



SINGHAIYI
GROUP

WHISTLE BLOWING POLICY
SINGHAIYI GROUP LTD



1. INTRODUCTION

SingHaiyi Group Ltd and its subsidiaries (the “Company”) directors and employees are expected to carry out their duties as required and conduct themselves in a professional manner at all times and in ways that bring credit to themselves and the Company. We are required to observe high standards of business and personal ethics, honesty and integrity in fulfilling our responsibilities within all applicable laws and regulations. Being a public listed company, we are socially responsible in ensuring that this is practised within the organization. This Policy addresses the commitment of the Company to integrity and ethical behaviour by helping to foster and maintain an environment where employees and outside parties such as vendors, clients, contractors and other stakeholders can act appropriately, without fear of retaliation. To maintain these standards, the Company encourages its employees and outside parties who have concerns about suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company, to come forward and express these concerns without fear of punishment or unfair treatment.

The Company conducts business based on the principles of fairness, honesty, openness, decency, integrity and respect. It is Company’s policy to support and encourage its employees and outside parties to report and disclose improper or illegal activities, and to fully investigate such reports and disclosures. It is also the Company’s policy to address any complaints that allege acts or attempted acts of interference, reprisal, retaliation, threats, coercion or intimidation against employees and outside parties who report, disclose or investigate improper or illegal activities (the “Whistleblowers”) and to protect those who come forward to report such activities. Company assures that all reports will be treated strictly confidentially and promptly investigated and that reports can be made anonymously, if desired.

Employees and outside parties are encouraged to use guidance provided by this policy for reporting all allegations of suspected misconduct or improper activities.

2. AIMS OF THE WHISTLEBLOWING CODE

The Codes aims to:

- 2.1 Encourage employees and outside parties to feel confident in raising serious concerns and to question and act upon their concerns.
- 2.2 Provide ways for employees and outside parties to raise those concerns and get feedback on any actions taken as a result.
- 2.3 Ensure that employees and outside parties get a response to their concerns.
- 2.4 Reassure employees and outside parties that if they raise any concerns in good faith and reasonably believe them to be true, they will be protected from possible reprisals or victimization, to the extent where situations allow.

3. CHANNEL AND STRUCTURE OF WHISTLE BLOWING

- 3.1 All employees of the Company and outside parties may use this Code and have the duties to report concerns which may have, or reliable information provided to them, about possible misdeeds or improprieties committed by staff/management of the company.
- 3.2 Information about known or suspected violations by any employee and outside parties should be reported promptly to the Audit Committee Members of the Company. The reporting could be made via email at acm@singhaiyi.com
- 3.3 Where appropriate, the matters raised may:
 - 3.3.1 Be investigated by management, internal audit and/or a committee set up by the Audit Committee or through the disciplinary process or referred to police when necessary.
 - 3.3.2 Usually, within four weeks of a concern has been raised, the person looking into the concern will write to you:
 - Acknowledged that the concern has been received.
 - Indicating how the company proposes to deal with the matter.
 - 3.3.3 Subject to any legal constraints, the relevant employee or outside party will normally be informed of the final outcome of any investigation.
 - 3.3.4 Quarterly reports on cases reported will be submitted to the Audit Committee.

4. PROTECTION FOR WHISTLEBLOWER

- 4.1 The Company assures that the whistleblower's identity will be kept confidential unless required by court or other regulatory authorities to disclose the identity.
- 4.2 The Company will not tolerate victimization of the whistleblower, and the disciplinary action will be taken against those who victimize the whistleblower.
- 4.3 The Company assures that the employment of the whistleblower will be protected even if the report proved to be unfounded, provided the report has been made in good faith. However, reporting with malicious intent will not be tolerated.

5. CONFIDENTIALITY

- 5.1 Information pertaining to the whistleblowing case will be kept confidential and restricted to the group of designated officers in charge of the investigation. This is to prevent unnecessary leakage of information which could result in potential legal suits if there was insufficient evidence to support the case.
- 5.2 The Company will ensure there are sufficient facts and evidence to support the action decision to be taken and the evidence is able to stand up to cross-examination / scrutiny in the courts.
- 5.3 The Company will ensure that the party will not be convicted of any wrongdoing or unduly penalized until the case facts are proved to be genuine and sufficient evidence are in place to support the case.

6. ANNUAL REVIEW

- 6.1 The whistle blowing policy will be reviewed on an annual basis by Group Managing Director in consultation with key management personnel. Any proposed revisions shall be submit to the Audit Committee for approval.