



**Healthway
Medical**

Empowering Healthier Lives

SUSTAINABILITY REPORT

FY2022

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ABOUT THIS REPORT

Healthway Medical Corporation Limited (“Healthway” or the “Company” and together with its subsidiaries, the “Group”) is pleased to present our sixth sustainability report (“SR”), where we share about Environmental, Social and Governance (“ESG”) principles, initiatives, and performance over the financial year ended 31 December 2022 (“FY2022”).

REPORT COVERAGE

This report encompasses the key ESG issues faced by the Group across our operations in Singapore, with a focus on our Primary Healthcare Division and Specialist Healthcare Division. Unless otherwise stated, this report covers the financial year from 1 January to 31 December 2022. Where available, comparative data from prior years has been included as well.

REPORTING FRAMEWORKS

This report has been prepared with reference to the Global Reporting Initiative (“GRI”) Universal Standards (2021), chosen for its comprehensive guidelines for reporting on our organisation’s ESG impacts. In putting together this report, we have applied the GRI principles of accuracy, balance, clarity, comparability, completeness, timeliness, sustainability context, and verifiability.

This report has been prepared in accordance with Rules 711A and 711B of the Singapore Exchange Securities Trading Limited (“SGX-ST”) Listing Manual Section B. As mandated by SGX-ST, all issuers are to include climate-related disclosures that are in line with the recommendations from the Task Force on Climate-related Financial Disclosures (“TCFD”) on a ‘comply or explain’ basis from FY2022 onwards. Healthway has yet to embark on our climate reporting journey, as we are still at initial stages of formulating our procedures for identifying, assessing, and managing climate-related risks and strengthening our climate-related governance. We will be performing internal assessment to design a timeline to include TCFD reporting in our future sustainability reports, in line with the phased approach recommended by the SGX Practice Note 7.6.

In addition, the report contains our short-term targets, which we have defined as less than three years. Our medium- and long-term targets are being internally designed and will be included in our following reports once approved by the Board.

ASSURANCE

The Report has not been externally assured. Our internal audit function has performed internal review on our sustainability reporting data and programme, and we relied on our internal verification mechanisms to ensure the accuracy of the information presented in this report. Nevertheless, we plan to seek external assurance in the future.

FEEDBACK

We welcome feedback on this report and any aspect of our sustainability performance. For any queries or suggestions in relation to this report, you may reach us at care@healthwaymedical.com or via our [feedback form](#).

BOARD STATEMENT

The Board of Directors (the “Board”) is pleased to share about Healthway’s ESG performance and the steps we have taken over the past year to advance our sustainability goals. We remain firmly committed to delivering long-term value to all our stakeholders while fulfilling our social responsibility to our patients, employees, and the environment we live and work in.

STABILISING THE COVID-19 SITUATION

We are heartened to hear that Singapore’s COVID-19 situation has remained stable in recent months. The nation has collectively developed a high level of hybrid immunity and is well protected from severe COVID-19 symptoms, with around 80% of the population achieving minimum protection and around 50% keeping up to date with their vaccinations¹. Since 13 February 2023, Singapore has moved from DORSCON Yellow to Green and further stepped down its COVID-19 community measures.

On behalf of the Group, we are honoured to have received the President’s Certificate of Commendation for our efforts in the fight against COVID-19. Throughout the pandemic, the Group has provided the necessary manpower and resources to operate vaccination centres and Quick Test Centres, while continuing to treat patients with mild COVID-19 symptoms in our day-to-day operations.

TOWARDS A HEALTHIER SINGAPORE

Moving forward, Healthway will be enrolling in the Healthier SG programme by the Ministry of Health, to empower Singaporeans to take charge of their health and keep chronic illnesses at bay. With the support of an extensive network of clinics and medical centres island-wide, the Group will strive to provide healthcare excellence in our suite of services, promote preventive care and help Singaporeans build a trusted relationship with their family doctors to ensure continuity of care throughout their life-course.

As one of the largest outpatient clinic chains in Singapore, Healthway plays a key role in safeguarding the health and wellbeing of the local population, particularly as Singapore’s aging population grows and chronic diseases become more prevalent. To meet the growing needs of our Primary and Specialist Healthcare sectors, the Group has continued to forge ahead with our plans to expand our network of General Practitioner (“GP”) clinics and launch new verticals across the full spectrum of adult specialist disciplines.

OUR COMMITMENT TO SUSTAINABLE GROWTH

The Board recognises the importance of embedding sustainability in our business strategy and operations. We are mindful of our shared responsibility to provide oversight over the identification, management, and monitoring of material ESG factors, by constantly reviewing the impact of the Group’s business activities and the substantive expectations and interests of our

¹<https://www.moh.gov.sg/news-highlights/details/singapore-to-exit-acute-phase-of-pandemic#:~:text=4.,to%20date%20with%20their%20vaccinations>

stakeholders. To further our commitment to sustainable development beyond Healthway, we have also placed Green Deposits with HSBC² to support development of environmentally-beneficial projects.

In line with our corporate vision and mission, Healthway endeavours to contribute to the resilience of the nation's healthcare infrastructure, while working hard to deliver long-term value to all key stakeholders.

