



1. Introduction

- 1.1 ISEC Healthcare Group (“the Group”) is committed to a high standard of compliance with accounting, finance reporting, internal controls, corporate governance and auditing requirements and any legislation relating thereto. The Group has an established Code of Ethics (“Code”) which sets out the standards of conduct expected in the management of its business. All employees are expected to carry out their duties in a manner that is consistent with the code.
- 1.2 The Whistle-Blowing Policy (“Policy”) aims to provide an avenue for employees and external parties 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 and external parties.

3. Objectives of this Policy

- 3.1 To deter wrongdoing and to promote standards of good corporate practices.
- 3.2 To provide proper avenues for our employees and external parties 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 To provide assurance to our employees and external parties that they will be protected from reprisals or victimisation for whistle-blowing in good faith.
- 3.4 The Audit Committee is responsible for the oversight of the Policy, and the monitoring of the incident reports as well as the process of and the handling revolving whistleblowing.

4. Reportable Incidents

- 4.1 Some examples of concerns covered by this Policy include, but are not limited to, the following:
 - Concerns about the Group’s banking and treasury, procurement, accounting, business sensitive information, internal controls or auditing matters;

- Breach of or failure to implement or comply with the Group's policies or code of conduct;
- Impropriety, corruption, acts of fraud, theft and/ misuse of the Group's properties, assets or resources;
- Conduct which is an offence or breach of the law;
- Abuse of power or authority;
- Conflict of interest without disclosure;
- Disclosure of confidential information to outsiders;
- Intentional provision of incorrect information to public bodies;
- Fraud against stakeholders, or the making of fraudulent statements to stakeholders and regulatory 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 and records or operations of the Company;
- Concealing information about any malpractice or misconduct;
- Any other improper matters which may cause financial or nonfinancial loss to the Group, or damage to the Group's reputation;

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 whistle-blower 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 or an external party raises a genuine concern under this Policy, he or she will not be at risk of losing his or her job or suffering from victimisation or harassment as a result. Provided that the employee or external party 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 or external party making such allegations will face disciplinary action, as appropriate.

6. Confidentiality

6.1 The Group encourages the whistle-blower to identify himself/ herself when raising a concern or providing information. The whistle-blower's identity as well as concerns raised will be treated with strictest confidentiality.

6.2 Exceptional circumstances under which information provided by the whistle-blower could not or would not be treated with strictest confidentiality include:

- Where the Group is under a legal obligation to disclose the information provided;

- Where the information is already in the public domain;
- Where the information is given on a strictly confidential basis to legal/ auditing or other professionals for the purposes of obtaining professional advice/ assistance;
- Where the information is given to the Police or other authorities for criminal investigation.

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

7. Concerns and Information Provided Anonymously

7.1 The Group will consider anonymous reports, but concerns expressed or information provided anonymously will be investigated on the basis of their merits.

8. How to Raise a Concern or Provide Information

Who to report to:

8.1 The whistle-blower can address his/her concerns to the Group Audit and Risk Committee Chairman via email (whistleblower@isec.sg).

8.2 The Group Audit and Risk Committee Chairman may designate or assign an appropriate investigating officer to ensure independence maintained between the investigating officer and the whistle-blower on the concern raised during and throughout the investigation.

8.3 Concerns or information are preferably raised or provided in writing or email. Ideally, the Group recommends the whistle-blower to be detailed in setting out the background and history of events and the reasons for the concern. The whistle-blower can refer to the "Whistle-Blowing – Incident Recording Form" (Annex 1) for the details to be reported.

8.4 If the whistle-blower 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.

9. Important Points to Note when Raising a Concern of Providing Information

9.1 The earlier the concern is raised the easier it is for the Group to take effective action.

9.2 The Group expects the whistle-blower to provide his/her concern in good faith and to show the appropriate officer that there are sufficient grounds for his/her concern.



- 9.3 The Group also recognises that the whistle-blower may wish to seek advice and be represented by his/her trade union officer.
- 9.4 Concern or information raised by the whistle-blower will be treated with the strictest confidence practicable under the laws of Singapore, as well as any applicable laws of the respective jurisdictions. However, such concern or information may be disclosed in special circumstances such as when it is required by the Court, police or other relevant enforcement agencies conducting related investigation.

10. How the Group will Respond

- 10.1 The Group assures that any legitimate concern raised or information provided will be reviewed and investigated if deemed necessary. The following factors will be taken into consideration:
- Severity of the issue raised;
 - Credibility of the concern or information; and
 - 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 may be conducted involving one or more of these persons or entities:
- The Audit and Risk Committee;
 - The External or Internal Auditor;
 - Forensic Professionals;
 - The Police or Commercial Affairs Department; and/or
 - The Corrupt Practices Investigation Bureau.
- 10.3 The amount of contact between the whistle-blower and the person 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 whistle-blower during the course of the investigation.
- 10.4 The investigating officer will communicate the findings of the investigations to the Group Audit and Risk Committee for their necessary action.
- 10.5 On a regular basis, all whistle-blowing cases reported and the resolution would be reported to the Group Audit and Risk Committee.

End of Document

ANNEX 1: Whistle-Blowing – Incident Recording Form

Name of Whistle-Blower _____

(To assure caller that the identity would be kept strictly confidential. However, if whistle-blower wishes to remain anonymous, to state so clearly.)

Company/Department _____

Designation _____

Date & Time of Report _____

Contact Information _____

Incident Recording form Preparer _____

Description of Case

Recommendation of Reviewing Officer:

Reviewing Officer Name / Designation / Initial: _____

Reminder: To forward the completed report to Reviewing Officer no later than 3 working days after incident has been reported.

