



WHISTLE-BLOWING POLICY

PURPOSE

This Policy has been established to ensure that all cases of suspected wrongdoing are reported and managed in a timely and appropriate manner. Any director, officer, manager, or employee may discuss or disclose in writing any concern on potential violation of the laws as well as the Company's policies and procedure. Any report covered by this policy may be made to the HRD Head or to the President of the Company.

POLICY

The Company is committed to doing business lawfully, ethically and with integrity. It is the responsibility of each and every one of us to ensure that we fulfil this commitment in our day to day working lives.

However, from time to time there may be situations where the right course of action is unclear, or there may be situations where one suspects or knows that something is improper, unethical or inappropriate. The Company and its employees have both a legal and moral duty to take appropriate measures to identify such situations and attempt to remedy them.

This Policy makes sure that procedures and channels of communication are in place to help resolve the conflict in confidence.

Specifically, it aims to:

- ensure all employees feel supported in speaking up in confidence and reporting matters they suspect may involve anything, improper, unethical or inappropriate;
- encourage all improper, unethical or inappropriate behavior to be identified and challenged at all levels of the organization;
- provide clear procedures for the reporting of such matters
- manage all disclosures in a timely, consistent and professional manner
- assure that all disclosures will be taken seriously, treated as confidential and managed without fear of retaliation.

Whistle blowing means a disclosure of information made by an employee or contractor, an external person or body where they reasonably believe that one or more of the following matters is happening now, took place in the past or is likely to happen in the future. This is a non – exhaustive list of examples:

- a criminal offense
- fraud



- failure to comply with a legal obligation (e.g. breach of a contractual or other common law obligation, statutory duty or requirement or administrative requirement, including suspected fraud, malpractice or breach of the Company's Code of Ethics)
- miscarriage of justice
- danger to the health and safety of any individual
- damage to the environment; and
- deliberate concealment of information tending to show any of the above

The Company has other policies and Code of Conduct that deal with different infractions; and as such, relevant policy should be considered and followed where appropriate.

Reporting in good faith

Any allegation done in good faith, but it is not confirmed by investigation, no action will be taken against the whistle blower. However, if it was concluded that such allegations were made maliciously or simply to cause anger, irritation or distress, disciplinary action may be taken against him/her.

The whistle blower will not be expected to prove the wrongdoing that he/she believed or have witnessed or suspected.

PROCEDURE

1. Letter of Concern

The Letter of Concern must be submitted to the CEO or HR Head to formalize the perceived misappropriated act, with the following information:

- an outline of the known or suspected wrongdoing
- details, to the best of your knowledge, about when, where and how it occurred
- a list of the names of those suspected of being involved (both within internally and externally)
- a list of the names of anyone who may have relevant information
- details of how you came to know about the suspected activities
- what, if any, do you estimate to be the value of the loss to the Company or other parties
- what, if any, breaches of internal controls, policy, procedure or other requirements you believe took place
- any specific recommendations you have for actions
- the names of anyone who you have discussed or reported this incident to
- your name and contact details. Please note – these will be kept confidential as far as is reasonably practicable; and
- the date and time of making the report.



2. Investigation

The Company will decide how to respond in a responsible and appropriate manner under this policy. An investigation will be conducted as speedily and sensitively as possible in accordance with all relevant laws and regulations.

The purpose of this investigation is:

- to establish if a wrongdoing has occurred, and if so to what extent; and
- to minimize the risk of further wrongdoing, to prevent any further loss of assets, damage to reputation and to protect all sources of evidence.

We will handle investigations as fully, promptly and fairly as possible. As far as reasonably practicable, the confidentiality of the person reporting the suspected wrongdoing will be maintained.

An investigating manager will be appointed to lead the investigation into the allegations and will have the following responsibilities:

- Arrange individual interviews with relevant witnesses or individuals and inform them of their right to be accompanied at the meeting by a legal advisor / trade union representative / work colleague.
- Establish the facts/obtain statements/collect documentary evidence.
- Maintain detailed records of the investigation process.
- Make any recommendations for action to be submitted to a more senior manager. The investigating manager will have the following responsibilities towards the employee or party who raised the disclosure:
 - Hold a formal meeting with the employee making the complaint to discuss the matter.
 - Inform them of their right to be accompanied at any interview by a legal advisor/trade representative/work colleague.
 - Keep the employee up to date with progress on the matter and agree timescales for action.
 - Notify the employee making the disclosure about the outcome of the investigation, including how the matter will be dealt with and whether they will be required to attend an investigatory interview.
- Give details of employee support mechanisms available.
- Review the investigation report/procedure followed and findings.
- Communicate outcome in writing to the employee making the disclosure and the employee against whom the disclosure is made



3. Disciplinary action

If, based on the merits of the investigation, the reported questionable act has been deemed inappropriate and was made against the Rules and Code of Conduct of the Company, the perpetrator of the act will be sanctioned appropriately.

However, if, during the course of the investigation it is discovered that the matter has not been reported in good faith, this will be subject to investigation under the local disciplinary procedure.