

1. POLICY STATEMENT

The Whistleblowing Policy reflects SolarGy's (SLG) ongoing dedication to upholding the highest standards of integrity and ethical behavior. This policy is designed to create and sustain an environment where employees, suppliers, customers, contractors, and other stakeholders can confidently report unethical or corrupt practices in good faith, without fear of retaliation. SolarGy operates on the core principles of R.I.S.E. values: Reliability, Integrity, Sincerity, and Enterprise, and maintains a zero-tolerance stance towards any malpractice, impropriety, statutory non-compliance, or wrongdoing by staff or suppliers in the course of their duties.

This policy serves as a framework to ensure responsible and secure whistleblowing, protecting individuals from any adverse consequences or reprisals. While SolarGy's internal controls and operational procedures aim to detect, prevent, and deter improper activities, no system can offer absolute protection against irregularities. SolarGy is committed to investigating and reporting allegations of suspected improper activities to the appropriate authorities and taking necessary actions. All employees and stakeholders are encouraged to follow the guidance provided in this policy to report any suspected misconduct or improper activities.

2. OBJECTIVES OF THE POLICY

The Whistle-blowing Policy has the following objectives:

1. To provide avenues for employees, suppliers, customers and contractors to raise concerns and suggest ways to handle these concerns.
2. To enable the Committee and management of SolarGy to be informed at an early stage about acts of misconduct.
3. To reassure whistleblowers that they will be protected from punishment or unfair treatment for disclosing concerns in good faith in accordance with this procedure.
4. To help foster a culture of openness, accountability, and integrity.

3. DEFINITIONS

The following words as used in this document shall have the meaning ascribed herein:

3.1 "this Document" means Policy and Procedures.

3.2 "SLG" or "the Company" SolarGy Pte. Ltd.

3.3 "Whistleblower" means a person or entity making a protected disclosure about improper or illegal activity(ies) is referred to as a whistleblower. Whistleblowers may be SolarGy employees, candidates for employment, vendors, contractors, customers or the public. The whistleblower's role is as a reporting party. They are not investigators or finders of fact, nor do they determine the appropriate corrective or remedial action that may be warranted.

3.4 "Good Faith" is evident when the report is made without malice or consideration of personal benefit and the whistleblower truly believes that the report is genuine and free of personal biases. The burden of proof does not lie on the whistleblower, and to keep the investigation unbiased and impartial, the whistleblower is not the investigator or fact finder. Good faith is lacking when the disclosure is known to be malicious or made for personal gain.

3.5 "Possible Improprieties" means any activity, breach of business conduct and ethics, or omission by an employee of SolarGy or any concerns regarding accounting or auditing matters, internal controls or internal accounting controls, and other operational matters that are questionable or not in accordance with generally accepted accounting practices or trade practices prescribed by SolarGy.

This policy is intended to cover serious concerns that could impact the company, such as actions that:

- i) May lead to incorrect financial reporting.
- ii) Are unlawful;
- iii) Are not in line with a legal obligation or a policy of SolarGy;
- iv) May pose dangers to the health and safety of any individual.
- v) May damage or cause potential damage to the environment;
- vi) Amount to professional or ethical malpractices;
- vii) Deliberately conceal serious wrongdoings or malpractices;
- viii) May pose serious breach of fundamental internal controls;
- ix) Otherwise amount to serious improper conduct, or
- x) Deliberately conceal information tending to show any of the above.

3.6 “**Obstructive Action**” means the use or attempted use of force, authority, intimidation, threats, undue pressure or any other action or behavior by any employee that tends to or in fact does obstruct, influence or otherwise interfere with another employee’s exercise of his right to report any **Possible Improprieties** or that may discourage other employees from so doing in the future.

3.7 “**Complaint or Report**” means any complaint alleging either **Possible Improprieties** or **Retaliatory Action**.

3.8 “**Retaliatory Action**” means the use or attempted use of force, authority, intimidation, threats, undue pressure of any sort, or any other negative or other inappropriate action by any employee or officer of SolarGy, against any person who has filed a **Complaint or Report**.

3.9 “**Complaints Register**” means a register to record details of all **Complaints or Reports** lodged.

Whistleblowing Reporting and Communication Channels.

The Whistleblower reporting channel is not intended for reporting issues that are (i) not factual; or (ii) trivial, frivolous and vexatious in nature; or (iii) where the reported matter or subject has no relevance to SolarGy.

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Approved by:



Albert Lim
Managing Director (MD),
Signature,
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