



Enabling Better Outcomes

**CPM/COMPLIANCE/010**  
**WHISTLEBLOWER AND INVESTIGATION PROCEDURE**

**Effective on 01.03.2024**

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## WHISTLEBLOWER AND INVESTIGATION PROCEDURE

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## CONTROL AND MAINTENANCE

This Procedure is the property of Chemopharm Sdn. Bhd. (“**Chemopharm**”). This Procedure is a dynamic document and shall be reviewed at least annually to ensure the continued efficacy and appropriateness of its contents. Significant amendments to the Procedure must be approved by Chemopharm Management. All amendments are to be recorded in the **Amendments to the Procedure** sheet of this document. The Compliance Manager who is the “Document Owner” of this Procedure shall be responsible for its maintenance and distribution.

This Procedure and other relevant documents are intended for internal use only and only authorised Chemopharm employees can access these documents. All employees shall ensure proper safekeeping of this Procedure and other relevant documents provided to them.

The access to this Procedure and relevant procedures by a third party shall require approval from both the Document Owner and Chemopharm Management. A Non-Disclosure Agreement (“**NDA**”) shall be required for such access to be granted.

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**AMENDMENTS TO THE PROCEDURE**

The Compliance Manager who is the “Document Owner” of this Procedure shall be responsible for the maintenance and update of this document. All amendments made to this Procedure are to be tracked. Relevant information such as the document’s version control number, dates of amendment and approval, and section(s) amended are to be recorded in the amendment schedule set out below:

Version Number	Description Of Change (Removed)		Description Of Change (Inserted)		Effective Date
	Section	Comments	Section	Comments	

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### CROSS REFERENCES

This Procedure cross refers to the following document(s):

Document Ref. No.	Document Name
	Chemopharm's Code of Conduct Handbook
CPM/COMPLIANCE/009	Chemopharm's Whistleblowing Policy



## WHISTLEBLOWER AND INVESTIGATION PROCEDURE

### 1. INTRODUCTION

Chemopharm Sdn. Bhd. (“**Chemopharm**” or the “**Company**”) is committed to conducting its business lawfully and ethically. Chemopharm and its affiliate companies take a zero-tolerance approach to bribery and corruption. Chemopharm is committed to acting professionally, fairly and with integrity in its business operations and relationships by implementing and enforcing effective systems to counter bribery and corruption.

As part of this commitment, Chemopharm has in place an avenue for disclosure of any improper conduct or wrongful act. All employees are encouraged to raise genuine concerns about any improper conduct or wrongful act (“**Improper Conduct**”) occurring in Chemopharm at the earliest opportunity, and in an appropriate way, through available channels under the Whistleblowing Policy. This Whistleblower and Investigation Procedure (“**Procedure**”) is to ensure disclosures of Improper Conduct is managed in an appropriate and timely manner.

Any questions or additional information related to the scope of this Procedure can be referred to the Compliance Manager.

### 2. OBJECTIVE

The objective of this Procedure is to outline the steps to be followed when a whistleblower report is received and the subsequent investigation process to ensure that allegations of misconduct, fraud, or unethical behavior within the Company are thoroughly and impartially addressed.

The provisions in this Procedure comply with the Whistleblower Protection Act 2010 and all applicable laws and regulations in the countries where Chemopharm operates. If there is a conflict between mandatory laws and the principles in this Procedure and related policies, the laws shall prevail.

This Procedure shall also be read together with Chemopharm’s Code of Conduct, Anti-Bribery and Corruption Policy, Whistleblowing Policy and other related materials on disciplinary action under the custodian of Chemopharm’s Compliance Manager.

### 3. SCOPE

The Whistleblowing Policy and this Procedure applies to any Improper Conduct by any Employee of Chemopharm that affects others, such as other Employees, consultants, vendors, outside agencies or Employees of such agencies, and/or any other parties which have a business relationship with Chemopharm.

The Whistleblowing Policy and this Procedure does not cover:

- Customers complaints about Chemopharm products and services; and
- Personal grievances concerning an individual’s terms and conditions of employment or other aspects of the working relationship, such as complaints of bullying or harassment, which are to be dealt with under the Company’s procedure on grievance management.

