

Letter from the Chief Executive Officer and Chairman and the Group Medical Director

Every day, millions of people put their trust in International SOS to help them wherever they live or travel. We remain dedicated to maintaining this trust by providing efficient and compassionate assistance services to our clients. The commitment to our clients is evident in our sound reputation and strong position in the marketplace.

In their work, International SOS employees demonstrate core corporate values including: passion, expertise, respect and care. Our employees follow the Code of Conduct and Ethics, a set of principles by which we behave to operate a safe, honest, and responsible business. The Code of Conduct and Ethics is a rigorous set of standards and in many cases goes beyond the requirements of the law.

Our commitment to the Code of Conduct and Ethics is an important part of our reassuring brand - demonstrating how we put the interests of our clients and members first to make a real difference in people's lives. Our ethics and values give us pride in our work and organization and help us sustain our standing as socially responsible organization and good corporate citizens. International SOS is committed to maintaining its reputation as a trustworthy, ethical company so we can continue to grow and succeed for many years to come.

Arnaud Vaissié
Chairman and CEO

Dr Pascal Rey-Herme
Group Medical Director



INTERNATIONAL SOS

Code of Conduct and Ethics

Version 1.11

Document Owner: **Legal**

Document Manager: **Group General Counsel**

Effective: **May 2026**

POLICY

**WORLDWIDE REACH.
HUMAN TOUCH.**

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1. INTRODUCTION

1.1. Purpose

- 1.1.1. This Code of Conduct and Ethics (the "Code") has been adopted by International SOS to provide guidance to all employees in their conduct towards other stakeholders, customers, service providers, partners, government authorities and the general public.
- 1.1.2. This Code applies to **officers** and **employees** of International SOS and all **directors** appointed by International SOS, throughout the world.
- 1.1.3. As our future depends on our reputation, this Code goes beyond the requirements of the law.
- 1.1.4. As an employee, you are expected to act with the highest levels of honesty, integrity, ethics and fair dealing and to uphold our core values:
 - (a) **Passion:** We work with passion, entrepreneurial spirit and teamwork to serve our clients and people.
 - (b) **Expertise:** We are committed to apply our professional expertise to deliver great quality services to our clients.
 - (c) **Respect:** We treat all our stakeholders with respect and integrity in order to earn their trust.
 - (d) **Care:** We care about the interests of our clients, members and employees and aim to make a real difference to their lives.

1.2. Purpose of the Code

- 1.2.1. The purpose of this Code is to set standards to promote:
 - (a) honest and ethical conduct, including fair dealing and the ethical handling of conflicts of interest;
 - (b) compliance with applicable laws and regulations;
 - (c) the protection of our legitimate business interests, including corporate opportunities, assets and confidential information;
 - (d) full, fair, accurate and timely disclosures between officers, employees and directors within International SOS;
 - (e) internal reporting of any violations of this Code and deter wrongdoing; and
 - (f) accountability for adherence to this Code.

1.3. Compliance with Laws and Professionalism

- 1.3.1. This Code should be read in the context of applicable laws and in conjunction with our other policies, manuals and guidelines. International SOS expects you to become familiar with and fully comply with this Code.
- 1.3.2. You are expected to comply with applicable laws, rules, codes and regulations.

- 1.3.3. This Code provides a broad guideline. New ethical and legal considerations arise from time to time and the social, commercial and legal environments change rapidly. You may therefore have questions from time to time on how the Code will apply. You are encouraged to seek guidance from your supervisor or the **Group General Counsel**.
- 1.3.4. Both maintaining your safety and International SOS's good standing within the communities in which we operate is fundamental to our role as an international healthcare provider and assistance company. Conduct that compromises your safety and International SOS's reputation or jeopardises the position of trust that International SOS holds in a community will lead to disciplinary action. You are expected to act with professionalism, dignity and proper deportment, respecting social mores and avoiding inappropriate behaviour, both at work and during non working hours. In this regard, you are expected to take particular care in countries that are not your home country.

1.4. Reporting of Breaches

- 1.4.1. International SOS encourages employees to report any breach of our Code of Conduct and Ethics, professional standards or law (wrongdoing) in good faith and in an environment free from victimisation so that senior management can adequately identify issues and manage risk within the group.
- 1.4.2. You do not need to be certain that a violation has occurred. At the same time, you have an obligation to promptly raise a concern when you see a situation in which our integrity, principles or policies are not being followed.
- 1.4.3. Confidentiality is respected, and you may even choose to remain anonymous. However, if you identify yourself, we are able to follow up with you and provide feedback. Your identity and information will only be shared on a "need-to-know" basis. Any retaliation, whether direct or indirect, against employees who raise a concern is grounds for discipline up to and including dismissal.

