

Whistleblowing Policy & Procedure

举报规章准则和程序

Objective 宗旨

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.

金味有限公司(“金味”)及其附属公司(统称“本集团”)对欺诈采取零容忍态度。不容许管理层及员工在工作过程中作出任何舞弊, 欺诈, 违法或不合规行为。公司实施举报政策(“政策”)旨在提供一个架构, 以促进负责任及安全的举报, 并毋须害怕受到惩罚或不公平的待遇。

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.

雇员和外界各方, 如供应商, 客户, 承包商和其他利益相关者, 可以使用政策中规定的程序对任何不适当的财务或审计事项, 内部控制, 披露事项, 利益冲突, 内幕交易, 与竞争对手勾结, 或严重违反集团政策, 违法行为, 不安全的工作行为或任何其他涉及欺诈, 腐败和员工不当行为的事项作出举报。

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.

本政策允许员工或外界各方向集团举报委员会举报此类事件, 而毋须担心被报复, 歧视或不良后果, 本政策并允许集团采取适当的行动来处理此类举报, 包括但不限于, 惩罚或终止当事人与集团的雇佣关系和/或服务。

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.

该政策旨在保护真诚举报人不受到任何不公平的待遇, 但严格禁止轻浮和虚假的举报。此政策也不是个人申诉委屈的途径, 员工应该直接与部门负责人联系。

Reporting Procedures 举报程序

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.

本集团鼓励员工及外界各方尽可能不匿名举报及披露不当或非法活动。基于处理匿名举报的复杂性，尽管本集团不能保证按匿名举报者所望的方式处理该举报，但将尽一切努力地处理所提出问题的严重性，复杂程度，及对信息来源可信度给予从速处理。除非获得举报者同意，否则举报者之身份将不会被洩露。

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.

每項举报必須以书面，或电子邮件方式作出，以便更有效地作出评估和调查。所以举报应尽可能详细描述具体的内容。内容应包括涉案人员，日期或时间段，涉案证据（如有）以及举报者详细的联系方式，以便进一步查询。

The dedicated whistle blowing reporting channel is as follows:

专用的举报渠道如下：

Chairman of the Audit Committee of Kimly Group

致：金味集团审计委员会主席

Email: whistleblowing@kimlygroup.sg

电邮: 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”

所有书面举报须放入密封之信封内寄出，信封上须清楚注明“机密 - 只供金味集团审计委员会主席拆阅”字样，以确保其机密性并发送至以下地址：

新加坡立杰律师事务所/ Rajah & Tann Singapore LLP

9 Battery Road #25-01 Singapore 049910

“机密 - 只供金味集团审计委员会主席拆阅”

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.

举报委员会负责确保提出的问题得到妥善解决。所有举报都将在合理的时间范围内进行审查，经过适当考虑和调查后，委员会将决定是否进行更详细的全面调查。

举报委员会由以下成员组成：

The Whistleblowing Committee consists of the following members:

Chairman / 举报委员会主席

Independent Director & Chairman of the Audit Committee

独立董事兼审计委员会主席

Members/ 举报委员会会员

Audit Committee Members

审计委员会成员

Safeguards 保障

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.

本集团禁止对善意提交投诉或举报人进行任何形式的歧视，报复或骚扰。如果举报人认为他或她因根据本政策举报而遭受歧视，报复或骚扰，应立即向举报委员会报告这些事实以便及时调查和采取适当的行动。

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.

在适当的时候，提出举报/投诉的一方可能需要出面作为人证。如果员工或外界各方善意提出举报，未经调查确认，则不会采取任何行动。但如有员工恶意或为谋取私利地而作举报，集团有可能会对他或她采取纪律处分。同样，如果调查显示，提出举报的外界当事人是为了谋取私利，集团会采取适当的行动，包括向警方报案。

Handling of Complaints 投诉处理

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.

举报委员会可将举报交给最适合处理该举报的部门，或主导调查以确保迅速并适当地采取行动。在调查过程中所披露的信息将保密，除了依照任何适用的法律和法规，进行调查和采取任何补救措施外。本集团将保留任何疑虑或投诉转介给适当的外部监管机构的权利。依据投诉的性质，将对涉案对象，他或她提供一个机会答复有关的指控。如员工在调查过程中不给予配合，或在调查过程中故意提供虚假信息，将受到严惩，包括立即被解雇。如果在调查结束后，本集团确定其违规行为或指控成立，将采取与违法行为严重程度相称的补救行动。

Modification 修改

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

本集团可能会修改本政策以符合法律法规或应本集团内部的组织变化而作出适当的调节。

A Chinese translation of this Policy is provided for ease of reference. In the event of any conflict or inconsistency between the English text and Chinese text, the English text shall prevail.

基于方便参考，本规章准则给予中文译本。如中英文版本内容有抵触或不一致处，应以英文版本为准。