



WHISTLEBLOWING POLICY

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Our Statement

At UBC Chemical we're committed conducting our business with honesty and integrity at all times. Therefore, with the help of this policy we want to ensure that when a person has reasonable ground to believe that an employee, manager or any other person related to the company has committed an offence knowingly or not knowingly that could harm our business and our reputation, that person should be able to raise their concerns freely. UBC Chemical encourages and will support our employee who report illegal practices or individuals who violate our policies.

A Whistleblower

A whistleblower is a person who reports any risks and/or concerns regarding illegal behaviour or other misconduct within an organization.

Scope & Reporting

We're expecting from all our employees to report misconduct or suspected misconduct, including fraud and financial impropriety to the management team. This includes activities such as below but not limited to;

- Serious Health and Safety risks and environmental threats
- Serious violations of legislation, company rules and control procedures
- Bribery or corruption
- Providing false or misleading information, misuse of financial means, fraud, material theft, and serious breach of professional secrecy
- Discrimination, sexual harassment, physical or verbal abuse or bullying or intimidation of employees or customers, violation of human rights or any other activities that constitute inappropriate behaviour by law
- Abuse of authority

We recognise that the decision to make an allegation is a difficult one. However, the ultimate aim here is to stop and prevent any wrongdoings and it's in the public interest. The whistleblower has nothing to fear because they are doing their duty. We will treat all allegations in confidence and won't reveal the identity of the whistleblower unless requested otherwise by the whistleblower.

No disciplinary or other action will be taken against a whistleblower who makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistleblower who makes an allegation



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without reasonable belief that it is in the public interest to do so (e.g. making a false allegation, maliciously or for personal gain where there is no element of public interest).

How to raise concerns

At UBC Chemical, we have an open-door policy. Every employee has the right to raise their concerns directly with the management team, disciplinary team, the CEO or any C-level director or company advisors such as Health & Safety, Human Resource Consultancy. It is preferable for allegations to be made to an employee's immediate manager to whom they report. However, this may depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. If the whistleblower believes that management is involved it would be inappropriate to raise it directly with them. The whistleblower may then make an allegation direct to CEO.

Once an allegation is made it will be evaluated by the disciplinary team. If there is not a potential criminal act, offence or any violation the matter will be dealt with the HR department. In case there is a belief that there may be an offence, further information will be gathered to determine whether or not a criminal act, a violation of ethical guidelines has really been occurred. With the support of our company lawyers and advisors a decision will be made and case will be finalized once the appropriate action is taken. The whistleblower will then receive an information that the investigation is complete and a decision has been made.

Based on the seriousness level of the report raised the police or other relevant authorities may need to be involved for further investigation and/or prosecution.

Disciplinary Team Consist of:

- CEO
- CCAO (Chief Common Affairs Officer)
- CBDO (Chief Business Development Officer)
- HR Manager / Executive
- R&D and Quality Manager