

TEN-LEAGUE INTERNATIONAL HOLDINGS LIMITED

WHISTLE-BLOWING POLICY

1. PURPOSE & OBJECTIVES

Ten League International Holdings Limited and its Board of Directors are committed to the highest standards of transparency integrity and accountability. An important aspect of accountability and transparency is a whistle-blowing mechanism for employees and stakeholders of the Group to voice out any concerns on improprieties or suspected improprieties in a responsible and effective manner.

It is the responsibility of all directors, officers and employees of the Group to report any possible improprieties.

The Audit Committee may in its absolute discretion delegate the investigation of the whistle-blowing reports and implementation of this Policy to such person as it deems fit.

2. SCOPE

This Policy applies to any suspected improprieties involving employees of the Group as well as consultants, vendors, contractors, and/or any other parties with a business relationship with the Group.

This policy is designed to enable employees of the Group to express their concerns and to disclose information which the whistle-blower believes to be an indicator of malpractice or impropriety. These concerns include but are not limited to:

- Financial malpractice or impropriety or fraud;
- Failure to comply with a legal obligation or Statutes;
- Dangers to Health & Safety or the environment;
- Criminal activity;
- Improper conduct or unethical behaviour;
- Insider trading or the dissemination of material non-public information; or
- Attempts to conceal any of the above.

3. DEFINITION

- 3.1 “**Group**” refers to Ten League International Holdings Limited and its subsidiaries.

POLICIES & PROCEDURES

1. Whistle-Blowing Reporting

1.1. All whistle-blowing reports should be sent directly to any member of the Whistle-blowing Committee. Contact information of the Whistle-blowing Committee members are as follows:

Chairman:

Name: Mr. Kong Chee Keong (Audit Committee Chairman)
Email: whistleblowing@ten-league.com.sg

Members:

Name: Mr. Ong Shen Chieh (Member of the Audit Committee)
Email: whistleblowing@ten-league.com.sg

Name: Mr. Cheam Heng Haw (Member of the Audit Committee)
Email: whistleblowing@ten-league.com.sg

Name: Mr. Jison Lim (Executive Chairman)
Email: whistleblowing@ten-league.com.sg

2. Reporting Procedures

2.1. Whistle-blowing reports may be communicated in writing, via Email, Telephone or in person. However, all reports are encouraged to be made in writing, so as to assume a clear understanding of the issues raised. The format provided in *Appendix A* may be used for reporting purpose.

2.2. *Anonymous Reporting*: It is strongly encouraged for the whistle blower to identify himself/herself. Investigations may be hindered if the Group is unable to contact the whistle-blower for more information. The Group is committed to protecting whistle-blowers who report in good faith. The identity of whistle-blowers will not be disclosed unless it is absolutely necessary for the purpose of the investigation and will never be disclosed without prior notice to the whistle-blower.

3. Whistle-Blowing Handling Procedures

3.1. All whistle-blowing reports, other than whistle-blowing reports involving the Group’s internal auditors, shall be maintained in the whistle-blowing register. The whistle-blowing report should contain all information provided by the whistle-blower to substantiate his case.

3.2. The Group assures that any concern raised or information provided will be investigated, but consideration will be given to the following factors:

- Severity of the issues raised
- Credibility of the concern or information
- Likelihood of confirming the concern or information from attributable sources

- 3.3. Depending on the parties involved in the whistle-blowing report, Chairman of the Audit Committee may then appoint an investigating officer(s) to follow up on the whistle-blowing report.
- 3.4. The investigating officer(s) will communicate the findings of the investigation(s) to the Audit Committee for their necessary action.
- 3.5. The Group and its Board of Directors should also consider the option of making disclosure to the relevant regulatory bodies, if necessary.

