



ORGANISATIONAL INTEGRITY AND ANTI-CORRUPTION PLAN 2025

DUOPHARMA BIOTECH BERHAD

PREPARED BY
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CONTENT

Abbreviation	3
Background	4
Purpose	6
Objective	6
2025 Key Initiatives	7
Dimension 1: Vision and Mission	8
Dimension 2: Leadership	9
Dimension 3: Infrastructure	10
Dimension 4: Legal, Compliance, Policies and Rules	11
Dimension 5: Organisational Culture	12
Dimension 6: Disciplinary and Reward Measures	13
Dimension 7: Measurement, Research and Assessment	14
Dimension 8: Confidential Advice and Support	16
Dimension 9: Ethics Training and Education	17
Dimension 10: Ethics Communication	19
Dimension 11: Whistleblowing	20
Dimension 12: Accountability	21

ABBREVIATION

Anti-Bribery Management System	ABMS
Code of Conduct	COC
Corporate Integrity System	CIS
Corporate Integrity System Assessment Questionnaire	CIAQ
Corrupt Practices Investigation Bureau	CPIB
Corruption Risk Management	CRM
Corruption Risk Register	CRR
Group Risk Management & Integrity	GRMI
Head of Department	HOD
Human Governance Profiling	HGP
Institut Integriti Malaysia	IIM
Key Performance Indicator	KPI
Corruption Eradication Commission/ Komisi Pemberantasan Korupsi Republik Indonesia	KPK
Malaysian Anti-Corruption Commission	MACC
My Duopharma Learning	MDL
Organisational Integrity and Anti-Corruption Plan	OIACP

BACKGROUND

Duopharma Biotech Berhad's Organisational Integrity & Anti-Corruption Plan 2025 (OIACP 2025) is a one-year strategy aimed at strengthening governance, integrity, and anti-corruption measures throughout the Group. It is developed based on the 12 dimensions outlined in the Corporate Integrity System Assessment Questionnaires (CIAQ).

In order to achieve the OIACP 2025 objectives, we aim to build upon the key goals of the previous OIACP, while incorporating selected initiatives from the National Anti-Corruption Strategy 2024-2028.

A total of 6 strategic objectives and 19 initiatives have been identified for implementation by all relevant stakeholders.



BACKGROUND



The Corporate Integrity System (CIS) Malaysia was created to strengthen good governance and integrity in the business community in Malaysia to reduce crime rates and fight corruption in the public and private sectors.

The Corporate Integrity System Assessment Questionnaire(CIAQ) is used to evaluate implemented Corporate Integrity Systems in the organisations.

An effective corporate ethics and integrity system gives equal importance to all 12 dimensions. For each dimension, there are further descriptors totaling 19 descriptors of the Integrity and Anti-Corruption initiatives.

PURPOSE

The purpose of initiating the Plan is to foster and maintain Board, Management, Employees and stakeholders confidence in the company's Integrity and Anti-Corruption System. This is achieved through the provision of a framework to build the culture of integrity in Duopharma Biotech Berhad (Duopharma Biotech).

OBJECTIVE

- Enhance initiatives to raise awareness of integrity, fostering a deeper understanding and commitment to ethical practices across the organisation;
- Continue collaborating with key agencies, such as MACC , Corruption Eradication Commission of Indonesia and Corrupt Practices Investigation Bureau to refine and improve existing policies and workflows, ensuring alignment with best practices and regulatory standards;
- Committing to promote values of integrity, transparency, accountability and good corporate governance;
- To ensure Duopharma Biotech's integrity and transparency is sustained in daily practices through elements of honesty, efficiency and trustworthiness.

In order to achieve the OIACP 2025 objectives, we aim to build upon the key goals of the previous OIACP, while incorporating selected initiatives from the National Anti-Corruption Strategy 2024-2028.



2025 KEY INITIATIVES



ENGAGEMENT

Integrity network with external stakeholders and community (ie; MACC, KPK, CPIB, School) to promote ethical practices, share insights, and develop sustainable solutions collaboratively.



