



Revision 0

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COMPANY POLICY

WHISTLEBLOWING POLICY

REVISION RECORD

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COMPANY POLICY

WHISTLEBLOWING POLICY

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COMPANY POLICY**WHISTLEBLOWING POLICY****1. INTRODUCTION**

Micro 2000 Holdings, including all its subsidiaries, is committed to the highest standards of openness, probity and accountability.

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 employee 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.

Whistleblowing is when an employee, contractor, supplier or any other third parties goes outside the normal management channels to report suspected wrongdoing at work, i.e. speaking out in a confidential manner.

It should be emphasised 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.

2. APPROVAL AND ADOPTION

This policy, which has been approved by the Audit Committee and is issued by the Board of Directors, is a statement that improper, unethical or inappropriate behavior within the organisation is unacceptable and this statement is endorsed and supported at the highest level.

This policy does not form part of your contract of employment.

3. PURPOSE

This aim of this policy is to:

- ensure all cases all employees feel supported in speaking up in confidence and reporting matters they suspect may involve anything improper, unethical or inappropriate;
- encourage all improper, unethical or inappropriate behaviour to be identified and challenged at all levels of the organisation;
- provide clear procedures for the reporting of such matters;

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- manage all disclosures in a timely, consistent and professional manner; and
- provide assurance that all disclosures will be taken seriously, treated as confidential and managed without fear of retaliation.

Suggested reporting lines are contained within this Policy. However, should employees feel uncomfortable with or unsure of how the reporting lines apply to their situation please contact whistleblow@micro2000.com.sg who will ensure that all matters are dealt with in a timely manner, with sensitivity and by the appropriate person.

In all cases involving suspected fraud employees should contact whistleblow@micro2000.com.sg immediately.

4. SCOPE

This policy is designed to enable employees to raise concerns internally and at a high level and to disclose information which the employee 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:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Breach of Company's policies
- Attempts to conceal any of these

It is important to distinguish whistleblowing from a complaint of personal grievance. Employees who make a disclosure under the whistleblowing policy should believe that they are acting in the public interest. This means that personal grievances and complaints are not covered by the whistleblowing policy.

Micro 2000 has other policies and procedures that deal with complaints, critical or constructive comments, appeals and standards of behaviour at work. Employees may send such complaints and feedbacks to stafffeedbacks@micro2000.com.sg. The relevant policy should be followed where appropriate.

This policy can be used by any officer, employee or group of employees or contractor. In addition, suppliers, shareholders, customers and other third parties such as agents, distributors or joint venture partners may also use this policy to report suspected wrongdoing.

5. SAFEGUARDS

5.1 Protection

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

- in good faith
- in the reasonable belief of the employee making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below).

The Company does not tolerate reprisals or victimisation, including harassment, retaliation or adverse employment consequences, of the whistleblowers for reporting in good faith. Those found to have taken reprisal actions or victimised the whistleblower will face disciplinary action, including the possibility of dismissal. Whistleblowers will not be disadvantaged if they acted in good faith, should their concerns be proved unfounded at a later date. This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the malpractice, and disciplinary actions may be taken against such individual (see Clause 5.4 below).

It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure.

5.2 Confidentiality

The Company will treat all such disclosures in a confidential and sensitive manner. The identity of the whistleblower may be kept confidential so long as it does not hinder or frustrate any investigation. In order not to jeopardize the investigation, the whistleblower should also keep the fact that he or she has filed a report, the nature of his or her concerns and the identity of those involved confidential.

However, the investigation process may reveal the source of the information and the whistleblower may need to provide a statement as part of the evidence required.

5.3 Anonymous Allegations

This policy encourages employees 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:

- The seriousness of the issues raised
- The credibility of the concern

- The likelihood of confirming the allegation from attributable sources

5.4 Untrue Allegations

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

6. PROCEDURES

6.1 Procedures for Making a Disclosure

All disclosures will be taken seriously and the following procedure will be used.

6.1.1 Who to Report to

Due to the potential sensitivity of the situation, employees may not always feel comfortable about discussing their concerns internally. As soon as an employee becomes aware of any suspected wrongdoing, he or she should notify the matter to one of the people below:

- his or her immediate supervisor
- his or her Head of Department
- Head of HR Department (for personnel-related complaints only)

Concerns raised under this policy relate to employees of the Company, but may also relate to the actions of a third party, such as a supplier, agent, distributor or joint venture partner. Employees should consult their Head of Departments to raise their concerns relating to third parties.