4. Investigation Procedure

- 4.1. The Whistle-blowing Committee member who receives a report will notify the sender and acknowledge receipt of the reported violation or suspected violation within ten business days.
- 4.2. The appointed investigating officer(s) should follow these steps:
 - (i) Full details and clarifications from the whistle-blower should also be obtained. All Information obtained from whistle-blower should be documented in writing (*Appendix A*).
 - (ii) The allegations should be fully investigated by the investigating officer(s) with the assistance where appropriate, of other individuals / bodies;
 - (iii) The investigating officer(s) should consider the involvement of the Police at this stage and consult with the senior management if necessary;
 - (iv) A judgement concerning the complaint and validity of the complaint will be made by the investigating officer(s). This judgement will be detailed in a written report (*Appendix A*) containing the findings of the investigations and reasons for the judgement;
 - (v) The senior management reserves the right to make any decision based on the findings by the Investigating officer(s).

5. Addressing Whistle-Blowing Concerns

- 5.1. **Retaliation:** The Group will not tolerate any form of retaliation against the whistle-blower and will take the appropriate actions to protect whistle-blowers as long as the concern raised is in good faith, with no malicious intent.
- 5.2. **Confidentiality:** The Group will do its utmost to protect the whistle-blower's identity as practically possible. However, there may be instances in the investigation process which require the identity of the whistle-blower to be made known. (E.g. when the source of the information or a witness is required.)
- 5.3. **Untrue Allegations:** If an individual makes an allegation in good faith, and that allegation was proven untrue by subsequent investigation, no action will be taken against that individual. In making a disclosure, the individual should exercise due care to ensure the accuracy of the information. On the other hand, when an individual is found to be making malicious or vexatious

allegations, and especially if he or she persists with making them, disciplinary action may be taken against that individual.

- 5.4. **Timeline:** Due to the varied nature of the whistle-blowing complaints, it may not be possible to lay down precise timelines for such investigations. The investigating officer will ensure that the investigations are undertaken in the shortest possible time, without affecting the accuracy and reliability of those investigations.

The investigating officer, will as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing, the outcome of the investigation and the follow-up action. If the investigation takes place over a prolonged period, the investigating officer may keep the complainant updated in the most appropriate manner.

WHISTLE-BLOWER REPORT FORM

Please provide the following details for any suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Group and submit directly to any of the Whistle-Blowing Committee members. Please note that you may be called upon to assist in the investigation, if required.

Note: Please follow the guidelines as laid out in the Whistle-Blowing Policy.

REPORTER'S CONTACT INFORMATION	
Name	
Designation	
Department/Operation/Relationship to the Group	
Contact number	
E-mail address	

SUSPECT'S INFORMATION	
Name	
Designation	
Department/Operation/Relationship to the Group	
Contact number	
E-mail address	

WITNESS(ES) INFORMATION <i>(if any)</i>	
WITNESS 1	
Name	
Designation	
Department/Operation/Relationship to the Group	
Contact number	
E-mail address	
Allegation no.	
WITNESS 2	
Name	
Designation	
Department/Operation/Relationship to the Group	
Contact number	
E-mail address	
Allegation no.	

COMPLAINT:

- (a) Briefly describe the misconduct / improper activity and how you know about it.
- (b) Specify what, who, when, where and how.
- (c) If there is more than one allegation, number each allegation and use many pages as necessary.

1. What misconduct / improper activity occurred?

2. Who committed the misconduct / improper activity?

3. When did it happen and when did you notice it?

4. Where did it happen?

5. Is there any evidence that you could provide us?

6. Are there any other details or information which could assist us in the investigation?

7. Do you have any others details or information which would assist us in the investigation?

8. Any other comments?

Date:

Signature (optional):

*Note: You **SHOULD NOT** attempt to obtain evidence for which you do not have a right of access since whistle-blowers are 'reporting parties' and not 'investigators'.*

FOR WHISTLE-BLOWER COMMITTEE USE	Report No.
Received by:	Received on:
Signature:	Acknowledgment sent on:
Investigation Required (Yes / No)? <i>(If no, please state the reason)</i>	
Investigation Done By:	
Investigation Results:	
Action Taken / Conclusion:	
Reported to Whistle-blower Committee Chairman on:	
Signed off by:	