How to report a breach

- 1.4.4. International SOS offers four (4) reporting channels for reporting suspected wrongdoing:
 - (a) You can choose to speak to someone about a suspected wrongdoing or put it in writing. Generally, your supervisor or manager will be in the best position to resolve a suspected wrongdoing, but other resources include your human resources leader or the **Group Manager Compliance** at Compliance@internationalsos.com.
 - (b) You can report suspected wrongdoing via **Hydra**, the application used for customer feedback, incident reporting and management, risk management and quality management within International SOS. Hydra – Incidents supports adverse incident reporting and incorporates automatic escalation to line management and functional management.

- (c) You can report anonymously using the “**Integrity Reports**” application for non-Government Services related matters via the web at: <https://intlsos.portal.speeki.com>.
- (d) For Government Services related suspected wrongdoings, you can report anonymously using the “**EthicsPoint**” application via the web at: <https://secure.ethicspoint.com/domain/media/en/gui/59418/index.html>.

How we handle reported wrongdoings

- 1.4.5. Reports of suspected wrongdoing raised through these channels must be escalated to the relevant country or functional general manager or divisional head.
- 1.4.6. All incidents are to be investigated in accordance with the International SOS Investigation Procedures, which require a preliminary investigation (to ascertain whether there are sufficient grounds to launch an investigation), establishment and sign off of terms of reference, approval by the **Group General Counsel** and conduct of a formal investigation.
- 1.4.7. During the investigation process, International SOS:
 - (a) Forms an objective investigation team;
 - (b) Determines the facts through interviews and/or the review of documents;
 - (c) Recommends corrective action, if necessary; and
 - (d) Provides the person who raised the original concern (if that person is known) with feedback on the outcome.

2. CONFLICTS OF INTEREST

2.1. Conflicts of Interest

- 2.1.1. You are expected to maintain objectivity and to avoid conflicts between your personal interests and the interest of International SOS.
- 2.1.2. A conflict is something that interferes with the independent exercise of sound judgment in the best interests of International SOS when performing your duties and responsibilities.
- 2.1.3. Any material transaction or relationship that could reasonably be expected to give rise to a conflict or the appearance of such a conflict should be discussed with your supervisor or with the **Group General Counsel**.
- 2.1.4. Service to International SOS and its customers should not be subordinated to personal gain or an advantage.

2.2. Gifts, Entertainments, and Other Favours

- 2.2.1. You shall not request, accept or give personal gifts or hospitality in a way that creates a conflict of interest.
- 2.2.2. **No gifts of cash** may be given or received under any circumstances, regardless of the amount.
- 2.2.3. **Non cash gifts** which are to be given on behalf of the Company or which are received from non employees by you with an estimated value of more than US\$ 200 (or equivalent) must be approved by the **Group General Counsel**. Company employees involved in specific customer contracts that require a stricter standard must also adhere to those strict rules.
- 2.2.4. The **Group General Counsel** will assess any such request for approval on the basis of the conflicts of interest principles set forth in Section 2.1 above.

2.3. Corporate Opportunities

- 2.3.1. Your duty of loyalty to International SOS is violated if you personally profit from a business opportunity which rightfully belongs to International SOS.
- 2.3.2. You are prohibited from competing with International SOS or taking advantage of any opportunities that were created through the use of International SOS's property or information or as a result of your position with International SOS.

2.4. Fair Dealing and Integrity

- 2.4.1. You must perform your duties and responsibilities for International SOS with the highest degree of integrity.
- 2.4.2. You are expected to deal fairly with our customers, partners, employees, service providers, suppliers, the general public and other third parties. You should not take unfair advantage of anyone through manipulation, concealment, abuse of confidential information or misrepresentation of material facts.

