

## **ANTI-FRAUD AND WHISTLE BLOWING**

### **1.0 Purpose**

- 1.1 To set out a policy to develop controls that will aid in the detection and prevention of fraud, malpractice, wrongdoings and other irregularities of Richland (as defined below), inclusive of its holding company Eneco Energy Limited, hereinafter refer to as “The Company”.
- 1.2 This policy is part of The Company’s overall objective to maintain and improve high standards of governance, internal control and risk management.
- 1.3 The Company’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.
- 1.4 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 Company and offer reassurance that they will be protected from reprisals or victimization for whistle blowing in good faith without malice.

### **2.0 Scope**

- 2.1 This policy is applicable to RichLand Logistics Service Pte Ltd and its affiliated entities, inclusive its holding company Eneco Energy Limited and:
- 2.2 All directors, full-time, part-time, temporary and contract employees of the Company collectively referred to as the “**EMPLOYEES**”.

### **3.0 Operating Guidelines**

- 3.1 The Company takes fraud very seriously; all cases of fraud or suspected fraud will be vigorously and promptly investigated and appropriate actions will be taken.
- 3.2 The Company 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.

- 3.3 This policy is intended to cover concerns over irregularities, malpractices, wrongdoings, including but not limited to:
- 3.3.1 Breach of fundamental internal controls
  - 3.3.2 Reporting of improper or inappropriate conduct pertaining to accounting practices
  - 3.3.3 False or misleading financial reporting
  - 3.3.4 Endangerment of health and safety of any individuals/hazardous or unsafe work conditions/damage to the environment
  - 3.3.5 Breach of legal obligations
  - 3.3.6 Abuse of power and authority, discrimination and harassment
  - 3.3.7 Serious conflict of interest with concealment or without disclosure
  - 3.3.8 Disclosure of confidential and proprietary information to external parties
  - 3.3.9 Serious or improper conduct resulting in financial or non-financial loss to the Company or damage to the reputation of the Company and/or Senior Management
  - 3.3.10 Dishonest or fraudulent acts such as profiteering as a result of insider knowledge or information of the Company's activities
  - 3.3.11 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
  - 3.3.12 Acceptance or seeking of material value from contractors, vendors, government officials or persons providing services/materials to the Company; except where gift value is less than S\$100 or its equivalent
  - 3.3.13 Destruction, removal or inappropriate usage of records, furniture, fixtures and equipment without authorization

## **4.0 Reporting Procedure**

### **4.1 Authorization**

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

- 4.1.1 Free and unrestricted access to all Companies' records and premises
- 4.1.2 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.

4.2 Ethics Committee (EC) comprises of:

4.2.1 Chief Executive Officer/ Executive Director

4.2.2 Audit Committee

4.2.3 Non-Executive Directors (Board)

4.3 Report of alleged wrongful acts

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:

**4.3.1 The Group HR Manager**

By post to:

300 Tampines Avenue 5

#05-02

Singapore 529653

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

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

By post to:

300 Tampines Avenue 5, # 05-02, Singapore 529653 Or via email to:

[ethics.committee@enecoenergy.com](mailto:ethics.committee@enecoenergy.com)

**5.0 Anonymous Allegations**

5.1 The policy encourages employees to put their names to allegations to facilitate appropriate follow-up questions and investigations with the source of allegation.

5.2 Please be as specific as possible and include the following information:

5.2.1 The name of the person(s) and/or department(s) involved in the conduct, violation(s) or hazardous condition(s)

- 5.2.2 The date(s) when the conduct or violation(s) occurred or the hazardous condition(s) existed
  - 5.2.3 Whether the conduct or violation(s) continue to occur or the hazardous condition(s) continues to exist
  - 5.2.4 The specifics of the conduct, violation(s) or hazardous condition(s)
  - 5.2.5 Where the conduct or violation(s) took place or where the hazardous condition exists
  - 5.2.6 The name of witness(es), and any other relevant information
- 5.3 Concerns expressed anonymously will be investigated, but considerations will be given to:
- 5.3.1 The seriousness of the issue raised
  - 5.3.2 The credibility of the concern
  - 5.3.3 The likelihood of confirming the allegation from reliable sources
- 5.4 You may request to remain anonymous when raising a concern and The Company will make every effort to protect your identity unless the Company is required to disclose it by law.

## **6.0 Malicious Allegations**

Employees who raise a concern in good faith, which is shown to be unsubstantiated by subsequent investigation, will not have action taken against them. However, an employee who makes an allegation maliciously in bad faith knowing it to be untrue or unfounded may be subjected to disciplinary action.

## **7.0 Timing**

All reports should be made as soon as practicable to enable the Company to take action.

## **8.0 Evidence**

The report should be sufficiently detailed, setting out the background and history of events and reasons for concern so as to provide the necessary information to the Ethics Committee (EC) as to the nature of the Alleged Wrongful Act. The employee (complainant) is encouraged to provide evidence, so as to demonstrate that there is sufficient ground for concern.