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In this Procedure, any reference to “you” or “your” means any person subject to this Procedure.

This Procedure shall be applicable throughout the Company and shall comprise of a minimum set of expected standards and principles that shall be consistently applied and adopted throughout the Company.

### 4. RESPONSIBILITY

- 4.1 This Whistleblower and Investigation Procedure outlined herein must be adhered to and followed uniformly by all employees of Chemopharm.
- 4.2 The owner of this Procedure is Compliance Department. The Compliance Manager has primary and day-to-day responsibility for implementing and monitoring this Procedure’s use and effectiveness. Compliance Manager shall regularly report to the Management and ultimately the Board of Directors concerning the implementation and effectiveness of this Procedure.

### 5. DEFINITIONS

- 5.1 “**Director**” refers to a director appointed to Chemopharm Board of Directors.
- 5.2 “**Employee**” refers to any individual working at any level or grade, including officers, senior managers, interns, secondees, agency staff, volunteers and trainees of Chemopharm, whether full-time, part-time, permanent, fixed term or temporary.
- 5.3 “**Whistleblowing**” is defined as the deliberate, voluntary disclosure or reporting of an individual or organizational malpractice by any person on an actual (past or present) or suspected improper conduct within the Company based on his or her reasonable belief.
- 5.4 The person who reports, disclose or alerts the serious concerns of improper conduct is referred to as “**Whistleblower**”.
- 5.5 “**Improper Conduct**” includes among others, the following:
- violation of Chemopharm’s Code of Conduct and other Company policies or procedures;
  - fraud, misappropriation or financial irregularity;
  - corruption, bribery, money laundering or blackmail;
  - criminal offences;
  - abuse of power, authority or position for personal financial gain, any unauthorised or ulterior purpose;
  - misuse of company property;
  - anti-competitive conduct;
  - failure to comply with legal or regulatory obligation;
  - risk of or actual damage to the environment;
  - workplace discrimination and harassment, including sexual or physical abuse, retaliation or



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retribution against the Whistleblower;

- any creation of misleading, dissemination of misleading and/or false financial records;
- endangerment of an individual's health and safety;
- concealment of any or a combination of the above; and
- any other concerns that could subject any part of the Company to serious legal or reputational liability.

5.6 The list of Improper Conduct under this section is not exhaustive and shall include any other act or omission, which if proven, will constitute an act of misconduct pursuant to the Code of Conduct and/or a criminal offence under the relevant law in force.

### 6. WHAT IS WHISTLEBLOWING?

6.1 Whistleblowing is defined as the deliberate, voluntary disclosure or reporting of individual or organisational malpractice by a person who has or had privileged access to data, events or information about an actual, suspected or anticipated **Improper Conduct** within Chemopharm or by an organisation that is within its ability to control.

6.2 Improper Conduct is generally described as any conduct by an Employee which if proved constitutes a criminal offence or any conduct that constitutes a wrongdoing or malpractice and may include any of the following:

- breach of any law, regulation or rule that is applicable to Chemopharm;
- any criminal act, including criminal breach of trust, extortion and sabotage;
- danger to safety and health;
- damage to the environment;
- any act that is likely to cause significant financial loss or costs to the Company including any intentional misrepresentation of the Company's financial statements;
- any breach of ethics as described in the Code of Conduct handbook and/or any fraudulent act including those described in the Anti-Bribery and Corruption Policy. Examples of such acts include forgery, theft, any form of corruption (including accepting and giving bribes), unauthorised disclosure of the Company's confidential information and abuse of power for personal gain;
- any other action that would cause significant harm to Chemopharm or to any person; and
- deliberate concealment of information concerning any of the matters listed above.

### 7. WHO IS A WHISTLEBLOWER

7.1 Under this Procedure, any of the following persons can be a Whistleblower:

- Employees of the Company (this include full-time, part-time, or temporary employees, foreign or expatriate workers, interns, volunteers); and
- Any Third Party including but not limited to customers or associates providing services to



the Company such as vendors, contractors, consultants and ex-employees.

