

WHISTLEBLOWING POLICY

As part of our Risk Management Framework, ALM has instituted a Whistleblowing policy. We are dedicated to ethical and fair business conduct, and encourage all stakeholders, such as Employees, Shareholders, Clients, Contractors, Vendors, and Regulators to disclose actual, potential or suspected instances of misconduct.

A. Definition

Whistleblowing is the act of disclosing or raising concerns about misconduct or other actions affecting the organisation or which could endanger the Company and its employees or threaten its Client's, Shareholders or the general public.

B. Objectives

- To provide a safe avenue for escalating actual, potential or suspected misconduct without fear of reprisal;
- To serve as a tool for the identification of risky events;
- To reinforce zero tolerance for fraudulent, illegal and unethical conduct by employees and any person connected with the Business.

C. Reportable Misconduct

- Conduct that is against ALM's Core Values , rules, procedures, and policies, both internally and regulatory or established standards of practice;
- Conduct that amounts to fraudulent or an illegality including but not limited to theft and corrupt practices as prescribed by the relevant authorities;
- Conduct that amounts to misuse of ALM's resources, including business information;
- Conduct that amounts to wilful or negligent practices, including abuse of office;
- Health and safety violations; and
- Conduct that amounts to an attempt to conceal any of the above actions.

D. Confidentiality

All information obtained from a Whistleblowing Report would be considered as Confidential and would only be disclosed or discussed with other persons, on a need to know basis; for the purpose of conducting an investigation; to the Board of Directors or where the Company has a legal or regulatory obligation to disclose same.

Any breach of this Confidentiality would be treated in accordance with the Disciplinary Process as stipulated within the ALM Employee Handbook.

E. Whistle blower Protection

An individual making a Whistleblowing Report in good faith may do so without fear of reprisal or prejudice. However, this protection is forfeited if it is found that the report was deliberately falsified or made with malicious intent.

F. Whistleblowing Channels

- Link on our website; www.almconsultingltd.com (Whistleblowing)
- Email: whistleblowing@almconsultingltd.com

G. Minimum Information Required for a Whistleblowing Report

- Name of officer(s) involved;
- Nature of Misconduct (Fraudulent/Illegal Conduct, Unethical Conduct, Internal Procedural Breach, Regulatory Compliance Breach, Health & Safety Risks, Abuse of Office, Misuse of Company Resources, Willful Negligence, Others);
- Date of Occurrence;
- Estimated value of loss to the Company (if any); and
- Specific evidence of occurrence of the Misconduct

H. Confidential & Anonymous Whistleblowing

H.1. Confidential Whistleblowing: A whistle blower is encouraged to reveal his or her identity when a report or disclosure is made using any of the channels mentioned above. This approach helps the investigation significantly, as the Whistle blower can be contacted to provide further details on the report, where necessary.

H.2. Anonymous Whistleblowing: However, a whistle-blower may choose not to reveal his or her identity upon making a report. With the reporter's anonymity thus assured, the identity of the reporter cannot be ascertained by anyone. Should this approach be chosen, the Whistle blower must ensure that enough information is provided to ensure a thorough investigation can be successfully conducted.

I. Investigation

There shall be a three (3) person panel referred to as WHISTLE BLOWING PANEL comprising the Managing Director, Company Secretary and Audit Committee Chairman/non-Executive Director to oversee all whistleblowing cases.

The three (3) person panel may on a case by case basis appoint an in-house ad hoc investigation committee to review cases arising from whistleblowing, and such committee must not include any staff from the department of the "accused".

All disclosures under this policy will be acknowledged in writing confirming that the matter will be investigated and that ALM will get back to the whistle blower within the shortest possible time, not later than one month from the date of notification of the malpractice. However, the whistle blower might be asked to provide more information if there are grounds for more

detailed explanation in the course of an investigation, which might further protract the response time.

The three (3) person panel will immediately assign the whistle blower with a “primary contact person” who will be responsible to revert on all proceedings throughout the course of the investigation. The person so appointed will act as a counsel and offer required support and protection to the whistle blower, stemming from the level of disclosure made.

Any individual or persons so appointed to be a part of the investigating team would have had no previous involvement in the matter.

If it is found that there is no sufficient evidence of malpractice, or the actions of the individual(s) are not serious enough to warrant disciplinary action, it may be more appropriate for the whistle blowing panel to take a more informal approach to dealing with the matter.

The following are the possible outcomes/actions that might follow any investigation:

- Disciplinary action (up to, and including dismissal) against the wrongdoer if allegations are substantiated or;
- Disciplinary action (up to, and including dismissal) against the whistle-blower, if the claim is found to be malicious or otherwise in bad faith; or
- No action if the allegation proved unfounded.
- If the whistle blower is not satisfied with the response received, he is at liberty to raise the matter with the three-person panel outlining his reasons in detail.
- If the whistle blower had requested for his identity to remain anonymous, care will be taken to respect such request in line with the rules of confidentiality.