

# WHISTLE BLOWING POLICY

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**TITLE**

WHISTLE BLOWING POLICY

**DOCUMENT NO.**

SCL-COR-POL-004

**REVISION**

2023-02

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**1. POLICY ON BUSINESS RELATED CONDUCT**

V2Y Corporation Ltd (“V2Y”) directors and employees are expected to carry out their duties as required and conduct themselves in a professional manner at all times and act in ways that bring credit to themselves, the Company and the public we serve. We are required to observe high standards of business and personal ethics, honestly and with integrity, in fulfilling our responsibilities and to comply with all applicable laws and regulations. Being a public listed company, we are socially responsible in ensuring that this is practised within the organisation, consistent with the Company’s corporate governance practices.

**2. SCOPE**

This policy applies to all employees of V2Y.

**3. DEFINITIONS**

V2Y/ Company	V2Y Corporation Ltd.
Group	V2Y Corporation Ltd. and its subsidiaries

**4. PURPOSE**

The Company has established this policy so as to enable all concerns about such malpractice(s) to be raised at an early stage and in the appropriate way. Any such matter is to be raised when it is just a concern rather than to wait for concrete proof.

If something is troubling you, that you think we should know about or look into, please refer to this policy for guidance. If, however, you are aggrieved about your personal position, please approach your Head of Department or Group Financial Controller going through the human resource channel. This Whistle Blowing Policy is primarily for concerns where the interests of others or of the Company itself are at risk.

## 5. EXAMPLES OF VIOLATIONS

### 5.1 ACCOUNTING PRACTICE REPORTING

- (a) Fraud whether actual or suspected or deliberate error in preparing, evaluation or review of any financial statements of the Group.
- (b) Fraud whether actual or suspected or deliberate error in recording and maintenance of the financial records of the Group.
- (c) Actual or suspected deficiencies in or non-compliance with the Group's internal controls and procedures.
- (d) Any misrepresentation whether actual or suspected by an officer or auditors regarding a matter contained or required to be contained in the Company's financial records, reports or audit reports.
- (e) Misappropriation of cash sales.
- (f) Misuse of petty cash.
- (g) Unauthorised discount.
- (h) Falsifying attendance record.
- (i) Pilferage of stock in trade.
- (j) Abuse of authority for personal gain.
- (k) Intentional provision of incorrect information to public bodies.
- (l) Deliberately or attempting to conceal information about any malpractice or misconduct.
- (m) Any conflict of interest in any activity that is, or appears to be, opposed to the best interest of the Company.

### 5.2 NON-ACCOUNTING PRACTICE REPORTING

- (a) A criminal offence has been/is likely to be committed.
- (b) The health or safety of any individual has been/is likely to be endangered by any human related activities or work environmental factors, etc.
- (c) Discrimination on grounds of sexuality, race, religion or physical abilities or harassment at work.
- (d) Occurrence of physical/verbal abuse of staff or service recipient at the workplace.

## 6. REPORTING ALLEGATIONS

- 6.1 For all whistleblow reporting including those persons not within the Group, an email group had been created and the person reporting can write to the following email:

[reporting@v2y.si](mailto:reporting@v2y.si)

The email group comprises all non-executive directors (including Independent Chairman and Audit Committee Chairman), Chief Executive Officer and Group Financial Controller.

The above email group will be made available to the public via our company website at <https://v2y.si/contact-us/> page.

Please refer to section 6.2 to 6.4 for contact information to reach out accordingly.

- 6.2 If the concern relates to matters as described in Accounting Practice Reporting above, the whistleblower can address his/her concern to the Audit Commitment Chairman. The Whistleblower information will be strictly protected.

Name: Mr Eugene Goh Chee Liang, Audit Committee Chairman

Direct no: (65) 6229 5832

E-mail: [Eugene.Goh@V2Y.si](mailto:Eugene.Goh@V2Y.si)

- 6.3 If the concern relates to matters as described in Non-Accounting Practice Reporting above, the whistleblower can address his/her concern to the Group Financial Controller who will handle the concern in consultation with the Non-Executive Chairman:

Name: Mr John Cai, Group Financial Controller

Direct no: (65) 6229 5838

E-mail: [John.Cai@V2Y.si](mailto:John.Cai@V2Y.si)

- 6.4 If the concern involves whistleblower's immediate supervisor, manager or head of department, or for any reason he/she would prefer them not to be told, he/she may report to the Audit Committee Chairman or Non-Executive Chairman who has the discretion to delegate the handling of the matter to an appropriate person(s) in the Company, as he deems fit and expedient:

