

# CNA GROUP LTD

## WHISTLEBLOWING POLICY

### 1. INTRODUCTION

CNA Group Ltd (“the Company”) directors and employees are expected to carry out their duties as required and conduct themselves in a professional manner at all times and in ways that bring credit and respect to themselves and the Company. We are required to observe high standards of business and personal ethics, honesty and with integrity in fulfilling our responsibilities within all applicable laws and regulations. Being a public company, we are socially responsible in ensuring that this is practised within the organization, consistent with the Company’s code of ethics.

The Whistle Blowing Policy (“the Code”) is intended to help employees who have major concerns over any wrongdoing within the Company and its subsidiaries (“Group”) relating to unlawful conduct, financial malpractice or dangers to the public or the environment to come forward and express these concerns without fear of any punitive action. Specific examples could include:

- 1.1 A criminal offence (e.g. fraud, corruption or theft) has been/is likely to be committed.
- 1.2 Fraud whether actual or suspected or deliberate error in preparing, evaluating or review of any financial statements, recording and maintenance of the financial records of the Group.
- 1.3 Actual or suspected deficiencies in or non-compliance with the Group’s internal controls and procedures.
- 1.4 Any misrepresentation whether actual or suspected by an officer or auditor regarding a matter contained or required to be contained in the Company or Group’s financial records, reports or audit reports.
- 1.5 Information relating to any of the above being deliberately concealed or attempts are being made to conceal the same.
- 1.6 Abuse of power or authority.
- 1.7 Serious conflict of interest without disclosure

# CNA GROUP LTD

## WHISTLEBLOWING POLICY

### Non-Accounting Malpractice Reporting:

- Misappropriation of Cash Sales
- Misuse of Petty Cash
- Unauthorised Discounts
- Falsifying Attendance Record
- Pilferage of Stock in Trade
- Abuse of Authority for Personal Gain
- A criminal offence
- Health or safety of any individual has been or is likely to be endangered
- Discrimination or physical abuse of any member of staff or service recipient
- Discrimination to any member of staff or service recipient on grounds of sex, race or disability
- Any conflict of interest in any activity that is, or appears to be, opposed to the best interest of the Company and the Group
- Information relating to any of the above being deliberately concealed, ignored by immediate superior or attempts are being made to conceal the same.

The Company has established this Code so as to enable you to raise your concerns about such malpractice(s) at an early stage and in the right way. The company would prefer that you raise the matter when it is just a concern rather than wait for concrete proof.

If something is troubling you and you think we should know about or look into, please use this policy. If however, you are aggrieved about your personal position, please approach your immediate superior or go through the human resource channel. This Code is primarily for concerns where the interests of the Company itself are at risk.

## **2. AIMS OF THE WHISTLE BLOWING CODE**

The Code aims to:

- 2.1 Encourage employees to feel confident in raising serious concerns and to question and act upon their concerns.
- 2.2 Provide ways for employees to raise those concerns and get feedback on any action taken as a result.
- 2.3 Ensure that employees get a response to their concerns.

## CNA GROUP LTD

### WHISTLEBLOWING POLICY

- 2.4 Reassure employees that if they raise any concerns in good faith and reasonably believe them to be true, they will be protected from possible reprisals or victimization, to the extent where the situation allows.

#### 3. WHO CAN BE THE WHISTLEBLOWER UNDER THIS CODE?

- 3.1 All employees of the Group may use this Code.
- 3.2 Contractors working for the Company may also use the provisions of this Code to make the Company aware of any concerns that the contractor's staff may have with regard to any contractual or other arrangement with the Company. The private concerns of the contractor's staff relating to non-Company business should be raised with the relevant contractor and/or other suitable agency/regulator – including the police, if appropriate.
- 3.3 Any other stakeholders of the Group eg customers, bankers, consultants, etc.

#### 4. PROCEDURES TO RAISING A CONCERN

- 4.1 If have a whistle to blow, you should approach any of the members of the Whistleblower Committee:

##### **Chairman**

David Yeung Koon Sang  
Telephone: 9623-1668  
Email address: [dysec@davidyeung.com.sg](mailto:dysec@davidyeung.com.sg)

##### **Members:**

Bernard Chen  
Telephone: 9456-2226  
Email Address: [bernard.chen22@gmail.com](mailto:bernard.chen22@gmail.com)

Pang Toh Kang  
Telephone: 9794-6366  
Email address: [pang.toh.kang@cpgcorp.com.sg](mailto:pang.toh.kang@cpgcorp.com.sg)

- 4.2 Concerns may be raised verbally or in writing. Staff or whistleblower who wish to make a written report are invited to use the following format:

## CNA GROUP LTD

### WHISTLEBLOWING POLICY

- set out the background and history of the concern (giving relevant dates);
  - explain the reason why you are particularly concerned about the situation.
- 4.3 Although the whistleblower is not expected to prove the truth of an allegation, he/she needs to demonstrate to the person contacted that there are sufficient grounds for concern.
- 4.4 You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.
- 4.5 You are encouraged to put your name to your allegation whenever possible. Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Whistleblower Committee. In exercising such discretion, the committee will take into account the seriousness of the issues raised, its credibility and the likelihood of confirming the allegation from attributable sources.

#### **5. INVESTIGATING ALLEDGED MISCONDUCT OR IMPROPER ACTIVITES**

- 5.1 The Whistleblower Committee member who receives a report will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days.
- 5.2 The Committee Members shall meet to discuss about the action / investigation on the reports received from whistleblowers. The Committee may also exclude from its meetings any persons it deems appropriate, depending on the nature of the complaint.
- 5.3 The Committee Members have the responsibility to conduct investigations. In addition, other parties may also be involved in the investigations.
- 5.4 The Committee Members will ensure investigations are carried out using appropriate channels, resources and expertise.
- 5.5. Some concerns may be resolved by agreed action without the need for an investigation. Concerns about allegations which fall within the

## CNA GROUP LTD

### WHISTLEBLOWING POLICY

scope of specific procedures will be referred for consideration under those procedures.

- 5.6 The Committee Members will report to the Committee Chairman on a periodic basis about the reports received and actions taken.
- 5.7 The Management reserves the right to make any decision based on the findings by the Committee.

#### 6. SAFEGUARDS

- 6.1 **Harassment or Victimization** - The Company recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The Company will not tolerate harassment or victimisation and will take action to protect staff when they raise a concern in good faith.
- 6.2 **Confidentiality** - The Company will do its best to protect an individual's identity when he/she raises a concern and does not want their name to be disclosed. It must be appreciated, however, that the investigation process may reveal the source of the information and a statement by the individual may be required as part of the evidence.

#### 7. UNCONFIRMED ALLEGATIONS

- 7.1 No action will be taken against anyone who makes an allegation **in good faith, reasonably believing it to be true**, even if the allegation is not subsequently confirmed by the investigation.

#### CONCLUSION

Our Whistleblower Committee may consult Management or any other independent third party for any measures and/or policies which should be put in place to prevent similar breaches from taking place in the future. Management will in turn co-ordinate with the relevant departments to implement all recommended measures and policies.