

# Whistle-Blowing Policy

## 1. INTRODUCTION

- 1.1 Alpina Group is dedicated to maintaining high standards of corporate governance. This whistleblowing policy aims to prevent and stop unethical or unlawful business conduct by employees and ensure appropriate disciplinary actions.

## 2. WHAT IS WHISTLE BLOWING?

Employees are expected to report any unethical or unlawful business conduct to management for corrective action.

## 3. WHO IS A WHISTLE BLOWER

- 3.1 A whistleblower is typically an employee, former employee, supplier, customer, or other stakeholder. They witness or have knowledge of unethical or unlawful conduct by a fellow employee and report it to management to ensure corrective actions are taken.
- 3.2 Whistleblowing is not a tool for disgruntled employees seeking revenge without cause. It must be genuine, supported by evidence, and reported promptly to the Chairman of the Board or the Chairman of the Audit Committee. Testifying or providing statements may be required, but making unfounded or malicious allegations is discouraged.
- 3.3 A whistleblower doesn't have to be directly affected or have a personal interest in the outcome. As long as there's a genuine concern and reasonable grounds to believe a fellow employee is breaching ethical conduct, anyone can be a whistleblower. Acting in good faith is crucial.
- 3.4 Expressing concerns anonymously is challenging to address but will be considered based on seriousness and credibility. Efforts are made to confirm allegations from identifiable sources, ensuring confidentiality is maintained throughout the process.

## 4. ACTIVITIES GIVING RISE TO WHISTLE BLOWING

Below, while non-exhaustive, are some of the activities that could potentially give rise to whistle blowing:

- Theft, damage, or misuse of Alpina Group's offices, using them for personal gain or illegal purposes, and revealing proprietary information.
- Fraud, such as altering records, submitting false invoices, misusing funds, or providing false information.
- Making defamatory statements, causing racial disruption, engaging in sexual harassment, or practicing discrimination.
- Unethical or unlawful conduct like bribery, accepting gifts for personal favors, violence, or bullying.
- Violating laws or contractual obligations, such as not fulfilling contract terms without a lawful reason.
- Trading in listed company shares, including Alpina Holdings Limited, with confidential information.
- Misusing information that infringes on third-party copyrights or causes damage to Alpina Group, especially in relation to the Personal Data Protection Act 2012.
- Engaging in activities that endanger the health and safety of employees or third parties, or activities harmful to the environment.

## **5. REPORTING PROCEDURES**

5.1 In line with this commitment, dedicated communication channels have been established and whistle-blowers may choose to use any of these communication channels. The available communication channels are as follows:-

i) via postal mail marked "Private & Confidential" to the following:

The Audit Committee Chairman  
54 Senoko Road  
Woodlands East Industrial Estate  
Singapore 758118

ii) via email to Audit Committee Chairman Marcus Woon at [AlpinaACC@gmail.com](mailto:AlpinaACC@gmail.com)

5.2 If the whistle blower would like to discuss any matter with the Audit Committee Chairman, the whistle blower should indicate this in the submission and include a telephone number at which he or she may be contacted.

## **6. INVESTIGATION PROCEDURES**

6.1 The Audit Committee handles all complaints under this policy, informing the Chairman and Executive Directors unless inappropriate.

6.2 Upon receiving a complaint, the Audit Committee investigates and recommends corrective actions to the Chairman and Executive Directors.

6.3 Corrective actions may include warnings, demotions, salary reductions, suspensions, terminations, or legal proceedings.

6.4 The Audit Committee can seek help from other employees, directors, or external advisors during investigations.

6.5 The Audit Committee tries to protect the whistleblower's confidentiality, but anonymity isn't guaranteed due to the need for a thorough investigation.

6.6 The Audit Committee informs any employee or director named in a complaint, allowing them to respond in writing, which is included in the final report.

6.7 Valid complaints and investigation results are reported to the Audit Committee and Board of Directors.

6.8 The Audit Committee reports annually on this policy, its activities, and immediately reports any matters related to internal controls or financial integrity.

6.9 Records of complaints are securely kept by the Audit Committee for at least five years.

## **7. NO RETALIATION**

7.1 The Whistleblower Policy encourages employees, directors, and officers to address concerns within Alpina Group rather than externally. Alpina Group strictly prohibits any form of retaliation or harassment against individuals who submit genuine complaints. However, making false or malicious complaints may lead to disciplinary actions against the complainant.

## **8. AMENDMENTS**

8.1 Revisions, amendments or alternations to this policy can only be implemented following consideration and approval by the Board of Directors.