
Heeton Holdings Limited Whistleblowing Policy

1. INTRODUCTION

- 1.1 Heeton Holdings Limited ("Heeton" or the "Company"), together with its subsidiaries, collectively referred to as the "Group" maintains a commitment to the highest standards of business integrity, openness, and accountability.
- 1.2 Whistleblowing refers to reporting made in good faith on actual or suspected unethical, illegal or fraudulent wrongdoings within the Group. This Whistleblowing Policy encourages and facilitates such reporting.
- 1.3 The Company adopts a zero-tolerance approach towards workplace malpractices, statutory non-compliance, chronic impropriety, and abuse within the organisation and all subsidiaries.
- 1.4 This Policy provides a secure channel for employees, directors, contractors, suppliers, vendors, customers and other stakeholders ("interested parties") to raise major concerns or legitimate complaints without fear of reprisal, discrimination or adverse consequences, enabling the Company to address such reports by taking appropriate action.

2. COMMITMENT AND OBJECTIVES

- 2.1 The Whistleblowing Policy (the "Policy") has full support of the Board of Directors (BOD), Audit Committee (AC), and management of the Company.
- 2.2 The AC retains responsibility for overall policy oversight and monitoring.
- 2.3 The intended aims of this Whistleblowing Policy are to:
 - a) Deter wrongdoings and abuse within the Group.
 - b) Establish high standards of working practices and corporate governance.
 - c) Encourage interested parties to act on relevant concerns without fear of reprisals.
 - d) Create a standard operating procedure for interested parties to raise concerns.
 - e) Demonstrate company commitment towards the welfare of employees.
 - f) Develop a culture of openness, accountability, and integrity.

3. SCOPE

- 3.1 This Policy applies to actual or suspected malpractices and wrongful activities falling within the following categories of reportable conduct:
 - a) Dishonesty, fraud, and theft.
 - b) Corruption and bribery.

- c) Illegal acts and statutory non-compliance.
- d) Accounting irregularities and document falsification.
- e) Internal control deficiencies* such as management override and circumvention of authority.
- f) Health and safety violations.
- g) Conflict of interest without proper disclosure.
- h) Concealment of information relating to any reportable conduct.

Note:

*Internal control deficiencies should be reported where there is a reasonable concern that established procedures, controls or delegated authorities have been deliberately bypassed, overridden or otherwise undermined. Routine administrative errors, training gaps or isolated process failures should generally be addressed through the relevant operational or management channels, unless there are reasonable grounds to suspect fraud, misconduct or other reportable wrongdoing.

- 3.2 The procedure under this Policy is not a substitute for complaints pertaining to the employer-employee relationship. Issues relating to employment terms, working conditions, personal grievances, discrimination, bullying, sexual harassment and other forms of harassment should generally be reported to the local Human Resources (HR) department and managed in accordance with the applicable local HR policies and procedures, unless otherwise provided under applicable local legal or regulatory requirements.
- 3.3 Country-specific appendices form part of this Policy to address local level and regulatory requirements. Employees must read the relevant regional appendix for specific statutory protections, reporting procedures, and other compliance obligations.

4. REPORTING PROCEDURES AND CHANNELS

- 4.1. An employee who knows or suspects reportable conduct activities are likely to occur, are occurring, or have occurred should report the matter to the Receiving Officer in Group Internal Audit (GIA) as soon as possible or practicable. If employees are unsure whether any suspected wrongdoing is covered by the policy or how to report a case, they should contact the Receiving Officer for guidance. The contact details of the Receiving Officer are as follows:

Email: Receivingofficer@heeton.com

Phone: (65) 6571 9355

Address: Heeton Holdings Limited
60 Paya Lebar Road
#08-36 Paya Lebar Square
Singapore 409051

- 4.2. For whistleblowing cases involving the Receiving Officer, any member of Senior Management, a director, or a member of the AC, the whistleblower should report directly to the Chairman of the AC via the email address: AC.Chairman@heeton.com. Upon receipt, the Chairman of the AC will oversee the investigation and reserves the authority to appoint independent professional investigators to ensure objectivity and independence.

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- 4.3. The Company commits to protecting bona fide whistleblowers who report in good faith in the best interest of the Company and not with any malicious intent. The Company encourages whistleblowers to provide contact details to facilitate thorough investigations and timely communication. While the Company accepts anonymous reports, anonymity restricts our ability to clarify information, verify evidence, or provide progress updates. All reports, whether identified or anonymous, will be investigated in accordance with this Policy.
 - 4.4. The Company takes a serious view and does not tolerate false, malicious, or frivolous reporting. Appropriate disciplinary action will be taken against employees who make such reports.
 - 4.5. Whistleblower should provide clear details of the incident, including names, dates, times, and evidence to assist the investigation.
 - 4.6. The Company strongly encourages individuals to use internal whistleblowing reporting channels first to allow GIA to investigate and address concerns promptly. Whistleblowers retain the right to report concerns directly to relevant external regulatory authorities or law enforcement agencies in their respective jurisdictions.

5. INVESTIGATION

- 5.1 GIA leads all investigations into reportable conduct and involves Management only at its discretion.
- 5.2 Lawyers or external consultants will be engaged if cases required specific technical knowledge.
- 5.3 Depending on the nature of the concern and the information provided, an investigation may be conducted, and findings will be reported to the AC.
- 5.4 All complaints raised under the Policy are recorded and maintained in a centralised repository.
- 5.5 The Company expects full integrity and cooperation throughout the reporting process. Deliberate submission of false information or obstruction of an investigation leads to disciplinary action.

6. DISCIPLINARY ACTION

- 6.1. The Company will take appropriate disciplinary action against the subject of the complaint if the investigation substantiates the reportable conduct.

7. COMMUNICATION AND REPORTING

- 7.1 The Receiving Officer acknowledges report receipt and provides periodic updates to the whistleblower.
- 7.2 The final investigation result will be communicated to the whistleblower. The whistleblower shall observe the strictest confidence regarding such information.
- 7.3 The AC maintains oversight of all whistleblowing reports and investigations.

8. CONFIDENTIALITY

- 8.1 The identity of whistleblowers including other information revealed to the Receiving Officer regarding the reported case will be kept confidential to the extent possible within the legitimate needs of the law.
- 8.2 The Company discloses the whistleblower identity only due to legal obligations, criminal investigations, public domain disclosures, or confidential consultation with external professionals.

9. PROTECTION

- 9.1 The Company prohibits the victimisation or harassment of whistleblowers. Whistleblowers must report such actions directly to the Receiving Officer. The Company takes disciplinary action against anyone who threatens or punishes a person for reporting in good faith.
- 9.2 The Company strictly prohibits any form of direct or indirect retaliation against individuals who report concerns in good faith, even if the concern proves to be unfounded subsequently. Prohibited actions included dismissal, demotion, harassment, and any detrimental change to employment conditions.

10. GOVERNANCE AND OVERSIGHT

- 10.1 The Company maintains this Policy through periodic reviews by GIA. Material amendments require review by the AC and final approval by the BOD, to ensure continued effectiveness and alignment with best practices. This Policy is made accessible to all stakeholders to provide clear reporting guidance.