² <https://www.about.hsbc.com.sg/news-and-media/hsbc-launches-green-deposit-account-for-corporate-clients-in-sg>

CORPORATE PROFILE

From our beginnings in 1990 in primary healthcare, Healthway has grown to become a respected medical group in Singapore. We currently own, operate and manage one hundred and fifteen (115) clinics and medical centres. These facilities are located all over Singapore, including many major private hospitals. We leverage the innovation and technology for integrated health management to provide our patients with convenient access to affordable, comprehensive, holistic treatments and preventive healthcare.

Our Mission:

To be Asia's leading healthcare provider that is trusted, service-oriented and technology empowered

Our Vision:

A Healthier Asia

Healthway's key business segments are as follows:

i. Primary Healthcare

As one of the largest private clinic networks in Singapore, we operate 78 clinics across the island, providing outpatient medical services to private patients as well as corporate clientele.

Key Service Offerings:

Family Medicine

Health Screening

Dental

Tele-Medicine

Japanese Medicine

ii. Specialist Healthcare

We operate 35 specialist clinics and offer a comprehensive range of specialist disciplines through the Nobel, SBCC, and Island Orthopaedics brands. We currently have 38 specialists in 11 disciplines.

Key Service Offerings:

Gynaecology & Obstetrics

Paediatrics

Orthopaedics

Cardiology

Colorectal and General Surgery

Ear, Nose & Throat

Psychiatry

Gastroenterology

Paediatric Surgery

Endocrinology

Speech Therapy

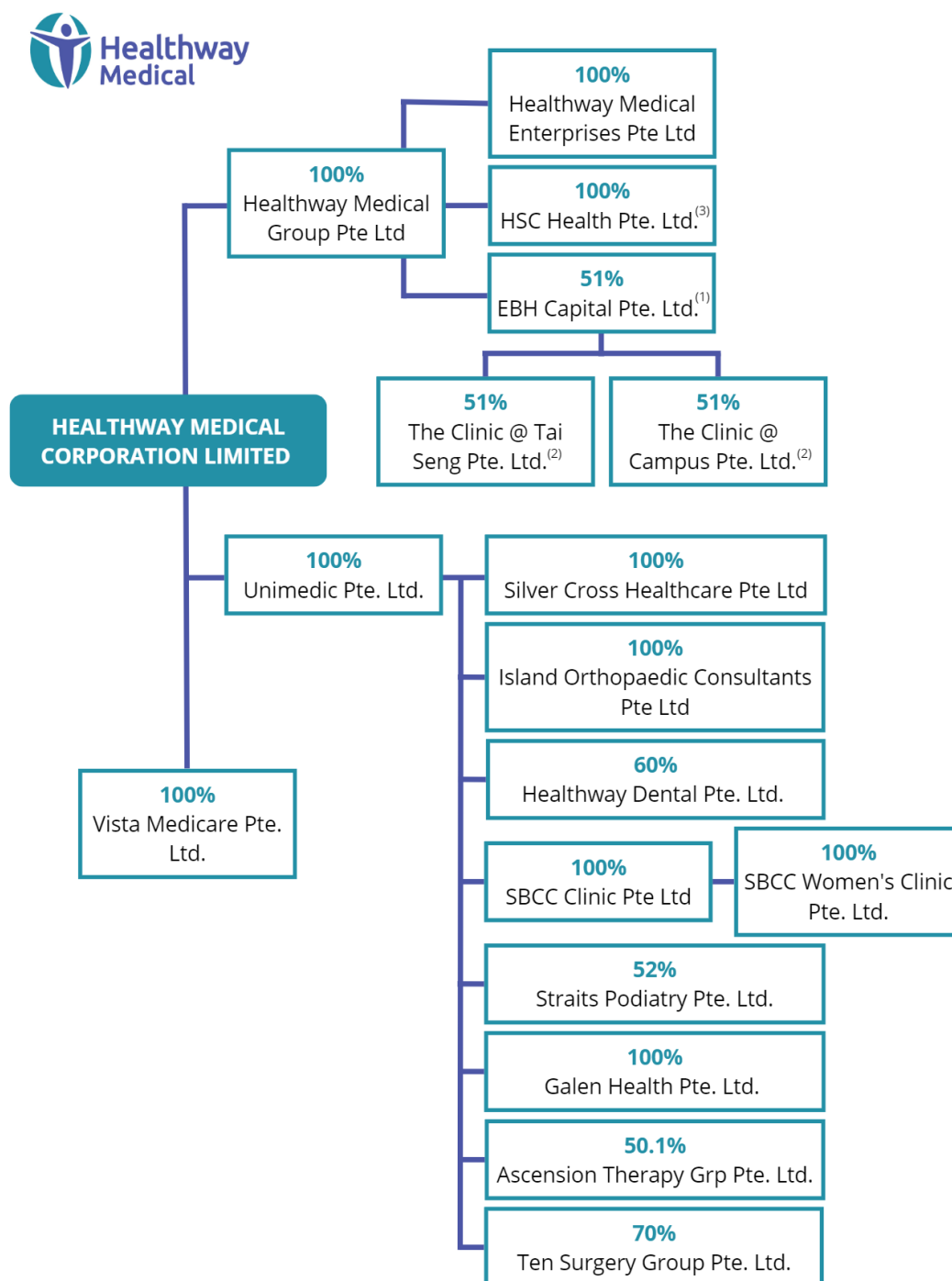
iii. Allied Health

Complementing our psychiatrists and specialists are our allied healthcare providers that offers psychology and podiatry services at two locations.

