WHISTLE BLOWING POLICY AND PROCEDURES

1. Overview

Whistle blowing (WBP) is an early warning system that expected to enables the CPBM to find out when something is going wrong in time to take necessary corrective action. Whistle blowing procedure will further ensure the high ethical standard in all business activities of CPBM.

Whistle blowing policy will provides a channel for the employee of the Company and other stakeholders to raise / disclose workplace malpractices, in confidential manner and for the Company to inquire / investigate the malpractices and take appropriate steps. WBP is intended to encourage the employees and other stakeholders to report perceived unethical or illegal conduct of employees(s) and other stakeholders to appropriate authority in confidential manner.

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2. Policy Statement

This policy is committed to the highest standards of openness, probity, accountability and high ethical behavior by helping to foster and maintain an environment where employees and other stakeholders can act appropriately, without fear of reprisal. To maintain these standards, the Company encourages employees' and relevant stakeholders who have material concerns about suspected misconduct or any breach or suspected breach of law or regulation that may adversely impact the organization, to come forward and report them through appropriate channels without fear of retribution or unfair treatment.

3. Objective

Specific objectives of the policy are:

1. To ensure all employees, service providers and other stakeholder feel free to support in speaking up in confidence and reporting the matters they suspect may involve improper, unethical or inappropriate conduct within the Company.
2. To encourage culture that all improper, unethical or inappropriate behavior to be timely identified;
3. To provide clear procedures for reporting and handling such concern(s);
4. To proactively prevent and deter misconduct which could impact the financial performance and damage the Company's reputation;
5. To provide assurance that all disclosures will be handled seriously, treated as confidential and managed without fear of reprisal of any form; and
6. To help promote and develop a culture of openness, accountability and integrity.

4. Scope

WBP is designed to enable employees and other relevant stakeholders to report any perceived act of impropriety which should not be based on mere speculation, rumors and gossips but on knowledge of facts.

Reportable misconducts covered under this policy include:

1. All forms of financial malpractices or impropriety such as fraud, corruption, bribery, theft and concealment;
2. Failure to comply with legal obligations, statuses, and regulatory directives;
3. Actions detrimental to Health and Safety or the work environment;
4. Any form of criminal activity;
5. Improper conduct or unethical behavior that undermines universal and core ethical values such as integrity, respect, honesty, accountability and fairness;
6. Other forms of corporate governance breaches;
7. Attempt to conceal any of the above listed acts.

The above listed reportable misconducts or concerns are not exhaustive. However, judgment and discretion is required to determine misconduct that should be reported under this policy.

5. Mode of Whistle Blowing

Whistleblower may raise concern through a letter and / or through cellphone call and / or through email.

The whistle blower could directly write a letter to the investigator (Head of Internal Audit) and for this purpose the locked boxes will be affixed at appropriate locations at the CPBM premises. The notice of WBP will also be displaced at appropriate locations bearing the brief summary of whistle blowing procedure and the cell # of the investigator and his e-mail address.

6. Roles and Responsibilities

Following are the roles and responsibility of the persons involved in the process

6.1 Whistleblower

Whistleblowers are expected to act in good faith and should refrain from making false accusations when reporting his/her concern(s) reported.

6.2 Suspect

Suspect has a duty to cooperate with investigators during the period of investigation including provision of relevant information, documents or other materials as may be required by the investigator.

6.3 Investigator (Head of Internal Audit)

The Head of Internal Audit is expected to handle all matters with high professionalism, confidentially and promptly. He shall be independent and unbiased in carrying out investigation. He may seek the advice from CEO as and when required.

7. Protection and Reward

Protect those who come forward to report the malpractice shall be given the prime importance. It will be further assured that all reports shall be treated in strict confidence.

In considering unanimous concerns / disclosure of malpractices, seriousness of the issue, its possibility of occurrence should be considered.

Where necessary, reward will be given to the whistleblowers whether internal or external. However compensations not mandatory and it shall be totally at the discretion of Management.

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