

Sengenics Whistleblowing Policy

At Sengenics, we expect our employees to conduct themselves with a high standard of professionalism and ethics in the conduct of our business activity.

As part of good corporate governance, Sengenics has established a whistleblowing policy that sets out avenues for legitimate concerns to be objectively investigated and addressed. Individuals will be able to raise concerns about illegal, unethical, or questionable practices in confidence and without the risk of reprisal.

What is Whistleblowing?

Whistleblowing is the voluntary disclosure of inappropriate, unethical, or unlawful behavior and practices by the management or employees. It includes how employees, suppliers and customers are treated. The following are generally accepted as improper and reportable conduct for whistleblowing, of which the list is not exhaustive.

- Any unlawful or illegal activities, whether criminal or breach in civil law;
- Breach of policies and/or procedures;
- Fraud, theft, embezzlement, or dishonesty;
- Corruption/bribery;
- Bullying and all forms of harassment including sexual harassment;
- Actions which can cause physical danger/harm to another person and/or can give rise to risk of damage to properties/assets;
- Forgery or alteration of any documents belonging to the Company, customers, or agents of the Company;
- Poor or unethical sales practices;
- Gross mismanagement or dereliction of duties;
- Conflict of interest;
- Misuse of position or information; and
- Any other similar or related irregularities.

Who Should Report a Concern?

Anyone has the right to whistleblow. This Policy applies to all matters involving Sengenics' employees (including former employees and irrespective of nature of employment status), customers and any other stakeholders/persons providing services to Sengenics, including consultants, vendors, independent contractors, external agencies and/or any other party with a business relationship with Sengenics.

How to Make a Disclosure

We take whistle blowing seriously and your concerns matter to us, so we would like to hear from you if you are aware of improper practices occurring within Sengenics. Sengenics uses WhistleB, an external whistleblowing partner that complies with new European whistleblower protection laws to ensure anonymity. The communication channel is encrypted, and password protected. Disclosures can be made to the following dedicated reporting website <https://report.whistleb.com/sengenics>

USA

Sengenics LLC
(5739583)
44 Manning Road
Billerica, MA 01821

Malaysia

Sengenics Sdn Bhd
(200801022561)
M floor, Block A, Plaza Zurich
Jalan Gelenggang, Bukit Damansara
Kuala Lumpur 50490

To make a report please ensure that you can provide the following details:

- Your concern, incident, or case
- Time of occurrence
- Location of occurrence
- Details of the incident

Do not include sensitive personal information about any individual mentioned in your report if it is not necessary for describing your concern.

Whistleblower Protection

Sengenics commits to ensure that all disclosed information, including the identity of the whistleblower, where disclosed, shall be treated with strict confidentiality. All personnel, with direct or indirect knowledge of a whistleblowing case, shall strictly protect the identity of the whistleblower and witnesses from unauthorized disclosure before, during and after an investigation.

Sengenics is also committed to protect the whistleblower from all acts of harassment, retaliation, victimization, and recrimination arising from making the disclosure in good faith. There may be certain circumstances where the identity of the whistleblower may need to be revealed on a need-to-know basis (e.g. requirement to testify in court). If such a situation arises, Sengenics shall discuss and seek consent with the whistleblower first before proceeding with the case. The protection will be removed if it is found that the whistleblower was also involved in the improper conduct, or if the whistleblower is found to have made the disclosures in bad faith. It is the responsibility of the whistleblower to:

- Make the disclosure in good faith;
- Reasonably believe that the information and allegations are substantially true; and
- Is not acting for personal gain. If the case involves the complainant's personal interests, it must be disclosed at the outset

Daniel Tan
CFO
8 June 2022

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