

DUOPHARMA BIOTECH GROUP OF COMPANIES

ORGANISATIONAL INTEGRITY AND ANTI-CORRUPTION PLAN 2021 - 2023

PURPOSE & OBJECTIVE OF DUOPHARMA BIOTECH OIACP



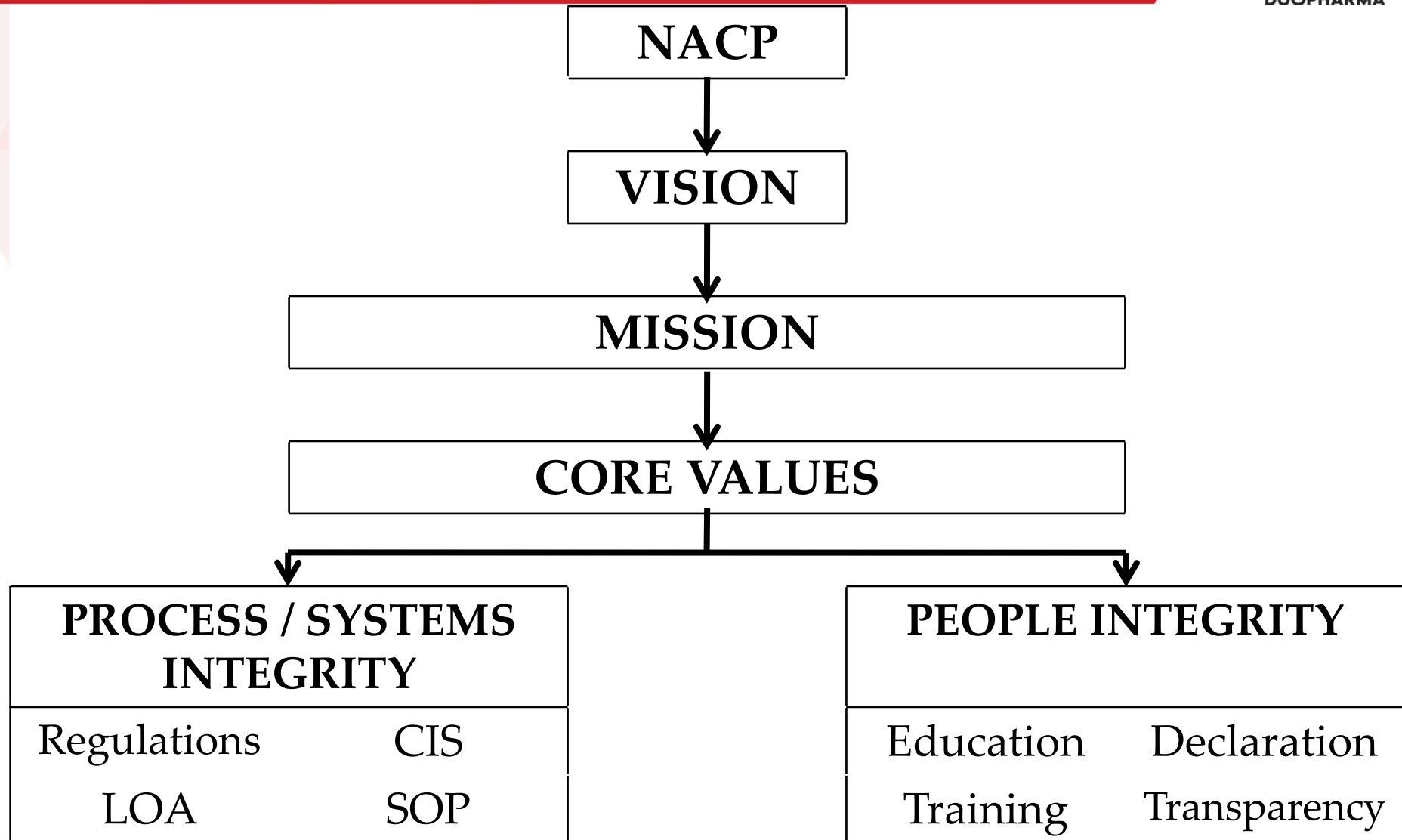
PURPOSE

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 by implementing the related objectives, strategies and program encompassed and recommended in the Malaysian National Anti-Corruption Plan, the Guidelines on Adequate Procedures and the Anti-Bribery Management System ISO37001.

OBJECTIVE

- Committing to promote values of integrity, transparency, accountability and good corporate governance;
- Strengthening internal systems that support corruption prevention;
- Complying with laws, policies and procedures relating to fighting corruption;
- To actively enhance a culture of professionalism and integrity in Duopharma Biotech;
- To prevent the incidence of misconduct and corruption linkages to other;
- To ensure Duopharma Biotech's integrity and transparency is sustained in daily practices through elements of honesty, efficiency and trustworthiness;
- Supporting corruption prevention initiatives by the Government and Anti-Corruption Agencies.

