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Code of Ethics & Conduct

PURPOSE

1. This Code of Conduct aims to:
   - Provide ethical guidance to employees
   - Establish a set of generally accepted principles, based on the Company's values, that define our daily behaviour and practice
2. In its preparation, account was taken of the Code of Medical Ethics, the Nursing Regulations, the Law on the Safeguarding and Protection of Patients' Rights (2004), and the legal provisions of Cypriot and European legislation relating to health and business activity.
3. All employees must familiarise themselves with the content of the Code and are accountable for observing its rules and principles.

POLICY

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BUSINESS ETHICS & COMPLIANCE WITH REGULATIONS

1. Our mission is fundamental to who we are and what we do. The principles that govern it form the basis of this Code of Ethics and Conduct.
2. We comply with all legislative and regulatory provisions that govern how we operate. This Code of Conduct is the official statement of the standards and rules of ethical business conduct of NAPA OLYMPIC Private Hospital.
3. In addition to all other Company directives and policies, the following set out the primary expectations of every employee or associated staff member in the performance of their daily work.

We are honest in our communication and business relationships

4. We are honest and clear when speaking with patients and their families, staff members, auditors and inspectors, government bodies and their representatives, and, in general, with everyone we deal with. We do not make misleading statements about our services or the services of our competitors.
5. We are honest in documenting the care we provide, in charging for materials and services, and in the financial claims we make for the services we provide. We are entirely accurate and honest in submitting claims, issuing bills and preparing costing reports.
6. NAPA OLYMPIC Private Hospital operates transparent invoicing and collection procedures. Patients are informed, both before and during their hospitalisation, about the progress of their financial obligations and the cost of each examination they are to undergo.
7. We do not copy material that is subject to copyright laws, and we do not make improper use of any confidential business information obtained from a competitor.

We operate in accordance with competition (antitrust) legislation

8. At NAPA OLYMPIC Private Hospital we are committed to conducting our activities within the framework of fair competition and in strict compliance with all applicable legislation.
9. We behave in a manner that does not contravene fair competition.
10. We do not engage in actual or apparent business activities that could be interpreted as collusion with others aimed at undermining a fair and competitive market.
11. We do not accept bribes of any kind from sellers, buyers or anyone else.
12. We do not breach trade secrecy, commit fraud, or engage in similar unfair practices.
13. We are committed to our procurement policy, through principles and regulations aimed at providing a structured, effective and controlled operating framework for the procurement of materials and services. Our aim is to ensure uninterrupted and reliable sources of supply.
14. We do not use any unfair means against the competitors of NAPA OLYMPIC Private Hospital, whether through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any negotiation or conduct of unfair transactions.

We strive to prevent any unlawful activity that may affect either our operation or our dealings with government or local authorities.

15. We comply with lawful and reasonable requests for information from government departments, auditors or other senior officials, in a timely and orderly manner.

16. We treat all government inspectors and auditors with respect; at the same time, bribery and any form of personal favour to public or government officials is prohibited.

EMPLOYMENT RELATIONS

17. At NAPA OLYMPIC Private Hospital, people make the difference. Every employee performs important work. To support our employees and the mission of NAPA OLYMPIC Private Hospital, Management has assumed the role of overseeing employment relations.

18. We strive to recruit and retain the best employees, offer competitive pay and benefits, apply policies and procedures for fair treatment, communicate openly and honestly with employees, listen to their views, promote their development, recognise their efforts, and maintain a positive and safe working environment.

19. We encourage our colleagues to develop their skills and abilities.

20. We support our colleagues with training programmes.

21. Through our actions and words, we create an atmosphere of which we are proud and which patients, families, employees and the public admire.

We follow and comply with the Principles of the United Nations Global Compact, which are based on the internationally recognised principles of the protection of Human Rights, as set out in the Universal Declaration of Human Rights.

22. We support equal employment opportunities.

23. We treat one another with fairness and respect.

24. We do not permit discrimination on grounds of gender, race, national origin, religion, colour, age, marital status, sexual orientation or disability.

25. We recognise diversity among our staff and associates as a source of strength and an advantage in providing quality care.

