financial and accounting data for inclusion in such disclosures.
2. All Covered Parties shall not knowingly conceal or falsify information, misrepresent material facts, or omit material facts necessary to avoid misleading the Corporation's independent public auditors or investors.

I. Employment & Labor Laws and Policies.

1. The Corporation is consistently compliant with Philippine labor laws, its implementing rules and regulations, DOLE department orders and circulars.
2. The Corporation's Human Resource Department shall meet regularly to, among other functions, monitor and share current trends in, including strict observance of, legislation and jurisprudence on laws, proclamations, and orders involving employee and labor relations.

J. Disciplinary Action.

1. In the spirit of its shared and corporate values, the Corporation holds all Covered Parties in esteem and believes in protecting their rights, implementing discipline with firm but fair actions. At the same time, it expects each of the Covered Parties to respect the rights of fellow Covered Parties at all times and strive to live out these shared values in conducting personal and business affairs with integrity, long-term vision, empowering leadership, commitment to national development.
2. All offenses or violations of Corporation policies and rules shall be dealt with accordingly.
3. The Corporation encourages all Covered Parties to come forward and raise serious concerns about a perceived wrongdoing, malpractice or risk involving the Corporation. The whistleblower may send or communicate a report, formally or anonymously, through a face-to-face meeting with the members of the Corporate Governance Committee.
4. The Corporate Governance Committee will forthwith conduct investigations and, applying the rules of due process, make the appropriate recommendations on personal actions.
5. Should it be determined by the Corporate Governance Committee that a whistleblower knowingly (a) submitted a report containing allegations, or (b) presented fabricated evidence, the whistleblower shall be subject to discipli-

nary or legal action pursuant to the policies and procedures of the Corporation and any applicable laws.

K. Non-Retaliation Policy

1. It is encouraged for all Covered Parties to report any known concerns, questionable activities or suspected violation of this Code without fear of reprisal, intimidation or harassment. Any report made by the whistleblower shall be considered confidential to the extent possible.
2. The Hospital shall not tolerate any retaliation in any form against anyone who, in good faith, raises a concern or reports a possible legal or ethical violation of this Code. Investigation shall be made and the Corporate Governance Committee shall take corrective actions, as necessary.
3. A whistleblower who makes a report in good faith under any circumstance under this provision shall not be subject to any form of suspension, demotion, harassment, discrimination or loss of benefits by reason of the report he/she made.

Section 4. Dissemination, Implementation, and Monitoring of Compliance with the Code of Business Conduct and Ethics and Effectivity

A. Dissemination.

1. All Covered Parties shall have copies of the Code. Part of the on-boarding program of all newly-hired employees is the orientation on the same to keep them informed in the same manner that the existing employees, as well as the directors, chairman, and senior management, are aware and informed.

B. Implementation and Monitoring Compliance.

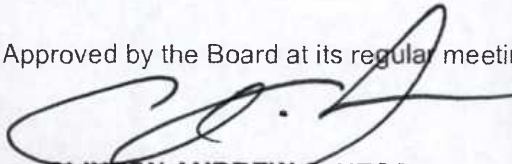
1. The Strategic Human Resource has the specific task of implementing and monitoring compliance with the provisions of the Code of Business Conduct and Ethics. It is responsible for:
 - a. Ensuring that the contents of the Code are communicated to all existing and new Covered Parties;
 - b. Requiring each Covered Party to sign an acknowledgment receipt that he or she has read and understood the same and agrees to abide with the standards and norms set forth therein;
 - c. Making the Code available on the Corporation's intranet for ease of access;
 - d. Requiring all Covered Parties to declare annually that they have complied with the Code, specifically on the provisions of conflict of interest and insider trading;
 - e. Investigating reported violations of the Code and impose sanctions for violations determined after investigation; and
 - f. Reviewing and continuously updating the Code.
2. The Management is also responsible for enforcing and monitoring compliance with the Code with their respective area of jurisdiction and taking or implementing disciplinary action after proper investigation.
3. All Covered Parties have the duty to report non-compliance with the Code and other related Corporation policies that may come to their knowledge and attention, in accordance with the relevant Corporation rules and procedures.

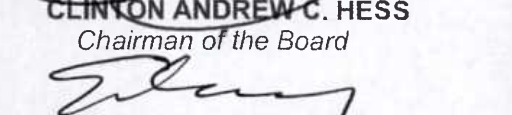
4. Any violation shall be dealt with in accordance with the procedures provided in other existing Corporation policies and proper observance of the requirements of due process. This shall be without prejudice to the filing of any legal action against the party concerned under existing laws.

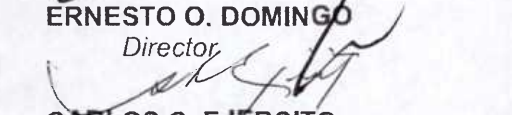
C. Effectivity

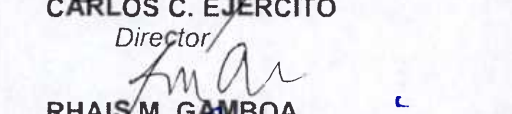
The Code or any amendments hereof shall become effective after its approval by the Board.

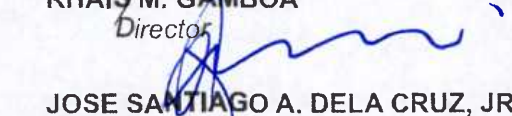
Approved by the Board at its regular meeting on 29 March 2023.

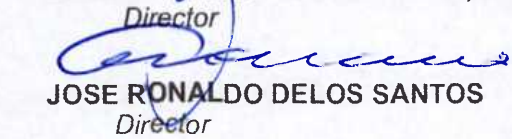

CLINTON ANDREW C. HESS
Chairman of the Board

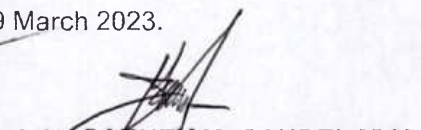

ERNESTO O. DOMINGO
Director

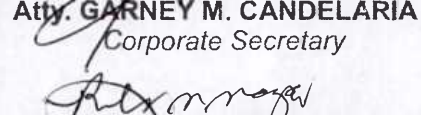

CARLOS C. EJERCITO
Director

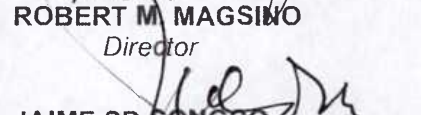

RHAIS M. GAMBOA
Director

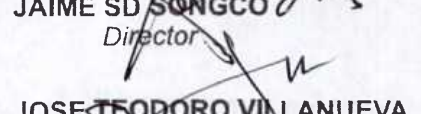

JOSE SANTIAGO A. DELA CRUZ, JR.
Director

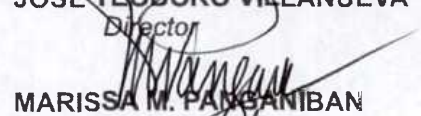

JOSE RONALDO DELOS SANTOS
Director



Atty. GARNEY M. CANDELARIA
Corporate Secretary


ROBERT M. MAGSINO
Director


JAIME SD SONGCO
Director


JOSE TEODORO VILLANUEVA
Director


MARISSA M. PAMBANIBAN
Director


ERIKA CHESKA G. MARTIREZ
Director