SECURA

WHISTLEBLOWING POLICY

1.0	**Objective**
1.1	Secura Group Limited ("**SGL**") is committed to a high standard of corporate governance.
1.2	In line with this commitment, the Whistleblowing Policy ("**Policy**") aims to (a) provide a trusted avenue for employees, vendors, customers and other stakeholders to report serious wrongdoings or concerns, particularly in relation to fraud, corruption, corporate governance or ethics, without fear of reprisals when whistleblowing in good faith; and (b) ensure that robust arrangements are in place to facilitate independent investigation of the reported concern and for the appropriate follow-up actions to be taken.
2.0	**Scope**
2.1	This Policy applies to all matters involving the Group's employees and any other stakeholders / persons providing goods and services to the Group, including consultants, vendors, independent contractors, external agencies and/or any other party with a business relationship with the Group.
2.2	This Policy does not apply to grievances or complaints concerning an individual's terms of employment or an employee performance matter and such matters shall be dealt with in accordance with Group Human Resource guidelines and policies. Should it be determined during the preliminary investigation that the matter disclosed does not fall within the scope of this Policy, such matters will be transferred and dealt with by the appropriate personnel of the relevant department for appropriate procedures and actions to be taken.
2.3	No employee shall use his / her position to prevent other employees from exercising their rights or complying with their obligations as indicated in this Policy.
3.0	**Definitions**
3.1	**"Whistleblowing"** is the deliberate and voluntary disclosure, made in good faith through designated reporting channel, of information relating to suspected or actual improper conduct or wrongdoing such as (but not limited to) committing fraud, corruption, financial irregularities, conflict of interest without disclosure, illegal activities, abuse of power and authority or unethical practices within the Group based on his or her reasonable and honest belief.
3.2	The person who reports, discloses or alerts serious concerns of improper conduct or wrongdoing is referred to as "**Whistleblower**".
3.3	**Whistleblowing Committee** or "**WBC**" comprising members of Audit & Risk Committee (ARC) and Executive Directors of the Group. The ARC provides independent oversight of the WBC, including reviewing investigation outcomes and assessing the adequacy and effectiveness of the Group's whistleblowing arrangements. The WBC of the Group will be assisted by Group Risk & Compliance in the administration and investigation of Whistleblowing reports.
3.4	**"Investigation Officer"** is a person or a team of people assigned by the WBC to carry out an investigation of a Whistleblower Report.

4.0	**Whistleblowing (WB) Incident Reporting**
4.1	**Reportable WB Incidents** The whistleblower can report on the following serious concerns (not exhaustive) covered by this Policy: • Fraud, theft, misappropriation of Company's properties, assets and resources • Misappropriation of funds, financial irregularities or malpractice; • Conflict of interests without disclosure • Corruption, bribery, money laundering or blackmail; • Illegal acts, practices and criminal offences; • Abuse of power, authority or position; • Unethical behaviour or practices • Disclosure of confidential information to unauthorised external parties • Failure to comply with legal or regulatory obligation; • Improper acts or behaviours that may cause harm or injury to person, loss or damage to Company's property • Concealment of information about any wrongdoing, malpractice or prohibited activities • Any other concerns that could subject any part of the Group to legal liability or affect its integrity and reputation
4.2	**Protection Against Reprisals** 4.2.1 The Group prohibits discrimination, retaliation or harassment of any kind against a Whistleblower who submits a complaint or report in good faith. 4.2.2 If an employee raises a genuine concern and "whistleblow" under this Policy, he/she will not be at risk of losing their job or suffer retribution or harassment, if they are acting in good faith. 4.2.3 However, the Company does not condone any frivolous, mischievous or malicious allegations. Employee(s) making such allegations shall face disciplinary action in accordance with the Company's disciplinary procedures. Likewise, if investigations reveal that the outside party making the complaint had done so maliciously for personal gain, appropriate action may be taken in accordance with the law.
4.3	**Anonymous Reporting & Confidentiality** 4.3.1 Anonymous reports may be accepted and will be assessed on their merits. However, the ability to investigate such reports may be limited where insufficient information is provided. 4.3.2 The report including information or evidence provided, on matters relating to whistleblowing case shall be handled discreetly and every effort shall be made to maintain confidentiality within the limits of the law. 4.3.3 The identity of the individual making the allegation shall be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

4.4 **How to Raise a WB Concern**

4.4.1 Who to Report To:

Option One : Report to HR department or Risk & Compliance department

Option Two : Email or by post to the Chairman of Audit & Risk Committee (ARC)
Email : whistleblow@securagroup.com.sg
Address: : 38 Alexandra Terrace Level 6, Singapore 119932

4.4.2 Information Required for Investigation

(i) It may be necessary to disclose the identities of the whistleblower and people involved in the case to facilitate investigations and may be also required to give evidence in disciplinary proceedings or legal proceedings, where relevant.

(ii) A Whistleblower shall provide complete and accurate information in the report. Information which would be useful in assessing Whistleblower's concerns include (not limited to):

- the details of improper conduct;
- the date, time and location of the improper conduct;
- the identity and designation (if any) of the alleged wrongdoer(s);
- particulars of witnesses or other parties involved, if any;
- particulars or copies of documentary evidence, including email or SMS correspondences, if any; and any other details that are useful to facilitate screening and investigation.

5.0 Handling of WB Report

5.1 All reported cases shall be acknowledged where the Whistleblower has provided contact details.

5.2 Any legitimate concern raised or information provided shall be reviewed and investigated if deemed necessary, taking into the consideration the following:
- Severity of the issue raised
- Credibility of the concern or information; and
- Likelihood of substantiating the concern through reasonably verifiable or attributable sources

5.3 Depending on the nature of the concern raised or information provided, the investigation may be conducted or referred to the relevant persons or entities:
- The Audit & Risk Committee
- The External or Internal Auditor
- Forensic Professionals
- The Police or Commercial Affairs Department; and/or
- The Corrupt Practices Investigation Bureau

5.4 Investigations and follow-up actions for all reported cases shall be reported to the ARC.

6.0 Safekeeping of Records

6.1 All reported cases, the supporting evidence, findings of investigations and resolution shall be logged and monitored by the Group Risk & Compliance under the supervision of WBC.