

MAMRE OAKS LIMITED – WHISTLE-BLOWING POLICY

1. INTRODUCTION

- 1.1. Mamre Oaks Limited (“Mamre Oaks”) is committed to a high standard of compliance with accounting, financial reporting, internal controls, governance, and auditing requirements and any legislation relating thereto. In line with this aforementioned commitment, the Whistle-Blowing Policy (“Policy”) aims to provide a framework to promote responsible and secure whistle-blowing without fear of adverse consequences.
- 1.2. Mamre Oaks’ Whistle-Blowing contact will be provided to external parties through its website.

2. COVERAGE OF THE POLICY

- 2.1. This Policy applies to any and all permanent and contract staff, partners, volunteers, suppliers, contractors, clients, and any other stakeholders (as and when they may arise and are not hereinbefore specifically set out in this clause) of Mamre Oaks and the general public.

3. OBJECTIVES OF THE POLICY

- 3.1. The Policy aims to deter wrongdoing and to promote standards of good governance practices.
- 3.2. The Policy aims to provide a proper framework for any and all interested parties to raise concerns about actual or suspected improprieties in matters of financial reporting or other matters and receive their feedback on any action taken.
- 3.3. The Policy further aims to give employees or external parties the assurance that they will be protected from reprisals or victimization for whistle-blowing in good faith.

4. REPORTABLE INCIDENTS

4.1. The following items are covered under the whistle-blowing policy :-

4.1.1. Impropriety, corruption, acts of fraud, theft, and misuse of company's properties, assets, or resources;

4.1.2. Conduct of an individual or group which is an offence or breach of law;

4.1.3. Serious conflict of interest without disclosure;

4.1.4. Breach of Mamre Oak's policies;

4.1.5. General malpractice such as immoral, illegal or unethical conduct;

4.1.6. Concealing information about any of the above malpractice or misconduct;

4.1.7. Any other serious improper conduct that may cause financial or non-financial loss to Mamre Oaks Limited or damage its reputation;

4.1.8. Manifestation of intention to mislead, deceive, or fraudulently influence any internal or external auditor in connection with the preparation, examination, audit or review of any financial statements or records of Mamre Oaks.

4.2. The abovementioned list is intended to give an indication of the kind of conduct which might be reportable under this Policy and is not meant to be exhaustive. In cases of doubt, the whistle-blower should consider consulting his/her immediate superior (unless the report is about said superior, in which case the whistle-blower should consult a member of the audit committee) or follow the procedure for reporting under this Policy.

5. PROTECTION AGAINST REPRISALS

5.1. Mamre Oaks prohibits discrimination, retaliation, or harassment of any kind against a whistle-blower who submits a complaint or report in good faith. If a staff member raises a genuine complaint pursuant to this Policy, he or she will not be at risk of losing his or her job or suffer from retribution or harassment as a result. Provided that the staff is acting in

good faith, it does not matter if he or she is mistaken. The Human Resources Committee will monitor for signs of harassment or victimization against the whistle-blower.

- 5.2. However, if an employee has made a frivolous, mischievous or malicious allegation, this will not be condoned by Mamre Oaks. Employees making such allegations will face disciplinary action in accordance with the recommendations made by the Chairman of the Governance & Audit Committee.

6. CONFIDENTIALITY

- 6.1. All complaints will be treated with strict confidentiality, except where :-

- 6.1.1. Mamre Oaks is under a legal obligation to disclose information provided.

- 6.1.2. Mamre Oaks is obliged by Caritas Singapore to disclose the complaint to Caritas Singapore.

- 6.1.3. The information is already in the public domain.

- 6.2. In the event that personal information is provided in the complaint, the complainant's personal information will not be divulged to anyone except those in the Governance & Audit Committee, except in the exceptions listed in 6.1 above.

7. EFFECTIVE DATE

- 7.1. This Policy supersedes and replaces all earlier draft versions and is effective from the date of its approval by the Board of Mamre Oaks.

8. WHISTLE-BLOWING PROCEDURE

- 8.1. Employees may report his or her complaint in good faith to his/her immediate supervisor.

- 8.2. Alternatively, any interested person covered by this Policy (including employees) may report via email to <governancecommittee@mamreoaks.sg>, which will be accessed by the Governance & Audit Committee. The Governance & Audit Committee may appoint a separate committee to investigate the complaint
- 8.3. If a prima facie case is established, a thorough investigation will be conducted. There may be circumstances where there is insufficient evidence to proceed, especially in the case of anonymous reporting.
- 8.4. If the complainant has provided his/her identity in the process of the complaint, the complainant will receive a preliminary report about the outcome of any investigations, detailing the following :-
 - 8.4.1. Acknowledgment of the complaint made;
 - 8.4.2. An indication of how the matter will be dealt with;
 - 8.4.3. Related information as to whether initial inquiries have been made;
 - 8.4.4. Related information to the complainant whether further investigation has been taken, and if not, the reasons for declining to take further investigation.
 - 8.4.5. If it is decided that investigations are to continue, the estimated turn-around time for a final response to be given.
- 8.5. After reporting the incident, the whistle-blower should refrain from confronting the accused person or making further investigation. This investigation team may ask the whistle-blower for further information or clarification.
- 8.6. All whistle-blowing reports shall be investigated as soon as possible and should be resolved and details of the investigation reported to the Board of Directors within two months of receiving the complaint.
- 8.7. The Chairman of the Board of Directors will monitor and follow-up on the investigation and decide on the action to be taken, depending on the results of the investigation.
- 8.8. In the event that the complaint is against one particular Board Member or Management Committee member, the Chairman of the Board of Directors will make a recommendation

to the Board on the action(s) to be taken and comply with the whistle-blower policy of Caritas Singapore. Those who the complaint was lodged against should not be directly or indirectly involved in the investigations. They should not be present at any and all meetings where the complaint is discussed and/or deliberated.

8.9. If the complainant provided email contact information, an email informing the complainant regarding the outcome shall be sent to the complainant, unless legal reasons restrict Mamre Oaks from doing so.

8.10. Proper records regarding the case must be maintained at all stages.