CORPORATE PROFILE

GROUP STRUCTURE

As of 31 December 2022 (unless otherwise stated), our Group Structure is as follows:



(1) EBH also holds interests in 7 other EBH Capital Pte. Ltd. ("EBH") subsidiaries. Details can be found on pages 107 to 110 of the Annual Report.

(2) HMG has a direct and indirect interest of 51% in EBH Tai Seng and EBH Campus. Details can be found on pages 107 to 110 of the Annual Report.

(3) HSC was incorporated by HMG on 16 February 2023.

CORPORATE PROFILE

SUPPLY CHAIN MANAGEMENT

Our suppliers provide us with clinical and medical supplies that are essential for our clinics' day-to-day operations. This includes pharmaceutical drugs and medicines, medical equipment, as well as healthcare consumables such as medical gloves, face masks, and other protective equipment.

As a healthcare organisation, we strive to reduce harm and improve the health of our communities by engaging in sustainable procurement practices. We hold our suppliers to the same ethical principles to which we hold ourselves, and we want to work with business partners who behave in a socially and environmentally responsible manner.

During the COVID-19 pandemic, we faced some supply chain disruptions due to a shortage of raw materials for drugs, vaccines, and testing kits. Since adding two core suppliers in FY2021, the situation has improved, as we were able to ensure a steady supply of clinical and medical supplies.

To ensure our expectations for service excellence, consistency, and timeliness of delivery are being met, we target to resume conducting yearly performance evaluations for suppliers with a total annual purchase value of S\$100,000 and above. Our yearly performance evaluations were temporarily suspended in FY2021 and FY2022 due to the COVID-19 restrictions. We also require that our suppliers are registered with the relevant local regulatory body for the sale of health products, where applicable.



CORPORATE PROFILE

MEMBERSHIP ASSOCIATIONS AND ACCREDITATIONS

In line with our commitment to provide accessible, affordable, and quality medical services to our patients, the Group actively participates in government schemes to better serve the needs of the community.

Our clinics are accredited under the following programmes and certification schemes:



Patients who are Singapore Citizens or Permanent Residents may use funds from their Central Provident Fund ("CPF") Medisave Account to pay for medical care and hospitalisation expenses for certain treatments such as acute care, rehabilitative care, and end-of-life care, as well as approved outpatient treatment including chronic conditions, vaccinations, and radiotherapy.

83 of our clinics are Medisave accredited by the Ministry of Health.



The Community Health Assist Scheme ("CHAS") provides Singapore Citizens, including members of the Pioneer Generation and Merdeka Generation, with subsidies for dental and medical care.

All Healthway GP clinics are participating CHAS clinics.



Under the Public Health Preparedness Clinic ("PHPC") scheme, our clinics help to serve the primary healthcare needs of Singaporeans in times of national need.

54 of our clinics are participating in the PHPC scheme.



MBS@Gov is a digital service for private medical practitioners and dialysis centres to submit claims for the government's share of medical bills incurred by civil servants, pensioners and their dependants.

54 of our clinics are accredited under MBS@Gov.



To facilitate the take up rate of important vaccinations amongst adults and help individuals make more informed decisions, the Ministry of Health (MOH) has established the National Childhood Immunisation Schedule (NCIS) and National Adult Immunisation Schedule (NAIS) to provide guidance on vaccinations that Singapore citizens of all ages can adopt to protect themselves against vaccine-preventable diseases.

All Healthway GP clinics offer the vaccinations recommended under the NCIS and NAIS.



Yellow fever vaccinations are compulsory for travellers who visit certain countries, where there is a risk of yellow fever virus transmission.

15 of our clinics are Yellow Fever accredited vaccination centres.



As testament to our commitment in attaining continuous quality and safety improvements, guided by rigorous international standards, for all our patients, our Healthway Screening Centres have achieved the Australian Council on Healthcare Standards International (ACHSI) International accreditation.



The Group is proud to have received the bizSAFE level 3 certification awarded by the Workplace Safety and Health (WSH) Council, on 26 January 2023 (valid till 25 January 2026).



The Podiatry Association (Singapore) was first established in 1994 as Singapore Podiatry Group, to serve as a platform for local podiatrists to share ideas, establish minimum standards of practice and a common code of conduct.

Two of our podiatrists are members of the Podiatry Association (Singapore).



The Allied Health Professions Council (AHPC) is established by the Allied Health Professions Act 2011 to regulate the allied health professions in Singapore. Its key purpose is to protect public interest through regulating the professional standards for practice, conduct & ethics of registered allied health professionals in Singapore.

Fourteen of our therapists are qualified speech therapists under the AHPC.

