

# HG METAL MANUFACTURING LIMITED (the “Company”)

## Whistleblowing Policy

### 1. Policy Objective

1.1 HG Metal Manufacturing Limited (“the **Company**”) and its subsidiaries (collectively, “the **Group**”) are committed to conducting its business with integrity, transparency, and in full compliance with all applicable laws and regulations. This includes maintaining the highest standards of corporate governance. In support of our zero-tolerance approach to fraud, bribery, corruption, and other unethical or illegal conduct, this Whistleblowing Policy (“**Policy**”) is established to foster a culture of transparency, accountability, and ethical behavior throughout the organization.

### 2. Purpose and Scope

2.1 This Policy aims to:

- Provide a secure and confidential channel for employees, vendors, customers, and other stakeholders to report suspected misconduct or wrongdoing (“**Alleged Wrongful Act**”) without fear of retaliation when reported in good faith.
- Protect whistleblowers from retaliation, victimization, or any adverse consequences when concerns are raised responsibly.
- Ensure all reported concerns are thoroughly investigated and addressed, with corrective or disciplinary action taken where appropriate.

### 3. What Can Be Reported

3.1 The Policy is intended to address concerns related to wrongdoing or malpractice within the Group or involving the Group (“**Alleged Wrongful Act**”), including but not limited to:

- Fraud and Financial Misconduct – Theft, bribery, embezzlement, falsification of records, or misleading financial statements.
- Collusion with Outsiders – Involvement with third parties to gain improper benefits or engage in fraud.
- Legal and Regulatory Violations – Breaches of laws, regulations, or criminal acts such as coercion or blackmail.
- Policy and Governance Violations – Breaches of internal policies, abuse of authority, or failure of internal controls.
- Health, Safety, and Environmental Risks – Threats to workplace safety, health, or the environment.
- Workplace Misconduct – Harassment, bullying, discrimination, or unethical behavior.
- Improper Financial Practices – Inaccurate financial reporting or questionable accounting practices.
- Misappropriation of Assets – Theft or misuse of company property or funds.
- Violations of This Policy – Breaches of the Whistleblowing Policy itself.
- Concealment of Wrongdoing – Any attempt to hide or suppress the misconduct listed above.

*Note: Personal employment matters such as promotions, compensation, or interpersonal conflicts should be addressed through the Human Resources grievance process.*

## 4. Principles and Safeguards

### 4.1 Good Faith and False Reports

All whistleblower reports must be made in good faith, with an honest belief that the information provided is accurate and raises a genuine concern. Submissions that are knowingly false, misleading, frivolous, or made with malicious intent to harm others or for personal gain are strictly prohibited and may result in disciplinary action.

### 4.2 Confidentiality

All reports will be treated with strict confidentiality. Reasonable efforts will be made to protect the whistleblower's identity, and any personal data shared will be handled in compliance with the Personal Data Protection Act (**PDPA**) of Singapore. Disclosure of identity will only occur if legally required or necessary for a fair and thorough investigation.

### 4.3 Protection Against Retaliation

The Group strictly prohibits retaliation against individuals who raise concerns in good faith. Whistleblowers will not face adverse treatment, even if the concerns are ultimately unsubstantiated.

Examples of retaliation include (but are not limited to):

- Termination, demotion, or suspension
- Denial of promotion or benefits
- Negative performance evaluations without merit
- Retaliatory investigations or job reassignment
- Exclusion from training or development opportunities
- Threats, intimidation, or discrimination

Any individual found to have retaliated against a whistleblower will face disciplinary action, up to and including termination.

## 5. Reporting Channels

### 5.1 Internal Reporting

Reports can be submitted in writing or via email to the Chairman or members of the Audit & Risk Committee (**ARC**) of the Group:

- **Email:** [whistleblow@hgmetal.com](mailto:whistleblow@hgmetal.com)
- **Physical Mail:**  
*Mark the envelope "Private and Strictly Confidential" and address to:*

Chairman, Audit & Risk Committee  
28 Jalan Buroh  
Singapore 619484

## 5.2 Anonymous Reporting

While this Policy allows for anonymous reporting, individuals are encouraged to identify themselves when making a report, as it enables more effective follow-up and investigation. Anonymous reports will still be considered and investigated to the extent possible; however, the ability to pursue such reports may be limited. In evaluating anonymous disclosures, the Group will consider:

- The seriousness of the issue raised
- The credibility of the concern
- The likelihood of substantiating the allegation through other sources

## 6. Supporting Information

Whistleblowers are encouraged to provide clear and sufficient information to help the ARC understand the nature, context, and seriousness of the concern. While it is not necessary to provide conclusive proof, any supporting details—such as relevant facts, documents, dates, or observations—will help facilitate a more effective and informed investigation.

## 7. Responsibilities of the Whistleblower

Whistleblowers are expected to act with integrity and responsibility. Specifically, they should:

- Provide accurate and specific information to support their concern.
- Act in good faith, with genuine intent and no personal agenda.
- Cooperate with any investigation as needed.
- Maintain confidentiality during and after the process.
- Avoid false or malicious claims, which may lead to disciplinary action.
- Respect company rules and obligations, including confidentiality, professional conduct, and fiduciary responsibilities.

## 8. How Complaints Will Be Handled

### 8.1 Initial Assessment

All reports will be assessed to determine whether an investigation is necessary. Some matters may be resolved through informal clarification without formal investigation.

### 8.2 Investigation Process

If an investigation is warranted, it may be conducted either:

- Internally by the ARC, or
- Externally by a party appointed by the ARC.

A report outlining the concern, findings, and recommended actions will be submitted to the Board of Directors. Any follow-up actions will be tracked and documented.

### 8.3 Interaction with the Whistleblower

The level of engagement with the whistleblower will depend on the nature of the concern and clarity of the initial report. Additional information may be requested to support the investigation.

## 9. Outcome of Investigation

Once the investigation is complete, and subject to legal limitations, the whistleblower will be informed of the outcome. This may include:

- Confirmation that the concern has been addressed
- A summary of actions taken during the investigation
- Whether disciplinary measures (e.g., reprimand, suspension, termination) or risk mitigation steps will be taken
- If a possible criminal offense is identified, the Group will seek advice from external legal counsel on whether to refer the matter to the appropriate authorities.

## 10. Dissemination and Awareness

This Policy will be shared with all employees via the company intranet and onboarding materials for new hires. It will also be accessible to external stakeholders such as contractors and vendors through appropriate channels.

Awareness will be maintained through regular training, communications, and reminders. Any updates to the Policy will be communicated clearly and promptly to all relevant parties.

## 11. Policy Maintenance and Review

The Whistleblowing Policy will be reviewed periodically to ensure it remains relevant, effective, and compliant with legal and regulatory standards. Any updates will be approved by the ARC and communicated to all internal and external stakeholders as appropriate.