TrickleStar Limited

Policies
and
Standard Operating Procedures

WHISTLEBLOWING POLICY

Policy Number 27

Approved by the Board of Directors on 28 Mar 2019
TRICKLESTAR WHISTLE-BLOWING POLICY

1.0 Policy Statement

TRICKLESTAR is committed to the highest standard of integrity, openness and maintaining high standard of accountability in the conduct of its business and operations. This Policy aims to set out the Company’s written, formal whistle-blowing policy, consisting of responsible and effective procedures for disclosure or reporting of misconduct and impropriety so that appropriate remedial action can be taken if concerns are deemed legitimate.

2.0 Objectives

The Policy is intended to encourage employees and other Company’s stakeholders to report unethical or illegal conduct or conduct of employees, management, directors and other stakeholders such as suppliers, shareholders, customers and other third parties to appropriate authorities in a confidential manner without any fear of harassment, intimidation, victimization or reprisal of anyone for raising a concern under this Policy.

3.0 Scopes

This policy is aim to address issue such as reporting, responsibility, confidentially, investigation and resolution to the improper conduct reported through internal channel. Such improper conduct includes the following:

a) Fraud;
b) Bribery or corruption;
c) Abuse of Power or management override;
d) Conflict of Interest;
e) Theft or embezzlement;
f) Misuse of Company’s Property;
g) Negligence
h) Miscarriage of justice
i) Danger to health and safety or to the environment;
j) Non-compliance with Procedure or failure to comply with legal or regulatory requirements; and
k) The cover-up of any of these in the work place.

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under TRICKLESTAR’s Scheme of Service or any criminal offence under relevant legislations in force.

Whistleblowing procedures are varied from grievance procedures. Typically, whistleblowing does not affect the complainant personally. They are different from a normal grievance/complaint in which the complainant is personally affected.
4.0 Applicability

Subject to the requirement of applicable local jurisdiction, this policy applies to all employees of TRICKLESTAR and extend to members of the public, where relevant.

5.0 Reporting Procedures

5.1 The Whistleblower should come forward with the information that he/she, in good faith and reasonably believes that an improper conduct was committed, is being committed or will be committed.

5.2 Any concerns should initially be reported to the immediate superior. However, if for any reason the Whistleblower is reluctant to do so, then the Whistleblower shall report the concerns in writing and made directly to the Audit Committee Chairman via email stated as “Confidential”. The report must provide full details of the improper conduct and if possible, with the supporting evidence.

5.3 The contact details of the Chairman of the Audit Committee where concerns can be raised by the Whistleblower is as follow:
Jeremy Figgins. Email: jeremy.figgins@tricklestar.com

6.0 Protection to Whistleblower

It is understandable that whistleblowers are sometimes worried about possible repercussions, as such we aim to encourage openness and will support staff members that raise genuine concerns under this policy even if they turn out to be mistaken. However, any anonymous complaints will not be entertained under this policy.

7.0 Notification

The whistleblower will be accorded the privilege to be notified on the outcome of the disclosure upon the completion of the whistleblowing process and procedures.

8.0 Circulation and review

This Policy will be circulated to all existing and new employees, and will be added as an appendix to the staff Scheme of Service. The Policy will also be reviewed regularly by the Audit Committee.