SUSTAINABILITY APPROACH

At Healthway, we strive to create long-term growth for our stakeholders through the transparent communication and proactive management of the ESG impacts arising from our business operations. By integrating key sustainability principles within our business operations, we aim to improve the economic and social well-being of our stakeholders, while minimising our environmental footprint.

SUSTAINABILITY GOVERNANCE

The Board is committed to maintaining a high standard of corporate governance to protect the interests of our stakeholders. More details on our governance structure and composition, procedures for nomination and selection, and remuneration policies can be found below and on pages 26 – 42 of our Annual Report.









The Board is collectively responsible for ensuring the long-term success of the Group. The Board seeks to incorporate ESG considerations in the formulation of our corporate strategy, while providing continual guidance to management on the identification, management, and monitoring of Healthway's sustainability focus areas. To meet the enhanced SGX sustainability reporting rules that were announced in December 2021, directors on the Board have all attended sustainability training courses by approved vendors. Please refer to pages 22 – 23 of our Annual Report for further details.

SUSTAINABILITY APPROACH

STAKEHOLDER ENGAGEMENT

We have identified our key stakeholders as those who may be impacted by our activities and business operations – our patients, suppliers, employees, investors, and regulators. We believe that regular two-way communication with our stakeholders allows us to better understand and address their concerns. By aligning our sustainability approach with our stakeholders’ expectations, we hope to build productive, long-lasting relationships with each of them.

Key Stakeholders	Purpose of Engagement	Engagement Platforms
 <p>Patients</p>	We consider our patients’ health needs to be our utmost priority, and we view it as our duty to help them achieve their desired health outcomes.	<ul style="list-style-type: none"> • Direct feedback during consultations • General call centre • Website feedback form • Email feedback
 <p>Suppliers</p>	We constantly communicate with our suppliers to ensure the quality, consistency, and timeliness of the products and services they deliver.	<ul style="list-style-type: none"> • Annual supplier evaluations • Meetings, emails, and phone calls
 <p>Employees, including Doctors and Nurses</p>	We strive to resolve operational and management issues as and when our employees voice their concerns. This is key to building a safe, inclusive, and empowering work environment.	<ul style="list-style-type: none"> • Induction and orientation programmes • Training and development • Internal memos and emails • Company town hall • Employees’ Dinner and Dance • Monthly newsletter from the Chief Executive Officer for EBH
 <p>Investors</p>	We aim to create long-term economic value for our investors, by maintaining a balanced capital allocation and pursuing operational efficiency improvements.	<ul style="list-style-type: none"> • Board meetings to discuss our strategy for long term growth and innovation • Annual general meetings and extraordinary general meetings • Periodic SGXNet announcements and as and when required
 <p>Government and Regulators</p>	By engaging governments and policy makers, we hope to achieve a better understanding of the government’s upcoming initiatives and help to contribute towards Singapore’s national health goals.	<ul style="list-style-type: none"> • Discussions with government agencies and departments • Feedback to initiatives by government agencies and departments
 <p>Local Communities</p>	By volunteering our time and skills and participating in local initiatives, we aim to build stronger relationships with the communities we serve.	<ul style="list-style-type: none"> • Joined the Shiok Children Fest, where our team from Nobel Eye & Vision Centre provided free eye screenings for 20 children



SUSTAINABILITY APPROACH

MATERIALITY ASSESSMENT

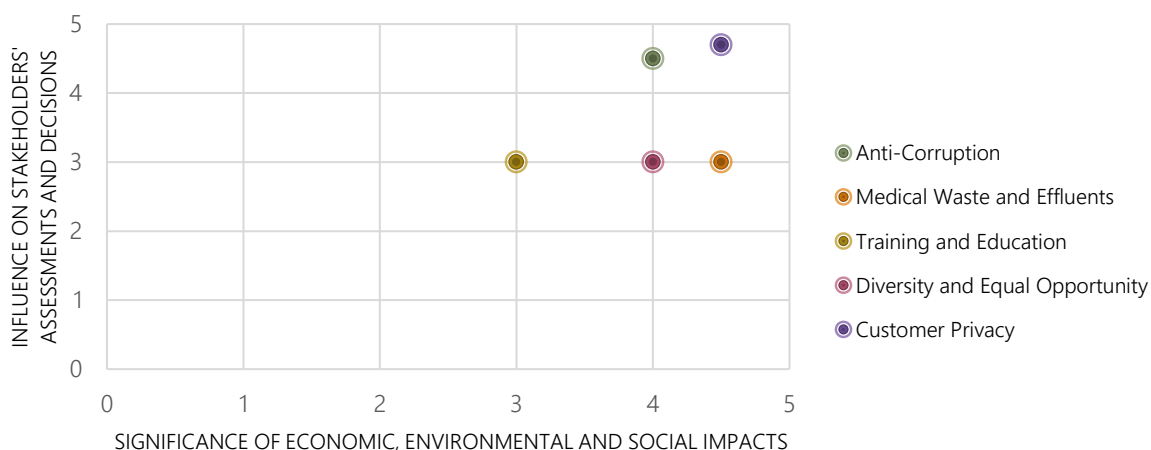
During our last materiality assessment in FY2020, we determined the following five (5) ESG factors to be material to the Group, taking into consideration our stakeholders' feedback and our organisation's impact on the economy, environment, and people.