DUOPHARMA BIOTECH CORPORATE INTEGRITY SYSTEM FRAMEWORK



3-YEAR STRATEGY INTEGRITY AND ANTI-CORRUPTION PLAN



AWARENESS



PREVENTION



ENHANCEMENT



PUNITIVE



REWARD



Corporate Ethics & Integrity System: 12 Dimensions

An effective corporate ethics and integrity system gives equal importance to all 12 dimensions

For each dimension (or category), there are further descriptors totaling to 33 descriptors of Integrity initiatives.



KEY 4 STEPS FORMULATION PROCESS



Step I - Diagnostic and Self-Assessment

An integrity development programme should begin with a diagnostic that consists of gathering information on the current challenges the administration faces in terms of integrity. The diagnostic will also identify the level of organizational commitment, as well as the current actions and initiatives underway to deal with the problems.

Step II - Analysis and Action Planning

The elements identified during the self-assessment process are analysed during this step in order to understand their impact and develop relevant and tailored solutions. These solutions and their respective desired outcomes will then constitute the integrity action plan in which the objectives, activities, parties responsible, deadlines and performance indicators will be outlined.

Step III - Implementation

The implementation phase is the most crucial one as it is the administration that will be responsible for making sure that the activities featuring in the action plan are carried out according to the deadlines.

Step IV – Monitoring and Evaluation

Monitoring and evaluation are essential to ensure the plan is meeting the milestones to achieve the desired outcomes. Monitoring should focus on the implementation of the plan, and propose readjustments as necessary. Evaluation should look at the outputs and outcomes of the project.

EXECUTIVE SUMMARY ORGANISATIONAL INTEGRITY AND ANTI-CORRUPTION PLAN

2021 KEY INITIATIVES



CODE OF CONDUCT

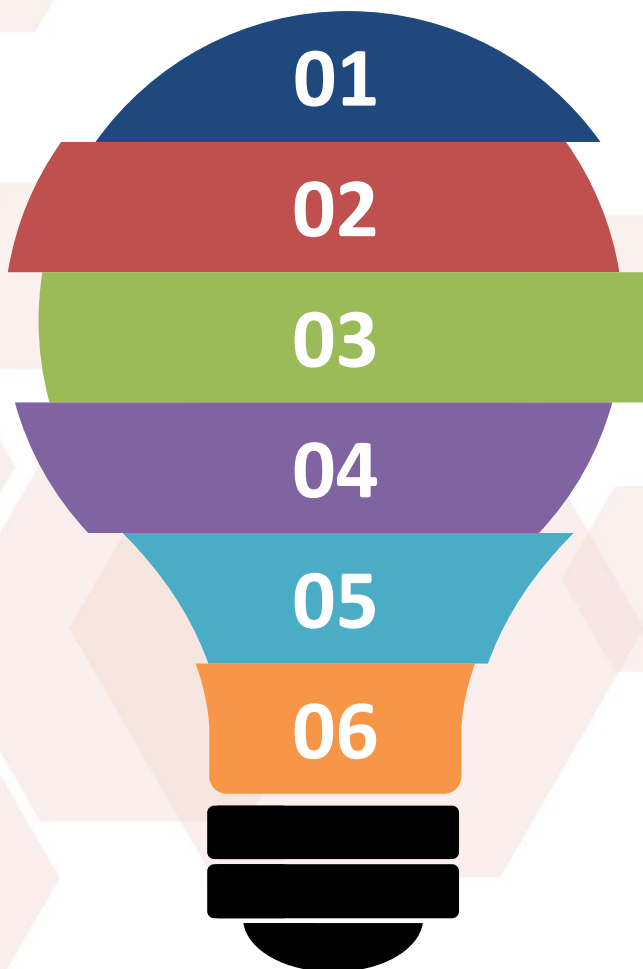
A task force to review the COC; Creation of the revised COC in a bilingual form; Periodical quiz to be taken by staff to gauge the level of understanding of COC.

POLICY REVIEW

Enhancement to the current Policies / SOPs to address compliance, ethics and corruption related risk.

E - DECLARATIONS

Introduction of online declarations with the Declaration of Interest as a start. Part of Digitalisation strategy.



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.

INTEGRITY MODULE

Formulation of an Integrity & Anti-Corruption module for the External Business Associates (Focus on Bumi Agents for a start)

WHISTLEBLOWING

Awareness campaigns kick off for employees on whistle blowing policy and grievances through website, posters, banners etc.

2022 KEY INITIATIVES



ENGAGEMENT

Private session with RED Book and GREEN Book should be conducted by GIA with the assistance of Integrity Champion on a periodical basis to uncover and enhance Ethics & Integrity.

CONT. AUDIT

Targeted gap assessment and subsequently develop the continuous auditing system.

