

WHISTLEBLOWING POLICY (“POLICY”)

1. INTRODUCTION

ProtectHealth Corporation Sdn. Bhd (201601041792 / 1212734-T) (“PHCorp”) pledged to the highest level of integrity and accountability in everything it does and will not tolerate any irresponsible or unethical behaviour that would jeopardise its good standing and reputation.

This Policy seeks to enhance corporate governance by helping to foster an environment where integrity and ethical behaviour is maintained and any illegality, improper conduct and/or wrongdoings in the company may be exposed. The Policy may also act as an early warning system and may enable PHCorp to remedy any wrongdoings before serious damage is caused.

The objective of this Policy is to provide a formal and confidential channel to enable external parties to report in good faith, serious concerns of any improper conduct and/or wrongdoing that could adversely impact PHCorp’s Board of Directors, senior managements, its employees, partners clinics or labs.

2. SCOPE OF POLICY

The scope of this Policy covers possible improper conduct listed below:

- a. A suspected criminal offence.
- b. Contravene any of the requirements and standards of a regulatory body, professional body, government, or its agencies.
- c. Impropriety, corruption, acts of fraud, theft and/misuse of the PHCorp’s properties, assets, or resources.
- d. Abuse of power or authority.
- e. Serious conflicts of interest without disclosure.
- f. Sexual harassment.
- g. Bullying or harassment.
- h. Intimidation.
- i. Gross mismanagement or dereliction of duties
- j. Bribery, blackmail, and miscarriage of justice.
- k. Attempts to suppress or conceal any information relating to any of the above; and
- l. Inappropriate business practice.

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under the PHCorp’s Code of Conduct or any criminal offence under relevant legislations in force and can be read together with ABAC Policy.

(all the above list shall hereinafter referred to as “Improper Conduct”)

3. PROTECTION TO WHISTLEBLOWER

A whistle blower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, anyone who whistleblows will be protected against any adverse and detrimental actions for disclosing any Improper Conduct committed or about to be committed by PHCorp, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistle blower is mistaken as to the facts and the rules and procedures involved.

4. PROTECTION OF CONFIDENTIAL INFORMATION

PHCorp 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.

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 appointed Investigating Officer, enforcement agencies and/or the independent party involved in investigation 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.

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.

5. ANONYMOUS WHISTLEBLOWER

Any anonymous disclosure will not be entertained. Any member of the public who wishes to report Improper Conduct is required to disclose his identity to the recipient party/ies at PHCorp as stated in **Table 1** below to accord the necessary protection to the Whistleblower. However, PHCorp will still investigate into anonymous disclosure provided that the information received is with facts and evidence.

6. MANNER OF DISCLOSURE OF IMPROPER CONDUCT

i. Recipient of Disclosure

The official avenues for disclosure by the Whistleblower are via the designated recipients which in this case is the Integrity and Governance Officer (“Recipients”):

ii. Types of disclosures

The type of disclosures are categorized based on the **Table 1** below :

Table 1

Category 1:	Designated Recipient:	Committee
For disclosures against: Chairman of BARIC	intergrity@protecthealth.com.my -	Board of Directors
Category 2:		
For disclosures against: i. Chairman of PHCorp; and/or ii. Board of Directors	intergrity@protecthealth.com.my	Board of Directors (Excluding the accused)
Category 3:		
For disclosures against: CEO	intergrity@protecthealth.com.my	BARIC
Category 4:		
For disclosures against: i. Senior Management ii. Staff and External Party	intergrity@protecthealth.com.my	Management of PHCorp (Excluding the accused)

iii. The Role of the Recipients are as follows:

- (a) To evaluate the issues/concerns disclosed relating to PHCorp’s Board of Directors, managements, its employees, partners clinics or labs and determine that there is a genuine concern to be investigated further.
- (b) To decide on the next course of action at their discretion.

iv. Reporting Channels

The Whistleblower may also lodge a report with the Royal Malaysia Police, MACC or any other enforcement agencies as defined under the Whistleblower Protection Act 2010 and forward a copy of the said report to the Recipients as per the Type of Disclosures matrix to enable PHCorp to conduct its own internal investigations.

Disclosure of Improper Conduct can be made to any of the following reporting channels:

- (a) Online submission via Email to: **integrity@protecthealth.com.my**
- (b) By mail/hand in a sealed envelope marked: "Strictly Private and Confidential" to:

ProtectHealth Corporations Sdn Bhd
F01 & F02, 1st Floor, Block 2300 Century Square,
Jalan Usahawan, 63000 Cyberjaya, Selangor

Attention: Integrity and Governance Officer

v. Whistleblowing Procedures

Reports of suspected or instances of Improper Conduct should be made promptly for effective action. The disclosure of misconduct shall be in writing via email to the designated recipients. The disclosure should seek to obtain pertinent facts including:

- (a) the background and history of the issues concerned (giving relevant dates);
- (b) the reason why the Whistleblower is particularly concerned about the situation; and
- (c) enclose any supporting or documentary evidence (if available).

If an allegation is raised verbally, the Recipients of disclosures may put the verbal disclosure in writing, as soon as it is practical to do so. The information should be reviewed and confirmed by the person providing the information. This is to ensure that it properly reflects the concern that has been raised and it was accurately understood.

When dealing with a disclosure filed under the Policy, the Recipients of disclosures must determine whether there is sufficient evidence to substantiate the disclosure and the corrective and preventive actions to be taken. A register of all disclosures received shall be maintained at the Legal Department.

The process flow of the whistleblowing procedures as stated in **Appendix A**

Appendix A

