

## **ANTI-FRAUD & WHISTLE BLOWING POLICY**

### **OBJECTIVE**

1. To set out a policy to facilitate the development of controls that will aid in the detection and prevention of fraud, malpractice, wrongdoings and other irregularities of RichLand Group (as defined below).

2. This policy is part of RichLand Group's overall objective to maintain and improve high standards of governance, internal control and risk management.

3. RichLand Group's expectation on propriety and accountability is that employees at all levels will lead by example by ensuring adherence to our standards of behaviour, legal requirements, rules, procedures and practices.

4. To provide a framework in which employees and external parties may raise concerns in confidence about wrongdoings, malpractice, possible irregularities or fraudulent activities within the Group and offer reassurance that they will be protected from reprisals or victimization for whistle blowing in good faith without malice.

### **SCOPE**

5. This policy is applicable to RichLand Global Pte Ltd and its affiliated entities, hereinafter refer to as "**RICHLAND GROUP**" and:

a) All directors, full-time, part-time, temporary and contract employees of RichLand Group collectively referred to as the "**EMPLOYEES**".

### **OPERATING GUIDELINES**

6. The Group takes fraud very seriously; all cases of fraud or suspected fraud will be vigorously and promptly investigated and appropriate actions will be taken.

7. The Group is committed to the highest standard of ethical, legal and moral business conduct. It strives to promote consistent organizational behaviour by providing guidelines and assigning responsibilities for the development of controls and conduct of investigations.

8. This policy is intended to cover concerns over irregularities, malpractices, wrongdoings, including but not limited to:

- Breach of fundamental internal controls
- Reporting of improper or inappropriate conduct pertaining to accounting practices
- False or misleading financial reporting
- Endangerment of health and safety of any individuals/hazardous or unsafe work conditions/damage to the environment
- Breach of legal obligations
- Abuse of power and authority
- Serious conflict of interest with concealment or without disclosure
- Disclosure of confidential and proprietary information to external parties

- Serious or improper conduct resulting in financial or non-financial loss to the Group or damage to the reputation of the Group and/or Senior Management
- Dishonest or fraudulent acts such as profiteering as a result of insider knowledge or information of the Group's activities
- Impropriety in the handling or reporting of money or financial transactions, corruption, acts of fraud, theft, misappropriation and misuse of properties, assets, resources or funds
- Acceptance or seeking of material value from contractors, vendors, government officials or persons providing services/materials to the Group; except where gift value is less than S\$100 or its equivalent
- Destruction, removal or inappropriate usage of records, furniture, fixtures and equipment

## **Reporting Procedure**

### **Authorization**

The Ethics Committee (EC) and the Administrator as authorized by the EC will have:

- Free and unrestricted access to all Companies' records and premises
- The authority to examine, copy and/or remove all or any portion of the contents of files, desks, cabinets and other storage facilities on the premises without prior knowledge or consent of any individual who might use or have custody of any such items or facilities when it is within the scope of their investigation.

**Ethics Committee (EC)** comprises of:

- (i) Group Senior Management / Executive Director
- (ii) Audit Committee

Concerns over or reports of alleged wrongful acts under this policy should be promptly reported in writing in a sealed envelope marked "Private and Strictly Confidential" to:

### **The Group HR Manager**

By post to:

Richland Logistics Services Pte Ltd  
300 Tampines Avenue 5  
Singapore 529653

Or via email to: [HumanResource@enecoenergy.com](mailto:HumanResource@enecoenergy.com)

However, where for some reason, it is inappropriate to report to the above person, the complainant may report directly to the Ethics Committee as follows:

### **Ethics Committee (ENECO Energy Limited)**

By post to:

Richland Logistics Services Pte Ltd  
300 Tampines Avenue 5  
Singapore 529653