



(Incorporated in the Republic of Singapore)
(Company registration no: 201110784M)

AOXIN Q & M DENTAL GROUP LIMITED & its Subsidiary Companies

WHISTLE BLOWING POLICY

1. INTRODUCTION

- 1.1 Employees are often the first to realise that there maybe irregularities within a company. However, employees may not express their concerns for fear of being disloyal to their colleagues or to the company. They may also be afraid of discrimination or harassment. In such circumstances, employees may feel that it is best to ignore the concern rather than report.
- 1.2 External parties who have dealings with the company (such as customers and suppliers) may also avoid raising a concern of potential irregularities for the same reasons.
- 1.3 **Aoxin Q & M Dental Group Limited** is committed to a high standard of compliance with accounting, financial reporting, internal controls and auditing requirements and any legislation relating thereto. In line with this commitment, the Whistle Blowing Policy ("Policy") aims to provide an avenue for employees and external parties to raise concerns and offer reassurance that they will be protected from reprisals or victimisation for whistle blowing in good faith. This will augment the Group's ability to detect potential fraud, hence providing another level of comfort and assurance to its stakeholders.
- 1.4 The Policy is intended to conform to the guidance set out in the Code of Corporate Governance, which encourages you to raise concerns, in confidence, about possible irregularities.

2. DEFINITION

- 2.1 For the purpose of this Policy, whistle blowing is defined as:

"a deliberate, voluntary disclosure of individual or organizational malpractice by a person who has or has had privileged access to data, events or information about an actual, suspected or anticipated wrongdoing within or by the **Aoxin Q & M Dental Group Limited & its subsidiary companies** ("Group") that is within its ability to control."

3. WHO IS COVERED BY THIS POLICY

- 3.1 This Policy applies to all employees of **Aoxin Q & M Dental Group Limited and its subsidiary companies**.
- 3.2 It also applies to all external parties who have a business relationship with **Aoxin Q & M Dental Group Limited and its subsidiary companies**. External parties include customers, suppliers, contractors, applicants for employment or the general public.

4. AIM OF THIS POLICY

- 4.1 Provision of proper avenues for you to raise concerns about actual or suspected improprieties in matters of financial reporting or other matters and receive feedback on any action taken.
- 4.2 Give you assurances that you will be protected from reprisals or victimisation for whistle blowing in good faith.

5. REPORTABLE INCIDENTS

- 5.1 Some examples of concerns covered by this Policy include (this list is not exhaustive): -
- Concerns about the Group's accounting, internal controls or auditing matters;
 - Impropriety, corruption, acts of fraud, theft and /misuse of the Group's properties, assets or resources;
 - Conduct which is an offence or breach of law;
 - Serious conflict of interest without disclosure;
 - Breach of the Group's policies or code of conduct;
 - Concealing information about any of the above malpractice or misconduct;
 - Any other serious improper matters which may cause financial or non-financial loss to the Group, or damage to the Group's reputation;
 - Fraud against investors, or the making of fraudulent statements to the Singapore Exchange Securities Trading Limited ("SGX-ST"), members of the investing public and government or state authorities; and
 - Distinct effort to mislead, deceive, manipulate, coerce or fraudulently influence any internal or external auditor in connection with the preparation, examination, audit or review of any financial statements or records of the Group.
- 5.2 Some examples of the above situations are provided in Appendix 1.

6. PROTECTION AGAINST REPRISALS

- 6.1 If you raise a genuine concern under this Policy, you will not be at risk of losing your job or suffering from retribution or harassment as a result. Provided that you are acting in good faith, it does not matter if you are mistaken.
- 6.2 However **Aoxin Q & M Dental Group Limited** does not condone frivolous, mischievous or malicious allegations. Employee(s) making such allegations will face disciplinary action in accordance to the Discipline Procedures.
- 6.3 Likewise, **Aoxin Q & M Dental Group Limited** does not condone any retaliatory action taken against any employee that has filed a compliant. But it may institute disciplinary action against any person found to be taken retaliatory action. "Retaliatory action" refers to the use of, or any attempt to use authority by any employee of the Group to influence or to interfere with the right of another employee to report any possible improprieties. Any compliant alleging retaliatory action shall be received, reviewed and investigated by **Aoxin Q & M Dental Group Limited** in the same manner as any compliant alleging against possible improprieties. A "complaint" refers to any complaint alleging either possible improprieties or retaliatory action.

7. CONFIDENTIALITY

- 7.1 **Aoxin Q & M Dental Group Limited** encourages you to identify yourself when raising a concern or providing information. All concerns will be treated with strict confidentiality.
- 7.2 Exceptional circumstances which information provided by you can or would not be treated with strictest confidentiality include:

- Where the **Aoxin Q & M Dental Group Limited** is under a legal obligation to disclose information provided by you;
- 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; and
- Where the information is given to the Police for criminal investigation.