26. We do not permit the recruitment or employment of persons who have not reached the legally prescribed minimum working age, and we ensure that all our partner companies adopt the same policies.

27. We do not permit sexual or any other type of harassment.

28. We work to build an environment of understanding and respect in which anyone can raise and openly discuss their concerns about ethical conduct, particularly with their supervisor, without fear of punishment or any other form of retaliation.

29. We recognise the importance of family and other obligations, and we help one another resolve any issues that arise between these and work.

30. We recognise the right of association and the right to collective bargaining.

PATIENT CARE QUALITY & SAFETY

Quality Care

31. All our actions advance our commitment to provide the highest quality of care to our patients. The 6 characteristics of quality care (according to the Institute of Medicine, 2001) are:

- ***Safe*** – avoiding harm to patients as a result of the care provided to them
- ***Effective*** – providing services based on scientific knowledge, best practices and cost-benefit considerations
- ***Patient- and family-centred*** – providing care that respects and responds to the individual preferences, needs and values of the patient and family, ensuring that patients' values guide clinical decisions
- ***Timely*** – reducing waits and, at times, harmful delays for both those who receive and those who provide care
- ***Efficient*** – avoiding the wasteful use of resources, including equipment, supplies, ideas and energy
- ***Equitable*** – providing care that does not vary in quality because of personal characteristics such as gender, ethnicity, geographic location, socio-economic status, sexual orientation or perceived disability.

32. We treat all patients with dignity, respect and courtesy.

33. We provide clear, accurate, honest and transparent information about the quality of the care we offer our patients, so that they can make informed decisions about their care.

34. We have made provision for, and facilitate, easy access for patients with mobility problems throughout the premises of NAPA OLYMPIC Private Hospital.

35. We ensure that safety rules are observed inside the Hospital and in the surrounding outdoor area, so as to minimise or eliminate the risk of disturbance to the peace of patients and their companions, the risk of theft, or other incidents.

36. We take all appropriate measures for the safety of high-risk patients. Our staff are suitably and adequately trained to deal with such cases.

37. Every patient, upon admission and throughout their stay, receives full and accurate information regarding admission, hospitalisation, the Hospital's regulations and the discharge procedure.

38. Our primary concern is to provide high-quality services. To respond to patients' needs, complaints and comments, there is a procedure for submitting suggestions, comments and complaints by completing a dedicated form. The Quality Directorate handles complaints and arranges the response to each individual case, with the participation and cooperation of all persons involved.

39. We consider it our duty to report to our superior or to Management any errors or shortcomings in the care we provide, even if some appear minor or insignificant.

Patient Rights and Choices

40. We inform and encourage patients and their families to take part in decisions about their treatment, to the extent that this is practical and possible and provided for by the relevant legislation (indicatively, the Code of Medical Ethics).

41. Patients and their families are informed of their rights and obligations upon admission, including information about the right to make decisions about their care. We take particular care with special categories of patients (e.g. minors, elderly or vulnerable patients, patients with disabilities, and foreign nationals who do not speak Greek). We ensure that, by identifying these patients, we assist them and keep them safe during the provision of medical and nursing care, by providing the necessary information in the most comprehensible and appropriate way for each case.

42. We provide our services after having first informed patients of the actual state of their health, the proposed medical procedure and the alternative treatment options, as well as the risks and expected outcomes associated with the care provided. The information given to the patient must enable them to form a full picture of the medical, social and financial parameters of their condition and to consent to procedures that may affect their later life. For the performance of medical procedures (diagnostic and/or therapeutic), such as invasive or surgical procedures, the administration of anaesthesia, etc., the patient's prior consent is required, following information by the attending physician. The patient or their legal representative / the person acting on their behalf (if the patient is unable or incapable of consenting) signs the relevant consent forms, which are filed in the Patient File.

43. We respect the wish of some patients not to be informed about their condition, in order to be spared the psychological burden that unwelcome information about their health may cause. This entails a different recipient of the information on the part of the physicians, and the principle of information and consent is not bypassed.