Given that there has been no substantive change in our business nature since then, the Board has reviewed the above material topics and determined that they remain relevant and significant to the Group in FY2022.

The following Materiality Matrix summarises the results of the ranking and prioritisation exercise that was conducted to assess the degree of influence each topic has on our stakeholders' assessments and decisions (see y-axis) and the significance of the Group's economic, environmental, and social impact (see x-axis).

Materiality Matrix



While 'Energy' and 'Water' have yet to be included within our list of material ESG factors, we have sought to further reduce our carbon footprint by installing LED light bulbs and highly energy efficient air-conditioners that were awarded five ticks under the Mandatory Energy Labelling Scheme. Excluding our consumption from vaccination and testing centres as well as our newly acquired clinics for which we are setting up data collection systems, we have maintained our water and electricity consumption levels at a consistent level relative to our operations since 2020.

ANTI-CORRUPTION

At Healthway, we strive to foster a culture of transparency, accountability, and integrity, where all our employees are expected to adhere to the highest ethical standards and act in compliance with all relevant laws and regulations. To safeguard our reputation and financial stability, it is necessary that we take a strong stance against any form of fraud, corruption, or dishonest practices across the Group.

As part of our efforts to promote good corporate governance practices, we have established several policies and practices to manage our Group's exposure to corruption risks.

Whistle-blowing Policy	Employees and other stakeholders can lodge reports of suspected fraud, corruption, dishonest practices, non-compliance with regulations and policies, or other similar matters via email to Mr Chen Yeow Sin, the Audit and Risk Committee ("ARC") Chairman, at whistleblow@healthwaymedical.com , in confidence and without fear of reprisal. Once a report has been received, independent investigation will be conducted, and follow-up actions will be taken where necessary.
Interested Persons Transactions	All interested person transactions are documented and submitted periodically to the ARC for their review to ensure that such transactions are carried out on an arm's length basis and on normal commercial terms, without prejudice to the Group. All reportable transactions will be promptly announced via SGXNet and in our annual report.
Conflict of Interest	All employees are to declare any instance of conflict of interest upon joining the Company. Subsequently, during the annual declaration exercise, all employees are required to disclose any potential conflicts of interest.
Corporate Gifts	Employees should report to their immediate supervisor if they are offered any gifts as inducement or gratification. In cases where it may be discourteous not to accept the gift, the recipient must thereby declare it by completing the 'Declaration of Gift Received' form.

These anti-corruption policies are made accessible and communicated to all our staff via our intranet portal, with training conducted as part of the onboarding process to educate them on the importance and necessity of abiding by Healthway's code of conduct. In addition, employees are encouraged to approach their reporting officer(s), their Head of Department ("HOD"), or the Human Resources ("HR") department if they would like to seek advice on implementing the organisation's policies and practices for responsible business conduct.

The ARC is empowered to commission investigations into matters of suspected fraud or irregularity, or failure of internal controls or infringement of any laws or regulations, and to evaluate the subsequent findings. In FY2022, there were no whistleblowing reports received regarding misconduct in the workplace such as bribery, corruption, or dishonest practices. Additionally, there were zero instances of employee dismissal or disciplinary action resulting from fraud or corruption. Our organization has also remained compliant with legal regulations and

listing requirements throughout FY2022, and we did not incur any fines or penalties due to non-compliance.

We are pleased to share that our Singapore Governance and Transparency Index (“SGTI”) ranking improved from 270th position in 2020 to 87th position in 2022 (FY2021: 26th place). The annual SGTI is the leading index for assessing Singapore-listed companies on their corporate governance disclosures and practices, as well as the timeliness, accessibility, and transparency of their financial results announcements.

Targets for FY2023

To maintain zero reported incidents of corruption and misconduct.

MEDICAL WASTE AND EFFLUENTS

Improper disposal of medical waste may lead to the spread of diseases, environmental pollution, and public health risks. To prevent harm to human health and the environment, we place great emphasis on the careful and responsible handling of medical waste within our clinics.

We have engaged external medical waste handlers that are licensed by the National Environmental Agency (“NEA”) to properly dispose of all medical waste generated in our day-to-day operations. We regularly assess our selected vendors on a rotational basis to ensure that their performance meets our criteria for safe and sustainable waste management practices.

Our healthcare staff are required to undergo training to identify the different types of pharmaceutical waste, as summarised below, and learn the specifics of our disposal procedures, as described in our inaugural sustainability report for the financial year ended 31 December 2017. Our staff are also periodically reminded to apply the proper disposal methods via emails and during clinic supervisors' meetings involving our pharmacists.



General Pharmaceutical Waste

- Pharmaceutical products such as vitamins, over the counter medications, and most prescription-only medications for hypertension, diabetes, etc.



Special Pharmaceutical Waste

- Anti-infective, vaccines and other immunological products
- Antineoplastic drugs
- Controlled drugs
- Pharmaceutical products and medical devices containing heavy metals

Following our acquisition of EBH in FY2021, the total quantitative costs of medical waste has increased slightly, from S\$25,000 in FY2021 to S\$32,000 in FY2022. While quantitative data on the amount of waste disposed by EBH is unavailable, the amount of medical waste disposed by the rest of the Group decreased from 6,000 litres in FY2021 to 5,448 litres in FY2022, which is indicative of our commitment to engaging in sustainable waste management practises.

