

WHISTLEBLOWING POLICY AND PROCEDURE

This whistleblowing policy and procedure is to provide an opportunity for concerns raised by employees, directors and others to be investigated and for appropriate action to be taken to ensure that the matter is resolved effectively and within the Company wherever possible.

This policy shall apply to all employees of the Company and the Group.

The objective of the policy and procedure is to provide and facilitate a mechanism for any whistleblower to report concern about any suspected and/or known misconduct, wrongdoings, corruption, fraud, waste and/or abuse which may include the following examples of issues:

- commission of fraud and/or corruption
- unauthorized use of Company/Group's money, properties and/or facilities
- non-compliance with the Company's policies and procedures and/or code of conduct
- negligence/malpractice
- disclosure of Company's information without proper authorization
- commission of acts which intimidate, harass and/or victimise any members of the Board of Directors, Management or staff of the Company
- abuse of position
- involvement in conflict of interest and/or business opportunities positions
- commission of unlawful acts
- exposure of Company's properties, facilities and/or staff to the risks of safety and security
- failure to meet professional standard
- concealment of any of the above

Anonymous Reporting

The whistleblower may identify himself or if he prefers, to remain anonymous when reporting suspected and/or known misconduct, wrongdoings, corruption, fraud, waste and/or abuse.

Confidentiality

The identity of the whistleblower and all concerns raised would be treated as private and confidential in order to protect the whistleblower from victimisation or harassment arises from the reporting. However, the whistleblower may be required to come forward as a witness in accordance with any applicable laws and regulations.

Any employee reporting on any concern must make it in good faith with reasonable belief that it is true, without malicious or false allegation and not for personal gain. Any employee found to make false and malicious allegation shall be subjected to disciplinary actions by the Company and/or legal action by the Company.

Procedure

- Any concern should be reported to the immediate superior. However, if it is not possible or appropriate to do so, the concern should then be reported to the Managing Director.
- Any concern that deemed not appropriate to be reported to the immediate superior should be raised to the attention of the Executive Chairman.
- Upon receipt of the concern, the Managing Director or the Executive Chairman (depending on who is the recipient of the reporting) shall set up an investigating team ("Investigators") to conduct investigation on the issue/concern raised.
- The progress of the investigation shall be reported to the Managing Director or the Executive Chairman.
- Upon completion of the investigation, the Investigators shall submit their full report together with recommendation to the Managing Director or the Executive Chairman.
- Actions mandated shall be carried out accordingly.
- If the whistleblower is not satisfied with the way the concern/matter is dealt with, he/she can escalate the report to the Audit Committee Chairman. The Audit Committee will deliberate the matter reported and decide on the appropriate action.