44. In the case of patients with an incurable illness in its terminal stage, even when all medical treatment options have been exhausted, we ensure the relief of psychological and physical symptoms. We offer them palliative care and cooperate with their families to that end.

45. We provide a coordinated discharge plan to all patients for whom it is deemed necessary as part of their care plan, in order to support their needs after discharge.

46. We respect the religious, philosophical, ethical or cultural views and beliefs of patients. Our own views on the patient's way of life, beliefs and social or economic status do not affect the care or treatment we provide.

Emergency Care

47. We provide our services for the management of emergency cases, even if the patient is unable to pay or is not covered by insurance, until the patient is stabilised and referred to a physician of the appropriate specialty or transferred to an appropriate care and treatment facility.

Charitable Care and Discounts

48. We offer financial assistance to patients, in the form of discounts or free charitable care, provided in a way that corresponds to the individual financial situation of the patient.

Cardiopulmonary Resuscitation

48. We act in accordance with the provisions of the legislation in force.

Second Medical Opinion

49. In our effort to provide the best possible diagnosis and treatment for our patients, we accept the patient's right to a second medical opinion.

Disagreement among the patient's family members regarding treatment

50. The services at our Hospital are provided guided by the fundamental principles of bioethics: respect for autonomy, beneficence, nonmaleficence and justice, particularly in addressing and resolving ethical dilemmas, always in compliance with the applicable legal framework and with regard for the interests of patients and respect for their personality, particularities and needs.

51. The Attending Physician bears sole responsibility for the patient's treatment and ensures timely and honest information and communication with the patient and their family, in order to foster a climate of trust within which decisions are made during hospitalisation.

52. Medical and nursing staff ensure that the patient's state of health is fully explained and clarified, and that any disagreement between members of the patient's family is smoothed over, behaving in a decent, courteous and dignified manner so as to maintain a calm environment befitting a hospital.

53. Cases of bioethical issues and related disagreements may be referred to the Ethics and Conduct Committee for an opinion, in accordance with the rules governing the practice of the medical profession and as provided in the institutional framework in force from time to time.

ENVIRONMENT, OCCUPATIONAL HEALTH & SAFETY

54. We are committed to protecting the environment and preventing pollution, safeguarding occupational health and safety, and preventing workplace accidents and occupational diseases.

55. We are moving towards "green" operating practices, applying an environmental policy with regard to the construction of premises, energy saving, control of water and paper consumption, waste reduction and proper waste management.

56. We monitor and apply national and EU environmental legislation and all legal and regulatory requirements. Our compliance with the law, and our initiatives that go beyond merely meeting legal requirements, are strategic corporate objectives.

CONFLICT OF INTEREST

Throughout this "section", the first person plural refers to the employee and not to the Company.

57. We do not allow outside activities, or financial or other personal interests, to affect our ability to make fair decisions in the course of our work.

58. We select medicines, materials, medical technology equipment, etc. on the basis of their performance in caring for our patients and their cost, not on the basis of personal relationships and friendships.

59. We avoid recommending, or working with, companies in which members of our family have a financial interest, unless we have reported it to Management and have first obtained written approval.

60. We do not allow personal relationships to unjustifiably bias recruitment choices.

61. If we believe we may have a conflict of interest, we report it to Management.

PROMOTING TRANSPARENCY – COMBATING CORRUPTION

Throughout this "section" (except for 69), the first person plural refers to the employee and not to the Company.

62. NAPA OLYMPIC Private Hospital voluntarily follows and complies with the 10th Principle of the United Nations Global Compact, which is based on the promotion of transparency, as set out in the United Nations Convention against Corruption.

63. We avoid even the suspicion of improper or unlawful influence in the provision of care to patients.

64. We do not solicit, accept or offer money, gifts, entertainment or other items of value or any other benefit in order to influence the referral of patients to us.

65. We do not solicit, accept or offer money, gifts, entertainment or other items of value or any other benefit in order to influence the procurement of goods or services, the leasing of premises or equipment, or the conclusion of contracts.

