

## **Policies and Procedures**

### **WHISTLE BLOWING POLICY**

Version : v3.0  
Date : 01/03/2020  
Prepared by : Amanda Wang, Executive Secretary  
Approved by : Victor Neo, CEO

## **1. Purpose of the Policy**

1.1 The Management of **REVEZ Corporation Ltd** is responsible for establishing the Whistle Blowing Policy procedures.

1.2 Whistle Blowing refers to the act of reporting misconduct within an organization. The policy provides a channel for internal and external parties to bring to the attention of the Board & Audit & Risk Committee without fear of reprisal, discrimination or adverse consequences, and also permits the Company to address such reports by taking appropriate action, including, but not limited to, disciplining or terminating the employment and/or services of those responsible.

## **2. Scope of Policy**

This Whistle Blowing Policy is intended to help surface concerns over any action or omission within the company relating to unlawful conduct, financial malpractice, violation of law, rule, regulation or policy, or a direct threat to the interest of the company. By way of illustration, some of the concerns will include but not be limited to:

- Criminal Offences {e.g Fraud, corruption or theft} which have been or likely to be committed
- Fraud, whether actual or suspected, or deliberate error in preparation, evaluation or review of financial statements, or in recording and maintenance of financial records
- Non-compliance with the company's internal controls and procedures
- Profiteering as a result of insider knowledge
- Accepting or giving bribes
- Intimidation, discrimination or harassment of staff and other persons during the course of work
- Misappropriation of funds
- Unauthorized Discounts
- Abuse of authority for Personal Gain
- Unauthorized disclosure of confidential information
- Conflict of interest in business dealings or involvement in prohibited activities.

## **3. Reporting of Complaints**

All directors, officers and employees of **REVEZ Corporation Ltd** and its subsidiaries and affiliates ("Staff") are required to report any Complaints promptly.

This process sets out the details of the complaint channels for Staff to report Complaints The complaint channels are being administered by an independent third party service provider, so that the Complaints can be reported in an anonymous (if so desired) and confidential manner.

### **3.1 Details on Complaints Channel**

Concerns should be raised in writing via letter or email by detailing the background, history of events, reasons for raising concern and any available form of evidence to support the reported incident. Such information or reports should be addressed to the attention of "Chairman of the Audit & Risk Committee, Group CEO or Human Resource Manager" depending on the severity of the matters, through the following addresses:

Chairman of the Audit & Risk Committee

Name: Ms Lim Choon Noi

E-mail: [limcn@revezcorp.com](mailto:limcn@revezcorp.com)

Group CEO

Name: Mr Victor Neo

Contact no: 62912691

E-mail: [w.blower@revezcorp.com](mailto:w.blower@revezcorp.com)

Human Resource Manager

Name: Ms Amanda Wang

Contact no: 62912691

E-mail: [hr@revez-motion.com](mailto:hr@revez-motion.com)

### **3.2 Company Response to the Concerns**

3.2.1. The company assures that any concern raised or information provided will be investigated, but consideration will be given according to its seriousness, credibility and likelihood of confirming with attributable sources.

3.2.2. Upon receipt of the information provided, the Chairman of the Audit Committee or another person authorized by the Board would appoint the Investigating Officer(s) from one or more of the following persons:

- Audit Committee members
- External Auditor
- Internal Auditor
- External Forensic Accountant

### **3.3 Investigating Procedure**

The investigating officer(s) will follow these steps:

- Full details of the concern raised and all necessary clarifications should be obtained.
- Assess the best course of action to be taken. This may involve a more extensive internal inquiry or a more formal investigation.
- Where the concern raised involves a reportable offence, a report must be lodged with the authorities, after consultation with both Chairmen of the Board & the Audit Committee.
- if either Chairman is the subject of the complaint or investigation, the other Chairman shall appoint a Board Member to assist in place of the excluded Chairman.
- The findings and recommendations of the Investigating Officer(s) will be detailed in a written report addressed to the Chairman of the Audit Committee.
- The Chairman of the Audit Committee, in consultation with the Chairman of the Board, will decide on what further action(s) to be taken.
- The whistle blower will be kept informed of the progress of the investigation and where appropriate, the final outcome, subject to any legal or confidentiality constraint.

#### **4. Confidentiality**

**REVEZ Corporation Ltd** is fully committed to maintaining procedures for the anonymous and confidential reporting of Complaints by Staff. All reports of Complaints will be treated on a confidential basis. Generally, a report of a Complaint will only be disclosed to those persons who have a need to know in order to properly carry out an investigation of such Complaint in accordance with the procedures referred to in Section 7 and below.

#### **5. Prohibition on Retaliation**

There will be no retaliation or other action taken against any Staff or anyone, who, in good faith, reports a Complaint. Anyone engaging in retaliatory conduct will be subject to disciplinary action by **REVEZ Corporation Ltd**, which may include termination.

