



PROCEDURES FOR REPORTING IMPROPRIETIES

1. REPORTING POLICY AND PROCEDURES

1.1 Reporting of Improprieties

The Company believes that it is in the best interests of the Group to promote an environment conducive for employees of the Group (the “Employees”) to, in confidence, raise or report concerns about Improprieties, without fear of Reprisals, and to put in place arrangements for the investigation of such concerns for appropriate follow-up action.

1.2 Publication of these Procedures

The Company shall disseminate and publish these Procedures to all Employees together with all updates and clarifications.

1.3 Authority to receive Complaints

All Complaints, other than reports involving any Director, member of senior management (having designation of “Head/Chief/Managing Director of a Division” and above) shall be addressed to the Director, who shall be authorised to receive and act on all Complaints received by or on behalf of the Group.

Name	Email
Daw Poe Maw Maw Theint	poepoe@spa-mm.com

All Complaints involving any Director, member of senior management (having designation of “Head/Chief/Managing Director of a Division” and above) and Director shall be addressed to the Non-Executive Directors who may be reached at:-

Name	Email
Mr Martin Pun	martinpun@yomastrategic.com

1.4 Right to file Complaint

Every Employee shall have an unfettered right to file a genuine and bona fide Complaint and shall not be restricted in the exercise of such right.

1.5 Prohibition of Obstruction

The Company objects to and does not tolerate nor condone any Obstruction cause against any Employee who wishes or intends to file, or who is in the process of filling, a Complaint, and may institute such disciplinary action as it deems appropriate against any employee, officer or agent of the Group found to have caused or attempted to cause any such Obstruction.



1.6 Prohibition of Reprisals

The Company objects to and does not tolerate nor condone any Reprisals made against any Employee who has filed or attempted or intends to file a Complaint and may institute such disciplinary action as it deems appropriate against any Employee found to have made or attempted to make any such Reprisals.

Any Complaint alleging Obstruction or Reprisals shall be received, reviewed and investigated in the same manner as any Complaint alleging Improprieties.

2. **COMPLAINT PROCEDURES**

2.1 Procedures for handling Complaints

The procedures for the receipt, retention and treatment of a Complaint are set out below and shall be fully complied with.

2.2 Submission of Complaint

Every Complaint may be sent to or lodged in the manner described in paragraph 1.3 above.

2.3 Confidentiality of Identity

Employees are strongly encouraged to disclose their identity when lodging Complaints.

The identity of all Employees who have lodged Complaints shall be kept confidential save where:-

2.3.1 the identity of the Employee, in the opinion of the Audit & Risk Management Committee, is material to any investigation;

2.3.2 it is required by law, or by the order or direction of a court of law, regulatory body or by the Singapore Exchange or such other body that has the jurisdiction and authority to require such identity to be revealed;

2.3.3 the Management is of the opinion that it would be in the best interests of the Group to disclose the identity;

2.3.4 it is determined that the Complaint was frivolous, in bad faith, or in abuse of these policies and procedures or lodged with malicious or mischievous intent; or

2.3.5 the identity of such Employee is already public knowledge by reason other than disclosure under this paragraph 2.3.

2.4 Registration of Complaints

A Complaints Register shall be maintained or caused to be maintained for the purposes of recording details of all Complaints received, including the date of such Complaint and the nature of such Complaint.

The Complaints Register shall be made available for inspection upon any request of the Management.



3. INVESTIGATION OF COMPLIANTS

3.1 Review and Investigation of Complaints

All whistle-blowing reports, other than reports involving any Director, member of senior management (having designation of “Head/Chief/Managing Director of a Division” and above) shall be received by the Management Director who will log all reports into a register. The Management Director shall conduct an initial review of the report received and recommend the remedial, disciplinary or other action to be taken action taken by the Company. All investigations shall be reported to the Management for their attention and further action as necessary.

In the event that the whistle-blowing reports involve any Director, member of the senior management, the reports shall be escalated to the Chairman of the Board, for his attention and further action as necessary.

3.2 Determination by Management

Upon receipt of any Complaint, the Management may;-

- 3.2.1 conduct its own investigation or review;
- 3.2.2 instruct the internal auditors or external auditors other professionals to conduct further investigations or review;
- 3.2.3 instruct management to take such remedial, disciplinary or other action as it deems appropriate;
- 3.2.4 engage such third parties as the Management may determine, to commence or conduct further investigations or review;
- 3.2.5 engage such third parties as the Management may determine to take such remedial, disciplinary or other action as it deems appropriate; and/or
- 3.2.6 take any other action as Audit & Risk Management Committee may determine in the best interests of the Group.

The Company reserves the right to take such action as the Management deems appropriate against any such Employee.

3.3 Abuse of Policies and Procedures

The Group may, upon determination by the Management, take or cause to be taken such action as is appropriate against any Employee who has made a Complaint frivolously, in bad faith, in abuse of the policies and procedure herein or lodged with malicious or mischievous intent.

4. CONSISTENCY WITH LAWS AND REGULATIONS

These Procedures shall be read in conjunction with any laws, regulations, rules, directives or guidelines that may from time to time be prescribe or issued on the receipt, retention and/or treatment of complaints regarding the subject matter of these Procedures.



In the event that any of these Procedures is inconsistent or in conflict with any such laws, regulations, rules, directives, or guidelines or any part thereof, any such laws, regulation, rules, directives or guidelines shall prevail to the extent of such inconsistency or conflict.

5. INTERPRETATION

The following terms used in these Procedure shall have the meaning ascribed here:-

- 5.1 “Complaint” means any complaints alleging Improperities, Obstruction or Reprisals;
- 5.2 “Complaint Register” means a register to record detail of all Complaints lodged;
- 5.3 “Group” means the Company and its subsidiaries;
- 5.4 “Improperities” means any activity, conduct or omission by an employee, officer or agent of the Group or external advisers, consultants or professional firm (including auditing firms providing external or internal auditing services) engaged by the Group which relate to accounting, financial reporting, internal controls, internal accounting controls, financial, operational and compliance controls or risk management practices that are questionable or may not be in accordance with generally accepted accounting principles, standards or practices or which relate to issues of honesty or integrity or the commission or any act or activity which may be contrary to any law or regulation;
- 5.5 “Obstruction” means the use or attempted use of force, authority, intimidation, threats, harassment, coercion, undue pressure or any other action or behavior which is intended or leads itself to or in fact does impede, obstruct, influence or otherwise interferes with an employee’s or officer’s exercise of his right to report any improperities or Reprisals or which may discourage other from so doing in the future; and
- 5.6 “Reprisals” means the use or the attempted use of force, authority, intimidation, threats, harassment, coercion, undue pressure or any act or omission or any negative or other inappropriate behavior by any employee or officer of the Group, against any person who has failed or intends to file a Complaint.