2.5. Protection and Proper Use of Group Assets

- 2.5.1. You are responsible for protecting International SOS's assets and ensuring their efficient use for legitimate business purposes and not for personal use.
- 2.5.2. Assets of International SOS include not only physical assets such as cash and equipment. Assets also include software, trademarks and service marks, proprietary and confidential information and the time and talent of company employees.
- 2.5.3. International SOS intellectual property is a strategic asset at the heart of the Company's business and needs to be safeguarded. Some examples of intellectual property include customer lists, data in the SFDC system, provider network details, pricing and bid response plans, business plans, product development details, patents, copyrights, trademarks and trade secrets. We rely on you to take necessary steps to protect proprietary information and to respect the intellectual property of others. For more information, please refer to the **Legal Department**.
- 2.5.4. International SOS is committed to respecting the intellectual property rights of third parties. Violations of copyright and other intellectual property rights, such as unauthorised copying of software or proprietary training materials, are both illegal and against Company policy.
- 2.5.5. If you become aware of breaches of intellectual property rights, whether by a third party or by our employees, you are obliged to report this promptly using the **Hydra incident system**, the **Integrity Reports application** (anonymously), or via Compliance@internationalsos.com.

3. LEGAL COMPLIANCE

3.1. Improper Payments

- 3.1.1. You shall not pay bribes or receiving kickbacks either directly or indirectly.
- 3.1.2. A bribe is giving a gift, payment or something else of value to a government official to secure a business advantage to which we are not entitled.
- 3.1.3. A kickback is cash or something of material value given to you, your family members or friends by partners, suppliers or service providers so that the suppliers and service providers can improperly secure a contract or some other business advantage from us.

3.2. Accounting, Expenses and Records

- 3.2.1. You are responsible for providing clear, honest and accurate information in the course of your work.
- 3.2.2. It is important that you keep true, accurate and complete accounts and that there are no parallel accounts to facilitate illegal transactions. We rely on your truthfulness in accounting practices to maintain the integrity of our financial records.
- 3.2.3. It is important that you read, understand and follow all applicable **General Affairs Policies and Procedures (“GAPP”)**.

3.3. Obligations on Auditing Matters

- 3.3.1. In dealing with the auditors, you must be candid and not knowingly misrepresent facts or knowingly fail to disclose material facts and you must respond to specific inquiries and requests by the auditors.
- 3.3.2. You must not take any action, or direct any person to take any action, to fraudulently influence, coerce, manipulate or mislead the auditors in the performance of an audit of the financial statements.

3.4. Unfair Competition

- 3.4.1. While we compete vigorously in the marketplace, we compete on the merits of our quality services and customer loyalty.
- 3.4.2. In the event that companies providing competitive solutions approach you, you should immediately report this to **your general manager** or **regional general manager** and refrain from any further direct communication with such companies.

3.5. Compliance with trade controls

- 3.5.1. Part of practicing good business means complying with laws that impose economic sanctions. These laws restrict the trade dealings with specific countries, organizations and even individuals. These laws are complex and carry severe consequences for the Company. If you are involved in our international business, you are expected to understand the laws and regulations that apply. When in doubt, you should discuss with your supervisor or with the **Group General Counsel**.

3.6. Anti-Money Laundering Policies and Procedures

- 3.6.1. International SOS is committed to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities, by complying with applicable regulations and laws in all jurisdictions in which it operates. **Money laundering** is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds so that the proceeds appear to have derived from legitimate origins or constitute legitimate assets.
- 3.6.2. You must not knowingly deal with criminals, suspected criminals or the proceeds of crime. You must ensure that no business transactions on behalf of International SOS involves acquiring, using or holding monetary proceeds or property acquired with the proceeds of crime. If you have knowledge or suspicion that a counterparty is involved in money laundering in connection with its transaction with International SOS, you must promptly report it to the **Group General Counsel**.

3.7. Modern Slavery

- 3.7.1. At International SOS, we do not, under absolutely any circumstances use forced, bonded or child labour in the provision of our services. In addition, we make every effort to ensure that our service providers operate with the highest level of integrity and free of the use of forced, bonded or child labour.

3.8. Safeguarding of Children and Vulnerable Adults

- 3.8.1. International SOS takes seriously our obligation to safeguard and promote the rights and wellbeing of all children and vulnerable adults to whom we owe a duty of care and treat them with respect. We maintain zero tolerance for any form of abuse, exploitation, neglect, or harm, and applies a risk-based safeguarding framework across our activities and operations.

4. CONFIDENTIALITY

- 4.1. In carrying out International SOS's business, you will be exposed to confidential or proprietary information about International SOS, our customers, suppliers, competitors, joint venture parties, or our employees. **Confidential and proprietary information** includes any non-public information that would be harmful to International SOS if it is disclosed.
- 4.2. You must maintain the confidentiality of all information entrusted to you, except when disclosure is authorized or required by law.
- 4.3. International SOS treats seriously, any breaches of your confidentiality obligations as outlined herein and in the agreements that you have signed, including your contract of employment. Such breaches may result not only in disciplinary action but also in legal action.
- 4.4. You are expected to handle information according to the information security classification as summarised in the **Documents Policy**.