Over the reporting period, we further noted that there was a significant increase in the average cost per litre of waste disposed, from S\$4 in FY2021 to S\$6 in FY2022. In line with Singapore’s ambition to become a zero-waste nation, we will continue to work towards reducing wastage and managing our waste disposal processes in a responsible, efficient, and cost-effective manner.

Targets for FY2023

To provide training and regular reminders to our employees emphasizing the importance of wearing the appropriate personal protective equipment when handling medical waste.

To continue our record of zero non-compliance cases with waste disposal regulations.

DIVERSITY AND EQUAL OPPORTUNITY

Our people are key to the Group's long-term growth and success, and we are committed to cultivating a diverse and inclusive workplace environment that is free of discrimination, where all employees, regardless of their race, gender, age, religion, or ethnicity, are treated in a respectful and equitable manner.

We recruit employees solely based on merit, and promotion decisions are solely based on employees' work performance. Our remuneration structure and employee benefits are designed to be equitable, without any gender or age bias. We expect all our employees to treat each other equally, with dignity and respect. Employees can report any incidents of discrimination they faced or witnessed to the HR department or their HODs, who will then work together to investigate the report and take preventive and punitive actions, if necessary.

Board level

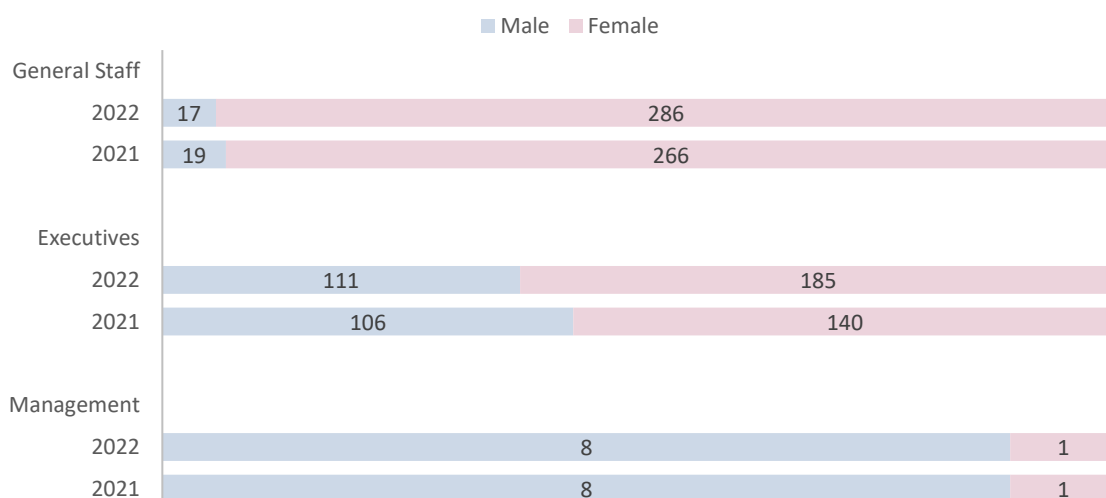
We highly value diversity in our Board of Directors and have drafted a board diversity policy, containing targets, plans, timelines and progress (where applicable). Please refer to the section in our annual report, under the Corporate Governance (Provision 2.4) disclosure for our "Board Independence" and "Women on the Board" disclosures

Employee level

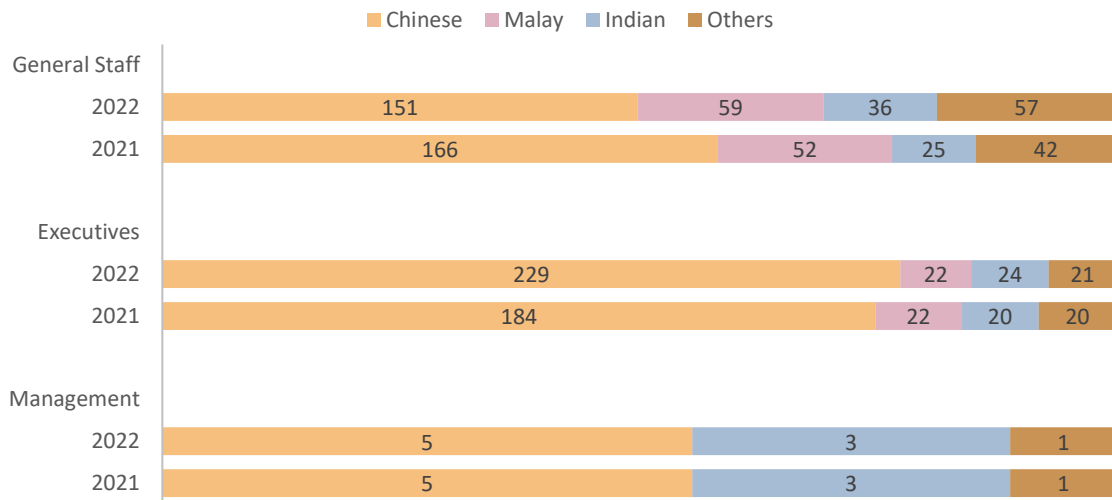
As of 31 December 2022, the Group employed a total of 608 permanent employees in Singapore, of which 30 employees were part-time workers. Between FY2021 and FY2022, there has been no significant variation in Healthway's workforce diversity. As is the norm within the healthcare industries, our female employees tend to comprise a larger proportion of the workforce (FY2022: 78%). Over 55% of our employees are between the age group of 30 to 50 years old, while 24% are above 50 years old.