- 7.2 The Whistleblower is not expected to prove the truth of the allegation but should, in making the report, have **reasonable belief that an Improper Conduct was committed**, is being committed or will be committed.

## 8. OTHER PROCEDURES

### 8.1 Whistleblower and Investigation Procedures different from grievance procedures

Typically, whistleblowing does not affect the complainant personally. They are therefore different from a normal grievance or complaint in which the complainant is personally affected. If you are the victim of an Improper Conduct, the complaint shall be channelled through the grievance procedure so that the appropriate action may be taken, and any restitution be made (if applicable).

### 8.2 Sensitive matters

Some sensitive matters may have different procedures for reporting any improper conduct or wrongdoing such as sexual harassment. In circumstances where there are specific procedures prescribed, those specific procedures shall apply.

## 9. REQUIREMENT OF GOOD FAITH

- 9.1 Since an allegation of Improper Conduct may result in serious personal repercussions for the person that has allegedly committed an Improper Conduct, any person who intends to lodge any report of Improper Conduct shall ensure that the report of Director's Improper Conduct is made in good faith.

- 9.2 Any person making an allegation of Improper Conduct must have reasonable and probable grounds before reporting such Improper Conduct and must undertake such reporting in good faith, for the best interest of the Company and not for personal gain or motivation.

- 9.3 The element of good faith shall be deemed to be lacking when:

- the person does not have personal knowledge or a factual basis for the report of Improper Conduct; or
- where the person knew or reasonably should have known that the report or any of its contents are false; or
- where the report is frivolous or vexatious; or
- there are any other circumstances that indicate that the report has been made with malicious intent, ulterior motive or for personal gain.

- 9.4 Any person that has not acted in good faith shall not be entitled to any protection under the Whistleblowing Policy.

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9.5 In addition, an Employee making allegations or reports that prove to have been made without good faith will be subject to disciplinary action (which may include termination of employment).

### 10. PROTECTION AGAINST DETRIMENTAL ACTION

10.1 Any Employee who makes a report of Improper Conduct in good faith shall not be subject to unfair dismissal, victimisation, demotion, suspension, intimidation or harassment, discrimination, any action causing injury, loss or damage or any other retaliatory actions (“**Detrimental Action**”) by the Company.

10.2 Any report of Improper Conduct made in good faith, even if it is not subsequently confirmed by an investigation shall be eligible for protection under the Whistleblowing Policy.

10.3 Any Employee that makes a report of Improper Conduct in good faith and who has been subject to Detrimental Action may lodge a complaint pursuant to this Procedure using the form appended hereto as **Appendix B**. The same procedures for investigation in for reports of Improper Conduct shall apply to any complaints of Detrimental Action

10.4 An Employee who takes any Detrimental Action against any Employee who has made a report of Improper Conduct in good faith shall be subject to disciplinary action (which may include termination of employment).

### 11. PROTECTION OF CONFIDENTIAL INFORMATION

11.1 Any person having knowledge of a report of Improper Conduct shall make all reasonable efforts to maintain the confidentiality of the Confidential Information, in particular the identity of the Whistleblower.

11.2 However, there may be circumstances, during the course of the investigation where it will be necessary to disclose the identity of the Whistleblower. If such circumstances exist, the Compliance Manager or the independent party involved in investigations shall endeavour to inform the Whistleblower that his/her identity is likely to be disclosed and to obtain his/her consent for the said disclosure.

11.3 In order not to jeopardise any investigation, the Whistleblower shall make all reasonable efforts to maintain the confidentiality of the Confidential Information, in particular, the fact that a report has been filed, the nature of the Improper Conduct and the identity of the person(s) who have allegedly committed the Improper Conduct

11.4 Any person who obtains any Confidential Information in the course of any investigation of an allegation of Improper Conduct shall not disclose any Confidential Information or any part thereof.

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### 12. WHEN PROTECTION MAY NOT BE AVAILABLE

12.1 The Employee may not avail him/herself to the protection against Detrimental Action mentioned in **section 10** above in the following circumstances:

- If the report of Improper Conduct is not made in good faith; or
- If the Employee him/herself has participated in the Improper Conduct reported; or
- The report of Improper Conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action; or
- The Employee breaches his/her obligations of confidentiality under this Procedure.

