

## FIRST SPONSOR GROUP LIMITED (“Company”) WHISTLEBLOWING POLICY

### 1. Policy and its Purpose

The Company and its Board of Directors are fully committed to conducting business with integrity and consistent with the highest standards of business ethics, and in compliance with all applicable laws and regulatory requirements. In line with this commitment, the Board has adopted this Whistleblowing Policy (“**Policy**”) to encourage the reporting of any instances of misconduct or wrongdoing involving the businesses of the Company and its subsidiaries (“**Group**”) and to provide protections and measures so that those persons who make a report may do so confidentially and without fear of intimidation, disadvantage or reprisal.

### 2. Application of the Policy

**2.1** This Policy applies to all current and former directors, officers and employees of the Group and external whistleblowers including clients, contractors and suppliers of the Group. For purposes of easy reference, the use of the word “**you**” refers to all whistleblowers covered under this Policy, and references to the “**Company**” shall in the relevant context, include all of the Company’s subsidiaries.

**2.2** Reportable actual or suspected misconduct or wrongdoing (“**reportable conduct**”) shall include but are not limited to the following:

- criminal offences, breaches of laws and regulations, for example fraud, theft, bribery, corruption, insider trading or money laundering;
- irregularities in financial reporting, accounting or other financial matters;
- conduct that is in violation of the Company’s policies, procedures or guidelines;
- unauthorised disclosure of confidential information whether within or outside the Group;
- undeclared conflicts of interest in business dealings;
- endangerment of the health and safety of an individual; or
- concealment of any of the above.

Reportable conduct generally does not include personal work-related grievances. These are grievances which relate to a current or former employee’s employment or engagement that have implications for only that person and do not have broader implications for the Group. Examples include a conflict between you and another employee, a decision relating to your promotion or transfer or a decision relating to the termination of your employment or engagement. Such matters should be raised directly with your supervisor, the Company’s senior management or the Human Resources Department. In limited circumstances, a personal work-related grievance may amount to a reportable conduct under this Policy, for example, if it:

- includes information about misconduct or wrongdoing or information that otherwise qualifies as a reportable conduct;
- relates to any detriment or threat of detriment to you for making a report;
- relates to particular offences or breach of laws, or has significant implications for the Group; or
- suggests misconduct or wrongdoing beyond your personal circumstance.

**2.3** To the extent that any of the Company’s key operating subsidiaries have adopted their own whistleblowing policies specific to the industry, environment or countries in which

they operate, this Policy is not intended to supersede the more restrictive terms of the subsidiaries' policies.

### 3. Oversight and Monitoring

- 3.1 The Group Audit and Risk Committee ("**Group ARC**") shall be responsible for the oversight and monitoring of the implementation of this Policy.
- 3.2 The Group ARC may, in its absolute discretion, delegate the execution of certain functions, including the investigation of any whistleblowing report and the maintenance of a register of whistleblowing reports ("**Whistleblowing Register**"), to such person(s) as it deems fit.

### 4. Procedures for Handling Reports

#### 4.1 *Submission of report*

For the purposes of this Policy and to ensure appropriate escalation and timely investigation, the whistleblower should submit his/her report to the Group ARC via one of the following channels:

E-mail: ac@1st-sponsor.com.sg

Mail: Group Audit and Risk Committee  
First Sponsor Group Limited  
c/o 63 Market Street  
#06-03 Bank of Singapore Centre  
Singapore 048942

Any report involving any member(s) of the Group ARC may be submitted to the Group CEO via e-mail at neotp@1st-sponsor.com.sg, who shall refer the report to the remaining member(s) of the Group ARC.

All reports will be independently assessed to ensure that they are fairly and properly considered. As it is essential to have all critical information in order to be able to effectively evaluate and investigate a report, the report made shall provide as much information and be as specific as possible, including:

- details of the circumstances relating to the reportable conduct;
- people (name and designation) and companies involved;
- witnesses (name and designation), if any;
- dates, times and locations of the incident(s);
- value of any money or asset involved; and
- any evidence or other relevant information or documentation that would assist in the evaluation of the report.

You are encouraged to disclose your identity when making your report. Reports made anonymously are difficult to act upon effectively; however, they may be considered, taking into account the severity and credibility of the issues raised and the likelihood of confirmation of the allegation from attributable sources and information provided. Hence, you are encouraged to provide your contact information so that clarifications may be sought during the course of investigation.

The Company will not be obliged to acknowledge the receipt of a report or keep you informed of the stage or outcome of any investigations.

