Issue No: 1

TITLE : ACPL/CORPORATE AFFAIRS/02

WHISTLEBLOWING POLICY

To establish the policies and procedures of whistle blowing.

Approved by: ______________________________
Chief Executive Officer

Date of issue: 22 July 2026

1. OVERVIEW

1.1 ACPL is committed to upholding high standards of corporate governance, integrity, transparency, and accountability in all its business activities. ACPL recognizes the importance of protecting its operations, employees, stakeholders, and assets against fraud, corruption, unethical conduct, and other forms of wrongdoing.

2. PURPOSE

The objectives of this policy are to:

(a) Provide a clear and trusted channel for reporting alleged or suspected fraud, corruption, or other wrongdoings.

(b) Establish a transparent reporting structure and process for the submission, assessment, and investigation of reports.

(c) Assure whistleblowers that reports made in good faith will be treated confidentially and that they will be protected against harassment, retaliation, victimization, or recrimination.

3. REFERENCE

Nil.

4. SCOPE

4.1 This policy applies to all ACPL employees, directors, officers, contract staff, and external parties, including vendors, contractors, consultants, business partners, and other stakeholders.

4.2 Whistleblowers may raise concerns or make reports on suspected incidents of fraud, corruption, or other wrongdoings, including but not limited to the following:

(a) Fraud

(i) Deliberate errors or irregularities in the preparation, evaluation, review, or audit of financial accounts and records

(ii) Misrepresentation or false statements relating to procurement, tendering, contracting, billing, claims, or other financial matters
(iii) Theft, forgery, or unauthorised alteration of documents, cheques, or records
(iv) Misappropriation or misuse of company funds, assets, or property
(v) Making unsubstantiated or fraudulent claims for allowances, reimbursements, or benefits
(vi) Unauthorised access to or misuse of confidential, proprietary, or personal data
(vii) Wrongful disclosure of privileged or confidential information.

(b) Corruption

(i) Bribery, kickbacks, or inducements
(ii) Engaging in business transactions involving undisclosed or unmanaged conflicts of interest
(iii) Extortion, including obtaining benefits through intimidation, coercion, or abuse of authority.

(c) Other Wrongdoings

(i) Deliberate circumvention of established internal controls, policies, or procedures
(ii) Money laundering or facilitation of illegal financial activities
(iii) Serious misconduct, unethical behaviour, or actions that may cause reputational, financial, or legal harm to ACPL
(iv) Conduct that endangers the health and safety of individuals or the environment.

5. PROCEDURES

5.1 Whistleblowers may report any concerns or disclosures relating to improper conduct by emailing to whistleblow@acpl.com.sg using the A96 Whistleblowing Report Form.

5.2 All reports must be made in writing via email using the report form provided and should include sufficient details to allow for proper assessment and investigation.

5.4 All reports are managed by ACPL Whistleblowing Committee, which comprises of members of Senior Management and designated officers.

5.5 Where available, the following information should be provided, if not requested:

(a) A detailed description of the alleged fraud, corruption, or wrongdoing
(b) Date(s), time(s), location(s), and manner in which the alleged incident occurred
(c) Identity and role of the person(s) involved
(d) Names and particulars of any witnesses
(e) Supporting evidence and/or relevant documents
(f) Name and contact details of the whistleblower
(g) Any other information that may assist in the review or investigation.

5.6. All reports and disclosures must be made in good faith, based on reasonable grounds and without malice.

5.7 Any whistleblower found to have provided false or misleading information with malicious intent may be subject to disciplinary action and/or legal proceedings.

5.8 Upon receipt of a report, ACPL Whistleblowing Committee will conduct an initial assessment to determine its credibility and seriousness. Where appropriate, investigations will be carried out in a fair, objective, and timely manner.

5.9 Appropriate corrective, disciplinary, or legal action will be taken where wrongdoing is substantiated.

5.10 Investigation outcomes and follow-up actions will be reported to the Audit Committee.

6. CONFIDENTIALITY

6.1 ACPL does not tolerate any form of harassment, retaliation, victimisation, discrimination, or other adverse treatment within the workplace against any individual who, in good faith, reports a concern or participates in an investigation. Where such conduct is identified, ACPL will take appropriate remedial and/or disciplinary action, where necessary, in accordance with the Company's policies and procedures.

6.2 All information disclosed, including the identity of the whistleblower, will be treated as confidential and will only be disclosed on a need-to-know basis or where required by law, court order, or regulatory authority.

7. POLICY REVIEW

7.1 This Policy will be reviewed periodically to ensure its continued relevance, effectiveness, and compliance with applicable laws and regulatory requirements.

8. QUALITY RECORDS

The following records shall be generated and maintained in relation to this Whistleblowing Policy:

(a) Whistleblowing reports or disclosures received through designated reporting channels
(b) Case registration records / whistleblowing log (including reference number, date received, and status)
(c) Investigation files, including supporting documents, evidence, and interview records
(d) Assessment, findings, and closure reports
(e) Records of actions taken, including corrective and preventive actions (if applicable)
(f) Management review records relating to whistleblowing cases

All records shall be treated as strictly confidential and handled in accordance with the Personal Data Protection Act (PDPA) and applicable internal data protection policies. Access shall be restricted to authorised personnel only.

Records shall be securely stored and retained for a defined period in accordance with the organisation's records retention policy and any applicable statutory or regulatory requirements in Singapore.

References to specific job titles or positions in this policy are for ease of reference only. In the event of any change to job titles or organisational structure, the responsibilities, authority, and approvals described in this policy shall be deemed to apply to the corresponding or successor role performing those functions.