12.2 Any Employee who has participated in an Improper Conduct may be subject to disciplinary action. However, in certain circumstances, the Disciplinary Committee may, in its discretion, on a case-by-case basis decide to grant amnesty to the Employee or consider leniency for the Employee.

However, please note that the Company has no power to provide any immunity from criminal prosecution. The Company also does not have any power to grant any protection from Detrimental Action to a Whistleblower who is not an Employee.

### 13. LODGING A REPORT OF IMPROPER CONDUCT

#### 13.1 Reports by Employees

- a) An Employee is advised and urged to report an Improper Conduct as soon as he/she discovers the commission or an intended commission of an Improper Conduct or if he/she is instructed to participate in any Improper Conduct. If an Employee becomes directly involved in the Improper Conduct, the protection under this Procedure may not be available to that Employee.
- b) An Employee shall make a confidential report of Improper Conduct in writing using the form appended to this Procedure as **Appendix A**. The report must provide full details of the Improper Conduct and, where possible, supporting evidence.
- c) The report must be made directly to the Compliance Manager.
- d) The report to be made to the Compliance Manager may be submitted in a sealed envelope marked "Confidential" addressed to the Compliance Manager via any other method that may be informed to the Whistleblower or publicised through internal communications or the Whistleblowing Policy.

#### 13.2 Reports by external parties who are not Employees

- a) The procedures for an external party to report an Improper Conduct by an Employee shall be posted in Chemopharm's website. The procedures shall include the form as **Appendix A** for reports of Improper Conduct to be made.

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- b) Any external party intending to lodge a report of Improper Conduct by an Employee may do so by sending a report to the Compliance Manager in the prescribed form which shall be made available at Chemopharm's website.
- c) The report received from any external party will be reviewed in accordance with the investigation procedures under this Procedure.

### 14. ANONYMOUS REPORTS

- 14.1 Anonymous reports are not encouraged as any follow-up to ascertain the facts or to obtain further information for investigation purposes would be very difficult.
- 14.2 Although the Company is not expected to address any anonymous allegations, the Company may, however, consider investigating an anonymous allegation after having considered the following:
- the seriousness of the concern;
  - the credibility of the concern; and
  - the likelihood of confirming the concern from credible sources.

### 15. LOG OF REPORTS OF IMPROPER CONDUCT

- 15.1 All reports of Improper Conduct, findings of investigations and monitoring and corrective actions shall be centralised and logged in a log administered and monitored by Compliance Department. The Compliance Manager may assign a designated officer in the Compliance Department to manage the log. The Disciplinary Committee shall be informed of any new reports of Improper Conduct and may request to review the log at any time.
- 15.2 The CEO shall be kept informed of any new reports of Improper Conduct reported where the CEO is not implicated (to the extent possible, without disclosure of identities of the Whistleblower and the person that allegedly committed that Improper Conduct) so that any interim corrective measure (if applicable) regarding any Improper Conduct can be taken immediately.
- 15.3 After receiving a report of Improper Conduct, the Compliance Manager shall inform the Disciplinary Committee ("DC") Chairman of the receipt of the report and provides the DC Chairman his/her opinion on whether he/she believes the case is a frivolous claim or is a case where there are suspicious circumstances. The DC Chairman then gives instructions for the conduct of preliminary investigations. The Compliance Manager or the designated officer shall log a report of Improper Conduct.

### 16. INVESTIGATION PROCEDURES

- 16.1 For a quick overview, please refer to the flowchart of Investigation Procedures in **Appendix C**.

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- 16.2 Upon logging a report of Improper Conduct, the Compliance Manager or the designated officer will provide the Whistleblower with an acknowledgement of receipt of the report of the Improper Conduct within two (2) working days of receipt.
- 16.3 Subsequently, if necessary, the following persons may be consulted (to the extent possible, without disclosure of identities of the Whistleblower and the person that allegedly committed the Improper Conduct) to assist and to provide relevant advice in relation to their respective areas:
- a) In the case of a report relating to
- a breach of any law, external legal counsel.
  - breach of the Code of Ethics or Anti-Bribery and Corruption Policy, Head of Human Resources and Chemopharm Head of Compliance.