GAP ASSESSMENT

Gap assessment on selected department to refine and enhance appropriate operational, managerial and strategic performance indicators.



CORRUPTION RISK

Embark on the compliance and adequacy of the Corruption Risk Management (CRM) on a monthly basis in rotation by the respective corruption risk exposure.



SURVEY

Conduct a survey to assess perceptions of the effectiveness of integrity and anti-corruption education initiatives within the company.



ENHANCEMENT

The Integrity Pact will be using e-signatures and stored in a secured data management system to smoothen process and easy retrieval.



INTEGRITY MODULE

Develop specialised training modules/ talk/ case study for each book category and Senior Management & Board Director to enhance awareness of integrity issues and promote ethical decision-making.

DIMENSION 1: VISION AND GOALS

FOREWARD	SPECIFIC MEASURES	OBJECTIVE
<p>Commitment on the Duopharma Biotech Core Values is through the Code of Conduct (COC). The COC is to be reviewed and subsequently communicated to all staff to promote ethical compliance in the Duopharma Biotech Group.</p> <p>Continuous commitment, All staffs includes BOD</p>	<ul style="list-style-type: none"> Revise of COC in bilingual and interactive form for easy understanding of the COC. 	<p>To ensure staff is aware, understand and integrate COC in carrying out their day-to-day activities.</p>
<p>The emphasis of the Core Values to all staff via trainings and activities which relates to core values.</p> <p>Continuous commitment, All staff, GHR & GRMI</p>	<ul style="list-style-type: none"> Compulsory Integrity training for every new entrant to the Group including Board members. Annual refresher program related to Duopharma Biotech's Core Values. 	<p>To ensure the Duopharma Biotech Core Values are practiced and embedded in the Duopharma Biotech culture.</p>

DIMENSION 2: LEADERSHIP

FOREWARD	SPECIFIC MEASURES	OBJECTIVE
<p>Leaders must make it a point to discuss express their opinion on the significance of Moral/ Ethics/ Integrity during Company town halls and Department meetings</p> <p>New Initiatives, Implementor: GRMI</p>	<ul style="list-style-type: none">• Leaders should act consistently with organisation's value and this should begin with the Board and Senior Management.• Leaders to continuously communicate on ethics and integrity as a culture at workplace.	<p>To equip leaders with a deep understanding of the consequences of unethical behavior through real-world case studies.</p>

DIMENSION 3: INFRASTRUCTURE

FOREWARD	SPECIFIC MEASURES	OBJECTIVE
<p>Selecting individuals with a robust commitment to integrity and ethical conduct is crucial in building a workforce aligned with our values. To gauge this commitment accurately, we implement Integrity Testing as a benchmark for recruitment and promotions.</p> <p>Continuous commitment Implementor: GHR & GRMI</p>	<ul style="list-style-type: none"> Human Governance Profiling to be implemented in recruitment and promotion process as it is a part of requirements outlines in the Guidelines on Adequate Procedures. Amendment of the recruitment and promotion policy to incorporate the HGP testing tool. 	<p>Enhance recruitment and promotions by using Human Governance Profiling (HGP) for Senior Executives and above. This strengthens governance, integrity, and ethical leadership. Engaging a consultant ensures impartial assessments and credible outcomes.</p>
<p>Empower Integrity Champions with the skills and knowledge to lead effectively and guide local management. Champion should serve as key points of contact for integrity matters, promoting ethical practices across the organization.</p> <p>Continuous commitment, New Initiatives, Implementor: GRMI & Integrity Champion</p>	<ul style="list-style-type: none"> Incorporating Integrity-related Key Performance Indicators (KPIs) into the individual Champions' KPIs will ensure a strong focus on ethical standards. Integrity Champions will be encouraged to share innovative ideas that promote workplace ethics, accountability, and transparency. Compulsory annual planned training for the Integrity Champions 	<p>To ensure the infrastructure on ethics and Integrity is effective and shouldered by a specific unit or person.</p>