5. INFORMATION SECURITY AND DATA PROTECTION

- 5.1. The security and privacy of our clients', patients', members', and employees' data is a top priority to us.
- 5.2. In the course of performing your tasks at International SOS, you may **receive, access, use, transfer** and **store** personal private data, including sensitive or special category data such as medical records.
- 5.3. You must process personal data lawfully, fairly and securely, and in accordance with:
 - 1) our contractual commitments to clients;
 - 2) applicable data protection laws and regulations; and
 - 3) International SOS internal policies, including the Data Protection Policy and relevant privacy and information security standards.
- 5.4. This means, in particular, that you must:
 - 1) **access** and use personal data only on a need-to-know basis and only for legitimate business purposes;
 - 2) **use** approved systems and tools and follow data classification/handling rules when storing, sharing or transmitting information;
 - 3) **apply** appropriate technical and organisational safeguards to prevent unauthorised access, disclosure, alteration, loss or destruction;
 - 4) **transfer/disclose** personal data only where permitted by contract and law, and only using approved transfer mechanisms and safeguards; and
 - 5) **follow** International SOS retention and secure disposal requirements and do not keep personal data for longer than necessary.
- 5.5. Where required by law, contract, or the specific circumstances, this may include **obtaining and recording valid consent** or ensuring the individual's rights requests are handled via the approved process.
- 5.6. You are expected to read, understand and comply with the **Information Security and Privacy Standards** and **Information Security Guideline** and to participate in periodic assessments of data security and privacy compliance, through both internal and independent third party audits.

6. WORKPLACE RELATIONS

6.1. Health and Safety

- 6.1.1. We are committed to providing a safe, healthy and alcohol and drug-free workplace.
- 6.1.2. You must understand and comply with the **safety, health and environmental laws and regulations** that affect our business activities.
- 6.1.3. You are expected to read and comply with the **Health, Safety and Environment Policy** as well as any related policies.
- 6.1.4. You are responsible to report threats and unsafe acts or situations to your supervisor. Seriously unsafe or violent behaviour should be elevated to the **Group General Counsel**.

6.2. Discrimination or Harassment

- 6.2.1. We are committed to allowing employees to be hired and progress based on their talents, skills, experience and knowledge. Decisions shall not be based on, for example, an employee's or employment applicant's race, colour, sex, religion, age, national origin, sexual orientation, marital status, or disability.
- 6.2.2. We expect all company employees to follow a simple standard: all employees must be treated with respect. "Harassment" covers a wide spectrum of conduct including unwelcome sexual advances, propositions, unwanted physical contact, jokes, remarks or racial epithets. If you witness or learn about harassment, violence or threats of violence, you should report it immediately. Managers are responsible for maintaining a work environment that is free of violence and unlawful harassment, which include acting promptly to investigate all allegations in accordance with laws and our policies.

6.3. Open Door Policy

- 6.3.1. You are encouraged to communicate your ideas and concerns directly to your supervisor, your location management or your functional management. It is important that you speak up promptly so that your ideas or concerns can be addressed.
- 6.3.2. Working together in an atmosphere of trust and cooperation provides the most productive work environment.
- 6.3.3. If your supervisor, location management or functional management cannot resolve a matter or if they are part of the problem, you can contact a human resources representative for guidance.

7. POLITICAL NEUTRALITY

- 7.1. International SOS maintains strict political neutrality and does not make donations or other gifts to political parties, organisations or politicians.
- 7.2. You will not devote your working hours or provide any International SOS assets to support political campaigns or other political activities.
- 7.3. International SOS's name and logos must not be used to support political parties or activities.

8. ENFORCEMENT AND REPORTING BREACHES

- 8.1. Breaches of this Policy may have serious legal and reputation repercussions and could cause material damage to International SOS. Consequently, breaches can potentially lead to disciplinary action that could include summary dismissal and to legal sanctions, including criminal penalties.
- 8.2. All employees are expected to promptly and fully report any breaches of the Policy. A report may be made to the employees' supervisor or the Group General Counsel. Reports made in good faith by someone who has not breached this Policy will not reflect badly on that person or their career at Intl.SOS. Reports may be made using the following e-mail address: Compliance@internationalsos.com.

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