



HALCYON AGRI CORPORATION LIMITED

(Company Registration No. 200504595D)

(Incorporated in the Republic of Singapore)

WHISTLEBLOWING POLICY

1. INTRODUCTION

- 1.1. Halcyon Agri Corporation Limited (the “**Company**” and together with its subsidiaries, the “**Group**”) is committed to maintaining high standard of integrity in its business conduct and its compliance with accounting, financial reporting, internal controls, corporate governance and any legislation relating thereto.
- 1.2. This Whistleblowing Policy (the “**Policy**”) sets out the policy for reporting concerns of past, present or future instances of unethical or unlawful behaviour relating to the Group and applies to the Group and its employees, vendors, customers and other relevant stakeholders.

2. OBJECTIVES OF THE POLICY

The Policy aims to:

- 2.1. Provide a trusted avenue and procedures for employees and external parties to report serious wrongdoing or concerns, particularly in relation to fraud, controls or ethics, without fear of reprisals when whistleblowing in good faith;
- 2.2. Ensure that robust arrangements are in place to facilitate independent investigation of the reported concern and for the appropriate follow up actions to be taken.
- 2.3. Deter wrongdoing and to promote standards of good corporate practices;
- 2.4. Provide a confidential channel for whistleblowers to raise concerns about on misconduct, irregularities or malpractices, without fear of harassment and with an assurance that their concerns will be taken seriously and investigated, and the outcome duly communicated; and
- 2.5. Reassure whistleblowers that they will be protected from reprisals or victimisation for whistleblowing in good faith.

3. REPORTABLE INCIDENTS

- 3.1. The Policy is intended to facilitate whistleblowing relating to improprieties including but not limited to:
 - (a) all forms of financial or non-financial malpractices or impropriety such as fraud, corruption, bribery, theft and/misuse of the Group’s properties, assets or resources;
 - (b) concerns about the Group’s accounting, internal controls or auditing matters;
 - (c) breach of or failure to implement or comply with the Group’s policies or code of conduct which create legal, financial or reputational risks to the Company, including negligence or lack of action by management which encourages such conduct;

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- (d) conduct which is an offence or breach of law, endangerment of the health and safety of an individual;
- (e) unethical behaviours such as abuse of authority or position;
- (f) wilfully make a negligent disclosure of serious conflict of interest;
- (g) any harassment, discrimination, victimisation or bullying, including in relation to a disclosure made under this Policy;
- (h) fraud against investors, intentional provision of incorrect information or make fraudulent statements to the Singapore Exchange Securities Trading Limited, members of the investing public and/or regulatory authorities;
- (i) acts to mislead, deceive, manipulate, 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 the Group; or
- (j) conceal information about any of the above malpractice or misconduct.

3.2. The above list is intended to give an indication of the type of conduct which might be considered as “wrong-doing”. In cases of doubt, the whistleblower may seek to speak to his or her immediate superior or follow the procedure for reporting under this Policy.

3.3. It is important to understand that this policy is aimed at addressing malpractice and wrongdoing, and these concerns should not be confused with grievances and other like issues that are not of the nature described in Section 3 of this Policy, for instance, a personal work-related grievance in relation to employment terms, interpersonal conflict with other employees, disciplinary or performance management process or termination of employment.

4. PROTECTION AGAINST REPRISALS

4.1. The Company is committed to protecting whistleblowers, and it will not tolerate any harassment, retaliation, unfair treatment or victimisation of anyone reporting a genuine concern in good faith. Furthermore, no whistleblower should suffer reprisal as a result of reporting a genuine concern, even if they are mistaken.

4.2. However, this assurance does not extend to any person who intentionally provides information in a report which they know or reasonably believe to be untrue, and the Company does not condone frivolous, mischievous or malicious allegations. Employee(s) making such allegations due to personal grievances or for personal gain will face disciplinary action in accordance with the Group’s disciplinary procedures.

5. CONFIDENTIALITY

5.1. The Group encourages the whistleblower to identify himself/herself when raising a concern or providing information. All reports and records will be treated with strict confidentiality, except as necessary or appropriate to conduct the investigation and to take any remedial action, in accordance with any applicable laws and regulations.