HGP

Human Governance Profiling (HGP) or alike is to be implemented in recruitment process (Senior Executive and above) and/or promotions.

2022

WEB BASED TRAINING

Introduction of a web-based training programs on topics such as the COC, ABAC and relevant matters for staff and Business Associates.

COMPLIANCE REVIEW

Annual review of adherence to the Malaysian Laws; FCPA; UKBA and etc. to ensure business is conducted in accordance to the laws and the identified risk areas are being addressed.

JOB ROTATION POLICY

Introduction of a rotation policy to minimize individual risks (for high risk functions)

2023 KEY INITIATIVES



COLLABORATION

Consider setting up/participating in an integrity network within PNB Group to support information and experience sharing to build collective commitment

REWARD / RECOGNITION

Recognition of ethical/exemplary Champions/role model within the Company.

OUTREACH

Usage of felt bags, bookmarks and packaging material to show the commitment on ethics and integrity behaviour.



BENCHMARKING

Benchmarking in 2023 on the current system (CIS) vs other renowned International entities and United Nations recommendations.

HIGH RISK TRAINING

Specific training programs for high risk individuals

ASSET DECLARATION

Introduction of the Asset Declaration system (Envelope System) and the information is to be kept in GIA's safe.

DETAILED ORGANISATIONAL INTEGRITY AND ANTI-CORRUPTION PLAN

DIMENSION 1: VISION & GOALS

The company's overall concept and approach to ethics and integrity, including its formal articulation of the company's underlying philosophy about ethical and moral conduct, and how these expectations are embedded in the fabric of the company.

It also includes the identification and definition of the core ethical values or principles, as well as the integration of those values into everyday business conduct.

DIMENSION 1: VISION & GOALS



SUGGESTED MEASURES / ACTIVITY			
FOREWORD	SPECIFIC MEASURES	OBJECTIVE	URGENCY / YEAR / TARGET GROUP / IMPLEMENTOR
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.	<ul style="list-style-type: none"> • Formation of a task force to review the COC and engagement with a subject matter expert; • Creation of the revised COC in a bilingual form; • Periodical survey/quiz to be taken by staff to gauge the level of understanding of COC. 	To ensure staff is aware, understand and integrate COC in carrying out their day to day activities.	HIGH / 2021 Onwards / All staff including BOD / Coordinated by GIA with GHR, Group Legal, Quality Safety & Sustainability, Finance, Group Risk & Co-Sec
The emphasis of the Core Values to all staff via trainings and activities which relates to core values.	<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 • Introduction of a web-based training programs on topics such as the COC, ABAC, collaboration with business partners; sponsorships, donations and memberships; and relevant matters, in 2022. 	To ensure the Duopharma Biotech Core Values are practiced and embedded in the Duopharma Biotech culture.	MEDIUM / 2021 Onwards / All staff / GIA

DIMENSION 1: VISION & GOALS



SUGGESTED MEASURES / ACTIVITY			
FOREWORD	SPECIFIC MEASURES	OBJECTIVE	URGENCY / YEAR/ TARGET GROUP / IMPLEMENTOR
Ensure compliance with the COC and ABAC policies by the staff to effectively prevent integrity and ethical violations. The COC shall cover to a sufficient detail in key integrity areas: conflict of interest, outside work performance, gifts and hospitality and identified relevant to be included.	<ul style="list-style-type: none"> Periodical test on the COC understanding and interpretation especially the decision makers; Compliance check to the COC by GIA. 	To ensure staff is aware, understand and integrate the Duopharma Biotech's core values in carrying out their responsibility. The COC should be a guide to discipline staff & an engagement tool.	MEDIUM / 2022 Onwards / All staff & GIA
To set and measure the organization's integrity targets is reasonable, clear, measurable and achievable. This will enhance the employees confidence in the system and measures taken by the Management and the Board.	<ul style="list-style-type: none"> The Management Review Meeting in relation to the Group's ABAC / ABMS compliance is to include all Managers, HODs and Senior Management. To table findings in terms of statistics for Good Governance, Ethics and Integrity, advice and counseling. To elect an Integrity Champion nominated by the Union in order to better disseminate information and initiatives. 	To ensure the core values are practiced by all staff and evaluated as part of performance. Further it will serve as a report card on the Integrity and Ethics initiatives in order to further improve and enhance the planned initiatives.	MEDIUM / 2021 Onwards / All staff

DIMENSION 2: LEADERSHIP

The responsibilities of the company's leadership in shaping, guiding, and supporting the company's ethics and integrity initiatives. It examines how leaders and managers are held accountable for promoting ethics and integrity.

This category includes an assessment of the company's "Tone from the Top" at both the senior executive and governance levels.

