



RH Petrogas Limited

Whistleblowing Policy

Date: 1 December 2025

Table of Contents

Commitment to protect whistleblowers	3
Objectives of Whistleblowing Policy.....	4
Definitions of key terms	5
Roles and responsibilities.....	7
Employees	7
Whistleblower Protection Officer (“WPO”).....	7
Investigator	8
Confidentiality	9
The reporting system	11
Conduct of investigation.....	12
Preliminary Assessment of Allegations	12
Full Investigation of Allegations	12
Natural Justice and Procedural Fairness.....	13
Communication with the Whistleblower.....	14
Investigator’s Final Report	15
Professional investigation management.....	17
Managing the welfare of the whistleblower	18
Commitment to Protecting Whistleblowers	18
Occurrence of Detrimental Action	18
Keeping the Whistleblower Informed	18
Whistleblowers implicated in improper conduct.....	19
Management of Alleged Person	20
Communication of policy	21

Commitment to protect whistleblowers

RH Petrogas Limited (“RHP”) is firmly committed to fostering a culture of integrity, transparency, and accountability. We actively encourage the reporting of any suspected improper conduct within the company and are dedicated to safeguarding employees who, in good faith, come forward with such information.

RHP recognises the critical role whistleblowers play in upholding ethical standards and sound governance. We empower our employees to report concerns without fear, and we will not tolerate any form of misconduct by our personnel - nor any act of reprisal or discrimination against those who raise concerns.

All reports of improper conduct will be subject to fair, impartial, and thorough investigation. RHP will take all reasonable measures to protect the identity of whistleblowers and ensure their confidentiality throughout the process. In cases where detrimental action is taken against a whistleblower, the company will provide appropriate relief to address the harm caused.

While employees are strongly encouraged to report genuine concerns, misuse of the whistleblowing channel - such as malicious or false reporting - will be treated as a serious violation of this policy and may result in disciplinary action.

RHP remains steadfast in its commitment to ethical conduct and the protection of those who help uphold it.

Dato' Sri Dr Tiong Ik King

Chairman of the Board

Objectives of Whistleblowing Policy

This policy provides guidance on the administration of RHP's Whistleblowing Policy, an official channel for a whistleblower to report suspicion of improper conduct on a confidential and anonymous basis.

The main objectives of the Whistleblowing Policy are:

- Support RHP values of integrity, transparency and accountability;
- Enable employees to report suspicion of improper conduct;
- Protect the identity of whistleblowers;
- Protect whistleblowers against reprisal action; and
- Facilitate timely, fair and measured evaluation of all reports of improper conduct.

The reporting procedures are designed to allow employees to report suspicion of improper conduct on a confidential or anonymous basis.

Employees can continue to use the existing communication channels at any time to raise appropriate matters with their supervisor. The supervisor shall promptly report the allegation in accordance with this Whistleblowing Policy.

The management should first assess the facts and circumstances, including the nature of the grievance. If the matter relates solely to routine HR performance related issues and does not involve improper conduct, for example corruption, fraud, or breach of applicable law, company policy or RHP standard, it need not be reported through the whistleblowing platform. If the grievance relates to allegations of acts of reprisal against a whistleblower, the matter ought to be reported through the whistleblowing platform. If there is any uncertainty, the supervisor should consult the Whistleblower Protection Officer (WPO) or the Audit Committee (AC) for clarification.

The Audit Committee is committed to review this policy regularly to ensure the policy remains relevant and effective.

Definitions of key terms

Corruption

Any dishonest act committed by a director, executive, manager, employee, or agent of RHP that violates the company's interests. This includes the abuse of a position of trust to secure personal gain or advantage for oneself or for another individual or entity.

Fraud

Intentional deception or wilful misrepresentation resulting in actual or potential financial loss to any person or entity. Fraud may include, but is not limited to:

- Theft of company funds or property by employees or third parties
- Falsification, concealment, or destruction of documents for business purposes
- Use or intended use of falsified documentation for business purposes
- Misuse of confidential information or abuse of position for personal benefit

Investigation

A formal process of gathering evidence to determine whether a person - either an individual or a corporate entity - has engaged in conduct that breaches applicable laws, company policies, or RHP's standards.