Further details on our employee profile is as follows:

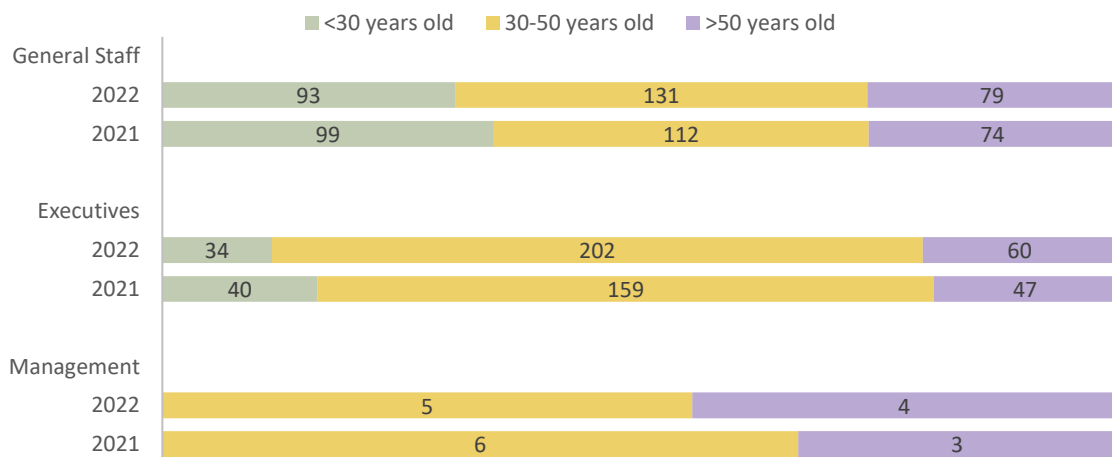
BREAKDOWN BY GENDER



BREAKDOWN BY RACE



BREAKDOWN BY AGE GROUP



Targets for FY2023:

To maintain our track record of having zero reported incidents of discrimination, while continuing to promote a culture of diversity and equal opportunity across the Group.

TRAINING AND EDUCATION

Keeping pace with technological advancements and constantly upgrading our employees' knowledge, skills, and abilities is key to helping the Group achieve better health outcomes for our patients. To maintain our market competitiveness, it is crucial that we invest in our employees and develop a skilled and competent workforce that can meet the ever-evolving demands of the healthcare industry.

We value the growth and development of our employees, and we strive to provide them with continual opportunities for lifelong learning and career growth. As part of our annual performance appraisal for all our employees, we conducted a training needs analysis to gather inputs from staff and managers on the type of training they require. A breakdown of the employees who have undergone such a performance and career development review in FY2022 is as follows:

Percentage of total employees receiving performance review		
	FY2022	FY2021
<i>By employee category</i>		
Management and above	100%	100%
Executives	94%	82%
General staff	86%	91%

In support of our employees' personal and professional development, we leverage the government's funding schemes and subsidies, such as the Skills Development Fund and Skills Future Fund, to offer a broader range of training and career development opportunities to our employees. In FY2022, our staff took part in courses on basic cardiac life support, phlebotomy, mask fitting, and clinic operational processes, most of which were conducted by external vendors. In addition, our staff are also offered the opportunity to enrol in diploma courses on varied topics, ranging from a Graduate Diploma in Family Medicine to a diploma on social media marketing.

The training hours increased from 2,377 hours in FY2021 to 10,088 hours in FY2022 mainly due to the increase in no. of staff who underwent formal training during FY2022.

A breakdown of the average staff training hours by gender and employee category is as follows:

Average staff training hours for all eligible staff		
	FY2022	FY2021
<i>By gender</i>		
Male	99	5
Female	24	22
<i>By employee category</i>		
Management and above	16	5
Executives	15	18
General staff	154	50

We are committed to regularly assessing our training plans to ensure that they remain relevant and effective according to the changing needs of our business and equipping our employees with the skills and knowledge required to adapt to the evolving needs of this industry.

Targets for FY2023

To have 90% of all staff undergo an annual performance evaluation and career development review

CUSTOMER PRIVACY

We are dedicated to safeguarding our patients' personal information and maintaining the confidentiality of all data related to our clinic operations. Given that any instances of misuse, breaches or leaks may lead to penalties, fines, and significant reputational damage for the Group, protecting the privacy and security of our patients' data is of utmost importance for us. In line with the Personal Data Protection Act 2012 ("PDPA"), we have established policies and practices within the Group to ensure that patients' personal data is collected, handled, and protected in a responsible and secure manner.

