

 <small>FROM SICKCARE TO HEALTHCARE</small>	Reference No	HHB/POL/HR/CG-WBP
	Effective Date	1 <sup>ST</sup> MARCH 2019
	Revision No	0
<b>DOCUMENT TITLE</b>	<b>CORPORATE GOVERNANCE: WHISTLE BLOWING POLICY</b>	

## H HEALTHCARE BERHAD

### CORPORATE GOVERNANCE: WHISTLE BLOWING POLICY

<b>Prepared By:</b>	<b>Reviewed By:</b>	<b>Recommended By :</b>	<b>Approved By :</b>
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## **1. Policy Statement**

H Healthcare Berhad 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 (“Policy”) aims to provide an avenue for employees to raise concerns and offer reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith.

## **2. Background**

- 2.1 An important aspect of accountability and transparency is a mechanism to enable staff and other members of the Company to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer’s affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).
- 2.2 It should be emphasized that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the “whistleblowing” procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside the Company.

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### 3. Scope of Policy

This policy is designed to enable employees of the Company to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include below listing which is non exhaustive :

- i. Financial malpractice or impropriety or fraud
- ii. Failure to comply with a legal obligation or Statutes
- iii. Bribery
- iv. Abuse of Power
- v. Conflict of Interest
- vi. Theft or embezzlement
- vii. Misuse of Company property
- viii. Non Compliance with procedure
- ix. Dangers to Health & Safety or the environment
- x. Criminal activity
- xi. Improper conduct or unethical behaviour
- xii. Attempts to conceal any of these

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#### **4. Safeguards**

##### **4.1 Protection**

This policy is designed to offer protection to those employees of the Company who disclose such concerns provided the disclosure is made:

- i. in good faith
- ii. in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person. It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.

##### **4.2 Confidentiality**

The Company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

##### **4.3 Anonymous Allegations**

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be taken into account will include:

- i. The seriousness of the issues raised

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- ii. The credibility of the concern
- iii. The likelihood of confirming the allegation from attributable sources

#### **4.4 Untrue Allegations**

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

#### **5.0 Making a Report**

##### **5.1** Before submitting or e-mailing report, following questions/statements should be followed:

Please tell us if you know for a fact that fraud or malpractice is happening – or if it is only a suspicion or a rumour.

- i. I know for a fact that the misconduct is happening
- ii. I have a strong suspicion that the misconduct is going on
- iii. I think there might be a misconduct going on
- iv. Someone told me about it

##### **5.2** To identify which category of misconduct be with examples as list below which is non exhaustive :

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<ul style="list-style-type: none"> <li>• Bribery or corruption</li> <li>• Supplier kickbacks</li> <li>• Tampering or destroying accounting documents</li> <li>• Misleading external/internal auditors</li> <li>• Abuse of Power / Authority</li> <li>• Actions affecting patient safety</li> <li>• Misrepresentation or false statements by officer regarding matters concerning financial records</li> <li>• Expense Claim Fraud</li> </ul>	<ul style="list-style-type: none"> <li>• Under or Over billing with fraudulent intent</li> <li>• Payroll related fraud</li> <li>• Procurement Fraud</li> <li>• Disclosing confidential information to outside parties</li> <li>• Compliance Fraud</li> <li>• Breach of Internal Procedures</li> <li>• Cheque fraud – misuse of Company’s cheques</li> <li>• Conflict of interest</li> <li>• Any other concerns : _____</li> </ul>
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**5.3** Following guideline can be used for reporting the misconduct as follows:

- i. Briefly describe the misconduct
- ii. Location of the misconduct
- iii. The people who are involved
- iv. Time or period the misconduct occurred
- v. Any other witness who can support the report
- vi. If a fraud, financial value of the fraud (if available)
- vii. Has anyone taken steps to conceal this issue

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- viii. What evidence is there and where can this evidence be found. Please be specific as possible. Employees may also email any evidence in jpeg or pdf format.
- ix. Only raise genuine concerns. Any reporting made with malicious intent will subject the whistleblower to disciplinary action by the Company.

## **6.0 Disclosure**

**6.1** Any concern should first be raised with the immediate superior/Human Resource where possible.

**6.2** Employees may raise their concerns regarding any unethical behaviour or serious misconduct to:

governance@HHB-healthcare.com

or may choose to write a letter directly to :

Attention :

The Managing Director, H Healthcare Berhad

Lot-21, SETIA SPICE ARENA

108, Jalan Tun Dr Awang, Bayan Baru, 11900

Bayan Lepas, Pulau Pinang

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**6.3** Where reporting to Management is a concern, then the report should be made to the Chairman of H Healthcare Berhad.

Attention :

The Chairman, H Healthcare Berhad

Level 11, Block A Pantai Hospital Kuala Lumpur,

8 Jalan Bukit Pantai

59100 Kuala Lumpur

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***RECEIPT AND ACKNOWLEDGMENT OF WHISTLE BLOWING POLICY***

Your signature below indicates that you have read, understand, and agree to abide by the company's whistle blowing policy.

Employee's Signature \_\_\_\_\_ Date \_\_\_\_\_

Employee's Name \_\_\_\_\_ Entity / Location \_\_\_\_\_

NRIC No / Passport No \_\_\_\_\_

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Immediate Superior's Signature \_\_\_\_\_ Date \_\_\_\_\_ Immediate Superior's Name \_\_\_\_\_

\_\_\_\_\_ Entity / Location \_\_\_\_\_

NRIC No / Passport No \_\_\_\_\_