Reprisal

Any adverse action taken against a whistleblower in retaliation for reporting improper conduct. Reprisal may include:

- Physical or psychological harm, financial loss, or property damage
- Intimidation, threats, or harassment
- Disciplinary measures, discrimination, or any form of disadvantage affecting employment, career progression, professional standing, or business interests

Improper Conduct

Any behaviour by individuals associated with RHP that, in the reasonable and good-faith view of a whistleblower, constitutes:

- Dishonesty
- Fraudulence
- Bribery and corruption
- Criminal acts (e.g. theft, violence, threats, or property damage)
- Breaches of local legislation
- Ethical violations (including breaches of RHP's Code of Ethics or internal policies)
- Acts of reprisal against whistleblowers

Whistleblower

Any director, manager, or employee of RHP who reports suspected improper conduct - either anonymously or openly - and seeks protection against retaliation. RHP will respect and uphold the confidentiality and anonymity of whistleblowers, in accordance with this policy.

Roles and responsibilities

Employees

All employees are strongly encouraged to report any known or suspected instances of improper conduct in accordance with this policy.

Employees play a critical role in supporting colleagues who have made a report of improper conduct in good faith.

Employees must safeguard the confidentiality of the whistleblower and refrain from disclosing their identity or any related information. Disclosing whistleblower's identity or any form of victimisation, retaliation, or harassment - whether actual or perceived - toward a whistleblower is in serious breach of this policy and appropriate disciplinary actions will be taken.

Employees who disclose information of improper conduct or report of improper conduct to individuals not directly involved in the administration of this policy or the investigation process is a serious breach of this policy and appropriate disciplinary actions will be taken.

As whistleblower reports, including the identity of parties involved and details of information in the report, are confidential, any disclosure to individuals not directly involved in the administration of this policy or the investigation process is a serious breach of this policy. Employees found to have made any unauthorised disclosure will be in breach of this policy and will be subjected to appropriate disciplinary action.

Employees who intentionally submit false or malicious reports of improper conduct are in serious breach of this policy and appropriate disciplinary actions will be taken.

Whistleblower Protection Officer (“WPO”)

The WPO holds overall responsibility for the administration and enforcement of this policy. The WPO reports directly to the Chairman of the Audit Committee, who maintains oversight of the Whistleblowing Policy.

The WPO is specifically accountable for implementing this policy and ensuring that whistleblowers are protected from any form of reprisal or detrimental action.

Key Responsibilities of the WPO:

- Liaise with the external service provider managing the WhistleblowAI platform to receive and manage reports of improper conduct related to RHP.
- Upon receiving reports of improper conduct – whether directly from the complainant or indirectly via Division Heads, Department Heads, or Supervisors - the WPO must promptly record the information on the WhistleblowAI platform.
- Take all necessary measures to safeguard the identities of both the whistleblower and the individual alleged to have engaged in improper conduct (“Alleged Person”).
- Coordinate the appointment of an Investigator and draft the terms of reference for either a preliminary assessment or a full investigation. The Audit Committee will approve both the appointment and the terms of reference.
- Facilitate the execution of remedial actions arising from the investigation process. The Audit Committee will approve all remedial actions.
- Provide regular and timely updates to the whistleblower regarding the progress and outcomes of the investigation process, unless the WPO determines that confidentiality must be maintained to preserve the integrity of the investigation, or the whistleblower’s identity is unknown.
- Maintain ongoing communication with the Chairman of the Audit Committee, providing updates on received reports and the status of investigations and outcomes.

The Head of Human Resources shall serve as the WPO. In the event that the Head of Human Resources is implicated in a report of improper conduct, the Audit Committee will appoint an alternative individual to assume the role of WPO.

Investigator

An Investigator will be appointed to conduct a preliminary assessment and/or full investigation into any reported improper conduct. The Investigator’s primary responsibility is to collect evidence on the reported improper conduct and determine whether sufficient evidence exists to substantiate or refute the allegations raised.

To ensure impartiality, the Investigator must be a different individual from the WPO and must not be implicated in the report of improper conduct.

The appointment of the Investigator will be approved by the Audit Committee, based on the following considerations:

- The nature and sensitivity of the report (e.g. confidentiality, seriousness, or complexity)
- The technical expertise and investigative skills required for the case

The Investigator can be the Head of Internal Audit or an external consultant or professional, or any individual specifically identified by the AC specifically for the purpose of conducting the investigation.

Confidentiality

RHP is committed to taking all reasonable measures to protect the identity of whistleblowers. Preserving confidentiality is essential to mitigating the risk of reprisal or adverse actions against individuals who report suspected improper conduct in good faith.

