

## **ANTI-FRAUD, CORRUPTION & WHISTLEBLOWING POLICY**

At **Vision Mission Cleaning**, we are committed to maintaining the highest standards of integrity, professionalism, and transparency. Fraud, corruption, and unethical behaviour undermine trust and the ethical foundation on which our business stands. We recognize the importance of creating a work environment where employees and our stakeholders feel safe to report any concerns regarding misconduct, and where these reports are taken seriously and acted upon swiftly.

This policy outlines our guidelines on preventing fraud and corruption and provides guidance on how to use our whistleblowing channel effectively.

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### **1. Defining Fraud and Corruption**

Fraud involves any intentional act of deception for financial or personal gain. Examples include, but are not limited to:

- a. **Falsifying Company's official documents** (e.g., deliberate tampering of company documents and records such as payslip, attendance report, night work and overtime claim form, wages adjustment form, expenses claim form, medical certificate etc. and forging signatures).
- b. **Misappropriation of funds or assets** (e.g., stealing cleaning supplies, equipment, or money).
- c. **False representation of work completed** (e.g., claiming and receiving payment for services not rendered).
- d. **Employee or external party misconduct** (e.g., submitting fraudulent claims for reimbursement or benefits).

Corruption involves the abuse of power or influence for personal gain. It may include:

- a. **Bribery** (e.g., offering, receiving, or soliciting gifts or money in exchange for favourable treatment).
- b. **Kickbacks** (e.g., offering or receiving payments for referring business or facilitating services).
- c. **Conflict of interest** (e.g., using company resources for personal gain or engaging in business activities that interfere with the company's objectives)

#### **Other Misconduct:**

- a. **Harassment or discrimination** related to fraud or corruption (e.g., targeting employees who report misconduct).
- b. **Covering up wrongdoing** by falsifying documents, withholding important information and lying about facts.

- c. **Disclosing confidential information without proper authorization or breach in information security** which include all company confidential information and operational documents, papers and information available to you in your official capacity.
- d. **Failure to report** any act of fraud or corruption that one is are aware of will be considered to be complicit in the misconduct and may be subject to disciplinary action.

## 2. **Whistleblowing Policy**

### **Your Right to Report**

We encourage all employees and stakeholders to report any instances of fraud, corruption, or misconduct that they have witnessed or suspect. This may include:

- a. Misappropriation or misuse of company assets.
- b. Any form of bribery or kickbacks.
- c. Falsification of records or invoices.
- d. Abuse of authority for personal gain.

A whistleblower who submits a disclosure via only **Vision Mission Cleaning** whistleblowing channels will be accorded with protection of confidentiality of identity, and protected against any adverse or detrimental actions for disclosing any improper conduct committed or about to be committed within **Vision Mission Cleaning**, to the extent reasonably practicable, provided that the disclosure is made in good faith.

The protection to the whistleblower however can be revoked under the following circumstances, among others:

- a. the whistleblower participated in the improper conduct.
- b. the whistleblower wilfully discloses a false statement.
- c. the disclosure is made with malicious intent.
- d. the disclosure is frivolous or vexatious .
- e. the disclosure is made solely or substantially with the motive of avoiding dismissal or other disciplinary action.

### **Proceeding to report**

The 3 whistleblowing channels that are provided by Vision Mission Cleaning are as below:

- a. **Whistleblowing Hotline: 010 550 1098 (via Whatsapp - Voice Note or text)**
- b. **Whistleblowing Email: [Whistle.vmc@gmail.com](mailto:Whistle.vmc@gmail.com)**
- c. **HR Department: [iskandar@visionmissioncleaning.com](mailto:iskandar@visionmissioncleaning.com)**

When making a report, please provide as much detail as possible to help with the investigation. Include:

- a. Description of the incident or activity.
- b. Names of individuals involved (if known).
- c. Dates and times of events.
- d. Any supporting documents or evidence.

### Investigation Process

Once a report is received, the following steps will be taken:

- a. **Acknowledgment:** Your concern will be acknowledged within two (2) business days.
- b. **Initial Review:** The matter will be reviewed to determine the credibility and severity of the allegation.
- c. **Investigation:** A thorough investigation will be conducted, which may involve interviews with relevant parties and a review of documents and evidences.
- d. **Resolution:** If fraud or corruption is confirmed, appropriate disciplinary actions will be taken, up to and including termination of employment or legal actions.
- e. **Feedback:** You will be kept informed of the outcome of the investigation to the extent permitted by law and company policies.

### Consequences of Fraud and Corruption

Engaging in fraudulent or corrupt practices will result in serious consequences, including:

- a. **Termination:** Immediate dismissal from employment or contract termination.
- b. **Legal Action:** Pursuit of criminal or civil charges if necessary, including fines, imprisonment, or both.
- c. **Reputational Damage:** Any involvement in fraudulent or corrupt activities will significantly damage the company's reputation, leading to loss of business and trust.

The company has a **zero-tolerance** policy on acts of fraud and corruption.

### **Ethical Decision Making**

If you are ever unsure whether an action might be considered fraudulent or corrupt, it is important to ask yourself the following questions:

- a. **Would this action violate the company's code of conduct or core values?**
- b. **Could this action harm the reputation or integrity of the company?**
- c. **Would I be comfortable if this action were made public?**
- d. **Could this action benefit someone unfairly at the expense of others?**

### **Important Contact information**

For further information or clarification about this policy, or to make a report, please contact:

- d. **Whistleblowing Hotline: 010 550 1098 (via Whatsapp - Voice Note or text)**
- e. **Whistleblowing Email: [Whistle.vmc@gmail.com](mailto:Whistle.vmc@gmail.com)**
- f. **HR Department: [iskandar@visionmissioncleaning.com](mailto:iskandar@visionmissioncleaning.com)**

All disclosures are to be reported via secured and confidential channel in accordance with the procedures as provided under this policy.