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1. ABBREVIATIONS AND DEFINITIONS

Avisena	Avisena Healthcare Sdn Bhd and its related companies
BOD	Board of Directors of Avisena
MACC	Malaysian Anti-Corruption Commission
MACC Act	Malaysian Anti-Corruption Commission Act 2009, the Malaysian Anti-Corruption Commission (Amendment) Act 2018 and its subsidiary legislations, regulations and orders
Policy	This Whistleblowing Policy
Third Party	An individual or organization, who/which come into contact with, or transact with Avisena, which includes actual and potential clients, suppliers, business contacts, consultants, intermediaries, representatives, subcontractor, agents, advisers, joint ventures and government and public bodies (including their advisers, representatives and officials, politicians and political parties
WPA	Whistleblower Protection Act 2010 (Act 711) and its subsidiary legislations, regulations and orders

2. INTRODUCTION

This Policy has been developed to be construed together with the Anti-Corruption Policy (Ref: AG/HCLRM/IARM/P&P0005/2020) as to align with the requirements set out in the MACC Act and the Malaysian Penal Code (Act 574) and their respective amendments. Whistleblowing is the act of combatting corruption and other wrongdoings by encouraging and facilitating disclosures of information that one reasonably believes to be evidence of illegal, immoral or illegitimate practices which known as improper conduct as defined under the WPA. This Policy aims to provide an avenue for whistleblowers to disclose any improper conduct that have been conducted or to be conducted in Avisena.

3. OBJECTIVE

This Policy aims to achieve the following objectives:

- (a) Provide a trusted avenue for external parties, key stakeholders, members and employees of Avisena to raise concerns, without fear of reprisals or victimisation for whistleblowing made in good faith; and
- (b) Ensure that robust arrangements and processes are in place to facilitate independent investigation of the reported concern and for the appropriate follow up actions to be taken.

4. SCOPE & APPLICABILITY

4.1 Applicability

This Policy applies to all individuals working in or with Avisena, including:

- (a) Board of Directors, shareholders;
- (b) all employees, trainees, seconded staff, casual workers, volunteers, interns;
- (c) all Third Parties, including consultants, contractors, suppliers, vendors, agents, clients, customers; and
- (d) such other persons affiliated with Avisena.

4.2 Scope

A person can report a whistleblowing complaint if they are aware of any wrongdoing or detrimental action committed within Avisena, including, but not limited to those set out in **Appendix A**.

5. POLICY

5.1 Policy Statement

Avisena is committed to the highest standards of ethical conduct and integrity in its conduct of business and operations. As part of this commitment, Avisena has in place an avenue for disclosure of any improper conduct to maintain open communication whilst ensuring protection to the whistleblowers.

5.2 Content Disclosure

In order for Avisena to investigate the wrongdoing reported, the whistleblower is to provide the following particulars in the report:

- (a) Whistleblower's personal details (name, identification card number, email address, contact number). Any anonymous disclosure will not be entertained. Any employee or member of the public who wishes to report any wrongdoing is required to disclose his/her identity in order to accord the necessary protection to him/her. However, Avisena reserves its right to investigate into any anonymous disclosure;
- (b) Details and description of the wrongdoing, including its nature, the date, time and place of its occurrence as well as the identity of the alleged person(s) involved. A disclosure may be made even if the whistleblower is not able to identify the identity of the person(s) involved;
- (c) Particulars of witness (if any) to the wrongdoing; and
- (d) Available documentation or supporting evidence (if any).

5.3 Reporting & Communication Channels

Such disclosure may be reported via email, online form or written communication to the Designated Recipient listed below:

Alleged Wrongdoer	Designated Recipient
All level of employees up to Manager	Head of Internal Audit & Risk Management Avisena Healthcare Sdn Bhd, No 3, Jalan Perdagangan 14/4, Seksyen 14, 40000 Shah Alam, Selangor Darul Ehsan <i>(mark strictly confidential and to be opened by addressee only)</i> Email: rosmawatiosman@avisena.com.my
Senior Management (Senior Manager up to CEO as well as BOD)	Chairman of Board Audit & Risk Committee Avisena Healthcare Sdn Bhd, No 3, Jalan Perdagangan 14/4, Seksyen 14, 40000 Shah Alam, Selangor Darul Ehsan <i>(mark strictly confidential and to be opened by addressee only)</i> Email: BARCChairman@avisena.com.my
Any level / If the above designated recipients are unsuitable	Chairman of the Board of Directors Avisena Healthcare Sdn Bhd, No 3, Jalan Perdagangan 14/4, Seksyen 14, 40000 Shah Alam, Selangor Darul Ehsan <i>(mark strictly confidential and to be opened by addressee only)</i>
Any level	Secured Whistleblowing Online Form avisena.com.my/sustainability/governance

5.4 Protection and Revocation of Protection

- 5.4.1 Upon making a disclosure in good faith, based on reasonable grounds, in accordance with the procedure pursuant to this Policy:
- the whistleblower shall be protected from reprisal within Avisena as a direct consequence of his/her disclosure;
 - the whistleblower shall have immunity from civil and criminal action;
 - the whistleblower shall have protection from detrimental action; and
 - the whistleblower's identity shall be protected, i.e. kept confidential unless otherwise required by law or for the purpose of any proceedings by or against Avisena.
- 5.4.2 If the whistleblower, in good faith, reasonably believes they are being subjected to harassment, victimization or reprisal as a direct consequence of having made a disclosure under this Policy, they may consult the Designated Recipient in confidence.
- 5.4.3 Avisena does not permit retaliation of any kind against the whistleblower for complaints submitted hereunder that are made in good faith. Any such reprisal shall in itself be considered a serious breach of this Policy. A reprisal may result in disciplinary action,

including a warning or letter or reprimand, demotion, loss of merit increase, loss of bonus, suspension without pay or termination of employment.

