WHISTLE-BLOWING POLICY

1. Introduction

Dyslexia Association of Singapore (“DAS”) and its Board of Directors ("Board") are fully committed to conducting its operations with integrity and consistent with the highest ethical standards, and in compliance with all applicable laws and regulatory requirements. DAS strongly believes that the actions and conduct of all employees, as well as other persons acting on behalf of DAS and/or its subsidiaries, are essential to maintaining these standards. The BOARD has approved and adopted this Whistle-blowing Policy to ensure necessary arrangements are available where whistle-blowers may raise concerns about possible improprieties without fear of reprisals in any form.

The Audit and Risk Committee of the BOARD of DAS shall have the overall authority and oversight of this Policy from time to time. The Audit and Risk Committee may in its absolute discretion delegate the investigation of the whistle-blowing reports and implementation of this Policy to such person as it deems fit.

It is the responsibility of all officers and employees of DAS to report any possible improprieties. He/she can report to Chairman of Audit and Risk Committee whose contact particulars are listed below.

2. Reporting and/or Communication Channels

This Policy applies to any suspected improprieties involving employees as well as consultants, vendors, contractors, and/or any other parties with a business relationship with the DAS.

In line with this commitment, dedicated communication channels have been established and whistle-blowers may choose to use any of these communication channels. The communication channels are to the Chairperson of the Board of the Audit and Risk Committee as follows:

Email – Mr Dickon Addis <dickonaddis@me.com>

All of the above communication channels are secure and available to all employees and any parties having business relationship with DAS and its subsidiaries. Information received will be treated with the utmost confidentiality and will be attended to by appropriate personnel appointed by the Audit and Risk Committee of the BOARD.

Any whistle-blowing report involving any BOARD member or member of the General Management of the DAS may be reported directly to the Chairman of DAS/Chairman of the Audit and Risk Committee of DAS using the following email communication channels:

- Chairman of BOARD : Mr Kevin Kwek <Kevin.Kwek@kennedyslaw.com>
- Chairman of Audit and Risk Committee: Mr Dickon Addis <dickonaddis@me.com>

Any whistle-blowing report involving the Chief Executive Officer may be reported directly to the Chairman of the Audit and Risk Committee.

Any whistle-blowing report involving the Chairman of the Audit and Risk Committee may be reported directly to the Chairman of BOARD, while any whistle-blowing report involving the Chairman of BOARD may be reported directly to the Chairman of the Audit and Risk Committee.

3. How to Make a Report

Reports on any improprieties can be made in the form of emails, phone calls, voicemails, letters or reports using the available communication channels mentioned in the above section. These reports should be made as soon as practicable. All reports shall be treated by the DAS with an appropriate level of confidentiality. When making a report, the whistle-blower should as far as possible include the following information:

- Date, time and place of the actions/transactions;
- Identity and particulars of the parties involved;
- Circumstances leading to the improprieties; and
- Any other relevant information or documentation that would assist in the evaluation of the report/incident.

Whistle-blowers making any such reports should ensure that they do so in good faith and in the best interest of DAS and not with any malicious intent. Whistle-blowers may be the subject of disciplinary or other legal action if the reports or allegations are malicious, frivolous or simply to cause anger, irritation, or distress.

4. How DAS will Respond

All whistle-blowing reports, other than reports involving any BOARD Member, shall be received by the Chairman of the Audit and Risk Committee who will log all reports into a register. The Chairman of the Audit and Risk Committee shall conduct an initial review of the report received and the action taken by the DAS will depend on the nature of the concern. All investigations shall be reported to the Audit and Risk Committee of the BOARD for their attention and further action as necessary. The matters raised may:

- be investigated internally;
- be referred to external auditor;
- be referred to appropriate law enforcement agencies; and
- be investigated by an independent inquiry.

In the event that the whistle-blowing reports involve any BOARD Member, the reports shall be escalated to the Chairman and/or Chairman of the Audit and Risk Committee of DAS as appropriate, for their attention and further action as necessary.