### 17. PRELIMINARY INVESTIGATION

- 17.1 The Compliance Manager and/or the designated officer will conduct a preliminary investigation of every report of Improper Conduct received to determine whether there are merits in initiating a full investigation.
- 17.2 The findings of the preliminary investigation and recommendation shall be referred to the Chairman of the DC for a decision on whether to close the case or to proceed to a full investigation of the allegations. The Chairman of the DC may decide to consult with the members of the DC or convene a DC meeting before making a decision.
- 17.3 Upon review of the findings of the preliminary investigation, the Chairman of DC may:
- a) instruct the matter to be closed in the event the preliminary findings clearly indicate that there are no circumstances that warrant a full investigation; or
- b) instruct the Compliance Manager and/or the designated officer to commence a full investigation in the event the preliminary findings clearly indicate suspicious circumstance and where the CEO is not involved. The Chairman of DC may delegate the oversight of the investigation and review of results of the investigation to the CEO; or
- c) refer the matter to the full DC to determine the next cause of action in case where the CEO or the Compliance Manager is involved. In such cases where the report involves the CEO or the Compliance Manager, DC may select other personnel (having due regard to suitable seniority and any circumstances that may give rise to conflicts of interest) or an independent their party to investigate the allegations; or
- d) in cases where the preliminary findings disclose a possible criminal offence, the consultation with DC and/or legal advisors (internal and/or external), decide if the matter should be referred to the relevant authorities, such as the police for further action; or
- e) determine any other course of action that the Chairman of DC deems fit having regard to

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the circumstances of the matter reported and the fairness of the conduct of any investigation.

- 17.4 If the matter is closed, the Compliance Manager and/or the designated officer will inform the Whistleblower that the matter is closed.
- 17.5 If the matter is to be referred to the authorities, subject to any legal requirements or prohibitions, the Compliance Manager and/or the designated officer will inform the Whistleblower that the matter has been referred to the authorities.
- 17.6 In the event a full investigation is to be carried out, the Compliance Manager and/or the designated officer will inform the Whistleblower of the conduct of a full investigation and the Whistleblower shall give his/her full cooperation during the conduct of the investigation.

### 18. FULL INVESTIGATION

- 18.1 In the event a full investigation is to be conducted, the Compliance Manager and/or the designated officer and/or any other persons identified by the DC shall conduct the investigation and endeavour to complete such investigation within two (2) months. Any extension of the time required for the completion of the investigation shall be subject to the DC's approval.
- 18.2 In the event a full investigation is being conducted, all Employees shall give their full cooperation to any investigation conducted.
- 18.3 In the event a full investigation is to be conducted on a report of Improper Conduct by the CEO or the Compliance Manager, and the DC decides to appoint an external independent party to conduct or to assist in conducting the investigation, the terms of appointment of the said external independent party shall be approved by the DC.
- 18.4 All information, documents, records and reports relating to the investigation of an Improper Conduct shall be kept securely to ensure its confidentiality.

### 19. FINDINGS OF INVESTIGATION

- 19.1 Upon the conclusion of an investigation in a case where the CEO is **not implicated**, the investigation report shall be reviewed by the CEO. Upon the review of such investigation report, the CEO shall determine whether the allegation could be substantiated or not. In the event the allegation is substantiated, the CEO will identify and recommend corrective action to be taken to mitigate the risks of such Improper Conduct recurring and recommend if disciplinary action is to be taken against the wrongdoer.
- 19.2 Upon the conclusion of an investigation in a case where the CEO or the Compliance Manager is **implicated**, DC shall review the investigation report. Upon the review of such investigation report, DC shall determine whether the allegation could be substantiated or not. In the event the allegation could be substantiated, DC will identify and recommend the corrective action to be taken to mitigate the risks of such Improper Conduct recurring and recommend if disciplinary action is to be taken against the wrongdoer.

