

WHISTLEBLOWING POLICY

Policy Statement

KTMG Limited and its subsidiaries (“**KTMG**” or the “**Group**”) is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. As a responsible corporation, KTMG will conduct its affairs in an ethical, responsible and transparent manner.

Recognising the abovementioned values, KTMG provides an avenue for all employees of KTMG and members of the public to disclose any improper conduct within the Group.

For the purpose of this policy, the words “members of the public” include suppliers, vendors, associated stakeholders and customers of KTMG.

Objective of the Policy

This policy is to provide an avenue for all employees of the Group and members of the public to raise genuine concerns about possible improprieties and conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and members of the public who report such allegations.

This policy also enables KTMG to take swift, fair and effective actions that will enable KTMG to comply with our social and corporate responsibilities and maintain the trust and support of all employees of the Group and members of the public.

Scope of the Policy

This policy is designed to provide guidance to employees and members of the public who have major concerns over any wrongdoings within the Group relating to unlawful conduct, financial malpractice or dangers to the public and environment that has taken place or is likely to be committed. Specific examples include the following:

- Fraud;
- Corruption, bribery or blackmail;
- Abuse of Power;
- Conflict of Interest;
- Miscarriage of justice;
- Theft or embezzlement;
- Misuse of Company’s Property or misappropriation of funds;
- Non-Compliance with laws and regulations or internal and financial control procedures and policies;
- Intimidation, discrimination or harassment of staff and other persons during the course of work;
- Actions which endanger the health or safety of staff or the public;
- Actions which cause damage to the environment; and
- Actions which are intended to conceal any of the above.

The above list is not exhaustive.

Applicability of the Policy

Subject to the requirement of applicable local jurisdiction, this policy applies to all employees of KTMG and its subsidiaries. This policy also applies to members of the public, where relevant. The policy is not intended for personal complaints or for employees of the Group who seek personal gain or who otherwise do not act in good faith and the Company will not tolerate malicious acts. Disciplinary action(s) may be taken against such informant(s).

Procedure in Making a Disclosure

All disclosures are to be channeled in accordance with the procedures as provided under this policy.

Disclosure can be submitted via whistleblow@ktmg.sg. All reports must contain the following information:

- (a) your full name;
- (b) the department in which you are employed and the name of your reporting officer; and
- (c) the particulars of the alleged impropriety, including:
 - (i) the full name(s) and other contact particulars (where available) of the person(s) involved;
 - (ii) the date, time and place of the occurrence or commission of the alleged impropriety;
 - (iii) the nature of the alleged impropriety;
 - (iv) evidence (documentary or otherwise), if any, of the alleged impropriety; and
 - (v) other relevant information to facilitate the investigations.

All incidents or concerns raised by the Whistleblower will be independently evaluated to ensure that they are fairly and properly considered. It is important for the whistle-blower to provide all critical information in order for the incident to be effectively assessed and investigated

Although the Whistleblower is not expected to prove beyond doubt the truth of an allegation, it will be necessary to demonstrate to the Recipient(s) that there are sufficient grounds for real concerns. All concerns raised will be independently assessed by the AC to ensure that they are fairly and properly considered.

Protection to Whistleblower

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within the Group, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved. However, this protection may be revoked if employees of the Group and members of the public misuse or abuse this policy by making false, malicious or vexatious allegations.

Any party who treats the whistle blower unfairly will face disciplinary actions.

Help will be provided to whistle blower in order to minimise any difficulties that he/she may experience. These may include advice on giving evidence if needed, arrange meetings off-site with he/she and with he/she being represented, if he/she so wishes; and

Employees' and any other persons' identities will not be disclosed without prior consent (except where disclosure obligations are required under law and regulations). Where concerns are unable to be resolved without revealing the identity of the employee and any other persons raising the concern, (e.g., if their evidence is required in court), we will enter into a dialogue with the employee and any other persons concerned as to whether and how we can proceed.

Anonymous Whistleblower

Incidents and/or concerns which are reported anonymously may be difficult to act upon effectively. To facilitate an investigation of the matters reported, Whistleblowers are encouraged to identify themselves. This would allow the Whistleblower to be informed of the outcome of the investigation, so as to maintain the transparency and effectiveness of the whistle-blowing arrangement. Due to the need to allocate time, costs and resources to carry out an investigation, it will be difficult for the Audit Committee (the "AC") to commence investigations based on an anonymous report. However, an investigation may still 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.

Investigation and Notification

Concerns raised in writing by email to the AC at whistleblow@ktmg.sg shall be independently verified and investigated under the oversight of the AC. The AC may request person(s) who are independent of the allegations in the report made by the Whistleblower to assist with the investigations.

Employees and any other persons who have raised concerns internally, will be informed of who is handling the matter, how they can make contact with them and if there is any further assistance required. The AC will give as much feedback as possible without any infringement on a duty of confidence.

During the course of investigation, the Whistleblower or any party privy to the confidential information should not:

- a. Inform or discuss with external media or any colleagues;
- b. Contact the suspected individual in an effort to determine facts or demand restitution; and
- c. Release information concerning the status of the investigation.

Where necessary, the Whistleblower may be requested to make a statement to the relevant law enforcement authority(ies) or otherwise give evidence to the extent required by law or order of a court.

Upon completion of the investigations, the whistleblower will be notified on the outcome and any actions to be taken by the Company.

This policy is non-contractual and KTMG Limited reserves the right to update and/or amend this policy from time to time.

Any question about the application of this policy should be addressed to whistleblow@ktmg.sg.