Name: Mr Eugene Goh Chee Liang, Audit Committee Chairman

Direct no: (65) 6229 5832

E-mail: [Eugene.Goh@V2Y.si](mailto:Eugene.Goh@V2Y.si)

Name: Mr Yip Mun Foong James, Non-Executive Chairman

Direct no: (65) 6229 5836

E-mail: [James.Yip@V2Y.si](mailto:James.Yip@V2Y.si)



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**7. ASSURANCE**

7.1 If you raise a concern under this policy, you will not be at risk of losing your job or suffering any form of retribution as a result, provided that:

- (a) The disclosure is made in good faith.
- (b) You reasonably believe that information and any allegations contained in it are substantially true.
- (c) You are not acting for personal gain.

7.2 The Company will not tolerate the harassment or victimization of anyone raising a genuine concern. However, we recognize that you may nonetheless want to raise a concern in confidence under this policy. If you ask us to protect your identity by keeping your confidence, we will not disclose it without your consent. If the situation arises where we are not able to resolve the concern without revealing your identity (for instance because your evidence is needed in court), we will discuss with you whether and how we can proceed.

7.3 Remember that if you do not tell us who you are, it will be much more difficult for us to look into the matter or to protect your position or to give you feedback.

7.4 Accordingly, we will not consider anonymous reports, this policy is not well suited to concerns raised anonymously.

**8. COMPANY'S RESPONSE**

8.1 If the concern is raised verbally, the person receiving the information should put it in writing as soon as practicable to ensure that it properly reflects the concerns that have been raised. The employee must also indicate if the concern is to be treated in confidence. The limit of that confidence will be checked out by the person receiving the information. The relevant person and/or the Human Resource Manager will also ensure that the Company's management receives adequate details of the employee's concerns for the purpose of corporate recording and monitoring purposes.

8.2 Once you have told us your concern, we will look into it to assess initially what action should be taken. This may involve an internal inquiry or a more formal investigation. We will tell you who may be handling the matter, how you can contact him/her and

whether your further assistance may be needed. If you request it, we will write to you summarizing your concern(s) and setting out how we propose to handle it.

- 8.3 When you raise the concern you may be asked how you think the concern(s) might best be resolved. If you do not have any personal interest in the matter, we do ask that you tell us at the outset. Should your concern be best handled by another approach such as through the human resource development channel, we will tell you.
- 8.4 While the purpose of this policy is to enable us to investigate possible malpractice and take appropriate steps to deal with it, we will give you as much feedback as we properly can. If requested, we will confirm our response to you in writing. Please note, however, that we may not be able to tell you the precise action we take where this would infringe a duty of confidence owed by us to someone else.
- 8.5 Concerns or allegations, which fall within the scope of specific procedures, will normally be referred for consideration under that relevant procedure. Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.
- 8.6 Where appropriate, the matters raised may:
- (a) Be investigated by management, internal audit, a committee set up by the Board of Directors or through the disciplinary process.
  - (b) Be referred to the police.
  - (c) Be referred to the external auditor.
  - (d) Form the subject of an independent inquiry.
- 8.7 Usually, within 4 weeks of a concern being raised, the person looking into the concern will write to you :
- (a) Acknowledging that the concern has been received.
  - (b) Indicating how the Company proposes to deal with the matter.
  - (c) Giving an estimate of how long it will take to provide a full response.
  - (d) Saying whether any initial enquiries have been made.
  - (e) Supplying information on support available to you.
  - (f) Saying whether further investigations will take place and if not, why not.
- 8.8 Subject to any legal constraints, the relevant employee will normally be informed of the final outcome of any investigation.



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## Revision History

Date	Revision	Description of Revision	Prepared	Reviewed	Approved
01-04-2020	2020 - 01	Update on the particulars of AC Chairman	John Cai	BOD	BOD
28-Dec-2020	2020 – 02	Rename of Company Name and change of HR personnel.	John Cai	BOD	BOD
31-Jul-2021	2021-01	Updating of Company email address in Company's website in 6.1	John Cai	BOD	BOD
12-Jun-2023	2023-01	Updating of email address to include direct office email and phone number to publish policy on the Company's website.	John Cai	BOD	BOD
12-Aug-2023	2023-02	Update of new AC Chairman Details	John Cai	BOD	BOD
29-Oct-2024	2024-01	Update of AC Chairman & Non-Executive Chairman Details	John Cai	BOD	BOD