

## POLICIES AND PROCEDURES

### **WHISTLEBLOWING**

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Approved by: Lee Mun Kam Bernard	

## **WHISTLEBLOWING POLICY**

### **1. INTRODUCTION**

- 1.1 Singapore Paincare Holdings Limited, and its subsidiaries (the “**Group**”) are committed to a high standard of compliance with accounting, financial reporting, internal controls, corporate governance and auditing requirements, and any legislation relating thereto. In line with this commitment, the Whistleblowing Policy (the “**Policy**”) aims to provide an avenue for employees and external parties to raise concerns and offer reassurance that they will be protected from reprisals or victimisation for whistleblowing in good faith.
- 1.2 The Policy is intended to conform to the guidance set out in the Code of Corporate Governance, which encourages employees to raise concerns, in confidence, about possible irregularities.

### **2. WHO IS COVERED BY THIS POLICY**

- 2.1 This Policy applies to all employees of the Group.

### **3. OBJECTIVE OF THIS POLICY**

- 3.1 Deter wrongdoing and promote standards of good corporate practices.
- 3.2 Provision of proper avenues for employees to raise concerns about or suspected improprieties in matters of financial reporting or other matters and receive feedback on any action taken.
- 3.3 Assure employees that they will be protected from reprisals or victimisation for whistleblowing in good faith.

### **4. REPORTABLE INCIDENTS**

- 4.1 Some examples of concerns covered by this Policy include (this list is not exhaustive):
- Concerns about the Group’s accounting, internal controls or auditing matters
  - Breach of failure to implement or comply with the Group’s policies or code of conduct
  - Impropriety, corruption, acts of fraud, theft and/or misuse of the Group’s properties, assets or resources
  - Conduct which is an offence or breach of law
  - Abuse of power or authority
  - Serious conflict of interest without disclosure

- Intentional provision of incorrect information to public bodies
- Any other serious improper matters which may cause financial or non-financial loss to the Group, or damage to the Group's reputation
- Fraud against investors, or the making of fraudulent statements to the Singapore Exchange Securities Trading Limited, members of the investing public and government or state authorities
- Acts to mislead, deceive, manipulate, coerce or fraudulently influence any internal or external accountant or auditor in connection with the preparation, examination, audit or review of any financial statements or records of the Group
- Concealing information about any malpractice or misconduct

4.2 The above list is intended to indicate the kind of conduct which might be considered as “wrongdoing”. In cases of doubt, the whistleblower should seek to speak to his or her immediate superior or follow the procedure for reporting under this Policy.

## **5. PROTECTION AGAINST REPRISALS**

- 5.1 If an employee raises a genuine concern under this Policy, he or she will not be at risk of losing his or her job or suffering from retribution or harassment as a result. Provided that the employee is acting in good faith, it does not matter if he or she is mistaken.
- 5.2 However, the Group does not condone frivolous, mischievous or malicious allegations. Employee(s) making such allegations will face disciplinary action in accordance with the Group's disciplinary procedures.

## **6. CONFIDENTIALITY**

- 6.1 The Group encourages the whistleblower to identify himself/herself when raising a concern or providing information. All concerns will be treated with strict confidentiality.
- 6.2 Exceptional circumstances in which information provided by the whistleblower could or would not be treated with strictest confidentiality include:-
- Where the Group is under a legal obligation to disclose information provided
  - Where the information is already in the public domain
  - Where the information is given on a strictly confidential basis to legal or auditing professionals for the purpose of obtaining professional advice
  - Where the information is given to the Police or other authorities for criminal investigation

- 6.3 In the event the Group is faced with a circumstance not covered by the above, and where the whistleblower's identity is to be revealed, the Group will endeavour to discuss this with the whistleblower first.

## **7. CONCERN AND INFORMATION PROVIDED ANONYMOUSLY**

- 7.1 Concerns expressed anonymously are much less persuasive and may hinder investigation work, as it is more difficult to look into the matter or to protect the whistleblower's position. Accordingly, the Group will consider anonymous reports, but concerns expressed or information provided anonymously will be investigated based on their merits.

## **8. HOW TO RAISE A CONCERN OR PROVIDE INFORMATION**

- 8.1 Acts of misconduct may be disclosed in writing, telephonically or in person. However, all reports are encouraged to be made in writing, to assume a clear understanding of the issues raised. The format provided in **Appendix 1** may be used for reporting purposes. All reports should be sent directly to any member of the Whistleblowing Committee. Contact information of the Whistleblowing Committee members are as follows:

**Chairman: Andrew Wong Yee Kong**

Email: report@sgpaincare.com

**Members:**

- a. Dr Bernard Lee Mun Kam
- b. Dr Jeffrey Loh Foo Keong
- c. Dr Lim Kah Meng
- d. Dr Kenneth Sheah Ban Joo

- 8.2 In case of reports sent through e-mail, it is recommended to mark the subject as 'Whistleblower' for ease of identification.
- 8.3 Although the whistleblower is not expected to prove the truth of an allegation, he/she need to demonstrate to the person contacted that there are sufficient grounds for concern.

