



Whistle Blowing Policy and Procedure

Riverstone Group's whistle blowing policy provides a two ways communication channel for you and the company/group.

It is the duty of each and every one of you, who are employees of Riverstone Group, to raise genuine concern/(s) in the workplace. It applies whether or not the information is confidential.

Riverstone Group is committed to ensure your concerns will be taken seriously & investigated. A disclosure will be protected and those who raise concern(s) reasonably and responsibly will not be penalized in any way.

Thank you.

By order of the Board

TS Wong
Chief Executive Officer

01 January 2022



Whistleblowing Policy - Step by step procedural guidelines

1. Issues that can be raised

The concerns are as follows:

- Malpractice/ill treatment of a client/customer/employee by any member of the staff
- Repeated offences despite a complaint being made
- A criminal offence has been committed, is being committed, or is likely to be committed
- Suspected fraud
- Disregard for legislation, particularly in relation to health & safety at work
- Breach of statutory regulations and financial policies and measures
 - Statutory Reporting Requirement
 - Insider Trading
 - Established internal financial policies, controls & measures
- Showing undue favoritism over a contractual matter or to a job applicant
- A breach of any code of conduct or protocol
- Information on any of the above has been/is being or is likely to be concealed

2. Confidentiality protection for the whistleblower

We encourage the whistleblower to identify him/her and assure him/her that every effort will be made to ensure confidentiality of the identity. In the event of being unable to maintain the anonymity of the whistleblower additional measure will be considered within the rights of the whistleblower, e.g. leave of absence, temporary relocation etc.

3. Petty, malicious accusations & repercussions

If the whistleblower makes allegations in good faith, but is not subsequently confirmed by the investigation, no action will be taken against that person. If however, malicious or vexatious allegations are made, disciplinary action may be taken against that person.

4. Communicating a concern [refer attach Diagram on Communication Channels]

The reporting employee could initially approach the immediate supervisor. If however the employee does not feel comfortable about doing so, or feels inadequate action was taken after the concern was communicated, he/she could approach the Chief Executive Officer ("CEO"), to voice his/her concerns. Facilities have been provided to ensure this communication will be in strictest confidence. The whistleblower is encouraged to communicate the information in person, but could also use other means (i.e., phone, email, letter etc.). Please refer to *APPENDIX 4* for a whistleblowing form.

5. Details to include in the communication

The whistleblower is invited to provide the background and history of their concern, giving names, dates & places where possible. Although they are not expected to prove the truth of an allegation, they will need to demonstrate that there are sufficient grounds for the concern.



Whistleblowing Policy - Step by step procedural guidelines (continued)

6. Subsequent investigation & action process

The action will depend on the nature of the concern. It may be:

- Investigated internally by the CEO
- The CEO may setup Whistle Blowing Committee (“WBC”) and delegate the authority/power to a WBC or alternatively to the Chairman of the Audit Committee (“AC”) to conduct an investigation, as he deemed fit.
- Be referred to the policy
- Be referred to the external auditor
- Form the subject of an independent inquiry

Subject to legal/confidentially constraints the issue raised will be communicated to the whistleblower as well and an opportunity given to hear his/her defense. The CEO/AC Chairman and/or WBC will discuss an appropriate action should a disciplinary action is required.

7. Protection for whistle blower

To assure the whistleblower that their concerns will be taken seriously, the Group will:

- Not allow the whistleblower, if he/she is an employee of the Group to be unfairly victimized or subject to adverse personnel action, it being:
 - Removal
 - Demotion
 - Suspension
 - Transfer/Re assignment
 - Adverse performance evaluation
 - Adverse decisions concerning pay/benefits/awards
 - Adverse decisions concerning training/development
 - Other significant changes in duties/responsibilities, working conditions etc
- Treat victimization of the said employee as a serious matter, leading to disciplinary action that may lead to dismissal of the victimizer
- Not attempt to conceal evidence of poor or unacceptable practice.
- Take disciplinary action if an employee destroys or conceals evidence of poor or unacceptable practice or misconduct.
- Ensure confidentiality clauses in employment contracts do not restrict, forbid or penalize whistleblowing.
- During the internal handling of a reported offence, the Internal Auditors/AC will decide if an external party should be notified.
- Before, during, and after the internal handling of the concern raised, the reporting employee shall refrain from seeking or giving internal or external publicity.
- This will be strictly enforced by the Group to protect the reputation of the Group and its Stakeholders’ interests.