More specifically, neither **REVEZ Corporation Ltd** nor any person acting on behalf of **REVEZ Corporation Ltd** or in a position of authority in respect of the Staff will take any disciplinary measure against, demote, terminate or otherwise adversely affect the employment of a Staff or threaten to do so with the intent to compel a Staff to abstain from reporting a Complaint to a law enforcement and/or regulatory authority.

However, the company does not condone frivolous, mischievous or malicious allegations. Employees making such allegations will face disciplinary action in accordance with the company's Disciplinary Procedures. The company will not tolerate abusing this Policy for personal gains on the part of any employee.

#### **6. Publicizing the Process for Reporting Complaints**

The process sets out the procedures **REVEZ Corporation Ltd** will follow to make known to Staff the reporting process for Complaints and to communicate reminders of the process to Staff.

6.1 The process for reporting Complaints on an anonymous and confidential basis will be made known to the staff. This is accomplished by means of saving a copy of the details of the complaint channels in Revez Station Shared Drive where Staff has access. This information will make it clear that no Staff will be penalized for making a good-faith report of a Complaint, nor will tolerate retaliation against a Staff who makes a good-faith report of a Complaint.

6.2 Communicating Reminders of the Process

**REVEZ Corporation Ltd** will also periodically (at least annually) communicate reminders to Staff of the process for reporting Complaints. This may be accomplished by electronic or other means, including, for example: email or written memos.

#### **7. Investigation of Complaints and Reporting Results**

This procedure sets out the timing and procedures **REVEZ Corporation Ltd** will follow regarding the manner of investigating Complaints, monitoring the status of investigations of Complaints and reporting to the Audit Committee.

##### **7.1 Manner of Investigation**

7.1.1 The Audit & Risk Committee will review and assess the seriousness of all Complaints promptly and determine, in consultation with others, if necessary, the manner in which Complaints will be investigated. If upon initial assessment of the Complaint it appears that the Complaint could materially affect the financial statements of **REVEZ Corporation Ltd** or the integrity of **REVEZ Corporation Ltd's** system of internal controls, the Chairman of the Audit Committee shall inform the Board Chairman immediately.

- 7.1.2 The Audit & Risk Committee may appoint an external party to conduct the investigation of the Complaint(s) and the appointee will:
- (i) treat each report of a Complaint, as well as its investigation and disposition on a confidential basis in accordance with the Policy;
  - (ii) if so desired by the person reporting the Complaint, take all reasonable steps to ensure that such person's anonymity is maintained;
  - (iii) will involve in each investigation only those persons who need to be involved in order to carry out such investigation properly; and
  - (iv) conduct each investigation in a timely manner.

## **7.2 Monitoring the Status of the Investigation**

- 7.1 The investigation of all Complaints will be monitored by the Audit & Risk Committee and the results will be reported to the Board.
- 7.2 Depending on the nature of a Complaint and its materiality as determined in the first instance by the Audit & Risk Committee, and in particular, with respect to any Complaint or Complaints that could materially affect the financial statements of **REVEZ Corporation Ltd** or the integrity of **REVEZ Corporation Ltd's** system of internal controls, the Audit & Risk Committee will keep the Chairman of the Audit Committee, the Chief Executive Officer and the Chief Financial Officer (except to the extent any such persons are allegedly implicated in the Complaint) apprised of the status of the investigation for purposes of ensuring compliance with regulatory requirements, including the timely and continuous disclosure obligations of **REVEZ Corporation Ltd** and the certification obligations of the Chief Executive Officer and Chief Financial Officer of **REVEZ Corporation Ltd**.

## **8. Retention of Complaints Received and Investigations Conducted**

This procedure sets out the procedures **REVEZ Corporation Ltd** will follow regarding the retention of Complaints received, including the type of documentation to be retained in respect of each Complaint and its investigation and the timing and procedures for retaining such documentation.

### **8.1 Documentation Requirements**

All Complaints will be fully documented in writing by the person(s) assigned to investigate the Complaint. Such documentation will be marked as "Privileged and Confidential" and will include:

- (a) the original report of the Complaint;
- (b) the unique reference number assigned to the Complaint;
- (c) a summary/log of the investigation;
- (d) copies of any reports issued in connection with the Complaint;
- (e) a log of any communications with the Complainant; and
- (f) a summary of the disposition of the Complaint.

### **8.2 Retention Requirements**

Such documentation will be maintained in accordance with the requirements of prevailing laws and regulations. Such documentation will be available for inspection by members of the Audit Committee, the external auditors and any external legal counsel or other advisors hired in connection with the Complaints. Disclosure of such documentation to any other person, and in particular any third party, will require the prior approval of the Audit Committee to ensure that privilege of such documentation is properly maintained.

**9. Policy Review**

This policy and its effectiveness will be reviewed by the Audit Committee at least annually, with recommendations regarding updates or amendments, if any, being made to the Board as required. Amendments, if any, to the Policy will be made known in accordance with Schedule D hereto.

**10. Enquiries**

Any questions with respect to the general application of this Policy should be made to the CEO office, **REVEZ Corporation Ltd.**