

WHISTLEBLOWING POLICY

Kuok Group Singapore is committed to developing, promoting, and upholding high standards of corporate governance within the Group (as defined below). The Group adopts a zero-tolerance toward corporate impropriety, malpractice, or wrongdoing by any employee in the course of their duties.

Employees are often the first to detect potential irregularities within the organisation. However, they may hesitate to voice their concerns out of a sense of loyalty to colleagues or fear of discrimination, retaliation, or harassment. As a result, they may choose to remain silent rather than report the issue. External parties who have dealings with the Group (such as customers, vendors, or contractors) may also be reluctant to raise concerns due to similar apprehensions.

This policy establishes a formal framework for whistleblowing, ensuring that concerns may be raised in good faith and without fear of reprisal.

1. Definitions

The following terms, when used in this document, shall have the meanings ascribed here:

- i. **“Board”** means the Board of Directors of Kuok (Singapore) Limited.
- ii. **“Complaint”** refers to any concern raised that alleges Possible Improprieties.
- iii. **“Complaints Register”** means a record maintained by the Receiving Officer to document all complaints received, including the date, nature of the complaint, and actions taken.
- iv. **“Disciplinary Committee”** refers to a Board committee that reviews employee misconduct to ensure fair and consistent resolutions.
- v. **“Governance Committee”** refers to a Board committee overseeing the effectiveness of the Group’s internal controls, risk management, and governance, including compliance with the Group’s Whistleblowing Policy.
- vi. **“Group”** means Kuok (Singapore) Limited, its subsidiaries, and its affiliates over which it has operational control.
- vii. **“Obstructive Action”** refers to any act, including the use or attempted use of force, authority, intimidation, threats, or undue pressure, that is intended to prevent, deter, or interfere with the ability to report a complaint or raise concerns about Possible Improprieties. It includes attempts to influence, silence, or discourage whistleblowing.
- viii. **“Possible Improprieties”** refer to any actual, suspected, or attempted misconduct, malpractice, unethical behaviour, or breach of the Group’s policies, code of conduct, or applicable laws and regulations.
- ix. **“Receiving Officer”** refers to the Head of Internal Audit.
- x. **“Retaliatory Action”** refers to any adverse action taken after a complaint has been made, or is suspected to have been made, against a whistleblower. This includes

demotion, dismissal, harassment, discrimination, threats, or any other conduct intended to punish or retaliate against the whistleblower for raising a concern in good faith.

2. Scope

- i. This policy applies to all employees in the Group, including full-time, part-time, and contract employees.
- ii. It also applies to all external parties such as customers, suppliers, contractors, and other stakeholders who may have a business relationship with the Group.

3. Reportable Incidents

- i. This Whistleblowing Policy provides a formal avenue to raise concerns about Possible Improprieties within the Group. It assures whistleblowers that they will be protected from reprisals, retaliation, or victimisation, provided the report is made in good faith and without malice.
- ii. This policy is intended to cover serious concerns that may have an impact on the Group, including but not limited to actions that:
 - a. may lead to incorrect or misleading financial reporting;
 - b. are unlawful, including fraud, theft, corruption, bribery, or misappropriation of company assets;
 - c. are not in compliance with legal or regulatory obligations, or are in breach of the Group's policies or code of conduct;
 - d. constitute serious breaches of health, safety, or environmental standards;
 - e. amount to professional or ethical malpractice, including harassment, discrimination, or abuse of authority;
 - f. involve undisclosed or improperly managed conflicts of interest;
 - g. represent a serious breach of internal controls;
 - h. constitute serious improper conduct that may harm the Group's reputation, operations, or the interests of its stakeholders; or
 - i. involve the deliberate concealment of any of the above.

4. Procedures

i. Submission of Complaint

All complaints shall be made in person or in writing, and lodged with the Receiving Officer via the following channels:

- Mail to:
Head of Internal Audit, Group Internal Audit
Kuok (Singapore) Limited
1 Kim Seng Promenade, #07-01, Great World City, Singapore 237994

- Email according to your Business Unit:
ksl.whistleblow@kuokgroup.com.sg
whistleblow@paccoffshore.com.sg
whistleblow@pacificcarriers.com.sg
whistleblow@paxocean.com
whistleblow@allgreen.com.sg
whistleblow@K2datacentres.com

The Group encourages complainants to provide their particulars, i.e. name, designation, department or company, contact number, and email. This enables the Receiving Officer to seek clarification, ask follow-up questions, and conduct a more efficient and effective investigation.

To support the evaluation and investigation of the complaint, the complainant should, as far as practicable, include the following information:

- the date, time, and place of the Possible Improprieties;
- the identity and relevant particulars of the parties involved;
- a description of the circumstances leading to the Possible Improprieties; and
- any other relevant information or supporting documentation that may assist in the assessment of the complaint.

