



Pacific Radiance Limited

Whistleblowing Policy

Pacific Radiance Limited (the “Company”, and together with its subsidiaries, collectively the “Group”) does not tolerate any malpractice, impropriety, statutory non-compliance or wrongdoing by its employees in the course of their work.

Purpose and General Guidelines

The Policy aims to create a work environment where employees (“Employees”), and vendors, service providers, customers and other stakeholders (“External Parties”) are able to raise any concerns or complaint regarding questionable accounting or auditing matters, internal controls, disclosure matters, conflict of interest, insider trading, collusion with competitors, serious breaches of Group policy, unsafe work practices or any other matters involving fraud, corruption and employee misconduct.

This Policy allows for reporting by Employees or External Parties of such matters without fear of reprisal, discrimination or adverse consequences, and also permits the Group to address such reports by taking appropriate action, including, but not limited to, disciplining or terminating the employment and/or services of those responsible.

The Policy serves to protect genuine whistleblowers from any unfair treatment as a result of their report. Anonymous and frivolous complaints will be disregarded. The Policy is not intended for handling personal grievances that should be taken up directly with Division or Department heads.

Reporting Mechanism and Handling of Complaints

Concerns must be raised in writing as it is essential for the Group to have all critical information in order to effectively evaluate and investigate a complaint. The report should provide as much detail and be specific, including details of the parties involved, dates or period of time, the nature of concern, evidence substantiating the complaint, and contact details of the whistleblower. The contact detail of the Receiving Officer are as follows:

Email whistleblowing@pacificradiance.com

The whistleblower email is for reporting irregularities such as:

- Fraud, bribery, or corruption;
- Insider trading, or market manipulation;
- Misappropriation of funds, assets, classified documents, or material non-public information;
- Intentional error in the preparation, review or audit of any financial statement of the Group, falsification of or alteration to documents or accounts;
- Failure to comply with laws and regulations applicable to the Group and related to accounting, internal accounting controls or auditing matters;
- Criminal and dishonest acts, including theft, forgery, money laundering, violence or threatened violence, or criminal damage against property – detrimental actions taken in reprisal against a whistleblower;
- Unlawful or unethical conduct that is in breach of any policies of the Group;
- Danger of destruction to or unsafe practices in the work environment;
- Abuse and misrepresentation of power and authority;
- Discrimination on the basis of gender, race, or disabilities;
- Harassment; and
- Suppression or concealment of any information relating to any of the above actions.

The Group requires Employees and External Parties to put their names to their allegations. Concerns or irregularities expressed anonymously are difficult to act upon effectively but they will be considered, taking into account the seriousness and credibility of the issues raised, and the likelihood of confirming the allegation from attributable sources and information provided. All concerns or irregularities raised will be treated with confidence and every effort will be made to ensure that confidentiality is maintained throughout the investigation process.

Complaints raised to other parties within the Group will be directed to the Receiving Officer, who is responsible for maintaining a centralized repository of all reported cases and ensuring that issues raised are properly resolved. All matters reported will be reviewed within a reasonable timeframe, and after due consideration and inquiry, a decision will be taken on whether to proceed with a detailed investigation. Where necessary, guidance/direction may be sought from the Executive Chairman, Chief Executive Officer (“CEO”), Chief Financial Officer (“CFO”) and/or other appropriate parties.

The Receiving Officer reviews and submits whistleblowing complaints alleging irregularities, fraud and breaches of corporate governance to the Executive Chairman, CEO and CFO. Feedback on operational matters are forwarded to the respective division/ department heads for their follow-up. Where the complaints relate to a senior executive and/or the CEO, the Receiving Officer will escalate these to the Audit Committee, which will then decide whether to report the matter to the Board.

Safeguards

The Group prohibits discrimination, retaliation or harassment of any kind against a whistleblower who submits a complaint in good faith. If a whistleblower believes that he/she is being subjected to discrimination, retaliation or harassment for having made a report under this Policy, he/she should immediately report those facts to the Executive Chairman, CEO and/or CFO. Reporting should be done promptly to facilitate investigation and the taking of appropriate action.

Where appropriate, the whistleblower may need to come forward as a witness. If an Employee or External party makes an allegation in good faith but it is not confirmed by the investigation, no action will be taken against him/her. However, the Group will not hesitate to take disciplinary action including but not limited to immediate dismissal against those who intentionally or maliciously give false or misleading information against someone else.

Review of Policy

The Audit Committee will review and modify this Policy, as appropriate, to maintain compliance with applicable laws and regulations or accommodate organisational changes within the Group.

Publication of Policy

This policy is available on the Company's corporate website at www.pacificradiancance.com.