



Anti-Fraud & Corruption Policy

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1. Overview

City Pharmacy Limited (CPL) and its subsidiaries and affiliates (collectively referred to as the “Group”) are committed to maintaining the highest standards of integrity, transparency, and accountability. This Anti-Fraud/Corruption, and Whistleblower Protection Policy outlines the principles and procedures for preventing, detecting, reporting, and managing fraud and corruption within the organization.

2. Objectives

The primary objectives of this policy are to:

1. Clearly state CPL’s position on theft, fraud, and corruption.
2. Minimize the risk of fraud.
3. Enhance governance and internal controls.
4. Standardize business activities.
5. Maintain integrity in all business dealings.
6. Provide procedures and protections for employees and the public to report suspected fraud or corruption.

3. Implementation

This policy shall be implemented:

- Immediately upon approval and adoption by the Group’s Board of Directors.
- Whenever suspicions of fraud or corruption arise.

4. Key Principles

4.1. Honesty and Integrity

All employees and those charged with governance must:

- act honestly and with integrity.
- safeguard Group assets as a collective responsibility.

4.2. Definition of Fraud

Fraud may occur internally or externally and can involve staff, consultants, suppliers, contractors, or other stakeholders.

The Board and individual employees have a duty to counter theft, fraud, and corruption.

4.3. Reporting Suspected Fraud or Corruption

Employees and the public can voice concerns (whistle blow) through designated channels.

The Group will investigate complaints promptly and protect whistleblowers.

4.4. Protection for Whistleblowers

It is contrary to the values of CPL for anyone to against any board member, manager, or employee who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of CPL.

An employee who retaliates against someone who has reported a violation in good faith will be subject to serious disciplinary action, which could result in termination of employment.

Confidentiality will be maintained during investigations, and any information breach will be dealt with accordingly.

5. Whistleblower Protection Policy

Refer to [SC-01 Whistle Blower Policy](#)

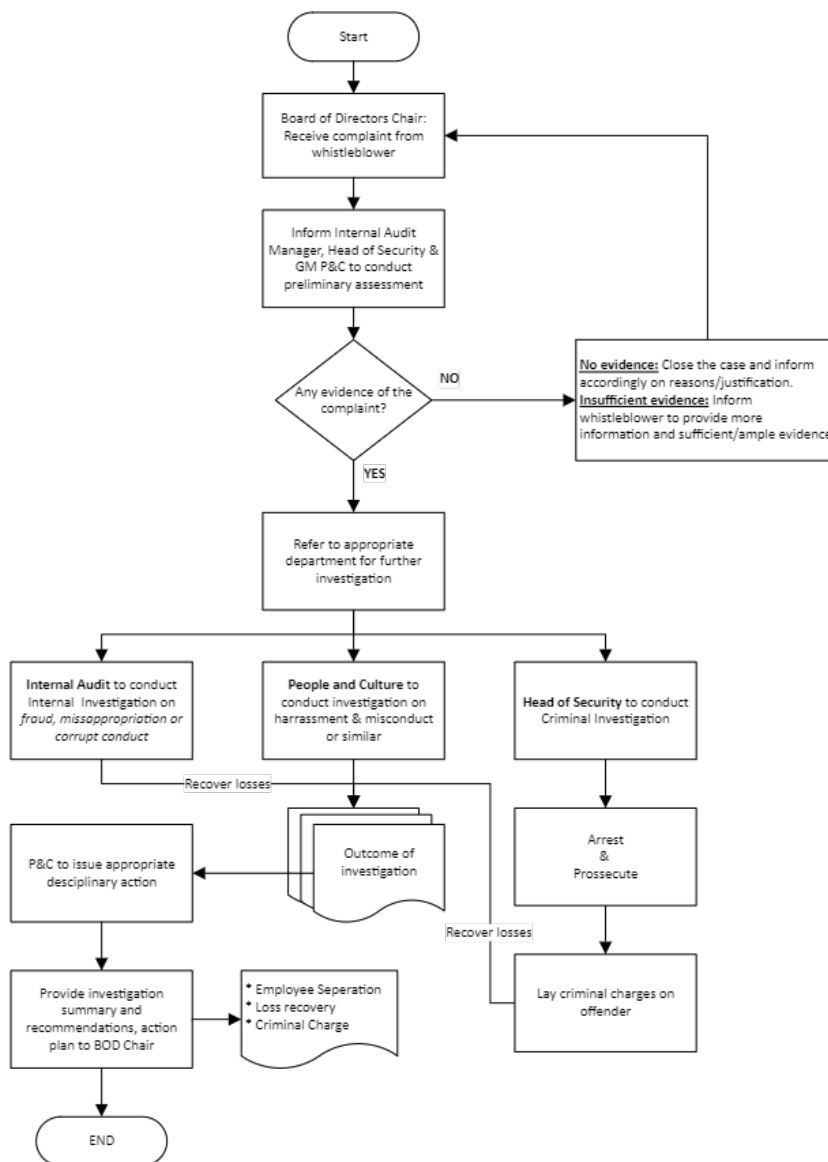
6. Responsibilities

The Board oversees policy implementation.

All employees are responsible for preventing and reporting fraud.

Managers must create awareness and ensure compliance.

Annex 1. Reporting & Investigation Process



7. Training and Communication

Regular training on fraud prevention and whistleblower protection shall be carried out when necessary, including clear communication channels for reporting concerns.

8. Review and Updates

Management reserves the right to revise this policy at any time and in any manner without notice. Any updates and or amendment (based on changing risks and legal requirements) to the Policy shall take effect from the date when it is approved by the Board of Directors of CPL Group.

Any change or revision will be communicated appropriately.

Approval

Drafted by	Reviewed by	Approved by
Internal Audit Manager	General Manager Finance & Administration	ARC Chair
<i>Jonathan Pala</i>	<i>Mohandraj Natarajan</i>	<i>Eddie Ruha</i>

References

- CPL Group Whistle-blower Policy ver. 3.0 (Dec-2022)
- Anti-fraud, anti-corruption and whistleblower protection policy by Department of Prime Minister and National Executive Council <https://pmnec.gov.pg/aawpp>.