Any specific request by a whistleblower to remain anonymous or to keep their identity confidential will be strictly respected and upheld.

Individuals involved in administering the Whistleblowing Policy or conducting investigations must not disclose any information related to the report or the whistleblower's identity, except under the following circumstances:

- The whistleblower has provided written consent for disclosure
- Disclosure is necessary for obtaining legal advice
- Disclosure is required under this policy (e.g. for appointing an investigator, reporting to authorities, or recommending remedial actions)
- Disclosure is mandated by law

Any information that could reasonably lead to the identification of the whistleblower must not be revealed unless legally required or explicitly authorised in writing by the whistleblower.

To ensure the confidentiality of whistleblower-related information, RHP will implement the following safeguards:

- Store all physical and electronic files in secure locations accessible only to the Whistleblower Protection Officer (WPO) and the appointed Investigator
- Label all printed materials clearly as “Whistleblowing Protected Document” with a confidentiality notice
- Maintain electronic files on password-protected systems, with additional file-level encryption recommended
- Use a secure filing system for all investigation-related documents and materials

The reporting system

While employees are encouraged to raise concerns through existing communication channels - such as direct engagement with their supervisors - RHP also encourages the reporting of suspected improper conduct through the secure avenue, WhistleblowAI platform, in accordance with this policy.

Employees may submit reports confidentially and anonymously via the WhistleblowAI platform at:

<https://prd.whistleblowai.airts.sg/rhpetrogas/whistleblow>

The WhistleblowAI platform is designed to protect the identity of whistleblowers. Disclosure of a whistleblower's identity will occur only under the following circumstances:

- The whistleblower has provided written consent for disclosure
- Disclosure is required by law

All reports submitted through the WhistleblowAI platform will be forwarded to the Chairman of the Audit Committee within five (5) working days of lodgment.

In cases where the WPO is implicated in the report, the WhistleblowAI platform will notify the Chairman of the Audit Committee directly to ensure impartial handling of the matter.

Conduct of investigation

Preliminary Assessment of Allegations

Upon receipt of a whistleblower report, a preliminary assessment will be conducted as an initial, high-level evaluation of the allegation. This assessment is typically discreet and based on readily available documentation and, where appropriate, limited interviews. While such a preliminary assessment should not take more than 2 working weeks, the Chairman of the Audit Committee may allow for more time.

The purpose of the preliminary assessment is to:

- Determine whether the allegation is supported by credible and bona fide evidence
- Assess whether a formal investigation is warranted
- If an investigation is required, recommend the appointment of an Investigator and define the scope of the investigation
- If an investigation is not required - particularly in straightforward cases - recommend appropriate remedial actions

In cases where the allegation is deemed serious in nature, a full investigation should be initiated immediately without delay.

Full Investigation of Allegations

Investigation Objectives

The purpose of a full investigation is to ensure a thorough, fair, and impartial examination of the allegations raised. The key objectives are to:

- Promptly gather and review all relevant information and documentation
- Preserve critical evidence, including physical documents, digital records, and other physical assets including electronic devices
- Uphold procedural fairness in the treatment of witnesses and the individual(s) accused of improper conduct
- Evaluate the evidence objectively and without bias
- Recommend appropriate remedial or corrective actions based on the investigation findings

Terms of Reference

The Audit Committee will approve the terms of reference of the investigation, based on findings of the preliminary assessment or information provided by the whistleblower. The terms of reference will include:

- The scope and boundaries of the investigation
- The expected timeline for completion
- The resources and information available to the Investigator to carry out the investigation effectively

The Investigator is required to provide regular progress updates of the investigation to the WPO or directly to the Chairman of the Audit Committee when requested. If necessary, the Chairman of the Audit Committee may approve an extension to the investigation timeline.

Investigation Planning

Based on the approved terms of reference, the Investigator will develop a detailed investigation plan, which must be submitted for approval by the Audit Committee. The plan should outline:

- The specific objectives of the investigation
- The procedures and methodologies in gathering evidence
- The individuals to be interviewed or consulted

As the investigation progresses and new information emerges, the plan may be revised to ensure alignment with the investigation's objectives. Any amendments to the plan must be approved by the Audit Committee.

Natural Justice and Procedural Fairness

RHP is committed to upholding the principles of natural justice in all investigations - whether preliminary assessment or full investigation.

