

Kimly Group	Whistle blowing Policy	Revision: August 2017
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Objective

Kimly Limited (“Kimly”) and its subsidiaries (collectively the “Group”) do not tolerate any malpractice, impropriety, statutory non-compliance or wrongdoing by management and staff in the course of their work. This Whistleblowing Policy (the “Policy”) is intended to provide a framework to promote responsible and secure whistleblowing without fear of adverse consequences.

Employees and outside parties, such as suppliers, customers, contractors and other stakeholders, may use the procedures set out in the Policy to report any concern or complaint regarding questionable accounting or auditing matters, internal controls, disclosure matters, conflict of interest, insider trading, collusion with competitors, serious breaches of Group policy, unsafe work practices or any other matters involving fraud, corruption and employee misconduct.

The Policy allows for reporting by employees or outside parties of such matters to the Whistleblowing Committee of the Group, without fear of reprisal, discrimination or adverse consequences, and also permits the Group to address such reports by taking appropriate action, including, but not limited to, disciplining or terminating the employment and/or services of those responsible.

However, while the Policy is meant to protect genuine whistle blowers from any unfair treatment as a result of their report, it strictly prohibits frivolous and bogus complaints. The Policy is also not a route for taking up personal grievances. These should continue to be taken up directly with Department heads.

Reporting Procedures

The Group encourages employees and outside parties to put their names to their allegations whenever possible. Concerns or irregularities expressed anonymously are more difficult to act upon effectively but they will be considered, taking into account the seriousness and credibility of the issues raised, and the likelihood of confirming the allegation from attributable sources and information provided. All concerns or irregularities raised will be treated with confidence and every effort will be made to ensure that confidentiality is maintained throughout the process.

The whistleblowing report should be raised in writing, via letter or email. As it is essential for the Group to have all critical information in order to be able to effectively evaluate and investigate a complaint, the report made should provide as much detail and be as specific as possible. The complaint should include details of the parties involved, dates or period of time, the type of concern, evidence substantiating the complaint, where possible, and contact details, in case further information is required.

The dedicated whistle blowing reporting channel is as follows:

Chairman of the Audit Committee of Kimly Group
Email: **whistleblowing@kimlygroup.sg**

Reports to the Chairman of the Audit Committee of Kimly Group should be delivered in a sealed envelope marked “Confidential – Only To be Opened by the Chairman of the Audit Committee of Kimly Limited” to the following address:

Rajah & Tann Singapore LLP
9 Battery Road #25-01 Singapore 049910
“Confidential – Only To Be Opened by the Chairman of the Audit Committee of Kimly Limited”

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The Whistleblowing Committee is responsible for ensuring that issues raised are properly resolved. All matters reported will be reviewed within a reasonable time frame, and after due consideration and inquiry, a decision will be taken on whether to proceed with a detailed investigation.

The Whistleblowing Committee consists of the following members:

Chairman

Independent Director & Chairman of the Audit Committee

Members

Audit Committee Members

Safeguards

The Group prohibits discrimination, retaliation or harassment of any kind against a whistle blower who submits a complaint or report in good faith. If a whistle blower believes that he or she is being subjected to discrimination, retaliation or harassment for having made a report under this Policy, he or she should immediately report those facts to the Whistleblowing Committee. Reporting should be done promptly to facilitate investigation and the taking of appropriate action.

At the appropriate time, the party making the report/complaint may need to come forward as a witness. If an employee or outside party makes an allegation in good faith but it is not confirmed by the investigation, no action will be taken against him or her. If, however, an employee has made an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against him or her. Likewise, if investigations reveal that the outside party making the complaint had done so maliciously or for personal gain, appropriate action, including reporting the matter to the police, may be taken.

Handling of Complaints

The Whistleblowing Committee, may, direct the complaint to the department best placed to address it, or lead the investigation to ensure prompt and appropriate investigation and resolution. All information disclosed during the course of investigation will remain confidential, except as necessary or appropriate to conduct the investigation and to take any remedial action, in accordance with any applicable laws and regulations. The Group reserves the right to refer any concerns or complaints to appropriate external regulatory authorities. Depending on the nature of the complaint, the subject of the complaint may be informed of the allegations against him or her and be provided with an opportunity to reply to such allegations. Employees who fail to cooperate in an investigation, or deliberately provide false information during an investigation, shall be subject to strict disciplinary action up to, and including, immediate dismissal.

If, at the conclusion of an investigation, the Group determines that a violation has occurred or the allegations are substantiated, effective remedial action commensurate with the severity of the offence will be taken.

Modification

The Group may modify this Policy to maintain compliance with applicable laws and regulations or accommodate organisational changes within the Group.