

WHISTLEBLOWING POLICY

Introduction

1. This Policy provides a channel for the reporting of actual or suspected wrong-doings committed by any director, trustee, employee, contract staff, contractor, volunteer or beneficiary which may result in investigation and corrective action, and provide assurance that the Whistleblower will be protected from reprisals for whistleblowing in good faith.

Scope

2. This Policy applies to all directors, trustees, employees, contract staff, contractors, volunteers and beneficiaries of the Company.
3. Any employee, contract staff, contractor, volunteer, beneficiary or member of the general public who notices or is aware of any wrong-doing can lodge a whistleblowing report.
4. Wrong-doings may include the following:
 - (a) Criminal offences;
 - (b) Breaches of laws and regulations, e.g. failure to observe health and safety regulations;
 - (c) Unethical and improper practices relating to financial and accounting matters and standards;
 - (d) Conflicts of interests and acting against the interests of the Company;
 - (e) Serious breaches of the Company's policies;
 - (f) Harassment, intimidation and abuse; and
 - (g) Attempts to conceal wrong-doings.

Whistleblowing Reporting Channels

5. Reports should be addressed to the Chairman of the whistleblowing unit.
6. Where the Whistleblower feels that it is inappropriate to make a report to the Chairman of the whistleblowing unit or the Chairman does not provide a satisfactory response, a report may be made to any other member/ members of the Whistleblowing Unit:

Members	Contact details
1. Mr Koh Chye Hock – Chairman/Whistleblowing unit, Board Member TRCL	▪ Email: chyehock_koh@trcl.sg ▪ Tel: (65) 97597992
2. Mr Kelvin Tan – Member/Whistleblowing unit, Board Member Millet Holdings	▪ Email: kelvin_tan@trcl.sg ▪ Tel: (65) 65312526
3. Ms Florence Lee – Member/Whistleblowing unit, Group Financial Officer, TRCL	▪ Email: florence_lee@trcl.sg ▪ Tel: (65) 68358178

How to Make a Report

7. The Whistleblower should ensure that all claims of wrong-doings are made in good faith.
8. When making a report, he/she should provide as much details as possible in relation to:
 - (a) What is the alleged act?
 - (b) Who is involved in the act?
 - (c) When and where did it occur?
 - (d) What are the supporting documents and evidence?
9. The Whistleblower is encouraged to identify himself/herself and provide his/her contact details. Reports made anonymously are less persuasive and may make proper investigation and assessment of the report difficult.
10. After making a report, the Whistleblower should refrain from further investigation of the incident, confrontation of the accused or further discussion of the incident. The Whistleblower should treat any information about an investigation as confidential.

How the Company will Respond

11. All reports received will be treated confidentially.
12. The Whistleblowing Unit will handle reports of alleged wrong-doings.
13. All reports will be promptly investigated and appropriate action will be taken if warranted by the investigation, including instituting disciplinary action in accordance with the Company's Staff Handbook and, where appropriate, raising the wrong-doing to the board of directors for its determination or reporting the wrong-doing to the proper authorities.