



Fintonia Group (Singapore) Pte. Ltd. (“the Company”)

WHISTLEBLOWING POLICY

Version 1.0

1. Whistleblowing Policy

At Fintonia Group (Singapore) Pte Ltd, we expect our employees to conduct themselves with a high standard of professionalism and ethics in the conduct of our business and professional activities.

As part of good corporate governance, the Company has established this whistle blowing policy that sets out avenues for legitimate concerns to be objectively investigated and addressed. Individuals will be able to raise concerns about illegal, unethical or questionable practices in confidence and without the risk of reprisal.

2. So, what is whistleblowing?

Whistleblowing is the voluntary disclosure of inappropriate, unethical or unlawful behaviour and practices by the management or employees. It includes how employees, customers and investors are treated. The following are generally accepted as improper and reportable conduct for whistleblowing, of which the list is not exhaustive:

- (a) Misconduct relating to financial reporting, accounting or other financial matters;
- (b) Corruption, misappropriation or blackmail;
- (c) Any criminal offence or failure to comply with a legal or regulatory obligation;
- (d) Significant breaches of the Company's policies or internal controls;
- (e) Endangerment of the health and safety of an individual; or
- (f) Concealment of any of the above.

3. Who should raise a concern?

Anyone has the right to whistle blow. This Policy applies to all matters involving the Company's employees (including former employees and irrespective of nature of employment status), customers and any other stakeholders/persons providing services to the Company, including consultants, vendors, independent contractors, external agencies and/or any other party with a business relationship with Company.

4. How to make a disclosure?

We take whistle blowing seriously and your concern matters to us, so we would like to hear from you if any of your disclosure is related to improper practices occurring within Company. Any disclosure can be made to any of the following dedicated reporting channels:

Email	whistleblow@fintonia.asia
Mail	80 Robinson Road #08-01 Singapore 068898

To facilitate an investigation into the alleged wrongdoing, where possible and applicable, the following information should be included when making a disclosure:

- (a) Brief description of the misconduct;
- (b) The date and location of the incidence;
- (c) The identity of the wrongdoer;
- (d) Particulars of witnesses, if any;
- (e) Supporting evidence and/or documents;
- (f) Other details deemed to be useful to facilitate screening and action to be carried out.

To ensure all whistleblowing incidents are genuine and to prevent abuse, whistleblowers are required to disclose his/her personal details to enable the relevant parties conducting the investigation to contact the Whistleblower for further information:

- (a) Name; and
- (b) Contact details - email address and/or telephone number.

5. How does the Company handle the information provided by you?

After receiving the report of any alleged wrongdoing, it will be independently investigated by an investigating committee led by our Managing Director, Fund Operations. Results of investigation will be report to the Fintonia Executive Committee (“FEXCO”).

If the outcome results in a proven case of wrongdoing/malpractice and confirms the allegations, disciplinary action shall be instituted against the related employees in accordance with the Company’s policy.

All records will be retained and kept strictly confidential by Lymon Pte Ltd, or any external compliance partner appointed by the Company, in accordance with the Company's Document Retention and Destruction Policy.

6. Whistleblower Protection

The Company commits to ensure that all disclosed information, including the identity of the whistleblower shall be treated with strict confidentiality. All personnel, directly or indirectly working relative to a whistleblowing case, shall strictly protect the identity of the whistleblower and witnesses from unauthorized disclosure before, during and after an investigation.

The Company is also committed to protect the whistleblower from all acts of harassment, retaliation, victimization and recrimination arising from making the disclosure in good faith.

There may be certain circumstances where the identity of the whistleblower may need to be revealed on a need-to-know basis (e.g., requirement to testify in court). If such a situation arises, the Company shall discuss and seek consent with the whistleblower first before proceeding with the case.

The protection will be removed if it is found that the whistleblower was also involved in the improper conduct, or if the whistleblower is found to have made the disclosures in bad faith.

7. Responsibility of Whistleblower

- (a) Whistleblower makes the disclosure in good faith.
- (b) Whistleblower reasonably believes that the information and allegations are substantially true.
- (c) Whistleblower is not acting for personal gain. If the case involves the complainant's personal interests, it must be informed at the outset.

8. Policy Review

The Policy shall be reviewed together with the review of the Compliance Manual, where the Policy may be modified, to maintain compliance with applicable laws and regulations or accommodate organisational changes. This review will be carried out by the Compliance function within Fund Operations, subject to the approval of the Board of Directors.