DIMENSION 2 : LEADERSHIP



SUGGESTED MEASURES / ACTIVITY

FOREWORD	SPECIFIC MEASURES	OBJECTIVE	URGENCY / YEAR/ TARGET GROUP / IMPLEMENTOR
There must be strong, explicit and visible support and commitment from senior management to the company's internal controls, integrity/ethics and compliance programmes or measures for preventing and detecting bribery, corruption and misconduct.	<ul style="list-style-type: none"> Resolution of audit issues should be integrated in the Senior Management KPI; Annual review of adherence to the Malaysian Laws; FCPA; UKBA and etc. to ensure business is conducted in accordance to the laws and the identified risk areas are being addressed; Inclusion of a KPI on ISO37001 compliance for all GMC and HODs by the respective area of responsibility. 	<p>To ensure active leadership, involvement, or accountability regarding ethics and integrity.</p> <p>Direct impact on ethics and integrity activities including strengthening of internal controls that will relate to the organization's bottom line.</p>	MEDIUM / 2021 Onwards / All staff / All HOD
Training for HOD and Managers on Governance, Ethics, Integrity, Anti-Corruption legislations and in dealing with grievances to ensure they are equipped with the knowledge and could assist them in handling those issues with staff.	<ul style="list-style-type: none"> GIA with the assistance from GHR to formulate appropriate training on an annual basis. Web Based Training – Introduction of a web-based training programs on topics such as the COC, ABAC, and relevant trainings/education for staff and Business Associates 	To ensure that Managers and supervisors are equipped with the knowledge in handling matters relating to ethics and integrity.	MEDIUM / 2022 Onwards / HOD & Managers / GHR

DIMENSION 2 : LEADERSHIP



SUGGESTED MEASURES / ACTIVITY

FOREWORD	SPECIFIC MEASURES	OBJECTIVE	URGENCY / YEAR/ TARGET GROUP / IMPLEMENTOR
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.	<ul style="list-style-type: none"> As a start, dissemination of a script on current issues and etc. to be shared to all; Senior Management / line leaders can also request for talk points relevant to that period from either GIA or the Integrity Champions.(internal and global issues); To introduce questionnaires to obtain feedback from employees in gauging leadership practice on ethics and integrity. 	Leaders must be seen and actually leading by example that can be gauged by fellow employees whether they practice what they preach.	MEDIUM / 2022 Onwards / HOD & Managers / GIA & Integrity Champions

DIMENSION 3: INFRASTRUCTURE

The way the company structures or organizes its ethics and integrity function so that it can carry out its goals effectively. It also covers on how the ethics function is structured, staffed, and resourced, as well as its formal and informal reporting relationships. This category also includes the roles and responsibilities of those individuals who are assigned to implement the ethics and integrity function.

DIMENSION 3: INFRASTRUCTURE



SUGGESTED MEASURES / ACTIVITY			
FOREWORD	SPECIFIC MEASURES	OBJECTIVE	URGENCY / YEAR/ TARGET GROUP / IMPLEMENTOR
Training and empowering the role of Integrity Champions at the respective entities. The Champions and Representatives must be equipped with the relevant knowledge and skills in leading their functions and advising the local management. The Champions must be a focal point of reference.	<ul style="list-style-type: none"> • Inclusion of Integrity related KPI in the individual Champions KPI; • Compulsory annual planned training for the Champions on ethics / governance / integrity / anti-corruption; • The functions and roles of GIA/ Champions to be shared in every training conducted. 	To ensure the infrastructure on ethics and Integrity is effective and shouldered by a specific unit or person.	HIGH / 2021 Onwards / Integrity Champions / GIA
GIA should ensure that the ISO 37001 - Anti Bribery Management Systems which specifies a series of measures to help organisation to prevent, detect and address bribery is adequate and functioning as intended. It will help the Company reduce the risk of bribery occurring and to demonstrate to stakeholders that Duopharma Biotech have put in place internationally recognised best practice on Integrity and anti-corruption practices.	<ul style="list-style-type: none"> • Monthly reviews in cycle the Corruption Risk Management and the controls mentioned; • Benchmarking in 2023 on the current system (CIS) vs other renowned International entities and United Nations recommendations; 	<p>To ensure the system in place is of world class system hence will give assurance to the Board of Directors.</p> <p>A learning and benchmarking process that will further enhance the current system in place</p>	MEDIUM / 2021 Onwards / All Staff / GIA

