

Whistleblowing Policy

1. Purpose:

Soon Hock Group (“The Group”) is committed to providing ethical, moral, and legal business conduct across our business functions. This whistleblowing policy sets out the guidelines and procedures to handle whistleblower reporting, which provides a confidential and independent channel for employees and external parties to report concerns or misconduct related to The Group.

2. Scope:

This policy applies to all employees (part time or full time), interns, senior management and directors, as well as third parties including customers, suppliers, contractors, investors, tenants, creditors and debtors and stakeholders The Group.

3. What to Report:

While it may not be possible to list down an exhaustive list of activities that may qualify as violations or misconduct, the Policy aims to address more serious incidences that can impact The Group, including but not limited to:

- Theft or misappropriation of funds
- Financial malpractice or fraud
- Bribery and corruption
- Abuse of authority or improper/unethical conduct
- Non-compliance with laws and regulations
- Non-compliance with internal controls, policies or rules
- Discrimination or harassment
- Workplace safety and health lapses
- Falsification of documents
- Other Criminal offences

4. How to Report:

You can report your concerns:

- In writing with attached Appendix A to: The Whistleblowing Investigation Officer, 2F Jalan Papan #05-01 Singapore 619816
- By email to: whistleblow@soonhock.com.sg

The report will be handled by the Audit Committee.



5. Confidentiality:

All reports will be treated with confidence and every effort will be made to maintain confidentiality. The whistleblowers (while not mandatory) are encouraged to provide their names and contact details so that further information and clarification can be obtained to provide a comprehensive investigation. The whistleblower's anonymity will be preserved and will not be divulged without their consent, save for instance where:

- i) The disclosure is to comply to any applicable law or regulation
- ii) The report or incident is already public knowledge

6. Protection:

You will not be victimized or taken to task for making a report in good faith. In return, the whistleblower is also expected to keep all information relating to the whistleblowing report confidential so as to preserve the integrity of the investigation.

All reports are expected to be made in good faith. Reports that are not substantiated may not warrant further investigation.

7. Investigation:

To investigate your concerns, please provide the following information:

1. Your contact details
2. Names of individuals/companies involved
3. Your relationship with them
4. Detailed description of the incident (date, time, location, actions)
5. Duration of the issue
6. Whether management has been informed (and if so, when and who)
7. Any supporting evidence

We encourage you to provide your contact information to facilitate investigations. All reports will be treated confidentially. The investigation will follow the flowchart as attached in Appendix B.

8. Amendments:

This policy may be updated as necessary.

WHISTLEBLOW FORM (HR_003 - Appendix A)

Name (optional): _____ Date of Report : _____

NRIC/Passport/UEN No (optional): _____

Email: _____ Contact: _____

Incident

Description of Concerns: : _____
(what happened, for
how long, which parties
are aware, what was
being committed) _____

Date & Time of Incident: : _____

Location of Incident : _____

How was it discovered : _____

Name of Companies or
Person(s) Involved : _____

Relationship with
Involved parties : _____

Evidence(s) : _____

To fill in by Audit Committee:

Findings / Evaluation: _____

Action to be taken : **Conduct Further Investigation / Case to be dropped**
(circle one)

Name / Signature / Date : _____

Whistleblowing Process Flowchart
(HR_003 – Appendix B)