Any complaint raised to someone other than the Receiving Officer shall be forwarded to the Receiving Officer for proper handling in accordance with this policy.

All complaints received by the Receiving Officer shall be reported to the Governance Committee and the relevant Chief Executive Officer or Corporate Function Head (hereinafter referred to as the “Senior Management”).

However, where the complaint pertains to a member of Senior Management, the Receiving Officer shall escalate the matter directly to the Chairman of the Governance Committee and Chairman of the Board.

Each complaint will be reviewed within a reasonable timeframe. Following a preliminary assessment and due consideration, a decision will be made on whether to initiate a detailed investigation. Guidance may be sought from the Governance Committee, Senior Management and/or other relevant parties to support the decision-making process.

The Receiving Officer shall notify the complainant of actions taken or reason(s) should it be decided that no action is to be taken, where appropriate or required.

ii. Confidentiality

Every effort will be made to protect the identity of the complainant. The complainant’s identity shall be treated with strict confidentiality, except under the following circumstances:

- when disclosure is material to the investigation;
- when the information is shared, on a confidential basis, with legal counsel or internal audit for the purpose of obtaining professional advice;

- c. when required by law, or pursuant to an order or directive of a court of law, regulatory authority, or other body with legal jurisdiction;
- d. when the Board determines that disclosure is in the best interests of the Group;
- e. when it is established that the complaint was frivolous, made in bad faith, or lodged with malicious or mischievous intent; or
- f. when the complainant's identity is already publicly known.

All information obtained during the course of an investigation shall be kept confidential and disclosed only as necessary and appropriate for the purposes of conducting the investigation, implementing remedial actions, or complying with applicable laws and regulations.

iii. Registration of Complaints

The Receiving Officer shall maintain a Complaints Register to record all complaints received. The register shall include the date the complaint was received, the nature of the complaint, and a summary of actions taken in response.

Access to the Complaints Register shall be strictly controlled. It will only be made available for inspection with the approval of the Governance Committee or upon formal request by investigative authorities or regulatory bodies with the appropriate legal jurisdiction.

iv. Review and Investigation of Complaint

The Receiving Officer, in consultation with the Governance Committee and/or Senior Management, may either lead the investigation directly or assign it to the division or department best suited to address the matter. Where necessary, third-party professionals may be engaged to initiate or support the investigation or review process. All investigations shall be conducted in a timely, objective, and appropriate manner, ensuring fairness and adherence to due process.

The Governance Committee shall assess the nature and severity of each case and determine whether escalation to the Board is required.

The Group reserves the right to refer any complaint to appropriate external regulatory or enforcement authorities, where deemed necessary and upon consultation with legal counsel. Depending on the nature of the complaint, the subject of the complaint may be informed of the allegations and be given opportunity to respond.

Any employee who fails to cooperate during an investigation, or who knowingly provides false or misleading information, shall be subject to disciplinary action, up to and including immediate dismissal.

If, upon conclusion of the investigation, the allegations are substantiated or a violation is determined to have occurred, the Governance Committee shall assess the investigation findings and depending on the nature and severity of the case, may:

- a. direct Senior Management of the Group or company to determine and implement appropriate remedial and/or disciplinary actions; or
- b. escalate the matter to the Group's Disciplinary Committee for further action.

5. Obstructive Action and Retaliatory Action

The Group strictly prohibits any form of Obstructive Action or Retaliatory Action against anyone who has filed a whistleblowing complaint, intends to do so, or is involved in the investigation process.

Any employee found to have engaged in Obstructive or Retaliatory Action shall be subject to disciplinary action, up to and including termination of employment or contract, as appropriate.

Complaints alleging Obstructive or Retaliatory Action will be independently reviewed and investigated, and appropriate action will be taken where warranted.

6. Frivolous or Malicious Complaints

This policy is intended to protect genuine whistleblowers acting in good faith. Any complaint found to be frivolous, made in bad faith, or lodged with malicious or mischievous intent will not be protected under this policy. Anyone who knowingly make such complaints will be subject to disciplinary action, including but not limited to termination of employment or contractual relationship.

7. Consistency with Laws and Regulations

This policy shall be read in conjunction with all applicable laws and regulations.

In the event of any inconsistency or conflict between this policy and applicable laws or regulations, the relevant provisions of the prevailing legal or regulatory framework shall take precedence to the extent of such inconsistency.

8. Maintaining This Policy

The Governance Committee is responsible for overseeing the maintenance, periodic review, and update of this policy to ensure its continued relevance and effectiveness.

Any amendments, revisions, or updates to this policy shall require the approval of the Governance Committee and the Board. All changes shall be formally communicated in writing to employees upon implementation.

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