

## Whistleblower Policy

### Scope and application

#### 1. Purpose of the Policy

The Company is committed to the highest levels of integrity and ethical standards in all business practices. Employees must conduct themselves in a manner consistent with current community and Company standards and in compliance with all relevant legislation. These principles are clearly set out in the Company's Code of Conduct.

This Whistleblower Policy complements the Code of Conduct and is designed to ensure that:-

- parties\* are able to disclose information in good faith regarding suspected wrongful conduct by Company employees without fear of any reprisals; and
- there is a clearly defined process through which such information is disclosed.

(\*Parties refer to full and temporary (\*employees, contractors, vendors, purchasers and the general public.)

#### 2. What the Policy applies to

The Whistleblower Policy applies to all business activities with suppliers, contractors, customers, shareholders and employees in the jurisdictions in which the Company operates.

#### 3. How the Policy interacts with other Company policies

The Code of Conduct should be read in conjunction with the following Company policies:

- Code of Conduct
- Disclosure of material information;
- Dealing in securities;
- Policy on Drugs and Alcohol;
- Quality Policy;
- Health, Safety and Environment Policy;
- Business Control Framework;
- Employee's Handbook; and
- Vision, Mission and Guiding Principles.

Copies of these policies are available on the Company's website or intranet.

The Company continually assesses and, where necessary, upgrades its policies and procedures. You will be notified of any material changes to the policies and procedures.

#### 4. How to report a wrongful conduct

##### (a) **Reporting channel and details**

Any reports of a wrongful or potentially wrongful conduct should be directed to the Company's **independent Whistleblowing Administration Service agent RHT Corporate Advisory Pte Ltd ("RHTCA")** in any of the following ways:-

Phone: (65) 8484-6288  
Operational hours:  
9:00 am to 6:00 pm (Singapore; GMT +8)  
Mondays to Fridays, not including public holidays or office closures

Email: [wb-meo@rhtcorporate.com](mailto:wb-meo@rhtcorporate.com)

Post: MEO WB  
c/o RHT Corporate Advisory Pte Ltd  
Six Battery Road  
#10-01  
Singapore 049909

A report of a wrongful or potentially wrongful conduct must contain the following information:-

- A report of the wrongful or potentially wrongful conduct that includes:
  - Nature of misconduct/improper activity
  - Date(s) and time(s) of the misconduct/improper activity
  - Full name of the person(s) involved
  - Is there any evidence or information you can provide to assist us in further investigation
- Reporting party's/ Whistleblower's
  - Full name and designation (if applicable)
  - Contact details

The requirement to provide the above details is to allow any investigation a reasonable opportunity (including contacting the reporting party for clarification if needed) to properly review any suspected wrongful conduct, and to take any necessary actions to address and rectify the wrongful or potentially wrongful conduct.

**NOTE: ANY REPORT THAT DOES NOT CONTAIN THE FULL NAME AND CONTACT DETAILS OF THE PERSON MAKING THE REPORT MAY BE DISREGARDED.**

Upon receipt of the report, RHTCA will compile the relevant information, without the Whistleblower's details, to be presented to the Risk Manager and/or Audit Committee ("AC") Chairman.

The Whistleblower's identity may be disclosed in the course of further investigations if deemed necessary with consideration given to the severity of the misconduct reported, the credibility of the parties, and the ability of confirming the allegation from other sources.

### (b) Investigations

The Risk Manager will review the information disclosed, interview the reporting party when required, and with the Company's Senior Management and/or the Chairman of the Audit Committee, determine whether the circumstances warrant an investigation and if so, the appropriate investigative process to be employed, and the corrective actions to take, if any.

The Company, the Risk Manager and/or the Audit Committee Chairman, in accordance with the above procedures, retain the prerogative to:-

- disregard any report that has not been submitted in accordance with the reporting channels and details set out above
- determine whether the circumstances warrant an investigation
- apply any investigative processes
- recommend or impose any corrective or remedial action.

In the investigation process, all employees are expected to co-operate fully with the directions of the Risk Manager and/or other party as authorized by the Audit Committee Chairman.

### 5. What an investigation means

A decision to conduct an investigation is not an accusation. It is to be treated as a neutral fact-finding process. The outcome of the investigation may or may not support a conclusion that a wrongful conduct has been or may be committed by the employee(s) under investigation.

The employee(s) under investigation will be informed of the outcome of the investigations.

### 6. Confidentiality and Reprisals

Section 36 of the Prevention of Corruption Act protects a whistleblower by stating that the whistleblower's identity will not be disclosed, even during court proceedings, unless the court finds that he/she has willfully made a false statement in his/her complaint.

## WHISTLEBLOWER POLICY

Confidentiality of the identity of the Whistleblower, any employee(s) assisting with any investigation and any employee(s) who is the subject of any investigation will, to the extent possible, be maintained. Such persons should nevertheless be cautioned that their identity may become known if the situation warrants.

No person shall be subject to any reprisal for having made a good faith report of any wrongful or potentially wrongful conduct in accordance with this Policy. The protection from reprisal also extends to persons who may have been called as witnesses or otherwise participated in the investigation arising from such a report. Any person who believes he/she is subject to any reprisal should make a report of the same in accordance with this Policy.

### 7. Who to speak to if you have questions

If you have any questions regarding the Whistleblower Policy or any of the Company's policies at any time, you should contact the Risk Manager, your HR Manager or the Company's General Counsel.

### 8. Definitions

- a) **"Whistleblower"** - A person or entity making a protected disclosure about improper or illegal activities is commonly referred to as a whistleblower. Whistleblowers may be employees, vendors, contractors, customers or the general public. The whistleblower's role is as a reporting party. They do not form part of the investigative team nor are they fact finders. They do not they determine the appropriate corrective or remedial action that may be warranted.
- b) **"Good Faith"** - When a report is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe that the report is true. The report does not have to be proven to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious or false.
- c) **"Misconduct and Improper Activities"** - Examples of misconduct include, but are not limited to, fraud (including financial or accounting fraud), violation of laws and regulations, violation of Company policies, unethical or indecent behavior or practices, endangerment to health or safety, and negligence of duty.