Code of Ethical Conduct
Of
CHC Healthcare Group (The "Company")

Article 1 Purpose of and basis for adoption

In order to encourage directors and managerial officers of the Company(including general managers or their equivalents, assistant general managers or their equivalents, deputy assistant general managers or their equivalents, chief financial and chief accounting officers, and other persons authorized to manage affairs and sign documents on behalf of the Company) to act in line with ethical standards, and to help stakeholders better understand the ethical standards, the Company made the code of ethical conduct to be followed.

Article 2 Content of the code

1. **Prevention of conflicts of interest:**
   Conflicts of interest arise when personal interests interfere or are likely to interfere with the overall interests of the Company, as for example when a director or managerial officer is unable to perform their duties objectively and efficiently, or when their position in the Company enables them, their spouse, or relatives within the second degree of kinship to obtain improper benefits. The Company shall pay special attention to transactions involving loans of funds, provisions of guarantees, major asset transactions, or the purchase and sale of goods with affiliated enterprises related to the aforementioned personnel. The Company shall establish policies to prevent conflicts of interest and provide appropriate channels for directors or managerial officers to proactively disclose any potential conflicts of interest with the Company.
2. **Minimizing incentives to pursue personal gain:**
   The Company shall prevent its directors or managerial officers from engaging in any of the following activities:
   (1) Seeking an opportunity to pursue personal gain by using the Company's property or information or taking advantage of their positions.
   (2) Obtaining personal gain by using the Company's property or information or taking advantage of their positions.

(3) Competing with the Company. When the Company has an opportunity for profit, it is the responsibility of the directors and managerial officers to maximize the reasonable and proper benefits that can be obtained by the Company.

3. **Confidentiality:**
   The directors and managerial officers of the Company shall be bound by the obligation to maintain the confidentiality of any information regarding the Company itself or its suppliers and customers, except when authorized or required by law to disclose such information. Confidential information includes any undisclosed information that, if exploited by a competitor or disclosed, could result in damage to the Company or the suppliers and customers.
4. **Fair trade:**
   Directors and managerial officers shall treat all suppliers, customers, competitors, and employees of the Company fairly, and may not obtain improper benefits through manipulation, nondisclosure, or misuse of the information learned by virtue of their positions, or through misrepresentation of important matters, or through other unfair trading practices.
5. **Safeguarding and proper use of company assets:**
   All directors and managerial officers have the responsibility to safeguard the Company's assets and to ensure that they can be effectively and lawfully used for official business purposes; any theft, negligence in care, or waste of the assets will all directly impact the Company's profitability.
6. **Legal compliance:**
   The Company shall strengthen its compliance with the "Securities and Exchange Act" and other applicable laws, regulations, and bylaws.
7. **Encouraging reporting on illegal or unethical activities:**
   (1) The Company shall internally establish and publicly announce on its website and the intranet, or provide through an independent external institution, an independent mailbox or hotline, for the Company's insiders and outsiders to submit reports. Relevant matters shall be handled pursuant to "Whistle-blowing System" of the Company.
   (2) The Company shall raise awareness of ethics internally and encourage employees to report to an independent director, managerial officer, chief internal auditor, or other appropriate individual of the Company upon suspicion or discovery of any activity in violation of a law or regulation or the code of ethical conduct. In order to make employees aware that the Company will use its best efforts to ensure the

safety of informants and protect them from reprisals, the Company will treat reported cases confidentially and investigate through independent channel.

8. **Disciplinary measures:**

   When a director or managerial officer violates the code of ethical conduct, the Company shall handle the matter in accordance with the disciplinary measures established in the code of ethical conduct and shall without delay disclose on the Market Observation Post System the date of the violation, reasons for the violation, the provisions of the code violated, and the disciplinary actions taken. The Company shall also establish an appeal system to provide remedies for individuals who violate the code of ethical conduct.

Article 3 Procedures for exemption

Any exemption for directors or managerial officers from compliance with the code of ethical conduct shall be approved by the board of directors, and that information on the date on which the board of directors adopted the resolution for exemption, objections or reservations of independent directors, and the period of, reasons for, and principles behind the application of the exemption be disclosed without delay on the MOPS, in order that the shareholders may evaluate the appropriateness of the board resolution to forestall any arbitrary or dubious exemption from the code, and to safeguard the interests of the Company by ensuring appropriate mechanisms for controlling any circumstance under which such an exemption occurs.

Article 4 Method of disclosure

The Company is advised to disclose the code of ethical conduct it has adopted, and any amendments to it, on its company website, in its annual reports and prospectuses and on the MOPS.

Article 5 Enforcement

The Company's code of ethical conduct, and any amendments to it, shall enter into force after it has been adopted by the board of directors and submitted to a shareholders' meeting.

Version	Date of Implementation/Amendment	Type of Approval
1	2014/03/27	Approved by Board of Directors
2	2015/03/23	Approved by Board of Directors

3	2017/08/10	Approved by Board of Directors
4	2025/03/12	Approved by Board of Directors