

WOH HUP TRUST

Incorporated in Singapore, UEN 201129946W (the "Company")

WHISTLE BLOWING POLICY

Introduction

WOH HUP TRUST (WHT) is committed to a high standard of compliance with accounting, financial reporting, internal controls and auditing requirements and any legislation relating thereto. In line with this commitment, this policy aims to provide an avenue for employees and external parties to raise concerns and offer them reassurance that they will be protected from reprisals or victimisation for whistle blowing in good faith.

Scope

This policy applies to all employees as well as to all external parties who have business relationships with WHT. These parties include customers, suppliers, contractors, applicants for employment, and the general public.

Definition

Whistle blowing is defined as a deliberate, voluntary disclosure of individual or organisational malpractice by a person who has or has had privileged access to data, events, or information about an actual, suspected, or anticipated wrongdoing within or by WHT that is within its ability to control.

Reportable Incidents

Below is a list of examples (though not exhaustive) of reportable incidents covered by this policy:

- Concerns about WHT's accounting, internal controls, or auditing matters;
 - Impropriety, corruption, acts of fraud, theft and/misuse of WHT's properties, assets, or resources;
 - Conduct which is an offence or breach of law;
 - Serious conflict of interest without disclosure;
 - Breach of WHT's policies or code of conduct;
 - Concealing information about any of the above malpractice or misconduct;
 - Any other serious improper conduct that may cause financial or non-financial loss to WHT or damage its reputation;
 - Fraud against members or making fraudulent statements to the Council, members of the public and government or state authorities;
 - Manifestation of intention to mislead, deceive, coerce, or fraudulently influence any internal or external accountant or auditor in connection with the preparation, examination, audit or review of any financial statements or records of WHT.

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Protection against Reprisal and Confidentiality

When raising concern or providing information about an actual, suspected, or anticipated wrongdoing, done in good faith; the individual, be it an employee or anyone else, he/she shall be protected against any reprisal such as employment termination, retribution, or harassment.

However, WHT shall not condone any frivolous, mischievous or malicious allegations. Employees, found making such allegations, shall be subject to disciplinary action levied with approval of the Board. Concern or information about an actual, suspected or anticipated wrongdoing as well as its source shall be treated with strictest confidence.

Exceptions to above include:

- When WHT is under legal obligation to disclose such information provided;
- When the information is already in the public domain;
- When the information is given in strict confidence to legal or auditing Professionals for the purpose of obtaining professional advice; and
- When the information is given to the Police for criminal investigation.

Concerns or information provided anonymously will still be given due consideration by WHT but will be investigated on their own merits.

Procedures

Concerns may be raised with or information provided to the relevant parties hereunder:

CONTACT DETAILS OF WHISTLEBLOWING OFFICERS

All complaints, except complaint against the Chairman:

Chairman: Mr Yong Kon Yoon, Eugene

Email: eugene_yong@wohhup.com

Complaint against the Chairman:

Treasurer: Ms Carla Jacqueline Barker

Email: Carla.barker@witherskhattarwong.com

Such reports are preferably made in writing, either in the form of a letter or email, and in detail setting out the background and history of events as well as the reason(s) for concern.

Assessment of the concern or information shall be made with due consideration given to the following factors:

- Seriousness of the issue raised;
- Credibility of the concern or information; and
- Likelihood of confirming the concern or information from the attributable sources

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Depending on the nature of the concern raised or information provided, the investigation will be conducted, involving one or more of the following individuals or entities:

- The Board of Directors
- The External Auditor, and/or
- The Police or Commercial Affairs Department.

The amount of contact between the whistle blower and the person(s) investigating the concern raised or information provided will be determined by the nature and clarity of the matter reported.

Further information may be sought from the whistle blower during the course of the investigation. When the investigation is completed, the investigating officer(s) will report the findings to the Board for its necessary action.

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