These principles are essential to ensuring procedural fairness, protecting the rights of all individuals involved, and facilitating a just and impartial outcome:

- The Alleged Person is entitled to be informed of the allegations and given an opportunity to respond - if the evidence gathered during the investigation may adversely affect them.

Note: This does not require immediate notification upon receipt of the whistleblower report or commencement of the investigation. Notification may occur after the preliminary assessment or during the full investigation, as deemed appropriate.

- The Alleged Person's response or defense must be fairly and accurately reflected in the final investigation report.
- All relevant parties to the allegation must be given an opportunity to present their views, and all submissions must be considered objectively.
- No remedial or disciplinary action affecting the Alleged Person shall be taken until the investigation has been properly concluded. The AC should be consulted in the event that the Alleged Person's continued presence might affect the integrity of the investigation.
- The Audit Committee, WPO, Investigator and any decision-making authority must not have any personal or direct interest in the matter under investigation.
- All investigative procedures must be conducted in a manner that is fair, transparent, and free from bias.
- The Investigator must remain impartial when evaluating the credibility of whistleblowers, Alleged Persons and witnesses.
- If a witness requires legal representation or other support during an interview, such requests should be reasonably accommodated.

Communication with the Whistleblower

Throughout the investigation process, the Investigator must remain sensitive to the whistleblower's concerns regarding retaliation and be fully aware of the protections afforded under this policy.

Communication with the Whistleblower should be conducted via the WhistleblowAI platform. For all communication with the Whistleblower outside the WhistleblowAI platform:

- The Investigator will maintain timely and accurate records of all discussions, interviews, and telephone communications
- Interviews may be recorded, subject to applicable consent and privacy requirements

- All interviews will be conducted in private, and every reasonable effort will be made to protect the whistleblower's identity

Where an investigation step may inadvertently disclose the whistleblower's identity, the Investigator must notify the WPO in advance. The WPO will inform the whistleblower of the likelihood of disclosure and offer to provide appropriate support. If the whistleblower is not agreeable, the Investigator should not proceed with the investigation step under any circumstances.

Investigator's Final Report

At the conclusion of the investigation, the Investigator shall submit a comprehensive written report to the WPO or directly to the Chairman of the Audit Committee when requested. Where appropriate, the Chairman of the Audit Committee may release the report to the Board of Directors for further consideration.

The investigation report must clearly document the findings and should include the following elements:

- A summary of the allegation(s) under review
- The objective(s) of the investigation
- The scope of the investigation and approved terms of reference
- Key findings derived from the investigation procedures
- Justification for rejecting any evidence deemed unreliable
- Conclusions reached and the rationale supporting them
- Recommendations for remedial or other appropriate actions

Where Improper Conduct is substantiated, the investigation report should also include:

- The response and defence provided by the Alleged Person
- Preventive measures to mitigate recurrence of such conduct
- Remedial actions to minimise financial and reputational damage to RHP
- Recommend disciplinary proceedings for breaches of RHP's policies and standards

- Consider legal actions to recover financial losses or pursue other forms of compensation
- Referral of the matter to relevant authorities (e.g. police or regulatory bodies) for potential criminal proceedings, where applicable

All findings in the investigation report must be substantiated by relevant evidence, including:

- Transcripts or records of oral evidence, including audio recordings where applicable
- Supporting materials such as written statements, documents, and exhibits (e.g. forensic evidence, electronic files) obtained during the investigation

Professional investigation management

To ensure both actual and perceived objectivity in handling serious allegations, the Audit Committee may engage an external, independent Investigator and/or legal counsel. This approach reinforces impartiality and strengthens confidence in the integrity of the investigation process.

The management of external investigations shall be guided by the following principles:

- Investigations must be planned with consideration for budgetary constraints. Where appropriate, the investigation may be structured in phases, each with clearly defined objectives, scope, timeline, and cost parameters.
- The scope, methodology, and procedures of the investigation must be agreed upon prior to the commencement of the engagement.
- Investigations should be managed with flexibility, allowing for adjustments to scope or approach as new information emerges. This ensures that the investigation remains aligned with its objectives and responsive to evolving circumstances.
- All communication must be clear, precise, and unambiguous. Depending on the complexity of the case, a multi-disciplinary team, including external legal support, may be adopted to leverage diverse expertise.
- The external Investigator must adhere strictly to the provisions of this policy, particularly those relating to confidentiality, data protection, and procedural fairness.

