

Whistle-Blowing Policy

Purpose

Hoe Leong Corporation Ltd. (the “**Company**”) and its subsidiaries (collectively, the “**Group**”) is committed to a high standard of compliance with accounting, financial reporting, internal controls, corporate governance and auditing requirements and any legislation relating thereto. In line with this commitment, the Whistle-blowing Policy (this “**Policy**”) aims to provide an avenue for employees and external parties to raise concerns and offer reassurance that they will be protected from reprisals or victimisation for whistle-blowing in good faith.

This Policy is intended to conform to the guidance set out in the latest Code of Corporate Governance which encourages employees to raise concerns, in confidence, about possible irregularities.

Objectives of this Policy

1. Deter wrongdoing and to promote standards of good corporate practices.
2. Provision of proper avenues for employees and other persons to raise concerns about actual, suspected or possible improprieties in the business and/ or financial reporting or other matters of public interest and receive feedback on any action taken.
3. Give whistle-blowers the assurance that their identities will be kept confidential and they will be protected from reprisals for whistle-blowing in good faith.

Scope

This Policy covers concerns over wrongdoing or malpractice within or by the Group, including, without limitation, the following: -

- (a) Concerns about the Group’s accounting, internal controls or audit (including independence of auditors);
- (b) Breach of the Group’s code of business conduct and ethics for employees;
- (c) Impropriety, corruption, acts of fraud, theft and/misuse of the Group’s properties, assets or resources;
- (d) Failure to comply with the law and regulations;
- (e) Abuse of power or authority;
- (f) Serious conflict of interest that is not mitigated and/ or disclosed;
- (g) Obtaining or offering of bribes and/ or secret commissions and attempts to do so;
- (h) Improper or unauthorised expenditures;
- (i) Any other serious improper matters which may cause financial or non-financial loss to the Group, or damage to the Group’s reputation;
- (j) Fraud against investors, or the making of fraudulent statements or intentional provision of incorrect information to the Singapore Exchange and other regulatory authorities and members of the investment community;
- (k) Dangers to health and safety or the environment;
- (l) Improper conduct or unethical behaviour; and
- (m) Attempts to conceal any of the above.

The above list is intended to give an indication of the kind of conduct which might be considered as “wrongdoing”. In cases of doubt, the whistle-blower should seek to speak to his or her immediate superior or follow the procedure for reporting under this Policy.

This policy is not designed to:

- Question financial or business decisions taken by the Group;
- Reconsider any matters which have already been addressed under other procedures; and
- Settle personal disputes or personal differences

Protection Against Reprisals

If an employee raises a genuine concern under this Policy, he or she will not be at risk of losing his/ her job or suffering from retribution or harassment as a result. Provided that the employee is acting in good faith, it does not matter if he or she is mistaken.

Direct or indirect victimisation of any person who uses this policy in good faith will be regarded as a serious disciplinary offence.

However, the Group does not condone frivolous, mischievous or malicious allegations. Appropriate action (including disciplinary action) may be taken against employees and other persons who made such allegations.

Confidentiality of Whistle-Blower's Identity

The Group encourages the whistle-blower to identify himself/ herself when raising a concern or providing information. All concerns will be treated with strict confidentiality.

Exceptional circumstances under which information provided by the whistle-blower could not or would not be treated with strictest confidentiality include:

- where the Group is under a legal obligation to disclose information provided;
- where the information is already in the public domain;
- where the information is given on a strictly confidential basis to legal or auditing professionals for the purpose of obtaining professional advice; and
- where the information is given to the police or other authorities for criminal investigation

Where the whistle-blower's identity is to be revealed, the Company will endeavour to discuss this with the whistle-blower first.

Concerns and Information Provided Anonymously

Concerns expressed anonymously are much less persuasive and may hinder investigation work as it is more difficult to look into the matter or to protect the whistle-blower's position. Accordingly, the Group will consider anonymous reports, and concerns expressed or information provided anonymously will be investigated on the basis of their merits.

Reporting Procedures

1. Reporting

1.1 An employee may raise his/ her concern to his/ her immediate supervisors.

1.2 If the concern involves his/ her immediate supervisor, manager or Head of Department, or for any reason he/ she would prefer them not to be told, he/ she may report to the Executive Directors of the Company:

Name	Designation	Email
Liew Yoke Pheng Joseph	Executive Chairman and CEO	joseph.liew@hoeleong.com
Yeo Puay Hin	Executive Director (Business Development)	puayhin.yeo@hoeleong.com

1.3 If none of the channels above are suitable, the whistle-blower can address his/ her concerns directly to our Audit Committee (which comprises of independent directors of the Company) via: whistleblowing@hoeleong.com

1.4 Actual or suspected fraud should be promptly reported to the Audit Committee.

2. Timing

The earlier the concern is raised the easier it is for the Group to take action.

3. Evidence

The whistle-blower should set out the background/ nature/ history of events, personnel involved and reasons for the concern in his/ her complaint/ report. Although the whistle-blower is not expected to prove the truth of an allegation, the whistle-blower is encouraged to provide such evidence to demonstrate that there are sufficient grounds for concern.

All efforts will be made to ensure that any form of evidence would not be lost or contaminated during the review/ investigation process.

4. How the Report will be Attended to

4.1 The action taken will depend on the nature of the concern. Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take.

4.2 The Group assures you that any concern raised on information provided will be attended to, but consideration will be given to these factors:

- Severity of the issue raised;
- Credibility of the concern or information;
- Level of sufficient detail provided and whether an investigation can be instigated; and
- Likelihood of confirming the concern or information from attributable sources

4.3 If an investigation is necessary, the Audit Committee may request for an internal committee or may direct an independent party to do so. A report on the findings of investigation and follow-up actions shall be submitted to the Audit Committee and Board of Directors.

5. Guidelines for Investigation

The guidelines below are intended to ensure that investigations (if required) are conducted in a proper and complete manner.

5.1 Generally, documents should be collected and examined before interviews are conducted.

5.2 As far as possible, an interview with the suspect should be sought at appropriate juncture as this provides him/ her the opportunity to tell his/ her side, which is an important part of the fact-finding process.

5.3 The role of personnel involved in an investigation is to establish the truth. They should not use their role or position to influence the investigation.

5.4 At the end of the investigation, the Audit Committee or Investigation Committee shall determine further action that should be taken and consider whether the matter needs to be reported to any relevant authorities.

6. Further Information

6.1 The amount of contact between the whistle-blower and the Audit Committee or the body investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the whistle-blower.

6.2 Subject to legal constraints, the whistle-blower will receive follow-up notification on his/ her concern and/ or outcome of any investigations.