DIMENSION 4: LEGAL COMPLIANCE, POLICIES & RULES

FOREWARD	SPECIFIC MEASURES	OBJECTIVE
<p>Periodic assessment of specific compliance, ethics and corruption related risks for Holding/Divisions and overseas entities with a particular risk profile by the management of those units with the Integrity Unit.</p> <p>Continuous commitment Implementor: All Staff /GRMI</p>	<ul style="list-style-type: none"> • Embark on the compliance and adequacy of the Corruption Risk Management (CRM) on a monthly basis in rotation by corruption risk exposure • The inclusion of refresher training sessions as and when is required during CRR reviews. 	<p>Ensure compliance with company policies and regulations while mitigating associated risks across all entities</p>
<p>The Integrity Pact will be digitalized through the use of e-signatures, ensuring a streamlined and secured process. The signed documents will then be stored in a centralized data management system for easy access and efficient tracking.</p> <p>New Initiatives & Continuous commitment Implementor: GRMI & Integrity Champion</p>	<ul style="list-style-type: none"> • Implement digital signature on Integrity Pact. • Safekeeping of all Integrity Pacts from the Business Unit and Purchasing Department in the Data Management System. 	<p>To ensure all Integrity Pact are securely stored within the Data Management System for easy reference and retrieval.</p>

DIMENSION 5: ORGANISATIONAL CULTURE

FOREWARD	SPECIFIC MEASURES	OBJECTIVE
<p>Foster effective communication across all staff to ensure clear understanding and adherence to ensure adequate controls of responsibility, in alignment with relevant organizational regulations.</p> <p>New initiatives & Continuous commitment Implementor: All Staff & Stakeholders / HOD & GRMI</p>	<ul style="list-style-type: none"> • Strengthens engagement with Integrity Champions by having a quarterly meeting. • Conduct a survey to evaluate perceptions regarding the effectiveness of integrity and anti-corruption education initiatives within organisation. 	<p>Ensure that the activities undertaken by the Integrity Unit are highly visible and actively supported by the management.</p>
<p>Program/ campaign / activities on integrity, values and ethics should be continuously promoted to all staff .</p> <p>Continuous commitment Implementor: All Staff & Stakeholders / HOD & GRMI</p>	<ul style="list-style-type: none"> • Posters on Integrity awareness and simple reminder about policy and procedures. • Organize activities on integrity, ethics and values, i.e quizzes, crossword puzzle, booth. 	<p>To raise awareness on integrity via multiple mediums on an ongoing basis.</p>

DIMENSION 6: DISCIPLINARY AND REWARD MEASURES

FOREWARD	SPECIFIC MEASURES	OBJECTIVE
<p>Increase transparency in business trip management, gift and hospitality received from external parties ensure these are acceptable according to well-defined and acceptable criteria, policy and bound to terms and do not improperly affect the outcome of a business transaction, or otherwise result in an improper advantage and being declared.</p> <p>Continuous commitment Implementor: All Staff & Stakeholders / HOD & GRMI</p>	<ul style="list-style-type: none"> • Enhancement to the current E-Declaration to ensure proper approval from HODs. • All gifts declaration must be accompanied with a photo with the E-Declaration. 	<p>Increase transparency and ensuring adherence to the policies, i.e. Gift and Hospitality policy, Sponsorship Policy and Declaration of Interest Policy</p>