## **9.0 Disciplinary action**

In the case of proven fraud, or suspected fraud of a serious nature, the Ethics Committee reserves the right to refer the matter to the police at the earliest possible juncture.

Notwithstanding this, and following appropriate investigations, the Management and the Ethics Committee will determine whether to invoke action in accordance with the established disciplinary procedures.

## **10.0 How the Complaint will be handled**

The Company will conduct a timely, thorough and impartial investigation of issues involving unethical conduct, inappropriate conduct and alleged violations of related laws and policies.

The Company will investigate anonymous complaints falling within this scope, and may also investigate conduct by suppliers, customers or other third parties if needed to investigate an allegation of unethical or illegal conduct affecting the Company.

The Company will not tolerate threats or acts of retaliation against any employee for making a report in good faith. In addition, the Company prohibits retaliation against employees who cooperate with internal investigations.

## **11.0 INTERNAL INVESTIGATIONS – PROCEDURAL GUIDELINES**

### **11.1 Determine the nature of the issue and inform the necessary person(s) as well as the Ethics Committee**

### **11.2 Identify the issue owner**

Issue owner is typically a Head of Department whose area is affected by the complaint or issue.

### **11.3 Determine whether issues are valid and can be investigated**

Two levels of management should be given an opportunity to resolve the issue (exceptions should be made where appropriate, such as harassment claims in which a manager is the alleged offender).

#### **11.4 The Ethics Committee will determine who the investigator should be**

Investigator must be able to conduct a timely, thorough and impartial investigation that will produce independent findings and recommendations consistent with the facts and circumstances.

- 11.4.1 Investigator should not have a conflict of interest that would prevent him or her from being impartial (e.g. should not be the immediate supervisor or peer of the complainant)
- 11.4.2 Investigator should not have personal knowledge of the facts or be a witness to the investigation.
- 11.4.3 Investigator needs to have sufficient experience and stature in the organization to handle sensitive matters and obtain responses from employees.

#### **11.5 Determine the facts: Conduct interviews and obtain relevant documents**

- 11.5.1 Interview the complainant first, if possible. If the complaint is anonymous, interview the person(s) most likely to have knowledge of the subject matter raised in the complaint.
- 11.5.2 Investigator should work with relevant functions in the investigation to make an outline of questions to ask the complainant.
- 11.5.3 Interview witness(es); investigator should not identify complainant or witnesses to each other by name. Issues and allegations can be discussed verbally and investigator can ask witness(es) to identify other witnesses or documents that support their position. At no point in time should the complainant's alleged email or letter be shown to the witness(es).
- 11.5.4 Control the interview environment and preserve confidentiality of the interviews.

#### **11.6 Make a written report, upon review of the facts to be provided to the issue owner and a copy to the Ethics Committee**

Report should include the nature, scope and frequency of conduct, behaviour or incidents as well as recommendations and follow-up actions.

### **11.7 Determine what type of response to the complainant is appropriate**

Response should be made on behalf of and with approval of issue owner and endorsement from the Ethics Committee. Typically, response should consist of:

- 11.7.1 a verbal summary of the issues investigated
- 11.7.2 indication of how the matter will be dealt with and outcome of any investigations
- 11.7.3 Notification of reason(s) should it be decided that no action is to be taken
- 11.7.4 It should not include specific information on disciplinary action taken towards other employees.

Subject to legal and investigative constraints, the complainant will be given the opportunity to receive follow-up notification on his/her concern within 2 weeks of the complaint.

### **11.8 Provide a report to file and a soft copy to the Ethics Committee confirming that response has been made to complainant**

Report should include basic information such as date on which conversation occurred, whether complainant expressed an opinion about the outcome of the investigation, and any agreed-upon actions.

Investigator should retain final report of facts and recommendations in a confidential location, along with all supporting documentation.

### **11.9 Follow up to ensure that agreed-upon actions have been taken**

When following up with complainant after the investigation to ensure that appropriate actions have been taken.

## **12.0 Non-Retaliation Policy**

It is important to understand that retaliation can take many forms, including termination, demotion of positions, transfer of duties or location, changes in behavior toward an employee, a reduction of salary or hours, a failure to convert from temporary into permanent employment, disciplinary or financial penalties or discrimination.

Regardless of the form, The Company strongly and strictly prohibits retaliation against anyone who, in reasonable belief, raises a concern about a possible violation of applicable law, The Company's code or policy or who participates in any aspect of an investigation. Any act or threat of retaliation will itself be considered a serious violation of The Company's code of business ethics and conduct.

Any suspected observed retaliation should be immediately reported to the Ethics committee.

### **13.0 Maintenance of the Policy**

The Board, acting upon the recommendations of the Audit Committee, has the responsibility for ensuring the maintenance, regular review and updating of this policy. Revisions, amendments and alterations to this policy can only be implemented upon approval by the Board, with the recommendations of the Audit Committee and the changes must be communicated to the employees.