In situations where the employee feels uncomfortable in approaching the above people or if the disclosure is extremely serious or if notifying any of the people above is not possible, inappropriate, or would serve no purpose, he or she may report the issue directly to whistleblow@micro2000.com.sg.

6.1.2 Making a Disclosure

An employee can raise his or her concerns by email to whistleblow@micro2000.com.sg, stating that he or she is using the Whistleblowing Policy. The Incident Report form attached in Appendix B may be used. Where possible, include the information below:

- an outline of the known or suspected wrongdoing;

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- details, to the best of his or her knowledge, about when, where and how it occurred;
- a list of the names of those suspected of being involved (both within the Company and externally);
- a list of the names of anyone who may have relevant information;
- details of how he or she came to know about the suspected activities;
- what, if any, does he or she estimate to be the value of the loss to Micro 2000 or other parties;
- what, if any, breaches of internal controls, policy or procedure or other requirements he or she believe took place;
- any specific recommendations he or she have for actions;
- the names of anyone he or she has discussed or reported this incident to;
- his or her name and contact details. Please note that these will be kept confidential as far as is reasonably practicable; and
- the date and time of making the report.

The employee will not be expected to prove the wrongdoing that he or she believes he or she has witnessed or suspect, but should provide any supporting evidence where possible.

6.1.3 Investigating a Disclosure

- All disclosures under this policy will be acknowledged in writing within 3 to 5 working days confirming that the matter will be investigated and that a relevant person will get back to you in due course.
- A suitable person will be identified to manage the disclosure. This will be someone who is in a position to take any necessary action as an outcome.
- An evaluation will be done to decide if full investigation is necessary.

- If an investigation is warranted, an independent individual who has had no previous involvement in the matter will be instructed to conduct an

investigation into the allegation. Investigation will commence within 7 working days of the disclosure. The length and scope of the investigation will depend on the subject matter of the disclosure. In most instances, there will be an initial assessment of the disclosure to determine whether there are grounds for a more detailed investigation to take place or whether the disclosure is, for example, based on erroneous information.

- The complainant may be asked to provide more information during the course of the investigation.

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- The investigation report will be reviewed by the person managing the disclosure.
- Appropriate action will be taken – this could involve initiating a disciplinary process (in the case of employees) or may have their contract terminated (in the case of freelancers, part-timers, contact staff or contractors). Where it is believed that criminal activity has taken place e.g. fraud or theft, the matter will be referred to the audit committee who, in consultation with the legal advisers, will decide if the matter should be referred to the authorities for further action. The complainant will be informed if a referral to an external authority is about to or has taken place, although there may need to make such a referral without his or her knowledge or consent if it is considered appropriate.
- If it is found that there is not sufficient evidence of malpractice, or the actions of the individual(s) are not serious enough to warrant disciplinary action, it may be more appropriate for the manager to take a more informal approach to dealing with the matter.
- The complainant will receive written notification of the outcome of the investigation, though not all the details or a copy of the report may be included.
- Possible outcomes of the investigation could be that:
 - i. the allegation could not be substantiated; or
 - ii. action has been taken to ensure that the problem does not arise again. The complainant will not, however, be given details about the action taken as this could breach the human rights of the person(s) involved.
- A final report, with recommendations for change (if appropriate), will be produced to the audit committee. The audit committee will review the final report and make recommendations to the Board.

6.2 Timescale

Due to the varied nature of these sorts of complaints, which may involve internal investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

