

HARPS GLOBAL PTE. LTD.

WHISTLEBLOWING POLICIES AND PROCEDURES



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Objectives

HARPS GLOBAL PTE. LTD. and its affiliates (“HARPS Global”) expect high standards of ethical, moral and legal business conduct. HARPS Global takes a serious view of any wrongdoing on the part of any of its directors, group executive committee members, employees, and vendors, with respect to their obligations regarding HARPS Global’s interests.

Whistleblowing is defined in this policy as an attempt by any stakeholder and/or party to disclose, through established channels, genuine concerns about malpractice, impropriety, statutory non-compliance and/or wrongdoing by any personnel within HARPS Global.

This policy is in line with the whistleblower national law wherein provisions have been made to protect the whistleblower against being dismissed and/or penalized by their employers or superiors as a result of disclosing serious concerns and to ensure **NO** whistleblower should feel he and/or she is at a disadvantage in raising legitimate concerns.

Policy and Protection

This policy is designed to provide guidance to stakeholders of HARPS Global to report and/or disclose through established channels concerning any improper conduct or misconduct, and/or failure to comply with regulatory requirements that is taking place or has taken place or may take place in the future. This policy aims to encourage the whistleblower to feel confident in raising disclosures in HARPS Global’ interest about suspected serious misconduct in HARPS Global without fear of reprisals or victimization where the disclosure is not subsequently confirmed by an investigation.

The types of improper conduct shall include, but not limited to the following:

- Fraud (embezzlement, theft and misappropriation) of HARPS Group’s funds or assets;
- Bribery, corruption or money laundering;
- Criminal breach of trust, abuse of power and position or blackmail;
- Improprieties and irregularities in accounting and financial reporting;
- Improper or unethical conduct or behaviour within the meaning of HARPS Global’s Code of Conduct

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or other HARPS Global's policies;

- Unauthorized disclosure or use of confidential information of HARPS Global;
- Conflict of interest within the meaning of HARPS Global's conflict of interest policy;
- Misuse of HARPS Global's properties, assets or resources;
- Non-compliance with HARPS Global's policies and procedures or breach of internal control;
- Acts or omissions which are deemed to be against the interests of HARPS Global;
- Non-compliance with laws, regulations, requirements of statutory bodies or public policies;
- Danger to health and safety of any personnel of HARPS Global or any other individual;
- Damage to the environment;
- Sexual harassment;
- Unethical behaviour; and
- An accomplice to or deliberate concealment of any or a combination of the above matters or other acts of wrongdoing.

a) Anonymity

The policy encourages whistleblowers to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. However, whistleblowers may remain anonymous, if they choose to do so. Anonymous whistleblowers are encouraged to provide an email address or other contact information to facilitate proper investigation.

Whistleblowers are advised to provide sufficient information to enable the Group to conduct investigation.

Additionally, the factors to be taken into account will include:

- i) Seriousness of the issue raised;
- ii) Credibility of the concern; and
- iii) Likelihood of confirming the allegation from attributable sources.

b) Confidentiality

All concerns will be treated with utmost confidentiality and every effort will be made NOT to reveal the identity and particulars of the whistleblower. HARPS Global will only reveal information on a "need to know" basis and/or if required by law, court and/or authorities. Information about the action being taken to address the concern will be provided to the whistleblowers who raised the concern at the appropriate time.

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c) Protection

This policy provides assurance that the whistleblower will not be at risk of losing his and/or her job or suffer any form of biasness, retaliation, retribution or harassment provided that the disclosure is made in good faith even if the investigation later reveals that the whistleblower is mistaken as to the facts, information and/or regulations involved. This policy does not however extend to anyone who willfully or maliciously raises a concern, knowingly or believing the information is false or untrue.

How to Raise A Concern

Any concern on any personnel should, at first instance, be reported to their immediate superior, where possible. However, the most appropriate person to contact or to report a concern may depend on the sensitivity of the issue involved and who is suspected of malpractice.

Therefore, if the stakeholder or party prefers, they may utilise any one of the following mechanisms:

l) In Writing – *Marked Strictly Private and Confidential* - Whistleblowing

Address: Board of Director
HARPS Global Pte. Ltd.
1 Harbourfront Avenue,
#14-07, Keppel Bay
Tower, Singapore
098632.

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The investigation process shall be as follows:

- Full details and clarifications of the concern and/or allegation shall be obtained.
- Depending on type and/or nature of the reported concern and/or allegation, the Board of Director holds the highest authority to form an investigating panel which may consist of the relevant business division and/or personnel appropriately placed to address the reported concern and/or allegation.
- If appropriate, the investigating panel should consult with the Board of Director and/or other group executive committee member and consider the involvement of HARPS Global's internal auditors and/or the police at this stage.
- Concern and/or allegation shall be fully investigated by an investigating panel with assistance from the appropriate personnel and/or professionals and/or bodies.
- Findings regarding the concern and/or allegation and validity of the concern and/or allegation will be detailed in a written report together with conclusion of the investigation. The report will be passed to the Board of Director.
- Thereafter, the Board of Director will decide on the appropriate action to take. If the complaint is discovered to be valid, disciplinary or other appropriate action will be taken.
- The decision of the Board of Director shall be final at its sole discretion.
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- Findings of the investigation(s) will be communicated to the group executive committee, Human Resources Department and Legal Department for necessary action.
- The investigating panel will communicate the conclusion of all findings to the whistleblower only if necessary at HARPS Global's sole discretion.

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Safe keeping of Records

All concerns and/or allegations received in writing via the above-mentioned channels together with the relevant investigation documents are to be retained by the Group for a minimum period of seven (7) years.

All reports, supporting evidence, findings of investigations and implementation of corrective actions shall be maintained and monitored by the Human Resource Department.

Oversight and Ownership of Policy

- The Board of Directors of HARPS Global has overall responsibility for this policy and shall oversee the implementation of this policy.
- The Board has delegated responsibility for the administration and implementation of the policy to the Human Resources Department and Group Legal Department.
- The use and effectiveness of this policy shall be regularly monitored and reviewed by the Global HR Business Partner (HRBP) and the Head of Legal and shall be responsible for incorporating any amendments and updates into this document upon obtaining the approval of the Board of Directors for such amendments and updates prior to disseminating the same to the relevant parties.
- HARPS Global will review this policy at least once every three (3) years to assess its effectiveness.
- All amendments to this policy shall be made in writing upon written approval by the Board of Director.

- END OF POLICY -