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### 20. DECISION

- 20.1 In a case where the CEO reviewed the investigation and made a determination whether the allegation was substantiated or not, a final report together with recommendation of the CEO will be tabled to the DC. The DC will review the final report and decide on the corrective action to be taken and/or the disciplinary action to be taken (if any).
- 20.2 In a case where DC reviewed the investigation and made a determination whether the allegation was substantiated or not, a final report together with the recommendations of the DC will be tabled to the Board of Directors. The Board of Directors will review the final report and decide on the corrective action to be taken and/or the disciplinary action to be taken (if any).
- 20.3 Subject to any prohibition in law or any legal requirements, the Compliance Manager and/or the designated officer and/or any other persons identified by the DC to conduct the investigation shall inform the Whistleblower that the investigation has been completed and the findings have been presented to the DC or the Board of Directors as the case may be. As the findings are confidential, the details of the findings will not be disclosed to the Whistleblower.

### 21. CORRECTIVE ACTION

- 21.1 The Management shall carry out the decisions of the Board of Directors in relation to the findings of the investigation.
- 21.2 Where applicable, the Management shall institute the appropriate controls to prevent any further wrongdoings or damage to the Company.

### 22. DISCIPLINARY ACTION

- 22.1 Any disciplinary action against any Employee, the CEO or the Compliance Manager shall be carried out in accordance with the procedures for disciplinary action stipulated in the Human Resources Standard Operation Procedures.

### 23. ENFORCEMENT AGENCY

- 23.1 Whilst the Company respects the rights of Employees to directly make reports of improper conduct of an Employee to any enforcement agency set up by the local Government, the Company advises and urges the Employees to report Improper Conduct of an Employee to the Company first so that the Company can remedy any wrongdoings and where applicable, institute the appropriate controls to prevent any serious damage to the Company.



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### 24. ADMINISTRATION OF THIS PROCEDURE

The document owner shall be responsible for the administration, interpretation and revision of this Procedure.

This Procedure will be reviewed annually and may be amended from time to time by the document owner to ensure that it is in line with industry leading practices and caters for other applicable changes/guidelines introduced by the regulatory authorities.

Any significant modification and changes arising out of the review shall be tabled for Chemopharm Management’s recommendation and approval.

### APPENDIX A – WHISTLEBLOWER REPORTING FORM

WHISTLEBLOWER REPORTING FORM	
<p><i>This form is strictly for reporting of wrongful practices by Chemopharm employees, or vendor staff working in/for Chemopharm.</i></p> <p><i>Please provide the following details for any suspected Improper Conduct and submit directly to Chemopharm Compliance Manager. In the event the information is not available at the time the case is lodged, please type ‘Not Available’ in the field.</i></p> <p><i>Please note that you may be called upon to assist in the investigation, if required. In order for us to conduct a thorough investigation, please provide information as accurate as possible.</i></p> <p><i>Your identity and all information provided will be kept confidential.</i></p>	
WHISTLEBLOWER’S PARTICULARS	
Name:	
Designation <i>(if you are Chemopharm employee)</i> / Occupation:	
Department <i>(if you are Chemopharm employee)</i> :	
Date:	
How can we contact you for additional information, if required? <i>(Please provide us your contact number or email address)</i>	
CONSENT TO DISCLOSE YOUR NAME	
<p>Would you like to disclose your identity in the report? <i>(Please tick the box for name disclosure consent)</i></p> <p><input style="width: 40px; height: 20px; vertical-align: middle;" type="checkbox"/> I consent to my name being disclosed if so, required under the provision of the law or for the purpose of conducting a competent investigation.</p>	

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**WHISTLEBLOWER REPORTING FORM**

**INFORMATION OF CHEMOPHARM EMPLOYEE(S) INVOLVED IN IMPROPER CONDUCT**

Name of employee(s) involved in Improper Conduct:

Designation & Department (*where applicable*):

Contact Number and/or E-mail address (*where applicable*):

**DETAILS OF IMPROPER CONDUCT**

What is the incident you wish to report?