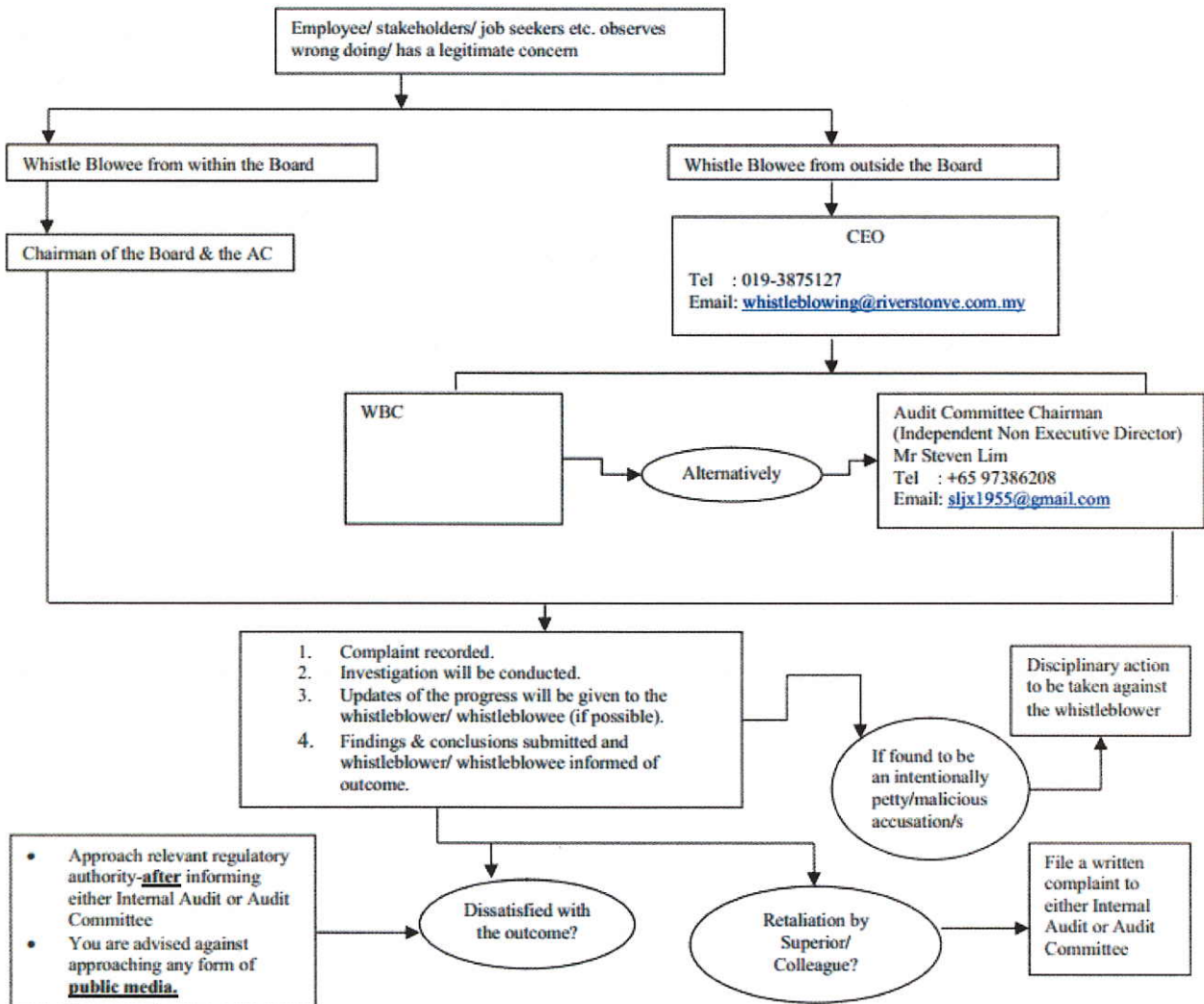


Whistleblowing policy-Reporting procedures

Appendix 3:

Communication Channels

This is a summary guide of the more detailed whistleblowing policy, *mainly to direct any employee with a legitimate concern that requires a hearing, to the relevant person in charge of the whistleblowing procedure.*





Appendix 4:

Whistleblowing Form

Date of submission of report: Time of report:			
Date of incident(s):	Time of incident(s):	Location of incident(s):	
Nature/Description of incident: <i>(Please give a brief narration)</i>			
Name(s) of person(s) reported on, and their respective departments:			
**Names & Signature of Reporting Party (ies):		Name & Signature of Recording Party (ies): <i>(if applicable)</i>	
**Employee Number: Department: NRIC Number:		Employee Number: Department: NRIC Number	

****Optional information, Whistleblower has an option to disclose or stay anonymous**