#### **4.2 Review and investigation of report**

Upon receipt of the report, the Group ARC will review the report and decide if the report is valid and within the scope of this Policy. If the report is valid and within the scope of this Policy, the Group ARC will determine the manner in which the report should be investigated. While the scope and timeframe for any investigation may differ depending on the report being examined, any investigation will be conducted in a timely manner and will be fair and independent from you as well as the persons involved in the reportable conduct.

In determining the appropriate approach to each investigation, the Group ARC may consider, among other things:

- whether an internal or external investigator should lead the investigation;
- whether the matter should be referred to the external auditor;
- whether the matter should be referred to law enforcement agencies or regulatory authorities; and
- the nature of any technical, financial or legal advice that may be required to support an investigation.

While the particular investigation process and enquiries adopted will be determined by the nature and substance of the report, if the report is not anonymous, you may be contacted to discuss the investigation process including who may be contacted and such other matters as are relevant to the investigation. Where a report is submitted anonymously, the investigation will be conducted based on the information provided in the report.

A person who is the subject of a report will be treated fairly and objectively, with any findings made on the basis of reliable evidence. The identity of a person being investigated will be kept confidential to the extent practicable.

All employees must cooperate fully with any investigations.

The Group ARC will consider the investigation report to determine what, if any, actions are to be taken.

#### **4.3 Maintenance of Whistleblowing Register**

The Group ARC shall maintain the Whistleblowing Register.

### **5. Protection of Whistleblowers**

The Company is committed to ensuring confidentiality in respect of all matters raised under this Policy, and that those who make a report are treated fairly and do not suffer any detriment.

#### **5.1 Protection against detrimental conduct**

Detrimental treatment includes dismissal, demotion, harassment, discrimination, disciplinary action, bias, threats or other unfavourable treatment connected with making a report.

If you are subjected to detrimental treatment as a result of making a report under this Policy, you should:

- inform your supervisor, the Company's senior management or the Human Resources Department; or
- report it in accordance with paragraph 4 of this Policy.

The Company may take disciplinary action including terminating the employment or engagement of anyone shown to have subjected you to detrimental treatment because you made a report under this Policy.

## **5.2 Protection of your identity and confidentiality**

To the extent that it is lawful and/or the investigative process and/or circumstance permits, the identity of the whistleblower will be kept confidential.

Upon receiving a report under this Policy, the Company will take reasonable steps to reduce the risk of you being identified. Each report is different and the Company's approach to protecting confidentiality with each report will reflect those different circumstances. Some examples of how the Company can protect confidentiality include:

- where appropriate, redacting your personal information from documents and referring to you in gender-neutral terms;
- where possible, discussing with you the approach to aspects of your report which risk identifying you;
- limiting sharing of the report to the Company's personnel trained in their confidentiality obligations;
- securely storing materials in relation to a report;
- even where you agree to sharing your identity, limiting the sharing of your identity to a strictly need-to-know basis;
- only sending materials related to your report to secure printers;
- investigation reports shall be marked "Privileged and Confidential" and access shall be restricted to the Group ARC, any relevant management who needs to know and those authorised to investigate or assist in the investigation;
- access to the Whistleblowing Register shall be limited to the Group ARC and such person(s) as the Group ARC may approve; and
- training the Company's personnel in relation to their confidentiality obligations.

Should an investigation lead to a criminal prosecution, it may become necessary for you to provide evidence or be interviewed by law enforcement agencies or regulatory authorities. In these circumstances, the Company will, once again, where possible, discuss with you the implications for confidentiality.

## **6. Malicious Reports**

**6.1** Malicious reporting of misconduct or wrongdoing without evidence or reasonable suspicions with the intention of harming another person's integrity or reputation amounts to an abuse of the whistleblowing mechanism. In such cases, the Company may revoke the protection accorded to a whistleblower under this Policy and take appropriate action including reporting the matter to law enforcement agencies or regulatory authorities and recover loss or damage suffered as a result of the malicious report. If the person making the malicious report is a director, officer or employee, he/she may face disciplinary action, including the termination of his/her employment or engagement where appropriate.

**6.2** A malicious report is distinct from reports of suspected misconduct or wrongdoing made in good faith based on the judgment and information available to the whistleblower at the time of his/her report, which may not be confirmed by an investigation. In such cases, whistleblowers are protected by this Policy.

**7. Policy Review and Publication**

- 7.1** The Company's senior management will review this Policy and its effectiveness from time to time, with recommendations regarding any amendments thereto to be made to the Group ARC for its approval.
- 7.2** This Policy, including any amendments thereto, shall be published on the Company's corporate website.

29 October 2021