## **9. INFORMATION POINTS TO NOTE WHEN RAISING A CONCERN OR PROVIDING INFORMATION**

- 9.1 The earlier the concern is raised, the easier it is for the Group to take action.
- 9.2 The Group expects the whistleblower to provide his/her concern in good faith and to show the appropriate officer that there are sufficient grounds for his/her concerns.

## **10. HOW THE GROUP WILL RESPOND**

- 10.1. The Group assures that any concern raised or information provided will be investigated, but consideration will be given to the following factors:
- Severity of the issue raised
  - Credibility of the concern or information
  - Likelihood of confirming the concern or information from attributable sources
- 10.2. Depending on the nature of the concern raised or information provided, the investigation will be conducted involving one or more of these persons or entities:
- The Audit Committee
  - The External or Internal Auditor
  - Forensic Professionals
  - The Police or Commercial Affairs Department
- 10.3. The amount of contact between the whistleblower and the person(s) investigating the concern raised and information provided will be determined by the nature and clarity of the matter reported. Further information may be sought from the whistleblower during the course of the investigation.
- 10.4. The investigating officer(s) will communicate the findings of the investigation(s) to the Audit Committee for their necessary action.

## **11. INVESTIGATING ALLEGED MISCONDUCT OR IMPROPER ACTIVITIES**

- 11.1 The Whistleblowing Committee member who receives a report will notify the sender and acknowledge receipt of the reported violation or suspected violation within ten business days.

- 11.2 The Committee Members shall meet to discuss the action/investigation on the reports received from whistleblowers. The Committee may also exclude from its meetings any person it deems appropriate, depending on the nature of the complaint.
- 11.3 The Committee Members have the responsibility to conduct an investigation. In addition, other parties may also be involved in the investigation.
- 11.4 The Committee Members will ensure investigations are carried out using appropriate channels, resources and expertise.
- 11.5 Some concerns may be resolved by agreed action without the need for an investigation. Concerns about allegations that fall within the scope of specific procedures will be referred for consideration under those procedures.
- 11.6 The Committee Members will report to the Committee Chairman periodically about the reports received and actions taken.
- 11.7 The Management reserves the right to make any decision based on the findings of the Committee.

**WHISTLEBLOWER REPORT FORM**

Please provide the following details for any suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company and submit directly to any of the Whistleblowing Committee members. Please note that you may be called upon to assist in the investigation, if required.

*Note: Please follow the guidelines as laid out in the Whistleblowing Policy*

<b>REPORTER'S CONTACT INFORMATION</b> (This section may be left blank if the reporter wants to be anonymous)			
NAME / ID NO. / BADGE NO.			
DESIGNATION			
DEPARTMENT / OPERATION			
CONTACT NUMBERS			
E-MAIL ADDRESS			
<b>SUSPECT'S INFORMATION</b>			
NAME / ID NO. / BADGE NO.			
DESIGNATION			
DEPARTMENT / OPERATION			
CONTACT NUMBERS			
E-MAIL ADDRESS			
<b>WITNESS(ES) INFORMATION (if any)</b>			
NAME		NAME	
DESIGNATION		DESIGNATION	
DEPARTMENT		DEPARTMENT	
CONTACT NUMBERS		CONTACT NUMBERS	
E-MAIL ADDRESS		E-MAIL ADDRESS	
ALLEGATION NO.		ALLEGATION NO.	

<p><b>COMPLAINT:</b> Briefly describe the misconduct / improper activity and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.</p>	
1. What misconduct / improper activity occurred?	
2. Who committed the misconduct / improper activity?	
3. When did it happen, and when did you notice it?	
4. Where did it happen?	
5. Is there any evidence that you could provide us?*	
6. Are there any other details or information which could assist us in the investigation?	
7. Do you have any other details or information which would assist us in the investigation?	
8. Any other comments?	
Date:	Signature (Optional):

**Note:** \* - You **SHOULD NOT** attempt to obtain evidence for which you do not have a right of access since whistleblowers are 'reporting parties' and **NOT** 'investigators'.

<b><i>For Whistleblower Committee Use</i></b>	<b><i>Report No.</i></b>
Received By:	Received On:
	Acknowledgement Sent On:
Investigation Required (Yes / No)? <i>(If no, please state the reason.)</i>	
Investigation Done By:	
Investigation Results:	
Action Taken / Conclusion:	
Reported to Whistleblower Committee Chairman on:	
Signed Off by:	