



SINGAPORE AEROSPACE MANUFACTURING PTE LTD

**TITLE: WHISTLEBLOWING POLICY**

**1. INTRODUCTION**

- 1.1 Directors and employees of the **Group** are expected to observe high standards of ethics, honesty and integrity; and are required to comply with all relevant laws and regulations applicable to their work.
- 1.2 This Policy is intended to provide a framework to promote responsible and secure whistle blowing without fear of adverse consequences.

**2. SCOPE OF APPLICATION**

This Document applies to all employees of the **Group** (*excluding the SAMEE Group of Companies which are governed by their own whistleblowing procedures*), including full-time, part-time and contract employees, as well as to **External Parties**.

**3. DEFINITIONS**

The following words as used in this document shall have the meaning ascribed below:

- 3.1 “**ARC**” means the Audit and Risk Committee of the **Company** and/or the **Relevant Company**, whichever is applicable.
- 3.2 “**Company**” means Singapore Aerospace Manufacturing Pte Ltd
- 3.3 “**Complainant**” means the person who files the Complaint and/or the victim featured in the **Complaint**.
- 3.4 “**Complaint**” means any allegations of either **Improprieties, Obstructive Action** or **Retaliatory Action**.
- 3.5 “**Complaints Register**” means a register to record details of all **Complaints** lodged.
- 3.6 “**Document**” means this Policy and Procedures.
- 3.7 “**External Parties**” means parties who have business relationship with the **Group**, including customers, suppliers, contractors, agents and applicants for employment, and public agencies, and each an “**External Party**”.



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- 3.8 “**Group**” means the Company and its subsidiaries, excluding the SAMEE Group of Companies.
- 3.9 “**Improprieties**” means any action or conduct contrary to the standards of ethics, honesty and integrity acceptable to the **Group**.
- 3.10 “**KPMG**” means KPMG Services Pte Ltd, the external vendor providing whistle blowing services for the Group.
- 3.11 “**Obstructive Action**” means the use or attempted use of force, authority, intimidation, threats, undue pressure or any other action or behavior by any employee which tends to or in fact does obstruct, influence or otherwise interfere with another employee or an **External Party’s** exercise of his right to report any **Improprieties** or which may discourage other employees or **External Parties** from so doing in the future.
- 3.12 “**Retaliatory Action**” or “**Retaliation**” means the use or attempted use of force, authority, intimidation, threats, undue pressure of any sort or any other negative or other inappropriate action, by any employee or officer of the **Group**, against any person who has filed a **Complaint**.
- 3.13 “**SAMEE Group of Companies**” means SAM Engineering & Equipment (M) Berhad and its subsidiaries.
- 3.14 “**Relevant Company**” means the relevant company within **Group** to which the **Complaint** is addressed.

4. **POLICY**

4.1 General

It is the desire and aim of **Group** to develop, promote and maintain high standards of corporate governance within the **Group**. This Document aims to create a work environment where employees and **External Parties** may submit a **Complaint** without fear of harassment, discrimination and/or **Retaliatory Action**, and with the assurance that their **Complaint** would be taken seriously and investigated.



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This Document is intended to address credible concerns relating to actions contrary to the standards of ethics, honesty and integrity acceptable to **Group**. Some examples include:

- (a) Concerns about the Group's accounting, internal controls or auditing matters;
- (b) Intentional misrepresentations affecting financial statements or records of the Group;
- (c) All forms of malpractices or impropriety such as unethical behaviour, misconduct, fraud, corruption, bribery or theft;
- (d) Conduct which constitutes an offence or breach of law;
- (e) Breach of the Group's policies or code of conduct;
- (f) Undisclosed conflict of interest;
- (g) Actions detrimental to health and/or safety or the environment;
- (h) Discrimination on the basis of gender, ethnicity, disability or any other reason;
- (i) Harassment, abuse and/or misrepresentation of power and authority;
- (j) Communicating false and/or misleading statements to any securities exchange, members of the investing public and/or government or state authorities;
- (k) Concealing information about any of the matters listed above; or
- (l) Any other improper conduct which may cause significant past, present or future loss and/or damage to the Group or its reputation.