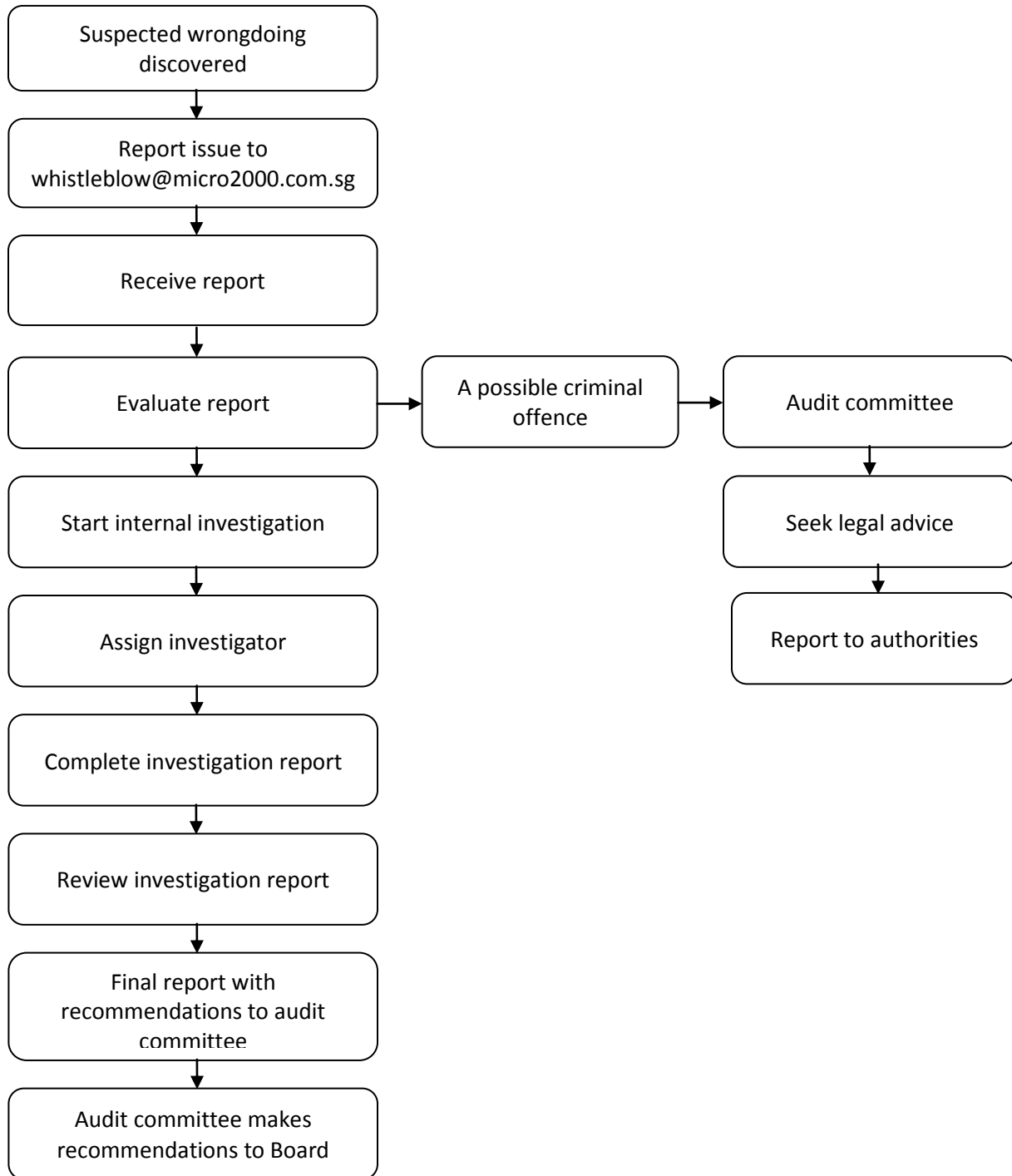
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The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

7. FORMS / RECORDS / REPORTS

Record/Form/Report Name	Satisfies Clause
Incident Report	6.1.2

Appendix A – Whistleblowing Process



INCIDENT REPORT FORM

(1) INFORMATION ABOUT THE INFORMANT			
Full Name		NRIC/ FIN/ WP No.	
Department		Designation	

(2) INFORMATION ABOUT THE INCIDENT			
Date of Incident (YYYY/MM/DD)		Time of Incident	AM/ PM
Date of Report (YYYY/MM/DD)		Time of Report	AM/ PM
Location of Incident			

Description of Incident (<i>What, How, Person(s) involved etc</i>)

Particulars of Witness(es) (<i>If applicable</i>)			
Witness 1			
Full Name		NRIC/ FIN/ WP No.	
Contact No.			
Witness 2			
Full Name		NRIC/ FIN/ WP No.	
Contact No.			

(3) REPORTING OF THE INCIDENT			
Incident Reported to		Designation	
How (e.g. this form, in person, email, phone)			

(4) DECLARATION
I declare that the information that I have provided for this claim is true and accurate.
<div style="border-bottom: 1px solid black; width: 200px; margin-left: 0;"></div> Signature/ Date