- 5.4.4 The whistleblower's protection shall be revoked if the whistleblower is found to have:
- (a) Himself participated in the improper conduct disclosed;
 - (b) Made a disclosure not in accordance with the requirements of this Policy (for instance, false, untrue, dishonest, frivolous, vexatious, mischievous or malicious complaints);
 - (c) Made the disclosure solely or substantially with a motive of avoiding dismissal or other disciplinary action;
 - (d) Violated the WPA in the course of making the disclosure or providing further information;
 - (e) Made a disclosure specifically prohibited by written law, as prescribed under Section 6(1) of the WPA;
 - (f) Made a disclosure of improper conduct which principally involves questioning the merits of the government policy, including the policy of a public body; or
 - (g) Participated or assisted in any process pursuant to this Policy, otherwise than in good faith.

5.5 Confidentiality

- 5.5.1 Reasonable steps will be taken to maintain the confidentiality of the whistleblower and report made by the whistleblower, unless:
- (a) The whistleblower expressly agrees otherwise, and provides his agreement in writing; or
 - (b) Otherwise required by law.
- 5.5.2 The whistleblower or any person who is involved in the investigation process, shall not disseminate to third party's information regarding the wrongdoing or any part thereof, including the status or outcome of an investigation into it, except:
- (a) To those who are authorized under this Policy;
 - (b) By lodging a report with an enforcement agency in accordance with the WPA or any other prevailing law;
 - (c) If required by law; and
 - (d) On a strictly confidential basis to a professionally qualified lawyer for the purpose of obtaining legal advice.
- 5.5.3 The whistleblower shall not:
- (a) Contact the suspected individual to determine facts or demand restitution; and
 - (b) Discuss the case, facts, suspicions, or allegations with anyone except to assist in the investigation.

5.6 Assessment and Investigation

The Internal Auditor shall be the named investigator unless the Chairman of Board Audit & Risk Committee (BARC) and/or the Group CEO assigns / appoints another investigator. Investigators must be impartial and independent of all parties concerned. The investigator is required to report all concerns raised, the status of all pending and on-going investigations, and any action taken or to be taken as a result of the investigations, to the Chairman of BARC and/or the Group CEO.

5.7 Being Informed and Having the Opportunity to be Heard

Co-operations by parties involved;

- (a) The whistleblower shall be informed of the preliminary status of his disclosure to the extent that is reasonably practicable;
- (b) The whistleblower and the alleged wrongdoer are expected to give full co-operation in any investigation or any process carried out pursuant to this Policy;
- (c) In the event the whistleblower is implicated or discovered to be or have been involved in the alleged wrongdoing, the whistleblower may also be investigated so as to complete the fact-finding process; and
- (d) An investigation is not and shall not be treated as a reprisal against the whistleblower. The whistleblower may be requested to attend a meeting to discuss the allegations and must take all reasonable steps to attend that meeting. The whistleblower shall be given an opportunity to answer any counter allegations against him at that meeting, and the answers shall be recorded in the minutes of that meeting. That meeting may be adjourned for Avisena to obtain further advice or proceed with further investigations.

6. REVIEW

The BOD should ensure that this Policy meets the objectives of relevant legislations and remain effective for Avisena. This Policy shall be reviewed by the BOD every three (3) years or earlier as and when the need arises.

7. REFERENCES

- (a) WPA
- (b) MACC Act

8. APPENDICES

Appendix A – Types of Complaints under the Whistleblowing Policy

APPENDIX A

List of Complaints under Whistleblowing Policy

The list of complaints / concerns includes, but are not limited to;

1. Abuse of power or authority
2. Corruption or bribery
3. Breach of trust
4. Conflict of interest
5. Providing or accepting gifts or material value to/from customers, contractors, vendors or other persons doing or attempting to do business with Avisena that are intended to influence a business decision or selection process
6. Fraud, theft, embezzlement or dishonesty
7. Forgery or alteration of a cheque, bank draft or any other financial document
8. Forgery or alteration of any document or account belonging to Avisena
9. Misappropriation or theft of funds, supplies or other assets
10. Misappropriation of Avisena-owned computer hardware, software, data, etc.
11. Falsifying payroll records or overtime claims
12. Falsifying travel and entertainment expenses and/or utilizing company funds to pay for personal expenses
13. Fictitious reporting or receipts, delivery orders, etc. from suppliers or shipment to customers
14. Acceptance of fictitious quotations from suppliers, vendors or contractors in favouring for a particular entity
15. Inventory or asset theft
16. Impropriety (including financial and operational, etc, within Avisena)
17. Failure to comply with legal and regulatory obligations
18. Misuse of company or confidential information
19. Negligence in carrying out work obligations
20. Destruction, removal or inappropriate use of Avisena's records, furniture, fixtures and equipment
21. Gross mismanagement within Avisena (including serious potential breach to the interest of society and environment)
22. Breach of code of ethics of Avisena, including sexual, physical or other abuse of human rights
23. Act and omission which jeopardizes the health and safety of the company's employees or the public
24. Any other detrimental wrongdoing which nature of the wrongdoing is subject to absolute discretion of the Board Audit & Risk Management Committee
25. Concealment of any of the above.