

Last updated: 25 July 2022

## WHISTLEBLOWING POLICY

### PRINCIPLE

1 NeuGen Fund ("NeuGen") is fully committed to strong corporate governance and transparent culture by providing a trusted avenue for employees, vendors, clients and other stakeholders to express concerns about possible improprieties without fear of reprisals. Arrangements are made to facilitate independent investigation of reported concern and appropriate follow-up actions. For the purposes of this Policy, "**reprisal**" means dismissal, demotion, suspension, termination of employment/contract, harassment (whether actual or threatened), discrimination or economic penalty.

### GUIDELINES

2 Wrongdoings may include all forms of unlawful conduct, financial malpractice and others, but are not limited to, the following:

- a. General malpractice such as illegal or unethical conduct;
- b. Potential infractions of Code of Conduct;
- c. Impropriety, corruption, dishonesty and/or fraudulent activity, theft and/or misuse of NeuGen's properties, and
- d. Any other serious improper matters which may cause financial or non-financial loss to NeuGen or damage NeuGen's reputation.

3 NeuGen accepts all whistleblowing reports of actual or suspected wrongdoings that are made in good faith ("**Protected Disclosure**") and will use all reasonable endeavours to ensure that whistleblowers and persons involved in investigations are not subjected to reprisal and are treated fairly at all times.

4. Persons making Protected Disclosures ("**whistleblower(s)**") must do so in good faith. Whistleblowers who report information which they know to be false, or without a reasonable belief in its accuracy, will not be accorded any protection under this Policy and disciplinary and/or legal action may be taken against such persons.

5. Whistleblowers can raise their report to the Chairman of the NeuGen Audit Risk Committee at email address: [chairman\\_audit@neugen.org.sg](mailto:chairman_audit@neugen.org.sg) directly. Protected Disclosures raised to other parties within NeuGen will be directed to the Chairman of the Audit Risk Committee.

6. Protected Disclosures should provide an appropriate and meaningful level of detail to enable proper and effective investigations, including identities of persons involved, relevant dates and times and descriptions of the wrongdoing.

7. Whistleblowers are encouraged to identify himself/herself for further clarification. NeuGen is committed to ensuring that Protected Disclosures, including the identity of the whistleblower will be handled

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in strict confidence. While anonymous reports will be considered, NeuGen may not be able to proceed with an investigation if it is unable to obtain sufficient information about the same.

8. All Protected Disclosures raised will be independently reviewed by the Audit Risk Committee. Where the Audit Risk Committee assesses that the Protected Disclosure warrants further investigation, this shall be done. The objectives of the investigation are:

- a. collate relevant information;
- b. consider the information collected and draw conclusions objectively and impartially;
- c. to maintain procedural fairness in the treatment of all relevant persons;
- d. to prepare a report setting out the conclusions of the investigation and recommendations in relation to any corrective, remedial or other appropriate action.

9. All Protected Disclosures and information provided in the course of investigations into the Protected Disclosures will be kept confidential. NeuGen will use reasonable efforts to ensure that any information relating to a Protected Disclosure will only be disclosed on a "need to know" basis. NeuGen will also take reasonable steps to ensure that all such information will be properly secured. However, NeuGen reserves the right to refer any concerns or complaints to appropriate external regulatory authorities, and/or disclose the information to appropriate third parties where it is under a legal obligation to do so, and/or share the information with legal or auditing professionals for the purpose of obtaining advice. In the course of any investigation, the persons involved should not discuss the investigations with third parties.

10. When a Protected Disclosure is received, NeuGen will provide the whistleblower with an acknowledgement that the concern raised has been received. While corrective, remedial and/or other appropriate action may be taken after the investigations, NeuGen is not obliged to share the outcome of the investigation with the whistleblower.