5.2. The Company will take all reasonable steps to protect the confidentiality and identity of a whistleblower. Exceptional circumstances under which information provided by the whistleblower may not be treated with strictest confidentiality include:

- (a) where the Group is under a legal obligation to disclose information provided;
- (b) where the information is already in the public domain;
- (c) where the information is given on a strictly confidential basis to legal or auditing professionals for the purpose of obtaining professional advice; or

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(d) where the information is given to the governmental or regulatory entities as part of investigations into allegations.

5.3. In the event the Company is faced with a circumstance not covered by the above, and where the whistleblower's identity is to be revealed, the Company will generally inform the whistleblower in advance and advise him/her of the process.

6. CONCERNS AND INFORMATION PROVIDED ANONYMOUSLY

6.1. Concerns expressed or irregularities expressed anonymously are more difficult to act upon effectively and may hinder investigation work. Notwithstanding, the Company will consider anonymous reports, taking into account the following:

- (a) the seriousness of the issue raised;
- (b) the credibility of the concern; and
- (c) the likelihood of confirming the allegation from attributable sources and information provided.

6.2. If a whistleblower chooses to make such reports anonymously, he/she shall not be entitled to the investigation outcome of the case reported.

7. WHISTLEBLOWING REPORTING AND COMMUNICATION CHANNELS

7.1. The whistleblower should report his/her concerns directly to the Audit Committee, who is responsible for oversight and monitoring of whistleblowing, and ensuring that issues raised are properly resolved by the management or such parties as appropriate.

7.2. The channels of reporting to the Audit Committee are as follows:

Email	ac@halcyonagri.com
Online form	https://www.halcyonagri.com/contact-us/ Select "Governance" or "Lead Independent Director" under Type of Enquiry
Post	Halcyon Agri Corporation Limited 180 Clemenceau Avenue #05-02 Haw Par Centre Singapore 239922 Attn: Audit Committee

7.3. All concerns raised will be independently assessed (parties who are related to the subject of the complaint must recuse themselves) to ensure that they are fairly and properly considered. As it is essential to have all critical information in order to be able to effectively evaluate and investigate a complaint, the report made should provide as much information and be as specific as possible.

7.4. All reports and submissions will be treated fairly and appropriately, and will be assessed based on the merit of their content, without regard to the identity of the whistleblower or the accused. The investigation will be undertaken from a neutral standpoint, without any presumption of wrongdoing.

7.5. The Company reserves the right to refer any concerns or complaints to appropriate external regulatory authorities. Depending on the nature of the complaint, the subject of the complaint may be informed of the allegations against him or her and be provided with an opportunity to reply to such allegations.

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- 7.6. Investigations will be carried out as promptly as reasonably practicable, aiming for an efficient resolution that is consistent with the seriousness of the reports, the amount of actionable information provided and the complexity of the matter.
- 7.7. Depending on the nature of the concern raised or information provided, the investigation may be conducted involving one or more of these persons or entities:
- (a) the Audit Committee;
 - (b) the External or Internal Auditor;
 - (c) the Forensic Professionals; and
 - (d) the Police or Commercial Affairs Department.
- 7.8. Nothing in this Policy prohibits a whistleblower from making a report to the relevant authorities and regulators including the Singapore Exchange Securities Trading Limited.

8. IMPORTANT POINTS TO NOTE WHEN RAISING A CONCERN OR PROVIDING INFORMATION

- 8.1. The earlier the concern is raised the easier it is for the Group to take action.
- 8.2. The Group expects the whistleblower to provide his/her concern in good faith and to show to the appropriate officer that there are sufficient grounds for his/her concern.
- 8.3. The Group also recognises that the whistleblower may wish to seek independent advice and be represented by his/her trade union officer (where applicable).

9. POLICY REVIEW

- 9.1. Principles and procedures of the Policy shall be communicated to all relevant stakeholders at the outset and as appropriate thereafter. Employees should read, understand and comply with this Policy. All Employees are responsible to ensure the highest standards of ethics, honesty, openness and accountability in line with the Group's commitment to safeguard its integrity and enhance good governance.
- 9.2. The Policy shall be reviewed regularly in order to maintain compliance with applicable laws and regulations or accommodate organisational changes. Amendment to the Policy shall be submitted to the Audit Committee for consideration and approval.