

SWIFT FOODS, INC.

**WHISTLE-BLOWING
POLICY**

SWIFT FOODS INC.

I. RATIONALE

The company establishes whistleblowing procedures to provide whistleblowers means to raise concerns relevant to misconducts, malpractices, irregularities, suspected fraud and fraudulent behaviors through a confidential reporting channel. All employees are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting and other malpractices at the earliest opportunity, and in an appropriate way.

II. PERSONS RESPONSIBLE

All directors, officers, and employees of the company

III. POLICY

Reporting Channels

Employee who has a legitimate fraud concern can raise the matter directly with the members of the Audit Committee. Suppliers, customers and business partners are also encouraged to report information pointing to fraud involving company employees or affecting Company funds and assets.

This can be done through any of the reporting channels established by the Company which includes the following:

- a. Face-to-face meetings
- b. Mail/E-mail
- c. Texts or phone calls
- d. Anonymous drop-boxes

Confidentiality

It is the policy of the company to treat all disclosures related to suspected fraud in a confidential and sensitive manner. Investigation reports and specific details of investigations are shared in the strictest manner to avoid damaging the reputations of person/s suspected but subsequently found innocent of wrongful conduct and to protect the company from potential civil liability.

Anonymity

Individuals may choose to report fraud anonymously. The company however, discourages anonymous allegations that individuals wanting to make a report are encouraged to provide contact details. Nonetheless, anonymous allegations will be considered on the account of the following:

- a. Seriousness of the issue/s raised
- b. Credibility of the concern
- c. Likelihood of confirming the allegation from other sources

Untrue Allegations

If an employee makes a false report maliciously with an ulterior motive, or for personal gain, the management reserves the right to take appropriate actions against the employee through disciplinary or legal action, including dismissal from service.

Third Party Actions

The company encourages its suppliers, customers and business partners to report any suspected fraud or any fraudulent acts involving company employees and other individuals dealing with the company directly through the Reporting Channels of the company.

Protection against Retaliation of Whistleblowers or Witnesses

The company will not tolerate harassment or victimization of anyone raising a genuine concern under the whistleblowing policy, regardless of whether or not the concern is ultimately validated.

Any person who believes that they are being retaliated as a result of reporting a concern or assisting the company in any investigation under this policy must immediately inform the Heads of Human Resources and Legal Department for appropriate actions.

Investigation Team

When a suspected or actual fraud against the company is reported, the management shall undertake a full and thorough investigation of the matter, regardless of position and seniority of the person/s involved. An investigating team will be formed to conduct a comprehensive and objective internal investigation of the alleged and/or reported instances of fraud or fraudulent behavior. The team will be reporting directly to the Audit Committee which will have the oversight responsibility over the whole conduct of the investigation.

The investigating team will be composed of the following:

- a. Representative from the Audit Committee which should be the designated head
- b. Head of the Internal Audit Department and/or representative
- c. Head of HR and/or Legal Department and/or representative
- d. Departmental Management Unit Head/Representative of the alleged individual as applicable

Investigation

An investigation will be conducted to establish facts. The investigation should be held in a timely and professional manner and which complies with the statutory and company requirements. The investigation shall include the collection and review of all relevant documents, interviews of people who can provide such information, and an interview with those alleged to be involved in fraud.

Investigation Report

All work done throughout the fraud investigation must be documented. The final investigation report will include all the details relating to the investigation and a timeline of all the events which took place. The report will also include the transcripts of any interviews undertaken and any legal advice received as an appendix. The report may also contain the recommendations of the investigation team on the course of action to be taken.

The appointed head of the investigating panel shall review the Investigation Report. The head in turn forward the same to the persons requiring notifications such as the Head of HR and Legal departments and agree on the remedial actions recommended.

After the review by the head of the special investigating team, the investigation report shall be forwarded to the CEO/Board of Directors for final disposition, taken into account the recommendations included in the report.

The whistleblower should be informed of the result of the investigation but this should be done only once the report and proposed course of action has been finalized.

Remedial Actions

After proper investigation, the company will take all possible remedies in accordance with the company's rules and regulations as in all cases where it is considered appropriate and will observe consistent dealings with such cases, regardless of position and length of service of the employee/s involved. The company will also remove suppliers from doing business with the company should they proved to be perpetrating any acts of fraud through conniving with internal parties.