DIMENSION 7: MEASUREMENT, RESEARCH AND ASSESSMENT

FOREWARD	SPECIFIC MEASURES	OBJECTIVE
<p>Enhance integrity efforts by conducting engagement activities with other entities while strengthen business process reviews.</p> <p>New initiatives & Continuous commitment Implementor: GRMI</p>	<ul style="list-style-type: none"> Continuous compliance monitoring system to be in place. It is suggested that the compliance function to be set up as a management level/function. Enhance opportunities for targeted cooperation and maintain close rapport with MACC, IIM & etc. For this purpose, establish a cooperation and communication structure. Collaboration and involvement of community and external stakeholders in Duopharma Biotech integrity events at least once annually. Roundtable discussion with key industry key players on Integrity and ethics activities. 	<p>Continue strengthening initiatives to foster a high level of integrity among Duopharma Biotech staff.</p>
<p>Duopharma Singapore underscores our commitment to fortify the ethical framework within the organization. Unlike the initiation of a new Corruption Risk Register (CRR), this initiative is tailored to review and verify the existing CRR of Duopharma Singapore. The focus is on ensuring accuracy and alignment with the adopted or registered Singapore Prevention of Corruption Act (PCA) acts and offenses.</p> <p>New initiatives & Continuous commitment Implementor: Duopharma Singapore, Group Legal, GRMI</p>	<ul style="list-style-type: none"> Involve a meticulous assessment of Duopharma Singapore's Corruption Risk Register. This includes a thorough verification process to confirm that all acts and offenses under the Singapore PCA are accurately reflected in the CRR. Collaborating with relevant authorities, such as Singapore public officers and local legal firms, alongside Duopharma Group Legal counsel, will be integral to this process. 	<p>To guarantee the accuracy and relevance of the Corruption Risk Register. By engaging with appropriate authorities and legal experts, our goal is to verify and update the reflection of Singapore PCA acts and offenses in the CRR.</p>

DIMENSION 7: MEASUREMENT, RESEARCH AND ASSESSMENT

FOREWARD	SPECIFIC MEASURES	OBJECTIVE
<p>Enhance communication about integrity with a specific focus on conveying Integrity and Anti-Corruption messages to all PTDHI staff, Group legal, Group Risk Management and Integrity, and other relevant parties. Ensure that everyone is well-acquainted with Indonesia's corruption eradication acts and offenses.</p> <p>Continuous commitment Implementor: PTDHI Staff, Group Legal and Secretarial & GRMI</p>	<ul style="list-style-type: none"> • To continue Collaborating with the Indonesia Anti-Corruption Officer and/or a locally appointed legal firm. The objective is to identify and incorporate all relevant anti-corruption offenses outlined in Indonesia's Anti-Corruption and Eradication Law into PTDHI's Corruption Risk Register. The aim is to align as closely as possible with the MACC Act 2009, mirroring what has been registered in our local/ present Corruption Risk Register. This alignment will enhance consistency and effectiveness across our anti-corruption efforts local and regional levels. • To support PTDHI team members in ensuring the development of adequate procedures and internal procedures for preparation of ABMS audit in 2025. 	<p>The initiatives outlined aim to strengthen Duopharma Biotech's commitment to ethical practices and anti-corruption measures. By collaborating with an Anti-Corruption Officer and/ or engaging local legal expertise in Indonesia, the goal is to enhance understanding and compliance with anti-corruption laws. Briefing sessions on Indonesia's Corruption Law, featuring senior public officers, aim to provide valuable insights to the Business Unit.</p>

DIMENSION 8: CONFIDENTIAL ADVICE AND SUPPORT

FOREWARD	SPECIFIC MEASURES	OBJECTIVE
<p>Apart from reporting through the hotline, Integrity Champions can also be the reference point for staff to seek advice on ethics and integrity.</p> <p>Continuous commitment Implementor: All Staff / GRMI & IC</p>	<ul style="list-style-type: none">• Specific channel aside from the whistle blowing platform for Management and employees to pose questions directly to GRMI/Integrity Champion on compliance / integrity matters.• The functions and roles of GRMI/ Champions & Reps to be shared in every training conducted.	<p>To create more access for staff to seek confidential ethics advice</p>

DIMENSION 9: ETHICS TRAINING AND EDUCATION

FOREWARD	SPECIFIC MEASURES	OBJECTIVE
<p>Effectiveness of Integrity & Ethics related trainings</p> <p>New Initiatives & Continuous commitment Implementor: All Staff & Stakeholders / GRMI</p>	<ul style="list-style-type: none"> • Revisit the annual training program and the way it's being implemented. • Customize training and modules to align with participants' levels of understanding. • Revise the new staff induction module on MDL to simplify content and enhance clarity, ensuring that new staff can easily comprehend the integrity policies and procedures. • Groom leaders as role models for ethical behaviors and ethical conduct via training and case study on Corruption and fraud. • Implementation of Online Integrity Training sessions through the My Duopharma Learning (MDL) platform for all staff members. The recorded training will be upload in MDL platform to ensure all staff able to access and revisit when needed. 	<p>To ensure the integrity messages spread effectively and continuously provide impactful activities on ethics and integrity.</p>