The Chairman of the Human Resource Committee shall be designated as the **Whistle Blower Protection Officer.** The role of the Whistle-blower Protection Officer is to protect the confidentiality and rights of the Whistle blower. Any staff member or public reporting a wrongdoing can seek advice from the Whistle Blower Protection Officer and the email communication channel is as follow:

- Chairman of Human Resource Committee: Mr Lim Boon Hon <boonhonl@gmail.com>

Harassment or Retaliation: DAS recognizes that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice or improprieties. DAS will not tolerate harassment or victimization and will take reasonable and appropriate action to protect you when you raise a concern in good faith.

Confidentiality: DAS will do its best to protect your identity when you raise a concern and do not want your identity to be disclosed. It must be appreciated though that the investigation process may need to reveal the source of information and the report made by you may be required as part of evidence.

Anonymous Report: DAS strongly encourages you to put your name to your report. DAS is committed to protecting whistle-blowers who make reports under this policy, so there should be no reason to report anonymously. Subsequent investigation may be hindered if contact cannot be made with the whistle-blower to obtain clarification or further information. DAS is committed to respect the rights of all of its employees/whistle-blowers, which include the right of an accused person, in due course, to know the identity of his or her accuser. The identity would, however, not be disclosed unless it is absolutely necessary for the purpose of the investigation and/or subsequent action, and never disclosed without prior discussion with the whistle-blower making the report. DAS may choose not to proceed with an investigation if the report is anonymous.

5. Scope of Improprieties

Possible improprieties which should be reported pursuant to this Policy may include but are not limited to the following:

- Any fraudulent act or forgery;
- Misappropriation of funds or assets;
- Profiteering as result of insider knowledge of the DAS's activities/information;
- Disclosing confidential or proprietary information to external parties;
- Accepting or seeking anything of material value from vendors, contractors or any persons providing goods and/or services to DAS;
- Destruction/removal/inappropriate use of DAS's records/assets/ facilities;
- Violation of existing legislation, rules and regulations applicable to DAS relating to its accounting, financial reporting, internal controls and/or policies;
- Improper actions or omissions which are likely to endanger the DAS's employees, customers and/or members of the public; an

- Distinct effort to mislead, deceive, manipulate, coerce or fraudulently influence any internal or external auditor/accountant in connection with the preparation, examination, audit or review of any financial statements or records of DAS.

This Policy does not and cannot reasonably detail or cover every situation that should be reported pursuant to this Policy. If you are in any doubt as to how you should apply any provisions of this Policy at any point in time, you are strongly encouraged to seek guidance from your immediate supervisors, the DAS's General Management Team or the Audit and Risk Committee of BOARD.

6. Communications with the Media and/or any External Parties

Employees of DAS are prohibited to communicate and disclose the details of any complaints or investigations with any external parties including media. This is to protect the interests of DAS as well as the Whistle-blower and the person being investigated. All media queries should be directed to the Chief Executive Officer, the Chairman of the Audit and Risk Committee and/or Chairman of Board as appropriate.

7. Implementation of the Policy

A copy of the Policy shall be made available on the DAS's intranet and website for transparency and ease of access by all employees and any parties who have business relationship with DAS.

All new employees shall be briefed on the Policy as part of their orientation program

Regular communications shall be made to stress to all employees the importance of this Policy as well as to maintain awareness of the BOARD's continued commitment to this Policy.

The Management Corporate Governance Committee shall collate any feedback received and report to the BOARD on a periodic basis.

The DAS Management Corporate Governance Committee shall be responsible for maintaining, reviewing and updating this Policy. Any proposed revisions shall require the Audit and Risk Committee of BOARD's approval.

Reference:
This Policy takes reference from the Whistle-Blowing Policy and Procedures guide issued by the Charity Council. (Charity Council – Whistle-Blowing Policy and Procedures)