DIMENSION 3: INFRASTRUCTURE



SUGGESTED MEASURES / ACTIVITY			
FOREWORD	SPECIFIC MEASURES	OBJECTIVE	URGENCY / YEAR/ TARGET GROUP / IMPLEMENTOR
The CIS to be expanded to the regional entities (i.e. Philippines, Singapore & Indonesia) to ensure staff commitment to ethical values and standards of conduct. Ethics & Integrity requirement is a must when Duopharma Biotech ventures to new grounds.	CIS is to be implemented at all international entities and for ad-hoc projects beginning 2021 in stages, including the implementation of Integrity Pact with Business Associates.	To ensure compliance on ethics and governance at all locations including the regional entities.	HIGH / 2021 Onwards / All International Staff & Stakeholders / GIA & IBD
Employing the Right People who possess a strong and unwavering degree of integrity and commitment to ethical behaviour and implementation of Integrity Testing as the yardstick for recruitment and promotions.	<ul style="list-style-type: none"> Human Governance Profiling (HGP) or alike is to be implemented in recruitment process (Senior Executive and above) and/or promotions; Amendment of the recruitment and promotion policy to incorporate the HGP testing tool; Introduction of a rotation policy to minimize individual risks (for high risk functions) 	To assess an individual's tendency to be honest & consistent with regards to actions, values and principles, & their propensity to become involved in counterproductive behaviours.	MEDIUM / 2022 Onwards / Identified candidates / GIA & GHR
Employment of Digitalisation in the forms and documents required under Integrity and Anti-Corruption	<ul style="list-style-type: none"> Introduction of online declarations with the Declaration of Interest as a start. Part of Digitalization strategy. To embark on other online learning platforms as required in 2022 	To ensure compliance on ethics and governance at all locations with better reach out and a more structured approach	MEDIUM / 2021 Onwards / GIA & Group IT

DIMENSION 4:

COMPLIANCE, POLICIES & RULES

Core laws, policies, rules, and guidance that comprise the legal framework for the company's ethics and integrity systems. It includes the systems and controls used to ensure and demonstrate that employees and the company are legally compliant. Essentially, the company has translated its legal commitments into concrete actionable guidance that is enforceable.

DIMENSION 4: COMPLIANCE, POLICIES & RULES



SUGGESTED MEASURES / ACTIVITY			
FOREWORD	SPECIFIC MEASURES	OBJECTIVE	URGENCY / YEAR/ TARGET GROUP / IMPLEMENTOR
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 & Compliance officer. The risk analysis for the Company as a whole are supplemented by interdisciplinary risk reviews.	<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; • Enhancement to the current SOPs to address compliance, ethics and corruption related risk. 	To ensure adherence to the policy and rules in the Company and mitigate related risk at each entity.	MEDIUM / 2021 Onwards / All Staff / GIA
A company-wide mandatory training programs mainly targeting the managers and employees whose roles bring them into contact with Integrity/Corruption risks, e.g. those in procurement, sales or project management.	<ul style="list-style-type: none"> • Specific training programs for high risk individuals; • The components in the COC has to be reviewed to include type of business conduct expected from staff in all interaction and when a dilemma arises. 	The in-person training sessions allow employees to discuss correct conduct using specific examples taken from day-to-day work together with their compliance officer who conducts the training session.	MEDIUM / 2022 / All Staff / GIA

DIMENSION 4: COMPLIANCE, POLICIES & RULES



SUGGESTED MEASURES / ACTIVITY

FOREWORD	SPECIFIC MEASURES	OBJECTIVE	URGENCY / YEAR/ TARGET GROUP / IMPLEMENTOR
Integrity Pact is to be implemented for all suppliers and High Risk Business Associates. Further, approach competitors to set up Compliance Pact as long-term industry initiative against corruption.	<ul style="list-style-type: none"> • Integrity Pact for all including International suppliers / High Risk Business Associates; • Formulation of an Integrity & Anti-Corruption module for the External Business Associates (Focus on Bumi Agents for a start); • A test on Integrity & Ethics for major suppliers prior to their appointment / renewal that is to be rolled out in 2023. • Compliance pact with fellow industry players. 	To extend the integrity initiatives at all International entities and stakeholders including competitors	MEDIUM / 2021 Onwards / All Staff & Stakeholders / GIA & GHR
To ensure adherence of COC and compliance with the laws / regulations bound by the Group of Companies. Knowingly / unknowingly violations should be immediately addressed.	<ul style="list-style-type: none"> • Quarterly compliance review by the management of the Business Units with the relevant compliance officer from GIA. 	Provides concrete actionable guidance and examples of real situations in dealing with ethics and Integrity dilemmas.	MEDIUM / 2022 / All Staff & Stakeholders / GIA & Group Legal

DIMENSION 4: COMPLIANCE, POLICIES & RULES



SUGGESTED MEASURES / ACTIVITY			
FOREWORD	SPECIFIC MEASURES	OBJECTIVE	URGENCY / YEAR/ TARGET GROUP / IMPLEMENTOR
In key operational processes, implement a system where personnel declare, GIA maintains a written record of, actual or potential conflict of interest. Further ensure that all employees are made aware on a regular basis to the fraud and corruption risks associated with conflict of interest.	<ul style="list-style-type: none"> Formal declaration of conflict of interest (COI); Education to employees in identifying potential COI and reporting them to GIA. 	The declaration of COI helps to identify situations where personnel may, through family or other connections, fail to prevent or report integrity violations. To promote transparency and accountability of all employees especially the Senior Management.	MEDIUM / 2021 / All Staff & Stakeholders / GIA & HODs

