



## **WHISTLEBLOWING POLICY**

The Audit Committee hereby adopts the following policies and procedures pursuant to the Code of Corporate Governance 2018 issued by the Monetary Authority of Singapore and the Listing Manual of the Singapore Exchange Securities Trading Limited.

### **1 INTRODUCTION**

- 1.1 Medtecs International Corporation 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 ('Policy') aims to provide an avenue for employees 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 current employees of the Group, whether full-time, part-time or as a contractor.

### **3 OBJECTIVES OF THIS POLICY**

- 3.1 Deter wrongdoing and to promote standards of good corporate practices.
- 3.2 Provision of proper avenues for employees to raise concerns about actual or suspected improprieties in matters of financial reporting or other matters and receive feedback on any action taken.
- 3.3 Give employees the assurance 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, but not limited to:

- Concerns about the Group's accounting, financial reporting, internal control or auditing matters.
- Failure to implement or comply with the Group's policies or code of conduct.
- Acts of impropriety, fraud, theft or misuse of the Group's properties, assets or resources.
- Grave abuse of power or authority resulting in demoralization of employees or breach of any material policy or regulation of the Group.
- Serious conflict of interest which would result in the financial loss or serious impairment in the business operations of the Group.
- Intentional disclosure of incorrect information to public parties.
- Any other serious improper matters which may cause financial or non-financial loss to the Group, or damage to the Group's reputation.
- Acts to gravely mislead, deceive, manipulate, coerce 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.

4.2 The above list is intended to give an indication of the kind of conduct which might be considered as "wrong-doing". In cases of doubt, the whistleblower should 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 Section 4 of 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. If the concern raised is not confirmed by the investigation, no action will be taken against the employee provided that he or she acts in good faith.

5.2 However, the Group does not condone frivolous, mischievous or malicious allegations or those made for personal gain. 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 or herself when raising a concern or providing information. All concerns will be treated with strict confidentiality.
- 6.2 Exceptional circumstances under 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 we are faced with a circumstance not covered by the above, and where the whistleblower's identity is to be revealed, we will endeavour to discuss this with the whistleblower first.

## **7 CONCERNS AND INFORMATION PROVIDED ANONYMOUSLY**

- 7.1 Concerns expressed anonymously are much less persuasive and may hinder investigation 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 only be investigated on the basis of their merits.

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

- 8.1 As a First step, the employee should raise concerns with his or her immediate supervisor.
- 8.2 If the concern involves his/her immediate supervisor, manager or Head of Department, or for any reason he/she would prefer them not to be told, he/she may report to the Human Resources Supervisor or Manager.
- 8.3 The employee may also report their concerns confidentially to the Audit

Committee via [whistleblowing@medtecs.com](mailto:whistleblowing@medtecs.com), which will also be received and processed by a member of the Group Corporate Governance team and Head of the Group's Human Resources Department, who will in turn report to the Chairman of the Audit Committee and Chairman of the Board. If none of the channels above are suitable, the whistleblower can address concerns to the Country Manager who in turn will report the incident to the Chairman of the Audit Committee and Chairman of the Board.

- 8.4 Concerns or information are preferably raised or provided in writing (letter or e-mail). Ideally, the Group recommends the whistleblower to be detailed in setting out the background and history of events and the reasons for the concern.
- 8.5 If the whistleblower is not comfortable about writing in, he or she can telephone or meet the appropriate officer in confidence at a time and location to be determined together.
- 8.6 All communications made by the whistleblower shall be considered highly confidential and should said information be obtained by a third party other than those mentioned in this Section, such information shall be treated as spurious and may not be admitted as evidence against the concerned employee or officer of the Group.
- 8.7 In relation to Section 8.6, any person found in possession of such confidential information without authority to do so shall be subject to civil and criminal proceedings, if applicable.

## **9 IMPORTANT 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 to the appropriate officer that there are sufficient grounds for his/her concern.
- 9.3 The Group also recognizes that the whistleblower may wish to seek advice and be represented by his/her trade union officer.
- 9.4 If the whistleblower makes a genuine allegation in good faith, which is

not confirmed by subsequent investigation, no action will be taken against him. If, however, the whistleblower makes malicious or vexatious allegations, particularly if he persists with making them, then disciplinary action may be taken by the Group's Human Resources Department (in consultation with the Chairman of the Audit Committee) against the individual concerned in accordance with the Group's disciplinary policies.

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

10.1 The Group undertakes that any concern raised or information provided will be investigated, but consideration will be given to these 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 and following the order of succession the investigation may be conducted involving one or more of these persons or entities:

- Human Resources Department
- Country Manager
- The Executive Committee
- 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 provided 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 Chairman of the Group or Audit Committee for their necessary action.

Approved confirmed and ratified first on 29 April 2009; amended and approved by the Board of Directors on 6 May 2021