On a best effort basis, please briefly describe the Improper Conduct and include the following details:

- (i) *What was the Improper Conduct which had occurred?*
- (ii) *Who had committed the Improper Conduct?*
- (iii) *When did it happen (date(s) and time(s))?*
- (iv) *Where did it happen?*
- (v) *Details of the Improper Conduct*
- (vi) *Who has been involved?*
- (vii) *Is there any evidence that you could provide?*
- (viii) *Are there any other parties involved other than the suspect stated above?*
- (ix) *Do you have any details or information which would assist us in the investigation?*

*You may attach additional pages if there is not enough space here:*

*Please tick the appropriate box*

Has this incident occurred before?

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**WHISTLEBLOWER REPORTING FORM**

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
--------------------------	-----	--------------------------	----

If yes, when was it first observed (*please include information such as the period and frequency if applicable*):

*Please tick the appropriate box*

Were there witness(es) or other people involved?

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
--------------------------	-----	--------------------------	----

If yes, who were they? (*please provide us the name, position and contact details*):

What is the estimated monetary value involved? (*optional*)

*Please tick the appropriate box*

Have you lodged a complaint on this matter to other parties through any other channels / procedures? (another person / department / authority)?

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
--------------------------	-----	--------------------------	----

If yes, please provide details of the complaint lodged below:

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**WHISTLEBLOWER REPORTING FORM**

**DECLARATION**

*Please read the following statements carefully and tick all the boxes before submitting.*

I declare that all information provided in this Form is correct and complete to the best of my knowledge, information and belief.

I hereby acknowledged above report been done in good faith and not for my personal gain.

I hereby agree that the information provided herein to be used and processed for investigation purpose and further agree that the information provided herein may be forwarded to another department / authority / enforcement agency for purpose of investigation.

Form completed by:

Signature:

***For completion by Chemopharm Compliance:***

Date form is received:

Name of recipient and designation:

Signature:

[End of Appendix A]

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**APPENDIX B – DETRIMENTAL ACTION COMPLAINT FORM**

<b>DETRIMENTAL ACTION COMPLAINT FORM</b>	
<p><i>Any employee that makes a report of Improper Conduct in good faith and who has been subject to Detrimental Action may lodge a complaint using this Form. The same procedures for investigation in for reports of Improper Conduct shall apply for any complaints of Detrimental Action.</i></p> <p><b>“Detrimental Action”</b> includes:</p> <ul style="list-style-type: none"> <li>a) <i>causing injury, loss or damage;</i></li> <li>b) <i>intimidation or harassment;</i></li> <li>c) <i>interference with lawful employment or livelihood of any person, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to a person’s employment, career, profession, trade or business or the taking of disciplinary action; and</i></li> <li>d) <i>a threat to take any of the actions referred to in (a) to (c) above.</i></li> </ul> <p><i>Please provide the following details and submit directly to Chemopharm Compliance Manager. In the event the information is not available at the time the case is lodged, please type ‘Not Available’ in the field.</i></p> <p><i>Please note that you may be called upon to assist in the investigation, if required. In order for us to conduct a thorough investigation, please provide information as accurate as possible.</i></p> <p><i>Your identity and all information provided will be kept confidential.</i></p>	
<b>WHISTLEBLOWER’S PARTICULARS</b>	
Name:	
Designation (if you are Chemopharm employee) / Occupation:	
Department (if you are Chemopharm employee):	
Date:	
How can we contact you for additional information, if required? <i>(Please provide us your contact number or email address)</i>	
<b>INFORMATION AND PARTICULARS OF DETRIMENTAL ACTION</b>	
Name of employee(s) committing the Detrimental Action:	
Designation & Department (where applicable):	

**WHISTLEBLOWER AND INVESTIGATION PROCEDURE**

**DETRIMENTAL ACTION COMPLAINT FORM**

Contact Number and/or E-mail address (*where applicable*):

Detrimental Action complained of:

*\* Please submit supporting documents if available.*

*\* Please attach additional sheets if necessary.*

**DECLARATION**

*Please read the following statements carefully and tick all the boxes before submitting.*

I declare that all information provided in this Form is true, correct and complete to the best of my knowledge, information and belief.

I hereby agree that the information provided herein to be used and processed for investigation purpose and further agree that the information provided herein may be forwarded to another department / authority / enforcement agency for purpose of investigation.

