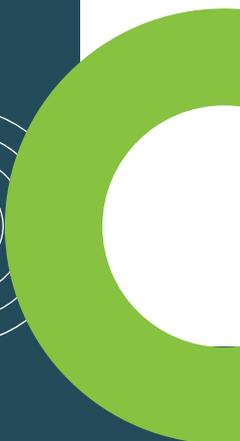


CODE OF ETHICS / CODE OF CONDUCT



Purpose

This Code of Ethics / Code of Conduct (“Code”) sets out the minimum ethical standards and behavior expected from all directors, officers, and employees of AsianCare in their dealings with members, providers, co-workers, shareholders, regulators, and the public.



All are expected to:

- Uphold the reputation of AsianCare;
- Act with honesty, fairness, and professionalism;
- Comply with applicable laws, regulations, and company policies;
- Respecting confidentiality;
- Avoiding conflicts of interest;
- Promote accountability and inclusivity;
- Commit to continuous improvement;
- Encourage reporting of unethical behavior.

Core Values



Integrity

·We act honestly and honor our commitments



Professionalism

·We deliver competent, timely, and high-quality service



Compassion

We treat members with empathy and respect



Accountability

We take responsibility for our decisions and actions



Respect

We value diversity, dignity, and the rights of others

Conflicts of Interest

- Directors, officers, and employees shall avoid situations where personal interests conflict or appear to conflict with the interests of the Company or its members.

Examples include:

- Having a financial interest in a supplier, provider, or competitor;
- Using one's position to obtain personal benefits or favors.
- Any actual or potential conflict shall be disclosed in writing to the immediate superior, the Compliance Officer, or the Board, as appropriate.
- A person with a conflict shall abstain from participating in decisions involving the matter.

Confidentiality and Data Privacy

- All personal, medical, and financial information relating to members, providers, and employees is confidential.
- Such information shall be:
 - Accessed only for legitimate business purposes;
 - Disclosed only to authorized persons;
 - Protected in accordance with the Data Privacy Act and company policies.
- Employees must not disclose or misuse confidential information during or after their employment with the Company.



Fair Dealing and Claims Handling

- Employees must treat all members and providers fairly and without discrimination.
- Claims shall be handled:
 - Promptly and objectively;
 - Based on medical necessity, plan coverage, and regulatory requirements;
 - Without undue delay, favoritism, or personal bias.
- Any attempt to influence claims decisions through improper payments or favors must be refused and reported.



Anti- Bribery, Gifts, and Hospitality

- The Company prohibits bribery and corrupt practices in any form.
- Employees shall not:
 - Offer, give, solicit, or accept any bribe, kickback, or improper payment;
 - Receive gifts, hospitality, or favors that may influence, or appear to influence, business decisions.
- Modest, customary business courtesies may be accepted only if:
 - Permitted under company policy;
 - Not excessive;
 - Properly declared and approved when thresholds are exceeded.

Use of Company Assets and Records

- Company resources, including funds, equipment, systems, and information, must be used solely for legitimate business purposes.
- Employees must:
 - Safeguard Company assets from loss, theft, or misuse;
 - Ensure that records and reports are accurate, complete, and not misleading;
 - Never falsify, alter, or destroy documents to conceal wrongdoing or mislead auditors or regulators

Employment Practices and Workplace Conduct



- AsianCare is dedicated to maintaining a workplace that is safe, healthy, and respectful for every employee.
- Any form of discrimination, harassment, bullying, or abusive behavior is strictly prohibited and will not be tolerated.
- Employees are expected to:
 - Treat all colleagues with dignity, respect, and courtesy at all times
 - Comply fully with all health and safety policies and procedures to ensure a secure work environment
 - Avoid working while impaired by alcohol, illegal drugs, or any substances that could affect performance or safety
 - Foster a positive and inclusive workplace culture that values diversity and teamwork
 - Promptly report any unsafe conditions, misconduct, or violations of company policies
 - Uphold professionalism and integrity in all workplace interactions and responsibilities

Whistle Blowing and Reporting Violations



- Directors, officers, employees, and external stakeholders are encouraged to report suspected violations of this Code, company policies, or applicable laws, including:
 - Fraud or theft;
 - Corruption or bribery;
 - Serious conflicts of interest;
 - Data privacy breaches;
 - Material regulatory violations.
 - Reports may be made to:
- Reports may be made to:
 - The immediate superior;
 - The Compliance Officer;
 - The President or Board Chairperson, as appropriate.
- The Company shall:
 - Investigate reports promptly and fairly;
 - Keep the identity of the reporter confidential to the extent possible;
 - Prohibit retaliation against anyone who reports in good faith.

Compliance and Sanctions

- Adherence to this Code is a condition of continued employment or service.
- Violations may result in:
 - Verbal or written warnings;
 - Suspension;
 - Dismissal;
 - Civil or criminal action, where applicable.

Awareness, Training, and Acknowledgment

- All directors, officers, and employees shall:
 - Be oriented on its contents upon hiring or appointment;
 - Participate in periodic ethics and compliance training.
- They shall sign an acknowledgment stating that they:
 - Have read and understood the Code;
 - Agree to comply with it;
 - Undertake to report any known or suspected violations.