



KPJ HEALTHCARE BERHAD
(Registration No: 247079-M)

WHISTLEBLOWING POLICY

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1. INTRODUCTION

KPJ Healthcare Berhad and its subsidiaries (collectively referred to as “KPJHB Group”) are committed to upholding the highest standards of ethics and integrity by demonstrating honesty, fairness, transparency, and accountability in their conduct of business and operations. Performing Duties with Integrity is one of the core values embraced by KPJHB Group.

2. OBJECTIVE OF THIS POLICY

The objective of this policy is to govern the whistleblowing process, establish a mechanism and encourage everyone who has a relationship with the KPJHB Group to voice and raise their concerns, including any act or conduct that violates the code of conduct, actual or suspected misconduct, illegal or unethical behaviour, without fear of retaliation or unfair treatment.

3. SCOPE

- 3.1 This Policy applies to KPJHB, the Board of Directors of KPJHB Group, and all the employees of KPJHB Group, including but not limited to, Top Management, executives, permanent and contractual employees, seconders temporary staff, workers and interns, and Stakeholders (ie. Shareholders/suppliers/customers), and any other parties.
- 3.2 Any employee or person shall report a whistleblowing complaint if they are aware of any wrongdoing or detrimental action committed within KPJHB Group, including, but not limited to the following:
- (a) Abuse of power/authority
 - (b) Breach of trust
 - (c) Breach of Group Policies and Procedures
 - (d) Bribery / Corruption
 - (e) Conflict of Interest
 - (f) Financial malpractice
 - (g) Fraud
 - (h) Misappropriation of company assets
 - (i) Misuse of confidential information
 - (j) Sexual harassment
 - (k) Any action which creates risk (actual or potential) to the health and safety of any individual
 - (l) Actions or omissions detrimental to the interest of KPJHB Group
- 3.3 Employment-related complaints or grievances shall be referred to the applicable KPJHB Group’s Human Resources Management to be addressed in accordance with their policies and procedures.

4. ACTING IN GOOD FAITH

- 4.1 All employees, directors, stakeholders (i.e., shareholders/suppliers/customers), and any other parties are encouraged to report genuine concerns about unethical behaviour, malpractices, illegal acts, or failure to comply with regulatory requirements without fear of reprisal should they act in good faith when reporting such concerns. The report should not be for personal gain or motivated by ill or malicious intentions.
- 4.2 Malicious and false allegations shall be viewed seriously and treated as gross misconduct that may lead to dismissal or disciplinary action if proven as such.

5. CONFIDENTIALITY

- 5.1 To encourage a conducive environment for effective whistleblowing, the Policy also provides assurances on the preservation of identity, the confidentiality of the information and the protection of whistle-blowers from possible retaliation.
- 5.2 A Whistleblower may choose to report and remain anonymous. However, if further investigation is required, he/she is encouraged to disclose his/her identity when making a report.
- 5.3 The identity of the person reporting a whistleblowing complaint will be kept confidential. His/her consent shall be sought should there be a need to disclose his/her identity for investigation purposes.
- 5.4 KPJHB Group will not disclose his/her identity to any third party without his/her consent except where disclosure is required by law or by the legally binding requirements of any statutory authority or on a strictly confidential basis for obtaining legal advice.

6. PROTECTION FROM RETALIATION

- 6.1 Any employee or person who discloses wrongdoing or improper conduct in good faith and compliance with the provisions of this Policy shall be protected against any retaliation.
- 6.2 Any employee or person that retaliates against a genuine whistleblower may be subject to appropriate action, up to and including legal action, where applicable
- 6.3 The protection given to a whistleblower, however, does not include immunity from any investigations, disciplinary action, criminal prosecution and/or civil liability arising from any personal wrongdoings, acts of misconduct, or non-conformance on his part.
- 6.4 Any employee or person who discloses improper conduct to any enforcement agency shall be protected under the Whistleblower Protection Act 2010.

7. WHISTLEBLOWING CHANNELS

7.1 Pursuant to 3.2, any wrongdoing or improper conduct that is discovered or genuinely suspected by any employee or person shall be reported immediately to the following:

i) Whistleblowing E-Mail: integrity@kpjhealth.com.my
(This email can only be accessed by the Chairman of the Whistleblowing Committee and Chief Integrity Officer)

ii) In writing to:

Chairman of Whistleblowing Committee

KPJ Healthcare Berhad

Integrity Unit

Level 15, Menara KPJ, No 238,

Jalan Tun Razak,

50400 Kuala Lumpur

(Mark Strictly Confidential & To be Opened by Addressee Only)

8. OVERSIGHT AND OWNERSHIP OF POLICY

8.1 KPJHB's Risk, Sustainability and Governance Committee (RSGC) has overall responsibility for this Policy and oversees its implementation of this policy. KPJHB's Integrity Unit (IU) has the day-to-day responsibility of administering and implementing this policy. The use and effectiveness of this policy shall be regularly monitored and reviewed by the IU.

8.2 The owner of this policy is KPJHB's IU who shall be responsible for incorporating any amendments and updates after obtaining the approval of the RSGC for all amendments and updates and distributing the same to the relevant parties.