66. We do not offer patients goods or services free of charge or at a discount without the approval of Management.

67. We do not request or demand money, gifts or any other personal benefit from patients or their families. The acceptance of voluntary tips or token gifts, offered spontaneously as an expression of gratitude, is permitted in accordance with the Hospital's rules, provided that it does not affect the quality of the care provided and does not entail any preferential treatment of patients.

68. We do not offer any financial incentive, gift, remuneration or bribe in order to induce, influence or reward decisions of a public body, customer, subcontractor or supplier in a commercial transaction, or of any person in a position to favour NAPA OLYMPIC Private Hospital or its executives in any way.

69. Any donations to political parties or persons associated with them are prohibited. Furthermore, all employees are prohibited from representing, or appearing to act on behalf of, NAPA OLYMPIC Private Hospital in any political activity they carry out in their private life.

PROTECTION OF ASSETS

70. We use the assets and fixed assets of NAPA OLYMPIC Private Hospital solely for the benefit of the company and never for personal gain. Assets include Patient Files, copyrights, research data, business strategies and plans for the corporate activity of NAPA OLYMPIC Private Hospital.

71. We have an obligation to protect the tangible and intangible assets of NAPA OLYMPIC Private Hospital.

PRIVACY, CONFIDENTIALITY & PERSONAL DATA

72. Patients and their families trust us with highly personal and sensitive information about their medical condition. If they do not feel confident that we safeguard the privacy and confidentiality of this information, they may hesitate to discuss some of their concerns with us, which may affect medical decision-making and hinder the provision of care.

73. We collect information about the patient's condition, personal and family history, medication and other relevant information in order to provide quality care. We understand the sensitive nature of this information and we protect the patient's privacy.

74. We comply with the General Data Protection Regulation and national legislation and apply an Information Security Policy, which includes the following:

- We access, use and disclose only the minimum necessary patient information to carry out our work.
- We do not discuss patients' personal and health data with third parties who have no need to know and are not involved in the care of the specific patients, including colleagues, associates, family and friends.
- We do not share user credentials or passwords for our electronic systems, and we log out of our computers when we step away from them.
- We assess our surroundings when speaking with or about patients and speak quietly, always asking for their permission to talk about their care when companions or family members are present.
- We check Patient Files to ensure that the personal and health data of one patient are not mixed with those of another, and that patient labels contain correct and accurate details.
- We store Patient Files in such a way as to ensure that access to them is limited to those who need it in the course of their work.
- Any documentation and documents that include patients' personal data, as well as health data, are not thrown into ordinary waste but are kept until their appropriate and secure destruction, in accordance with the requirements of the legislation in force.

- We report all privacy concerns or possible breaches of the Information Security Policy immediately to the Information Security Officer of NAPA OLYMPIC Private Hospital.
- We maintain medical records, in electronic or physical form, containing sensitive personal data related to patients' health. The provisions of the relevant legislation apply to the maintenance of these records and the processing of their data.
- In accordance with the Hospital's explicit procedures, test results are handed over only to the patient themselves or to a person designated by the patient, through procedures that are acceptable and compliant with the legislation.

75. NAPA OLYMPIC Private Hospital has established the role of a Data Protection Officer, who has guarantees of independence and monitors compliance with the law, while also serving as the point of contact with the supervisory Personal Data Protection Authority.

76. We apply in full the fundamental principles for the lawfulness of every kind of personal data processing. Specifically:

- Principle of lawfulness, fairness and transparency
- Principle of purpose limitation
- Principle of data minimisation
- Principle of data accuracy
- Principle of storage limitation
- Principle of integrity and confidentiality
- Principle of accountability of the controller

77. We are committed to safeguarding the fundamental rights of patients and are accountable for documenting them before the Personal Data Protection Authority. Specifically:

- **Right to information and access to data**, so that the data subject receives fuller and clearer information when their data are collected for processing, and has the right of access to them.
- **Right to rectification**, so that the data subject has the right to require the controller to correct inaccurate data and to complete incomplete data concerning them.
- **Right to restriction of processing**, under which the data subject is entitled to obtain from the controller the restriction of processing under specific conditions.
- **Right to object to processing**, under which the data subject has the right to object to the processing of their data under specific conditions, in particular in the case of profiling or for direct marketing purposes.
- **Right to data portability**, under which the data subject is entitled to receive, or to request the transfer of, their data in a machine-readable format from one controller to another under specific conditions, if they so wish and where technically feasible.

