

## **WHISTLE-BLOWING POLICY AND PROGRAMME (hereinafter called the “Programme”)**

### **OBJECTIVES**

The objectives of the Programme are:

- To communicate the Company’s expectations of employees of the Group (hereinafter referred to as “employee(s)”) in detecting fraudulent activities, malpractices or improprieties;
- To guide employees and any other persons on the course of action when addressing their concerns or suspicions of fraudulent activities, malpractices or improprieties;
- To provide a process for investigations and management reporting; and
- To establish the policies for protecting whistle-blowers against reprisal by any person internal or external to the Group.

### **TYPES OF ACTION COVERED BY PROGRAMME**

This Programme is intended to deal with concerns over wrongdoings that fall within the following activities:

- Financial malpractice or impropriety;
- Fraud or corruption or any dishonest act;
- Criminal activity including forgery or falsification of and alteration to Company documents/accounts;
- Breach of legal obligation (including negligence, breach of contracts);
- Danger of destruction to and unsafe practices in the work environment;
- Improper conduct or unethical behavior (e.g., disclosure of confidential and proprietary information to party(ies) without prior authorization and a need-to-know basis, accepting/seeking anything of material value from business associates e.g. Vendors);
- Attempts to conceal any of the above; and
- Any other similar or related inappropriate conduct or activities that might lead to other damaging implications to the Group.

The above list is not exhaustive.

## **REPORTING PROCEDURES**

The whistle-blower shall report to the Company's Chairman of Audit Committee ('AC') and/or Member(s) of the AC, any conduct or activity that he/she reasonably believes in good faith to be a reportable conduct as defined in this Programme. The report may be made in writing to the following:

- By email to the office of Chairman of AC and/or Member(s) of the AC at [ac.hockseng@gmail.com](mailto:ac.hockseng@gmail.com)
- Currently, the AC comprises the following members:  
Mr Wee Piew (AC Chairman)  
Mr Lim Heng Seng (AC Member)  
Mr Ngiam Zee Moey (AC Member)

All reports of any of the above actions will be duly investigated by an Investigation Committee.

The Investigation Committee shall comprise Chairman of AC and/or Member(s) of the AC and/or any other persons appointed by the Chairman of AC and/or Member(s) of the AC.

All employees must provide full cooperation and support to the Investigation Committee.

The Company views whistle-blowing seriously and would:

- Not allow the whistle-blower(s) to be victimized;
- Treat victimization of whistle-blower(s) as a serious matter that may lead to disciplinary action including dismissal; and
- Take disciplinary action if any employee destroys or conceals evidence or makes untrue allegations.

The employee or any other persons who has reported a suspicion of fraudulent activities, malpractices or improprieties in good faith and in compliance with the provisions of this Programme would not be prejudiced in his position in any way as a result of having made a report.

This Programme is not intended for personal complaints or for employees or any other persons to seek personal gain or who otherwise do not act in good faith and the Company will not tolerate any such malicious acts. Disciplinary action(s) may be taken against such informant(s).

## **ADMINISTRATION**

The Chairman of AC and/or Member(s) of the AC, with the assistance of the Human Resource (HR) Manager, will be responsible for the administration of this Programme. This Programme will be reviewed by the AC, as and when deemed appropriate, with recommendations, if any, made to the Board of Directors for approval.

## **IMMUNITY FROM DISCIPLINARY ACTION**

The Company encourages the reporting of fraudulent practices and inappropriate activities and in pursuit thereof, shall grant administrative immunity to whistle-blowers.

A whistle-blower acting in good faith and who has not himself engaged in serious misconduct or illegal conduct shall be protected from any forms of harassment, retaliation, adverse employment or career advancement consequence or discrimination, including but not limited to demotion, dismissal or reduction of compensation or privileges of employment.