



HOSPITAL POLICY			
<b>Document Title :</b> POLICY FOR WHISTLEBLOWING			<b>Process Owner :</b> MANAGEMENT
<b>Document No.:</b> HOP-MGT-015	<b>Version No.:</b> I1R2	<b>Controlled Copy No.:</b> 0 – Original	<b>Date First Initiated :</b> 05.02.2021
			<b>Effective Date :</b> 21.03.2022

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**Review & Approval**

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**Approved By:**

Lily Yap

Chief Executive Officer

**Document Revision History**

Date	Version	Description of Revision
05.02.2021	I1R1	Initial release
21.03.2022	I1R2	Change of template and update clause 6.3.1

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## 1.0 PURPOSE

- 1.1. Cengild Medical Sdn Bhd is committed to ensure its business and operations are conducted in an ethical, honesty and integrity manner. The objective of this policy is to provide an avenue for employees and other stakeholders to report genuine concerns in relation to breach of a legal obligation, miscarriage of justice, danger to health and safety or to the environment and the cover-up of any of these in the workplace, without the risk of reprisal, separation, demotion, suspension or loss of benefits because of the report.

## 2.0 SCOPE

- 2.1. This Policy governs the disclosures, reporting and investigation of misconduct within the Group as well as the protection offered to the persons making those disclosures from detrimental action.
- 2.2. The scope of the policy applies to ALL employees of Cengild and its subsidiaries, Board members, external parties, and other stakeholders, where relevant.
- 2.3. Misconduct include:
  - i. Accounting or audit irregularities, fraud
  - ii. Bribery, Corruption
  - iii. Conflicts of interest
  - iv. Falsification of company records
  - v. Abuse of power
  - vi. Sexual harassment or discrimination
  - vii. Theft of cash, goods, services or time
  - viii. Non-compliance with procedure

## 3.0 RESPONSIBILITY

Nil

## 4.0 ABBREVIATION

Nil

## 5.0 DEFINITIONS

Nil

## 6.0 POLICY

### 6.1. GENERAL PRINCIPLES

- 6.1.1. The general principles governing this whistle blowing are as follows:

- 6.1.1.1. All reports or complaints shall be treated in strict confidence without any risk of reprisal;

- 6.1.1.2. The whistle blower may identify himself or herself or remain anonymous when reporting suspected and/or known misconduct and wrongdoings. However, whistle blower shall note that the Board and the Audit Committee could only accord the necessary protection to him or her, is the whistle blower identities are known. The

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Board reserves its right to or not to investigate into any allegation communicated by anonymous whistle blower.

- 6.1.1.3. The identity of the whistle blower and all concerns raised would be treated as private and confidential in order to protect the whistle blower from victimisation or harassment arises from the reporting. However, the whistle blower may be required to come forward as a witness in accordance with any applicable laws and regulations.
- 6.1.1.4. The whistle blower will be informed of the investigators handling the matter and its status;
- 6.1.1.5. Whistle blower and any persons related or associated with the whistle blower are protected against any detrimental action in reprisal for whistle blowing improper conducts. However, this protection would not be extended to someone who maliciously raises matter he/she knows is untrue; and
- 6.1.1.6. Any employee reporting on any concern must make it in good faith with reasonable belief that it is true, without malicious or false allegation and not for personal gain. Any employee found to make false and malicious allegation shall be subjected to disciplinary actions by the Company and/or legal action by the Company.

## 6.2. Protection To Whistle Blower

- 6.2.1. It is the Group's policy to provide the whistle blower protection in term of confidentiality of Information, and safeguard the whistle blower from any act of interference that may be detrimental to the whistle blower. The Group assures that all reports will be treated with strict confidentiality and upon verification of genuine cases, prompt investigation will be carried out.

## 6.3. Whistle Blowing Channel

- 6.3.1. Whistle blower who believes reasonable and in good faith that violations and malpractice exist should report the wrong doing to the Chief Executive Officer by emailing to [cengild.whistleblower@cengild.com](mailto:cengild.whistleblower@cengild.com) or post to [Unit 2-3 & 2-4, Nexus @ Bangsar South, No.7, Jalan Kerinchi, 59200 Kuala Lumpur].

## 6.4. Investigation

- 6.4.1. All complaints will be investigated. The Internal Auditors shall review each claim and pursue it to the extent that the information and evidence received allows. The Internal Auditors shall begin preliminary investigations to establish whether the claim has merit and can be substantiated and report to the Chairman of the Audit Committee for further action.
- 6.4.2. The Board Chairman or the Audit Committee Chairman may seek assistance from other resources within the outside the Group when conducting its investigation at the cost of the Group.

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- 6.4.3. Upon completion of investigation, the Board Chairman or the Audit Committee Chairman shall decide the appropriate actions for:
- i. Informing the whistle blower the status of the findings;
  - ii. Initiating disciplinary action against any persons who has committed improper conducts;
  - iii. Making a police report where the improper conduct constitutes a criminal offence; and
  - iv. Recommending steps be implemented to prevent similar situation from repeating in the future.

#### 6.5. Corporate Recording And Compliance Monitoring

- 6.5.1. The Internal Auditors shall maintain a record of the complaints received and on quarterly basis, prepare a summary report of complaints received, if any, and present it to the Audit Committee.
- 6.5.2. This Policy (Version 2.0) is approved by the Board of Directors of Cengild Medical Sdn Bhd via a resolution dated 21 March, 2021.

#### 7.0 FLOW CHART

Nil

#### 8.0 GUIDELINES & PROCEDURES

Nil

#### 9.0 QUALITY IMPROVEMENT MONITORING

Nil

#### 10.0 REFERENCES

Nil

#### 11.0 APPENDICES

Nil