78. All kinds of patient data (sensitive and personal) are confidential and must not be disclosed to any third party, except in cases where: (a) the data subject has given consent, (b) a provision of Law so provides, (c) a court order requires it.

79. The communication or disclosure in any way of any kind of data (personal and sensitive) to third parties, natural or legal persons, is prohibited, unless this is required and provided for by law, such as

to the Judicial and Prosecuting Authorities, the Tax Authorities, State bodies legitimised by their statutory provisions, bailiffs, the social insurance institutions in which the insured person is compulsorily enrolled, and the insurance companies with which the Patient has concluded an insurance contract and which the Patient has expressly and specifically authorised to request from the Hospital data concerning their health.

80. Employees are prohibited from disclosing, circulating or handing over information that comes to their knowledge because of their work, and in particular information concerning the results of any kind of medical procedures and tests relating to patients, to any third party other than the Patients themselves, unless that third party holds a written authorisation with the Patient's signature authenticated by any public authority.

81. In particular, employees in the Hospital's Medical Records Department, where Patient Files are kept, are not permitted to hand over information from these files to any third party, even a relative of the patient, unless they have been specifically and expressly authorised.

82. Employees are not permitted to make announcements or statements to any third party, and in particular to the Mass Media (print and electronic), concerning the fact of hospitalisation and the provision of Medical Services in general to patients, or their state of health.

83. Employees are not permitted to appropriate in any way, or use, the client base of NAPA OLYMPIC Private Hospital for any reason or cause, and in particular to channel it, whether in exchange for consideration or not, to third parties, natural or legal persons, so that the latter may in turn exploit it in any way.

84. Even in the event of termination of the employment contract or of the relationship that links the employee with NAPA OLYMPIC Private Hospital, the employee is, on the one hand, obliged to hand over all data and information of any kind that they held by reason of their work and, on the other, obliged, even after their departure, to keep confidential all data of any kind (personal and sensitive) of patients that came to their knowledge by reason of their work there.

85. Employees safeguard the data (personal and sensitive) of their colleagues that came to their knowledge by reason of their work.

BILLING, ACCOUNTS & FINANCIAL MATTERS

Coding and Billing

86. NAPA OLYMPIC Private Hospital ensures that the bills issued to the public sector, third parties and patients are accurate and in accordance with the laws and regulations in force.

87. Coding is the way health information is identified and classified, such as diagnoses and procedures, materials and medicines, as provided to the patient and documented in their File. By using coding in the invoicing process, we identify the charges for the services provided.

88. Our commitment to timely, complete and accurate coding and billing includes the following principles:

- We charge for services that have actually been provided, have been documented in the Patient File and were carried out in accordance with the medical instructions of the attending physician.

- We assign billing codes that we believe accurately represent the services we provide and are supported by documentation in the Patient File.
- We apply controls to prevent overbilling, duplicate charges for the same service, and other billing errors.
- We respond to inquiries relating to coding and billing and promptly resolve any inaccuracies identified and confirmed in bills issued.
- We make every effort to ensure that employees and/or subcontractors who bill or code services have: (a) the necessary qualifications, (b) quality assurance procedures, and (c) appropriate mechanisms to ensure that charges are accurate and complete.
- We do not knowingly claim payments that are false, fictitious or fraudulent.
- We inform the patient promptly upon admission about the payment of an advance, depending on their accommodation category, as well as the expected cost.
- In our effort to control patient charges, we ensure that patients are not subjected to diagnostic or other examinations except where the patient's attending physician deems it necessary.

Integrity of Financial Reports and Non-Financial Information

89. We maintain a high level of accuracy and completeness in documenting all our financial records. These records form the basis of the Hospital's business management and are important in order to meet our obligations to patients, staff, suppliers and all stakeholders. These records are also necessary for our compliance with tax requirements and the submission of financial reports. The accounting records of NAPA OLYMPIC Private Hospital and the supporting documents are designed to describe and reflect the true nature of its transactions.