Managing the welfare of the whistleblower

Commitment to Protecting Whistleblowers

RHP is firmly committed to safeguarding bona fide whistleblowers from any form of detrimental action taken in retaliation for reporting suspected improper conduct. This commitment reflects RHP's dedication to fostering a culture of integrity, transparency, and accountability.

The WPO is the designated authority responsible for ensuring that whistleblowers are shielded from reprisal and that their rights are upheld throughout the reporting and investigation process.

All employees will be clearly informed that any act of retaliation against a whistleblower constitutes a serious breach of this policy. Such actions - including intimidation, discrimination, or adverse treatment - are themselves considered improper conduct and may be reported and investigated under the same Whistleblowing Policy.

In the event that a whistleblower suffers detrimental action in reprisal for their report, RHP will take all reasonable steps to provide appropriate relief, which may include protective measures, restorative actions, or other forms of support as deemed necessary.

Occurrence of Detrimental Action

If a whistleblower reports experiencing harassment, discrimination, or any form of adverse treatment that may constitute detrimental action in reprisal for reporting improper conduct, the WPO will promptly document the details of the incident.

Any report of detrimental action will be treated as a new and separate report of improper conduct under this policy and will be subject to investigation in accordance with this policy.

Keeping the Whistleblower Informed

Where the identity of the whistleblower is known, the WPO shall ensure that the whistleblower receives regular and timely updates regarding the status of their report and the progress of the investigation. Updates may include key milestones, procedural developments, and anticipated timelines.

Exceptions to this communication may apply where the WPO reasonably determines that maintaining confidentiality is essential to protect the integrity of the investigation or to prevent undue influence or disruption.

Upon conclusion of the investigation, the WPO will inform the whistleblower of the outcome of their report. Only essential information regarding the conclusion of the investigation should be shared, omitting any confidential, sensitive, or price-sensitive details.

Whistleblowers implicated in improper conduct

RHP recognises that whistleblowers play a vital role in maintaining corporate integrity. However, if a whistleblower is personally implicated in the improper conduct they report, the whistleblower will remain protected from any form of reprisal.

While whistleblowing is encouraged and protected, it does not exempt the whistleblower from accountability for his or her own actions. A person's liability for involvement in improper conduct is not negated by their disclosure of that conduct.

The Audit Committee will make the final determination regarding any disciplinary or remedial action to be taken against a whistleblower who is implicated in their own report. Such action will only be considered after the reported matter has been fully investigated and appropriately addressed.

Management of Alleged Person

RHP is committed to ensuring that the Alleged Person is treated with fairness, dignity, and respect throughout the preliminary assessment and investigation processes. RHP will take all reasonable steps to protect the identity of the alleged individual, particularly during the early stages of inquiry.

If the allegation is ultimately found to be unsubstantiated, the following will remain strictly confidential:

- The fact that a preliminary assessment or full investigation was conducted
- The outcome of the preliminary assessment or full investigation
- The identity of the Alleged Person

Where a full investigation is undertaken, the WPO will ensure that the alleged individual is:

- Informed of the nature and details of the allegations
- Given a fair opportunity to respond before any final decision is made
- Notified of the outcome of the investigation
- Represented fairly in the final report, including a clear account of their defense

If the investigation concludes that the report of improper conduct is untrue or lacks sufficient evidence, RHP will extend its full support to the Alleged Person. In cases where the matter has been publicly disclosed, RHP will consider any reasonable request from the Alleged Person to issue a formal statement affirming that the allegations were unsubstantiated or incorrect.

Communication of policy

RHP is committed to fostering a transparent and ethical workplace culture. To support this commitment, the company will ensure that the principles and procedures outlined in the Whistleblowing Policy are clearly and consistently communicated to all employees.

This policy will be introduced to all new staff during their induction programme, and regular refresher training sessions will be conducted to reinforce understanding and compliance across the organisation.

Training programme should highlight that the following actions constitute serious breaches of this policy and may result in disciplinary action:

- Taking any form of detrimental action against a whistleblower in retaliation for reporting improper conduct
- Disclosing confidential information related to a whistleblower report to individuals not authorised or involved in the management or investigation of whistleblower report
- Intentionally submitting false or malicious reports of improper conduct

RHP will continue to promote awareness of this policy through internal communications, training sessions, and leadership engagements, ensuring that all employees understand their responsibilities and the protections available under this policy.