DIMENSION 5: ORGANISATIONAL CULTURE

The overall company culture and how it promotes mission, vision, structure, and strategy. This dimension explores the degree to which a company focuses on shaping its company's culture (both written and unwritten rules that dictate how work is performed and goals reached) and whether that culture actively promotes ethical conduct. It also addresses how culture is defined (the history and traditions of the organization), who "owns" and shapes culture, how culture is measured, and the degree to which employees find the culture supportive of ethics and integrity

DIMENSION 5: ORGANIZATIONAL CULTURE



SUGGESTED MEASURES / ACTIVITY

FOREWORD	SPECIFIC MEASURES	OBJECTIVE	URGENCY / YEAR/ TARGET GROUP / IMPLEMENTOR
Program/ campaign / activities on integrity, values and ethics should be continuously promoted to all staff .	<ul style="list-style-type: none"> E-Integrity training module to be developed; Posters on ethics/ integrity/core values; Organise competition on integrity, ethics, values, i.e video; Embed integrity/ core values message in yearly company's calendar. Everyday reminder messages, i.e. sticker on laptops, badges on shirts and car stickers. 	To enhance and be a reminder that integrity is a key success factor	LOW / 2022 Onwards / All Staff & Stakeholders / HOD & GIA
Periodic review on the duties and responsibilities of all staff positions to ensure adequate controls of responsibility, professionalism, and integrity in accordance with the relevant regulations for internal organization and systematization of jobs. The culture of openness must be asserted in the individual employee.	<ul style="list-style-type: none"> Private session with RED Book and GREEN Book should be conducted by GIA with the assistance of Integrity Champion on a periodical basis to uncover Integrity issues. Empowerment of the Integrity Champions and nomination of an Integrity Champion from the Union. 	To increase professionalism and clear individual responsibility at all business areas. The individual responsibility have to be formalised in all Job Description regardless of category.	MEDIUM / 2022 Onwards / All Staff & Stakeholders / GIA / IC / HOD/

DIMENSION 5: ORGANIZATIONAL CULTURE



SUGGESTED MEASURES / ACTIVITY			
FOREWORD	SPECIFIC MEASURES	OBJECTIVE	URGENCY / YEAR / TARGET GROUP / IMPLEMENTOR
To gauge on how employees perceive the topics of integrity and compliance within the Group.	<ul style="list-style-type: none"> • Conduct periodical / regular surveys and analysis on the compliance of the organization; • A perception survey on how employees rate their managers' stance on integrity and compliance issues; • Should the satisfactory is low, review have to be conducted and action plan to be established. 	To ensure that a majority of our employees rate the workplace as respectful of individuals, fair, open, and flexible.	MEDIUM / 2022 / All Staff / GIA & GHR
The current policy on ethical conduct need to be reviewed. Action taken by the management should be shared to staff in the proper channel to demonstrate the commitments of the Company towards ethical / integrity issues occurred in the Company.	<ul style="list-style-type: none"> • Breaches of the COC/Code of ethics within the Company is to be shared during town-halls; • Disclosure of fraud trends and drivers; • Sharing of cases on screen saver as a reminder • Develop simple case studies for training purposes that will enhance understanding. 	Create transparency in sharing the cases and action taken by the Management for any misconducts.	LOW / 2022 / All Staff / GIA

DIMENSION 6:

DISCIPLINARY AND REWARD MEASURES

The way the company sets and enforces its standards for ethical conduct and behaving with integrity. It also addresses rewards and punishments, incentives that promote ethical behaviour, and disciplinary action taken to limit or punish unethical work conduct. This dimension includes how the company promotes ethical conduct through its performance appraisal process, and whether ethical conduct is linked to compensation and/or other types of non-monetary benefits.

DIMENSION 6: DISCIPLINARY & REWARD MEASURES



SUGGESTED MEASURES / ACTIVITY			
FOREWORD	SPECIFIC MEASURES	OBJECTIVE	URGENCY / YEAR/ TARGET GROUP / IMPLEMENTOR
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.	<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; Compiled data must be analysed and reported in the annual reporting. Quarterly Reporting to Audit & Integrity Committee on Gifts & Hospitality and external sponsorship given to external parties. 	Increase transparency and ensuring adherence to the policies, i.e. Gift and Hospitality policy; and the External Donation and Sponsorship Policy	MEDIUM / 2022 / All Staff / GIA and GCC
Recognition of ethical/exemplary Champions/ role model within the Company.	<ul style="list-style-type: none"> Reintroduction of SMILE award or alike and the GMD Discretionary Bonus for exemplary Integrity / Integrity Champions; Clearly defined criteria in the nomination process; Formation of a panel system to review the candidates and finally assessed by the Audit & Integrity Committee Chairman. 	To recognise leading examples of Integrity & Ethics	LOW / 2023 / All Staff / GIA & GHR

DIMENSION 7: MEASUREMENT, RESEARCH AND ASSESSMENT

This dimension look at how ethics and integrity are measured, whether the company undertakes research to support ethics strategies that create a culture of ethics and integrity, and the company's assessment processes around ethics, integrity and company's culture. It also includes the company's commitment to continuous improvement, based on benchmarking and other evaluation methodologies.