4.2 Submission of Complaint

**Complaints** should be submitted in accordance with the manner and procedure set out in Section 5 below. **Complainants** are encouraged to put their names to their allegations whenever possible. **Complaints** submitted anonymously are more difficult to act upon effectively, but would nonetheless be considered for further action, taking into account the following:

- (a) Gravity of the issues raised;
- (b) Significance and credibility of concerns;
- (c) Probative value of supporting and/or corroborative information or evidence.



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4.3 Right to file Complaint

Every employee and/or **External Party** shall have the right to submit a **Complaint** in good faith and shall not be restricted in the exercise of such right.

4.4 Prohibition of Obstructive Action and/or Retaliatory Action

The **Group** objects to and does not tolerate nor condone any **Retaliatory Action** and/or **Obstructive Action** taken against any employee or **External Party** who is in the process of filing and/or has filed a **Complaint**.

Any **Complaint** alleging **Retaliatory Action** and/or **Obstructive Action** shall be reviewed and investigated by the **Relevant Company** in the same manner as any **Complaint** alleging **Improprieties**.

4.5 Complaint involving the Complainant

Nothing herein shall preclude any administrative, disciplinary and/or other action being taken against any person who has committed or abetted the impropriety which is the subject matter of the **Complaint**, notwithstanding that the person is the Complainant or a witness in the investigation. However, the ARC may take as mitigation the fact that the **Complainant** has cooperated by filing the **Complaint** or by providing information or documents as a witness, and may recommend an appropriate course of action.

**5. PROCEDURES**

5.1 Submission of Complaint

Every **Complaint** shall be submitted via the following internet-based portal of the **KPMG**:

URL: <https://www.kpmgethicsline.com.sg/>

The **Complainant** is advised to submit as much information as possible to facilitate an effective inquiry into the **Complaint**.



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The **Complainant** is expected to submit the following information:

- (a) the name of the Relevant Company being the subject of the Complaint;
- (b) the location of the said Relevant Company;
- (c) the relationship between the Complainant with the Relevant Company; and
- (d) details pertaining to the Complaint.

5.2 Procedure for handling Complaints

Upon the receipt of a **Complaint**, **KPMG** shall assign a unique identification number to the **Complaint**.

An incident report would then be generated by **KPMG** and would thereafter be forwarded to both the Chief Executive Officer and the Chairperson of the ARC.

If the Chief Executive Officer is the subject of the **Complaint**, **KPMG** would forward the incident report directly to the Chairperson of the ARC only.

Upon the receipt of any incident report, the relevant recipient of the said report shall make an assessment regarding the veracity and credibility of the **Complaint** to decide if an internal referral to an alternative whistle blowing procedure is required, or an investigation (whether internal or external) should be commissioned. If the relevant recipient decides to commission an investigation, a preliminary investigation report should be submitted to the Chairman of the ARC within 2 weeks from the date of receipt of the incident report. The composition of the investigation team should not include the subject of the relevant **Complaint**, or create any apparent, perceived and/or actual conflict of interest. If the relevant recipient decides that an investigation should not be commissioned or a referral was warranted, the relevant recipient shall submit an incident report outlining the basis of the decision to the Chairman of the ARC within 3 days from the date of the receipt of the incident report from **KPMG**.



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5.3 Confidentiality of Identity

All information disclosed in the **Complaint** and during the course of investigation will remain confidential, except as determined otherwise by the ARC as may be necessary and/or appropriate in the circumstances.

The **Complainant** may be given the option to remain anonymous, thereupon the **KPMG** will not disclose the identity of the **Complainant** without prior consent of the **Complainant**, unless disclosed in accordance with this **Document** and/or legally required to do so.