DIMENSION 9: ETHICS TRAINING AND EDUCATION

FOREWARD	SPECIFIC MEASURES	OBJECTIVE
<p>Upholding ethical business practices is crucial to our organization's integrity. This initiative aims to empower our Internal Auditors, particularly the ABMS Committee, by providing targeted training on ISO 37001: ABMS Compliance Audit. By doing so, we strive to enhance our defenses against bribery and corruption, ensuring a principled and trustworthy organizational culture.</p> <p>Continuous commitment Implementer: ABMS Committee & GRMI</p>	<ul style="list-style-type: none"> • To make our auditors well-prepared, we're taking practical steps. This includes hands-on workshops on ISO 37001 standards, real-life case studies for practical insights, and interactive sessions for deeper learning. • To add a practical touch, we'll be giving our auditors practical experience to confidently handle ABMS compliance audits. 	<p>The main goal here is to equip our Internal Auditors in the ABMS Committee with the necessary skills and knowledge for ISO 37001: ABMS Compliance Audits. By doing this, we strengthen our anti-bribery framework, ensuring we can effectively prevent, detect, and respond to bribery and corruption risks.</p>

DIMENSION 10: ETHICS COMMUNICATION

FOREWARD	SPECIFIC MEASURES	OBJECTIVE
<p>Dissemination and communication of information and developments</p> <p>Continuous commitment Implementer: All Staff & Stakeholders / GRMI & IC</p>	<ul style="list-style-type: none"> • Constant reminders on the policies and compliances requirement to the employees and directors through various communication channels. • Organise integrity events annually. • Regularly update the Company-wide compliance intranet and Duopharma's official website with key regulations and procedures. • Continuously organise forums on ethics and integrity, and upload the recordings to the MDL platform for future reference. 	<p>To continuously provide impactful activities on ethics and integrity.</p>

DIMENSION 11: WHISTLEBLOWING

FOREWARD	SPECIFIC MEASURES	OBJECTIVE
<p>To promote a culture where employees feel encouraged to voice their concerns to management or supervisors. This aims to foster a perception among employees that the organization is fair in its internal administration of justice, such as grievance procedures or dispute resolution systems via Duopharma Whistleblowing channel.</p> <p>New Initiatives & Continuous commitment Implementer: All Staff & GRMI</p>	<ul style="list-style-type: none"> • Awareness campaigns to promote whistleblowing through website, training posters, banners and offer anonymous reporting options. • Compliance with the provisions of the Whistleblower Protection Act 2010, particularly on protection of whistle blowers in Duopharma Biotech. • Detailed procedure which must be followed in order to report any incidents of fraud and/or corruption. • Establishment of the Guide on Attending to MACC Whistleblowing Case. 	<p>To enhance stakeholders' awareness of the Duopharma Whistleblowing Channel, we aim to encourage the initiation of whistleblower reports.</p>

DIMENSION 12: ACCOUNTABILITY

FOREWARD	SPECIFIC MEASURES	OBJECTIVE
<p>To ensure that the Management readily responds to audit/ official inquiries and takes the necessary actions accordingly.</p> <p>New initiatives & Continuous commitment Implementer: All Staff & GRMI</p>	<ul style="list-style-type: none"> • Monitoring on the completion and effectiveness on Integrity initiative plan. • The KPI for managerial staff should include a target for resolving highlighted audit related issues/identified corruption risk and corrective measures within the agreed timeline. • Targeted gap assessment and business process review is to be continued and enhanced. 	<p>To ensure that the organization has a clear structure in the monitoring and evaluating processes and to strengthen the culture of adhering to the set policies and procedures</p>

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