

## **WHISTLEBLOWING POLICY OF TREASURE GLOBAL Inc.**

### **1. OBJECTIVE**

The Board of Directors (“Board”) of Treasure Global Inc. (“the Company”) is committed to achieving and maintaining the highest standard of work ethics in the conduct of business in line with the code of conduct and ethic and good corporate governance practices, the Company and its subsidiaries (“the Group”) encourage its employees to report suspected and/or known misconduct, wrongdoings, corruption and instances of fraud, waste and/or abuse involving the resources of the Group.

This policy is to provide an avenue for all employees of the Group and members of the public to disclose any Improper Conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and members of the public who report such allegations.

The policy is designed to support to the following:-

- i. Be committed to the Company’s business ethics of Honesty, Integrity and Transparency;
- ii. To provide a transparent and confidential process for all parties to given information on non-compliances to the Code of Conduct or any misconduct regardless of his or her positions, to an independent party to investigate the allegations and take the appropriate action; and
- iii. To uphold the moral duty being a Company by protecting the interest of all its stakeholders

### **2. DEFINITION OF REPORTED MISCONDUCT**

2.1 An Improper Conduct is any act or omission, which if proven, will constitute an act of misconduct pursuant to the Group’s code of conduct and/or a criminal offence under the relevant law in force and may be divided into the following categories:-

- i. Illegal and/or unlawful; or
- ii. in breach of any provisions as stipulated in the Company’s Code of Conduct, policies and/or procedures; or
- iii. against the best interest of the Company or the Group and may cause monetary loss, degrade and/or damages reputation of the Group.

The above list is not exhaustive and includes any act or omission which if proven.

2.2 Please note that any grievance of a personal nature or that is related to your employment should be raised through Human Resources (HR) channel and not through this Whistleblowing Policy or the Whistleblowing Form.

2.3 The differentiation between grievance and whistleblowing as detailed out in the Appendix A of this Policy.

### 3. **CONFIDENTIALITY AND ANONYMITY**

3.1 All whistleblowing reports are treated as confidential and/or anonymous and not to reveal the blower's identity if so wish. However, such consultation will not take place in the event the disclosure of identity is required by law. The whistleblower is to be given an assurance that his/her identity will be only known by a few top managements on a need-to-know basis and the outcome of the investigation will be fed back to the whistleblower. This is to encourage and give confidence to the whistleblower that the complaint will be investigated.

3.2 All whistleblowing reports have to be made in good faith with reasonable belief that the information and allegation is true and frivolously/maliciously and not for personal gain, otherwise disciplinary action may be taken against an employee whistleblower.

### 4. **PROTECTION TO WHISTLEBLOWER**

4.1 This policy provides assurance that the whistle-blower, if an employee of the Company, shall be protected against reprisals or retaliation, and immunity from disciplinary action from the whistle-blower's immediate supervisor or department/division head or any other person exercising power or authority over the whistleblower in his/her employment, provided that:

- i. only genuine concerns are reported, and the report is made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the whistle-blower does not provide false or misleading information knowingly, negligently or recklessly in the report;
- ii. the disclosure is not made with malicious intent or ill will;
- iii. the disclosure is not frivolous or vexatious; and
- iv. the report is not made for personal gain or agenda.

4.2 We trust that every whistle-blower must conduct themselves with high integrity and responsibility. To establish a sound relationship of trust, individuals who make disclosures are encouraged to identify themselves and their contact (phone number/email). This is especially so when more detailed information is required. Whenever necessary, the whistle-blower may be required to stand as a witness for the Company for the appropriate disciplinary action to be effective.

4.3 All information received will be treated with strictest confidentiality.

### 5. **PROCEDURES**

5.1 Any disclosure of Improper Conduct that concerns the Group must be made to any of the relevant Designated Persons through the communication channels as set out in the Group's whistleblowing channels listed as below:

- i. Disclosure can be made in writing, orally or via electronic mail ("email") to: [whistlesafe@treasuregroup.co](mailto:whistlesafe@treasuregroup.co); and
- ii. A disclosure shall be completed and submit the Form as attached in Appendix B to the abovementioned email address in accordance to Clause 5.2 below.

- 5.2 Whistleblowers are advised to make their disclosure in writing and to provide sufficient detail which includes the following:-
- i. The type or description of Improper Conduct;
  - ii. The name of individuals who have committed or are involved in the Improper Conduct;
  - iii. Full details of the concern raised, including the “what”, “when” and “where” in relation to the Improper Conduct; and
  - iv. The relevant supporting documents or evidence, if any.

Should you wish to do so, you may use the Form as attached in Appendix B hereto.

5.3 Whistleblowers are encouraged to provide their full name and contact details to facilitate the Group to clarify or obtain further information for the purpose of further investigation into Improper Conduct.

5.4 Any person who elects to remain anonymous is advised that the Group’s ability to investigate the alleged Improper Conduct is limited to the extent of the contents of the report received by the Group. Where insufficient information is provided, the Group reserves the right not to investigate the alleged Improper Conduct that is raised anonymously, due to the inability to seek clarification to ascertain relevant facts for investigation purposes.

**6. REVOCATION OF PROTECTION AND CONFIDENTIALITY**

6.1 The protection and confidentiality accorded to the Whistleblower can be revoked under these circumstances:

- i. the Whistleblower participated in the Wrongdoing; or
- ii. the Whistleblower willfully made in his disclosure of Wrongdoing a material statement which he knew or believed to be false or did not believe to be true; or
- iii. the disclosure is made with malicious intent; or
- iv. the disclosure is frivolous and vexatious; or
- v. the disclosure is to avoid dismissal or other disciplinary action; or
- vi. the information disclosed to other party before or after disclosing through the whistleblowing channel provided under this Policy; or
- vii. the Whistleblower in the course of making the disclosure or providing further information commits an offence under any laws or regulatory obligations.

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**APPENDIX A**

(to be taken, read and construed as an essential party of this Policy)

**Differentiation between the Grievance and Whistleblowing**

Grievance	Whistleblowing
<p>Any factor involving wages, hours or conditions of employment that is used as the complaint against the employer.</p> <p>Type of Grievance</p> <ul style="list-style-type: none"><li>- employee compensation and benefit</li><li>- workload and its distribution</li><li>- workplace personnel policy and environment</li></ul>	<p>The disclosure by a person, usually an employee in an organization to the public or to those in authority of mismanagement, corruption, illegality or some other wrongdoing.</p> <p>Type of Whistleblowing</p> <ul style="list-style-type: none"><li>- general wrongdoing as listed in the Employee or business Code of Conduct</li><li>- specific fraud and bribery</li></ul>

## APPENDIX B

You should raise any genuine concerns about any improper conduct or wrongful act (“Improper Conduct”) involving the Group. Concerns about your personal position or your employment, should be raised through Human Resources (HR) channel, and not through this Whistleblowing Form.

Your relationship with the Group	Please tick all applicable <input type="checkbox"/> Customer/Supplier/Vendor and Others <input type="checkbox"/> Employee
Your contact detail	Full Name:
	Address:
	Phone Number:
	Email Address:
Description of Improper Conduct	
Where did the Improper Conduct Occur?	
When did the Improper Conduct Occur?	
Name and Position of the Person(s) involved	
Details of Witness	
Did you report the Improper Conduct to any Authority? If Yes	
Any additional Information	