

Draft Whistleblowing Policy

Subject to Board Approval

Policy

This Whistleblowing policy is adopted to provide for a mechanism where genuine issues and concerns of wrongdoing, impropriety or irregularity involving or affecting the Company may be raised in a confidential manner. This Policy aims to deter and uncover corrupt, illegal, unethical, fraudulent and other conduct detrimental to the interests of the Company.

Company directors, officers, employees, vendors, suppliers, contractors, consultants and customers are encouraged to report any serious wrongdoing or impropriety committed by employees, officers, directors, vendors, suppliers, contractors, consultants, clients and customers which may concern auditing or accounting matters, internal controls, disclosure matters, conflict of interest, insider trading, serious breaches of Company policies such as the Code of Conduct and Business Ethics, Manual of Corporate Governance, Employee Handbook, unfair labor and trade policies or any other matters involving fraud, corruption and other unlawful activities.

Whistleblowing Channel

If an employee or stakeholder in good faith believes that wrongdoing or impropriety exists in the workplace, this should be reported immediately through an incident report either to his/her service line manager, the Internal Auditor, or the Company's Compliance Officer.

The Incident Report shall include details of the parties involved, dates or period of time, type of concern, evidence substantiating the claim, and contact details, in case further information may be required.

Subject to the gravity and credibility of the concern raised and the probability of validating the concern from reliable sources, the matter will be investigated by the Company's Internal Auditor.

Handling of Whistleblower Incident Report

The receiving officer shall then inform the CEO and/or President of the complaint who shall then require the Internal Auditor to investigate the complaint.

Depending on the nature of the complaint, the subject of the complaint may be informed of the allegation against him/her and be provided with an opportunity to reply to such allegations. Employees, officers and directors who fail to cooperate in the investigation, or

deliberately provide false information during an investigation, shall be subject to disciplinary sanctions, which may include dismissal or termination.

After completion of an investigation, the investigation findings shall be submitted to the board. If it is sufficiently supported by evidence that a violation has occurred, corrective actions shall be undertaken. The Company reserves the right to refer any concerns or complaints to appropriate regulatory authorities.

Identities of persons who have raised concerns will be held in confidence unless otherwise agreed. This policy protects employees and other whistleblowers from victimization, harassment or disciplinary action as a result of any disclosure of impropriety where the disclosure is made in good faith and is not made maliciously or for personal gain. However, this assurance will not extend to someone that maliciously raises a matter that is known to be untrue. Anyone who knowingly submits a false report or have fabricated evidence shall be subject to disciplinary and/or legal action.

This policy is intended to assist individuals who believe they have discovered wrongdoing or impropriety in the conduct of the business of the Company. It is not designed to address concerns relating to employment matters which can be properly raised through the grievance procedure.