90. Our financial information represents the business transactions actually carried out and is provided in accordance with generally accepted accounting principles and the laws and regulations in force.

91. We cooperate fully with internal and external audit and regulatory bodies. The employees and executives of NAPA OLYMPIC Private Hospital must, within the scope of our duties, provide auditors with accurate and truthful information on the financial and non-financial data of NAPA OLYMPIC Private Hospital.

92. The Company's financial statements are prepared in accordance with International Financial Reporting Standards (IFRS) and are audited by Certified Auditors as provided by the legislation in force.

93. The Company is committed to the quality, integrity and transparency of financial and non-financial data, so that they are recorded and reported with accuracy, objectivity and always within the prescribed deadlines.

94. The correct and accurate keeping of records is a necessary condition for the smooth operation of NAPA OLYMPIC Private Hospital. All information created and used in the course of the activity of NAPA OLYMPIC Private Hospital is kept and preserved in the records.

Our Relationship with Shareholders

95. The established control mechanisms and procedures of NAPA OLYMPIC safeguard transparency and integrity towards Shareholders and investors and strengthen their unwavering trust in NAPA OLYMPIC.

96. Through ethical management and transparency practices, the company ensures systematic, prompt, clear and equal information for the investment community on the financial data, business developments, strategy and objectives of NAPA OLYMPIC.

97. NAPA OLYMPIC Private Hospital authorises specific persons to communicate with the financial community. If an employee receives questions and does not have explicit authorisation to answer, they must forward the question to the Finance Department.

CORPORATE GOVERNANCE

98. The Board of Directors is the guardian of the Principles of Corporate Governance. The structure and responsibilities of the Board of Directors are set out in the articles of association and are in accordance with the legislation in force, while the members have been elected in accordance with the independence criteria provided for by the Law.

99. The Board of the Company consists of members with integrity of character, breadth of knowledge, suitable qualifications and experience, for the formulation of corporate strategy and the oversight of Management, with the aim of maximising the value of the Company and defending the rights of Shareholders and of Stakeholders in general.

OBLIGATION TO REPORT & COOPERATE

100. We are responsible for complying with the standards of ethics, regulations, policies and procedures issued by NAPA OLYMPIC Private Hospital.

101. The obligation to comply with the legislation in force is a duty and a fundamental obligation of all the Company's employees.

102. Our commitment to these principles and Values must be ensured by the daily conduct of all of us. It is necessary that each of us has understood clearly what ethically appropriate business conduct is required to be.

CORRECTIVE ACTIONS

103. We adapt our strategic planning, guided by our healthy growth, proceeding with business moves and exploiting, with a long-term focus and commitment, every opportunity that creates added value. Our priority remains that all the services provided by our Hospital remain on a par with the highest quality worldwide.

104. As part of our continuous self-assessment and self-improvement, the views of employees are important, and we welcome any improvement suggestions or comments from our staff.

105. We reduce any deviations from our operating standards and from best international practices through appropriate quality-improvement actions, and we monitor their effectiveness through indicators and measurements. Whenever deviations or undesirable trends in the performance of operations are identified, we take the appropriate corrective actions.

BUSINESS DECISIONS

106. This Code helps us make ethical business decisions. However, it is not designed to answer every issue. An employee may find themselves facing a situation in which it is not clear which course to follow. When this happens, the employee should ask themselves the following questions:

- Is it consistent with our mission and values?
- Is it illegal?
- Is it unethical?
- Could it harm patients?
- Could it harm colleagues, associates or physicians?
- Could it harm NAPA OLYMPIC Private Hospital financially?
- Would the reputation of NAPA OLYMPIC Private Hospital be at stake if it became publicly known?
- Would we feel uncomfortable reading about it in the newspaper and/or on social media?
- Is it consistent with the procedures and the Code of Ethics and Conduct?

107. If the employee is still in doubt about which decision to make or what to do, they should turn to their supervisor.