The Group has appointed a Data Protection Officer and established a Data Protection Committee to handle all matters concerning PDPA compliance. The committee consists of trained members from individual business units across the organisation and can be contacted at dpo@healthwaymedical.com. To further strengthen our PDPA policies and tailor them to the specific needs of our different businesses, we engaged an external data protection consultant in FY2021 to help establish a PDPA framework and policy at Group level and to develop Standard Operating Procedures ("SOPs") to guide different business processes within the Group.

Our Data Protection Policy sets forth general guidelines and procedures concerning the collection, storage, usage, processing, and disclosure of personal data. This policy also outlines the procedure for individuals to withdraw their consent to the use or disclosure of their personal data, and request access or correction to their personal data that is under our control.

In addition, we have implemented various protection mechanisms and security controls to ensure confidentiality of our corporate clients and patients, including the following:

- Access controls are role-based and granted on a need basis only. Authorised approvals are required for data extraction requests
- Softcopy in transit is password protected and hardcopy documents are locked in a secure location
- Softcopy information including data in our IT systems is accessible to specific user through user login only
- Detailed logging mechanism in generating and exporting data from Clinic Management System ("CMS") is trackable with audit logs and audit trails.
- Information in our CMS is accessible by clinics only
- Patient personal information is not disclosed over phone and only provided when patient is physically present at the clinic

The Group has also incorporated various safety measures into our Information Technology infrastructure through the implementation of the following essential controls:

- Computer Security: No administrator access for desktops, encryption for laptops, and endpoint security for all devices
- Network Infrastructure Security: firewalls, geolocation blocking, threat detection, controlled ports, enforced 2FA, and data encryption

We strictly adhere to our privacy policy, which prohibits the sending of promotional and marketing messages via phone calls, text messages, and faxes to patients who have registered

their phone numbers with the National Do Not Call (“DNC”) Registry. However, the Group may send marketing messages to patients who have given clear and unambiguous consent to receive them.

We are pleased to announce that we received zero customer complaints related to data privacy or any reported breaches of customer privacy in FY2022, and there were no incidents of leaks, thefts, or loss of customer data.

Targets for FY2023

To have zero complaints and data breaches with regards to customer privacy.

To maintain the highest standards of customer data privacy protection within our organisation and throughout our supply chain, in full compliance with the PDPA.

GRI CONTENT INDEX

Statement of Use	Healthway Medical Corporation Limited has reported with reference to the GRI Standards for the period from 1 January to 31 December 2022.
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	The relevant GRI Sector Standard for the healthcare industry has yet to be published, as of the publication date of this report.

GRI Standard	Disclosure	Page Reference
GENERAL DISCLOSURE		
GRI 2: General Disclosures 2021	The organisation and its reporting practices	
	2-1 Organisational details	1, 4 & 5
	2-2 Entities included in the organisation's sustainability reporting	1
	2-3 Reporting period, frequency and contact point	1
	2-4 Restatements of information	No restatements
	2-5 External assurance	1
	Activities and Workers	
	2-6 Activities, value chain and other business relationships	4 – 6
	2-7 Employees	16
	2-8 Workers who are not employees	Not applicable
	Governance	
	2-9 Governance structure and composition	AR: 21
	2-10 Nomination and selection of the highest governance body	AR: 31
	2-11 Chair of the highest governance body	AR: 10, 20
	2-12 Role of the highest governance body in overseeing the management of impacts	9
	2-13 Delegation of responsibility for managing impacts	9
	2-14 Role of the highest governance body in sustainability reporting	9
	2-15 Conflicts of interest	AR: 22
	2-16 Communication of critical concerns	AR: 48
	2-17 Collective knowledge of the highest governance body	9
	2-18 Evaluation of the performance of the highest governance body	AR: 38
	2-19 Remuneration policies	AR: 38
	2-20 Process to determine remuneration	AR: 38
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	2-27 Compliance with laws and regulations	13 – 14
	2-28 Membership associations	7 – 8
	Stakeholder engagement	
	2-29 Approach to stakeholder engagement	10
2-30 Collective bargaining agreements	Not applicable	
MATERIAL TOPICS		
GRI 3: Material Topics 2021	3-1 Process to determine material topics	11 – 12
	3-2 List of material topics	11 – 12

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GRI Standard	Disclosure	Page Reference
MATERIAL TOPICS		
Anti-Corruption		
GRI 3: Material Topics 2021	3-3 Management of material topics	13 – 14
GRI 205: Anti-Corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	13
	205-3 Confirmed incidents of corruption and actions taken	13
Medical Waste and Effluents		
GRI 3: Material Topics 2021	3-3 Management of material topics	15
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	15
	306-2 Management of significant waste-related impacts	15
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Diversity and Equal Opportunity		
GRI 3: Material Topics 2021	3-3 Management of material topics	16 – 17
GRI 405: Diversity and Equal Opportunities 2016	405-1 Diversity of governance bodies and employees	16 – 17
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GRI 3: Material Topics 2021	3-3 Management of material topics	18 – 19
GRI 404: Training and Education 2016	404-1 Average hour of training per year per employee	18
	404-2 Programs for upgrading employee skills and transition assistance programs	18
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GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	20 – 21