If the **Complainant** elects to remain anonymous, the identity of the **Complainant** shall not be disclosed save where:

- 5.3.1 The ARC determines that the disclosure of the identity of the **Complainant** is necessary to facilitate the investigation into the **Complaint**;
- 5.3.2 The ARC determines that the **Complaint** was submitted frivolously and/or maliciously and recommends any disciplinary or other appropriate action be taken against the **Complainant**; or
- 5.3.3 it is required by law, or by the order or directive of a court of law, regulatory body or by a securities exchange or such other body that has the jurisdiction and authority of the law to require such identity to be revealed.

5.4 Registration of Complaints

The Company will maintain a **Complaints Register containing a** recording all **Complaints** received on behalf of the Group (save for the SAMEE Group of Companies which would be guided by their own whistleblowing policy), the date(s) of such **Complaints**, the nature of such **Complaints**; and the date resolved.

Unless instructed to the contrary by the ARC, the **Complaints Register** shall be maintained by the Company Secretary and made available for inspection upon any request by investigating authorities.



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5.5 Acknowledgment of Receipt of Complaint

The Company shall, within one (1) week of the date of receipt of a **Complaint**, record the **Complaint** in its **Complaints Register**.

5.6 Preliminary Investigation and Report to Audit and Risk Committee

**KPMG** will provide feedback to the **Complainant**, if specifically requested by the Company and to the extent the **Complainant** makes it possible to do so.

If an investigation (whether internal or external) was commissioned by either the ARC or the Chief Executive Officer (as the case may be), the results of the investigation should be submitted to the Chairman of the ARC within **two (2) weeks** of the date of receipt of the **Complaint**.

5.7 Actions by Audit and Risk Committee

Upon receipt of the **Complaint** or the investigation report, the ARC may:

- 5.7.1 conduct its own investigation or review;
- 5.7.2 instruct the management or Internal or External Auditor to conduct further investigations or review;
- 5.7.3 instruct the management to take such remedial action as the ARC deems appropriate;
- 5.7.4 engage such third parties, including **KPMG's** fraud incident response service or forensic accountants, to conduct further investigations or review of the **Complaint** and/or the investigation report;
- 5.7.5 report the matter to the relevant regulatory and/or legal enforcement authorities, e.g. the Police or Commercial Affairs Department;
- 5.7.6 determine the disclosure of the identity of the **Complainant** is necessary to facilitate the investigation into the **Complaint**;
- 5.7.7 determine that the **Complaint** was submitted frivolously and/or maliciously and recommend that disciplinary action and/or appropriate action be taken against the **Complainant**, where necessary;



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- 5.7.8 re-direct the Complaint to the Audit Committee of the SAMEE Group of Companies for their attention and further action, where appropriate;
- 5.7.9 notify complainant of the outcome of the investigation; and/or
- 5.7.10 recommend or take any other action as ARC may determine to be appropriate and/or necessary.

5.8 Dissemination of Documents

A copy of this **Document** (including any updates thereof) shall be made accessible to the employees of the Group. .

6. **FRIVOLOUS AND/OR MALICIOUS COMPLAINTS**

The submission of a **Complaint** is a grave and serious matter. **Complainants** are encouraged to consider the matter carefully (or consider approaching an appropriate supervisor or management) before submitting a **Complaint**.

If a **Complaint** was submitted in good faith but not confirmed by investigation, no action will be taken against the **Complainant**. However, if the ARC determines that a **Complaint** was submitted frivolously and/or maliciously, the **Complainant** may not be entitled to remain anonymous and insulated but may be subject to disciplinary and/or other administrative action if so recommended by the ARC, subject to legal advice where appropriate.

7. **CONSISTENCY WITH LAWS AND REGULATIONS**

This **Document** shall be read in conjunction with any relevant and/or applicable laws, regulations, rules, directives or guidelines (“Laws and Regulations”) governing the receipt, retention and/or treatment of **Complaints**.

If any policy or procedure herein is inconsistent or in conflict with any Laws and Regulations, such Laws and Regulations shall prevail to the extent of such inconsistency or conflict.

8. **MAINTAINING THIS POLICY**

Revisions, amendments, and alterations to this Document can only be implemented via approval by the ARC.