DIMENSION 7: MEASUREMENT, RESEARCH & ASSESSMENT



SUGGESTED MEASURES / ACTIVITY

FOREWORD	SPECIFIC MEASURES	OBJECTIVE	URGENCY / YEAR/ TARGET GROUP / IMPLEMENTOR
Institute Duopharma Biotech Corporate Integrity System & Initiatives review and benchmarking within planned intervals (i.e. quarterly) implementation of objectives and measures and changes in external and internal issues that are relevant to the integrity management system.	<ul style="list-style-type: none"> Benchmarking with other GLC & MNC for integrity & ethics result; Verification/endorsement by external parties, e.g. Ethisphere; Explore opportunities for targeted cooperation and maintain close rapport with MACC, IIM & etc. For this purpose, establish a cooperation and communication structure: contact point, TOR, reporting and monitoring mechanisms; Consider setting up/participating in an integrity network within PNB Group to support information and experience sharing to build collective commitment. 	To be transparent on the ethics and integrity initiatives and to ensure it adds value to the business proposition and to stay current with industrywide developments in the field by engaging with the relevant agencies and organisation.	MEDIUM / 2023 / All Staff & GIA
Review of business processes, accounts and balances, and test transactions to assess robustness of controls and identify possible violations.	<ul style="list-style-type: none"> Business process review and GAP assessments is to be continued and enhanced; Continuous Auditing system to be in place. 	To reduce cost of non compliance and improve the business process.	MEDIUM / 2023 / All Staff & GIA

DIMENSION 8:

CONFIDENTIAL ADVISE AND SUPPORT

This dimension describes how the company provides confidential, neutral, professional and independent ethics advice to employees, supervisors, managers, executives, members of the governing bodies and other stakeholders.

DIMENSION 8: CONFIDENTIAL ADVICE & SUPPORT



SUGGESTED MEASURES / ACTIVITY

FOREWORD	SPECIFIC MEASURES	OBJECTIVE	URGENCY / YEAR / TARGET GROUP / IMPLEMENTOR
<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>	<ul style="list-style-type: none"> • Specific channel aside from the whistle blowing platform for Management and employees to pose questions directly to GIU/IC/compliance officer on compliance / integrity matters; • Those appointed person is to be well trained on procedure of handling complaints; • The functions and roles of GIA/ Champions & Reps to be shared in every training conducted. 	<p>To create more access for staff to seek confidential ethics advice</p>	<p>MEDIUM / 2022 / All Staff / GIA & IC</p>
<p>Protection against retaliation exists for all good-faith whistle-blowers. Retaliation and retribution against those who speak up is specifically prohibited.</p>	<ul style="list-style-type: none"> • Whistle Blowing Protection Act is to be communicated with all staff to increase awareness and confidence; • To table findings in terms of statistics for Good Governance, Ethics and Integrity, advice and counseling. 	<p>To increase the confidence level in the whistle-blowing framework.</p>	<p>MEDIUM / 2022 / All Staff / GIA</p>

DIMENSION 9: ETHICS TRAINING AND EDUCATION

This dimension explores ethics and integrity awareness, skill-building training and education, and the integration of such training into the overall development of all employees. This category includes the provision of ethics related training and skill building throughout the life cycle of staff members, and the degree to which these initiatives are integrated into other company training commitments.

DIMENSION 9: ETHICS, TRAINING & EDUCATION



SUGGESTED MEASURES / ACTIVITY

FOREWORD	SPECIFIC MEASURES	OBJECTIVE	URGENCY / YEAR/ TARGET GROUP / IMPLEMENTOR
Strengthen the integrity aspects in the internal and external communication strategy by focusing on integrity to convey Integrity and Anti-Corruption messages to all stakeholders including employees.	<ul style="list-style-type: none"> • Upgrade the website with information related to integrity enhancement policies / measures / achievements; • Selected speaker on Ethics and Governance should be trained at the respective Entity level; • Setup a network community with Duopharma Biotech stakeholders to disseminate periodical information on Integrity. 	To ensure formal ethics and Integrity communication and updates provided to staff and stakeholders	MEDIUM / 2022 / All Staff & Stakeholders / GIA
Effectiveness of Integrity & Ethics related trainings	<ul style="list-style-type: none"> • Rollout of periodical Online Integrity Trainings • To provide specific trainings / high level trainings to employees i.e. Fraud identification, Fraud Controls, CRM and etc. • Evaluation form for all training on ethics and integrity is to be made available for all training. • Roll out of the Integrity Assessment by the Malaysian Institute of Integrity (3 years once) 	To ensure the integrity messages spread to employees is effective.	MEDIUM / 2022 Onwards / All Staff & Stakeholders / GIA

DIMENSION 10: ETHICS COMMUNICATION

Articulation and promotion of ethics and integrity initiatives, both internally and externally.