Form completed by:

Signature:

***For completion by Chemopharm Compliance:***

Date form is received:

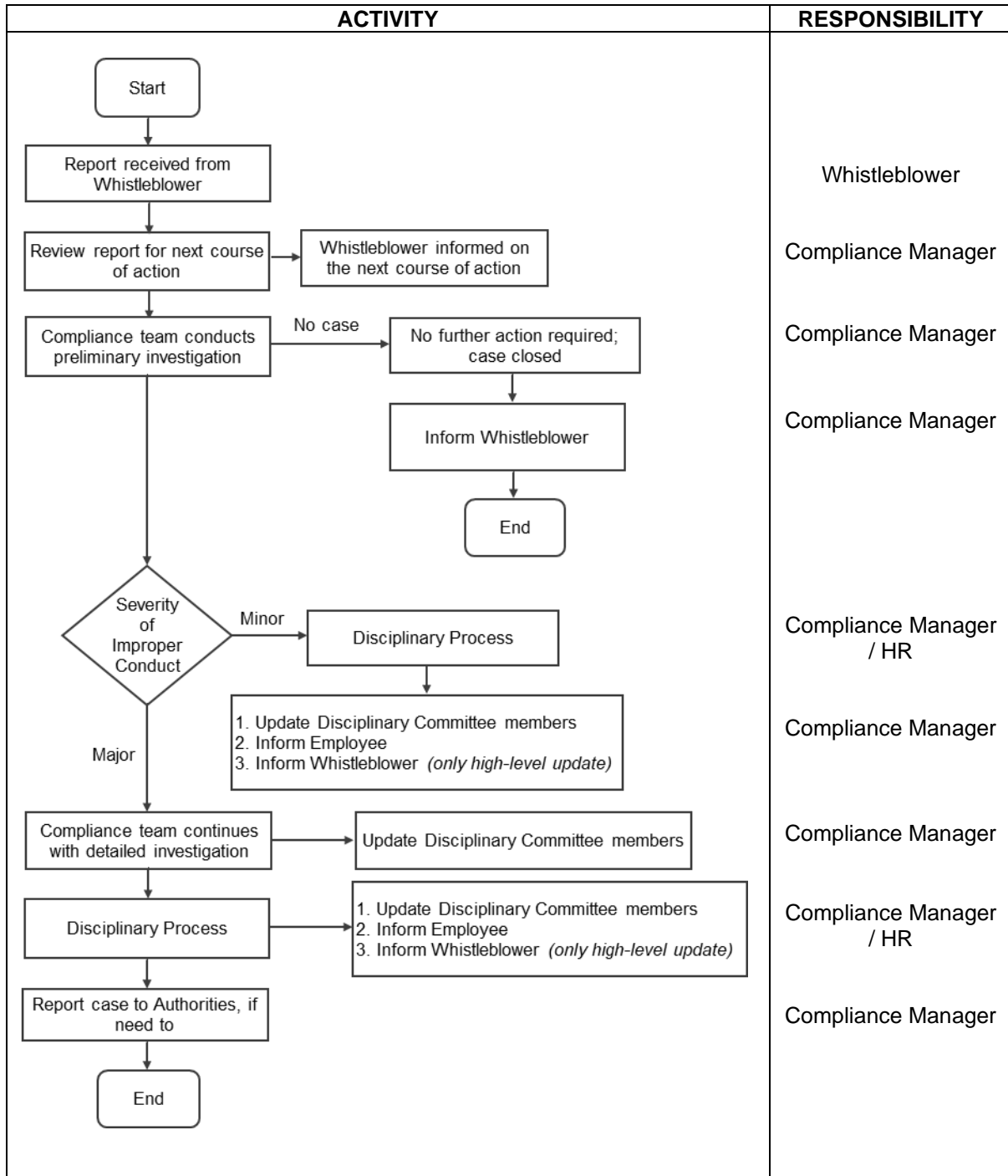
Name of recipient and designation:

Signature:

[End of Appendix B]

**WHISTLEBLOWER AND INVESTIGATION PROCEDURE**

**APPENDIX C – WHISTLEBLOWING PROCESS FLOW**



[End of Appendix C]