7.3 In the event we are faced with a circumstance not covered by the above, and where your identity is to be revealed, we will endeavor to discuss this with you first.

8. CONCERNS AND INFORMATION PROVIDED ANONYMOUSLY

8.1 Concerns expressed anonymously are much less persuasive and may hinder investigation work, as it is more difficult to look into the matter or to protect your position. Accordingly, **Aoxin Q & M Dental Group Limited** will consider anonymous reports, but concerns expressed or information provided anonymously will be investigated on the basis of their merits.

9. HOW TO RAISE A CONCERN OR PROVIDE INFORMATION

Who to Report To

9.1 Option One: Report to your immediate supervisor.

9.2 Option Two: If the concern involves your immediate supervisor, manager or Head of Department, or for any reason, you would prefer them not to be told, you may report to the Head of Department (HR department).

9.3.1 Option Three: If you feel that none of the channels above are suitable, you can address your concerns to the Audit Committee Chairman Mr Chua Ser Miang at 'chuasm@outlook.com' or Financial Controller at sinnee@aoxin.sg

How to Make the Report

9.4 Concerns or information are preferably raised or provided in writing (letter or email). Ideally, **Aoxin Q & M Dental Group Limited** recommends you to be detailed in setting out the background and history of events and the reasons for your concern.

9.5 If you are not comfortable about writing in, you can telephone or meet the appropriate officer in confidence at a time and location to be determined together.

9.6 All reports can be sent to the Audit Committee Chairman at chuasm@outlook.com or Financial Controller at sinnee@aoxin.sg or contacted via phone: 6779 7371 or via fax 67786781.

10. IMPORTANT POINTS TO NOTE WHEN RAISING A CONCERN OR PROVIDING INFORMATION

10.1 The earlier your concern is raised the easier it is for **Aoxin Q & M Dental Group Limited** to take action.

10.2 **Aoxin Q & M Dental Group Limited** expects you to provide your concern in good faith and to show to the appropriate officer that there are sufficient grounds for your concern.

- 10.3 **Aoxin Q & M Dental Group Limited** also recognizes that employees may wish to seek advice and be represented by their trade union officer.

11. HOW AOXIN Q & M DENTAL GROUP LIMITED WILL RESPOND

When a concern is raised or information is provided

- 11.1 **Aoxin Q & M Dental Group Limited** assures you that any concern raised or information provided will be investigated, but consideration will be given to the following factors:

- Seriousness of the issue raised;
- Credibility of the concern or information; and
- Likelihood of confirming the concern or information from attributable sources.

Investigating a concern raised or information provided

- 11.2 Depending on the nature of the concern raised or information provided, the investigation will be conducted involving one or more of the following persons or entities:

- The Audit Committee;
- The External Auditor;
- Forensic Accountants; and/or
- The Police or Commercial Affairs Department.

- 11.3 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.

What happens after the investigation is completed?

- 11.4 The investigating officer(s) will communicate the findings of the investigation(s) to the Audit Committee for their necessary action.

APPENDIX 1 - SOME EXAMPLES OF SITUATIONS THAT SHOULD BE REPORTED

Example 1

You work in the Finance Department of the Group. You are concerned about the lack of internal controls or the appropriateness of the internal controls in the functions of the Finance Department you are tasked to do and are aware of discrepancies and abuse as a result of this.

What should you do?

Report to your immediate Supervisor, with details of breach of controls. If reporting to your immediate Supervisor is not appropriate, follow reporting line provided in the Policy. Where possible, to provide supporting documents and evidence.

Example 2

A particular supplier is always providing poor quality materials or is shoddy in workmanship. You have brought this matter up with your immediate Supervisor, but no action was taken against the supplier. You suspect that your immediate Supervisor is favoring the supplier to the detriment of the Group.

What should you do?

Report to one or both of the designated officers as outlined in the Policy. Where possible, to provide supporting documents and evidence.

Example 3

You are a customer or a supplier. A staff member of the Group has suggested that you will be given a favorable contract in return for a reward in cash or in kind.

What should you do?

Report to one or both of the designated officers as outlined in the Policy. If this is not an appropriate reporting channel or the matter is very serious, you should report directly to the Audit Committee Chairman. Where possible, to provide supporting documents and evidence.

Example 4

You have become aware of serious and immediate safety concerns at one of the Group's properties. You have already informed the Property Management Department and no actions have been taken.

What should you do?

Report to your immediate Supervisor.

Example 5

As a close friend of the person in charge of procurement, you realise that a procurement contract he or she has approved, is with a company in which his or her family member has a financial interest. No one else in the company knows about this personal relationship with the supplier.

What should you do?

Report to your immediate Supervisor, with details of breach of controls. If reporting to your immediate Supervisor is not appropriate, follow reporting line provided in the Policy. Where possible, to provide supporting documents and evidence.

The above examples are not exhaustive.

1 May 2017