DIMENSION 10: ETHICS COMMUNICATION



SUGGESTED MEASURES / ACTIVITY

FOREWORD	SPECIFIC MEASURES	OBJECTIVE	URGENCY / YEAR/ TARGET GROUP / IMPLEMENTOR
Dissemination and communication of information and developments	<ul style="list-style-type: none"> Regular updating of the Company-wide compliance intranet on key regulations, procedures and tools for specific topics and dates of training programs; Regional Companies to make additional information available to the employees via the local intranet; Organisation of forums on ethics and integrity continuously. In addition, to share messages on and from the talks and forums via electronic media message such as Whatsapp, Facebook and Instagram. Effectiveness of the Integrity Corner is to be measured & interactive solutions to attract staff to drop by; 	To continuously provide impactful activities on ethic and integrity.	MEDIUM / 2021 / All Staff & Stakeholders / GIA & IC
Outreach to its stakeholders in an effort to promote transparency about ethics and values.	<ul style="list-style-type: none"> Usage of felt bags, bookmarks and packaging material to show the commitment to cultivate ethics and integrity behaviour in the Company; Collaboration and Involvement of community in Duopharma Biotech Integrity events, at least once yearly, e.g KL Krash Pad. 	To promote and increase ethical awareness internally and external.	LOW / 2023 / All Staff & Stakeholders / GIA & Group Corporate Affairs

DIMENSION 11: WHISTLE BLOWING

The Company should encourage individuals (both internal and external) to speak up and make reports of questionable conduct. This category explores the methods and protections offered to individuals who wish to make the company aware of possible unethical behaviour, misconduct or any illegal actions. It includes the making of both confidential and anonymous reports, and the systems used by the company to protect whistleblowers from retaliation or retribution.

DIMENSION 11: WHISTLE BLOWING

SUGGESTED MEASURES / ACTIVITY

FOREWORD	SPECIFIC MEASURES	OBJECTIVE	URGENCY / YEAR/ TARGET GROUP / IMPLEMENTOR
<p>To encourage employees to speak up their concerns to the attention of management or supervisors.</p> <p>For the employee to regard the Organisation as being fair in the internal administration of justice (for example, grievance procedures or dispute resolution system)</p>	<ul style="list-style-type: none"> • Compliance with the provisions of the Whistleblowing Act and the Whistle bower 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; • Dissemination of continuous trainings and talks (quarterly) in relation to ethics, Integrity and Anti-Corruption. This will indirectly enhance the trust in the current system. • Awareness campaigns kick off for employees on whistle blowing policy and grievances through website, posters, banners etc. 	<p>To encourage the employees to speak up and bring concern to the whistleblowing channel.</p>	<p>HIGH / 2021 / All Staff / GIA</p>
<p>A single standard or set of rules that controls how internal investigations and fact-finding will be conducted</p>	<ul style="list-style-type: none"> • The Investigation procedure, authority of GIA and the Audit Charter is to be shared with employees. • Proposed the findings used as a case study to be shared during employee meet up sessions. 	<p>To ensure the investigation procedures are of a high standard and based on rule of law, and publicly known by employees and stakeholders.</p>	<p>HIGH / 2021 Onwards / All Staff / GIA</p>

DIMENSION 12: ACCOUNTABILITY

Accountability of the organization and its members to ensure continuous improvement and in accordance with sound governance.

DIMENSION 12: ACCOUNTABILITY



SUGGESTED MEASURES / ACTIVITY

FOREWORD	SPECIFIC MEASURES	OBJECTIVE	URGENCY / YEAR/ TARGET GROUP / IMPLEMENTOR
To ensure that the Management readily responds to audit/officials inquiries and takes the necessary actions accordingly.	<ul style="list-style-type: none"> Increased frequency and diversification of audits; increased number of ad hoc audits on a random basis to follow-up on recent audits and verify the findings/ procedures applied; The KPI for managerial staff should include a target for resolving highlighted audit issues within the agreed timeline; Targeted gap assessment and subsequently develop appropriate operational, managerial and strategic performance indicators; Rollout of Continuous Auditing. 	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	MEDIUM / 2022 / All Staff & Stakeholders / GIA & IC

The background of the slide is a solid red color. Overlaid on this background are numerous hexagons of varying sizes and shades of red. Some hexagons are a darker red, while others are a lighter, more translucent red, creating a layered, geometric pattern. The hexagons are scattered across the left and center portions of the slide, with some overlapping each other.

THANK YOU