

1. Whistleblowing Policy

Fintonia Group Holdings Limited and its group of companies ("Fintonia Group") are committed to maintaining a high standard of integrity. We expect our employees and any other persons or organisations carrying out works for Fintonia Group to conduct themselves with a high standard of professionalism and ethics in the conduct of their businesses and professional activities.

As part of good corporate governance, Fintonia Group has established this whistle blowing policy ("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 of, and practices by, any officers and employees of Fintonia Group, or such behaviour of and such practices by any other persons or organisations carrying out works for Fintonia Group. It includes how employees, vendors, customers, investors and other stakeholders 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 Fintonia Group'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 Fintonia Group's employees (including former employees and irrespective of nature of employment status), customers and any other stakeholders/persons providing services to any entities within Fintonia Group, including consultants, vendors, independent contractors, external agencies and/or any other party with a business relationship with any entities within Fintonia Group.

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 Fintonia Group. 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 Fintonia Group 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 Director of Legal & Compliance. Results of investigation will be reported to the Fintonia Leadership Team ("FLT").

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 Fintonia Group's policy.

All records will be retained and kept strictly confidential by IQ-EQ, or any external compliance partner appointed by Fintonia Group, in accordance with Fintonia Group's Document Retention and Destruction Policy.

6. Whistleblower Protection

Fintonia Group 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.

Fintonia Group 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, Fintonia Group 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 regularly, and as a result of which the Policy may be revised and updated to maintain compliance with applicable laws and regulations or accommodate organisational changes. This review will be carried out by our Legal & Compliance Department of Fintonia Group, subject to the approval of the Board of Directors.

Updated as at 18th July 2025