

**ST GROUP FOOD INDUSTRIES HOLDINGS LIMITED**  
(Company Registration No. 201801590R)  
(Incorporated in Singapore)  
("the Company")

**POLICY AND PROCEDURES FOR WHISTLE BLOWING POLICY**

**1. OBJECTIVES OF THE PROGRAM**

The main objective of the whistle blowing policy ("policy") is to ensure that there are proper procedures and protocols in handling complaints relating to:

- Accounting;
- Internal accounting controls; or
- Auditing matters.

The Audit Committee is responsible for establishing procedures for:

- a. the receipt, retention and treatment of complaints received relating to the above matters; and
- b. the confidentiality, anonymous submission by employees on concerns regarding questionable accounting or auditing matters to the Audit Committee.

**2. POLICY OVERSIGHT**

The Audit Committee has the responsibility of overseeing this policy and compliance by all employees and associates of ST Group Food Industries Holdings Limited. The Audit Committee has the option to delegate the day to day administration of this policy to an Appointed Representative ("AR"), Richard Godwin.

**3. REPORTING OF COMPLAINTS**

All directors, officers, and employees ("Associates") are required to promptly report any complaints to any member of the Audit Committee or the AR which should be treated as confidential and will only involve those individuals needed to investigate the complaint either in writing or face to face.

**4. CONFIDENTIALITY**

The Group is fully committed to maintaining procedures for the anonymous and confidential reporting of complaints by members of the Company, including the employees and members of the public. All reports of complaints should be treated as confidential and will only be disclosed to those people who have a need to know in order to properly carry out an investigation of such complaints in accordance with procedures referred to Schedule "A".

**5. PROHIBITION OF RETALIATION**

There will be no retaliation or other actions taken against any person reports a complaint who acted in good faith. Anyone engaging in retaliatory conduct will be subjected to disciplinary actions by the company, which may include termination of services.

## **6. INVESTIGATION OF COMPLAINTS AND REPORTING RESULTS**

Schedule "A" to this policy sets out the timing and procedures that the associates will follow regarding the manner of investigating complaints, monitoring the status and reporting to the Audit Committee.

## **7. RETENTION OF COMPLAINTS RECEIVED AND INVESTIGATION CONDUCTED**

Schedule "B" to this policy sets out the procedures which the Group will follow regarding the retention of complaints received, including the type of documentation to be retained in respect of each complaint, and its investigation and the timing and procedures in retaining such documentation.

## **8. POLICY REVIEW**

This policy and its effectiveness should be reviewed by the Audit Committee at least annually with recommendations regarding updates and amendments, if any, being made to the board as required. Proper feedback schedule and procedures should be made to provide recommendations to the amendments of the policy, if required.

## **9. INQUIRIES**

Any questions with respect to the general application of this policy should be made to the AR.

### **Contact Details of AR**

Name: Richard Godwin  
Address: 120 Turner Street, Port Melbourne 3207 Victoria  
Telephone: +61410 160 816  
Email: rpgodwin@yahoo.com.au

Approved by the Audit Committee on 17 July 2019

Noted by the Board of Directors on 17 July 2019

**SCHEDULE "A" TO THE WHISTLE BLOWING POLICY**  
**PROCEDURES FOR INVESTIGATING COMPLAINTS AND REPORTING RESULTS**

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**1. Manner of investigation**

The designated officer will review and assess the seriousness of all complaints promptly and determine in consultation with others, if necessary, the manner in which complaints will be investigated, using internal and/or external resources, which will determine who will lead such investigation.

In most instances, investigation of a complaint under this policy will be led by the AR. If upon initial assessment of the complaint it appears that the complaints could materially affect the financial statements of the Group or the integrity of the Group's system of internal control, the designated officers should report the complaints to the chairman of the Audit Committee immediately.

Person assigned the investigation of the complaints will:

- Treat each report of complaints as well as investigation on a confidential basis;
- Take all necessary steps to ensure that the person's anonymity is maintained;
- Involved in each investigation only those persons who will need to be involved in order to properly carry out such investigation; and
- Conduct each investigation in a timely manner.

**2. Monitoring the status of complaint**

The investigation should be monitored on an ongoing basis by a designated officers or members of the Audit Committee.

## **SCHEDULE "B" TO THE WHISTLE BLOWING POLICY**

### **PROCEDURES REGARDING RETENTION OF COMPLAINTS RECEIVED AND INVESTIGATION CONDUCTED**

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#### **1. Documentation Requirement**

All complaints should be fully documented in writing by the person(s) assigned to investigate the complaint. Such document should be marked as "Private and Confidential" and will include the following:

- The original report of the complaint;
- Summary of the investigation;
- Copies of any report issued in conjunction with the complaints;
- Reports of all communications with the complainant; and
- Summary of the disposition of the complaint.

#### **2. Retention requirements**

Such documentation maintained in accordance with the Group's record retention policy. Such documentation will be available for inspection by the designated officers, members of the Audit Committee, external and internal auditors.