Whistleblower Policy

LIGHTHOUSE CANTON

Contents

Revision History

	Name	Designation	Date (DD/MM/YYYY)
Policy Created By	Charu Kunwar	HR Director	05/08/2019
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Whistleblowing Policy

Objective

To encourage the employees and other parties to report unethical behaviors, malpractices, wrongful conduct, fraud, violation of the company's reputation & Values.

Scope

This policy applies to all employees of Lighthouse Canton group. This policy is applicable to all companies of Lighthouse Canton group in Singapore and other countries, subject to the amendments resulting from local regulatory and legal requirements.

Responsibility

Employees are responsible for:

- Understanding that failure to comply with the Code of Conduct is a serious matter and may result in disciplinary action that may escalate up to termination of services.
- Ensuring that in situations where they are unclear about their responsibilities or how to deal with an actual or suspected breach of ethics, they ask for guidance from their manager or any member of the *Whistleblowing Committee* (see *Whistleblowing Committee Details section*).
- Reporting any actual or suspected breach of the as soon as they become aware of it.

Managers are responsible for:

- Leading by example and ensuring that business is being run in an ethical manner at all times.
- Responding quickly to questions from team members who report to them.
- Taking immediate action to resolve or escalate any actual or suspected breach.
- Documenting the issue, the resolution, and to whom the issue has been escalated.

Whistleblowing Committee responsible for:

The Committee is responsible for:

- Advising Process Owners on the course of action for any issue escalated to them.
- Stewardship of ethics across the organization by ensuring compliance amongst employees,
- Documenting the issues and the resolutions.
- Reporting Whistleblowing related escalations and resolutions to the Board.

Compliance with Laws, Rules and Regulations

- Employees are expected to comply with the local laws of the country in which they are based at all times. The employees are also expected to comply with the laws set up by the regulator.
- When subject to multiple jurisdictions, the employees must hold themselves accountable to the highest standard applicable.
- Employees are expected to understand and adhere to all laws governing their duties.
- All instances of financial or accounting irregularities, non-compliance with law or rules should be reported by the employees.
- Business affairs should be conducted with complete integrity at all times.

Confidentiality, Privacy and Inside Information

- While carrying out official business, employees often deal with confidential information that belongs to the organization, customer, employees, prospective customers and other third parties. As representatives of the organization, every employee is accountable for the security and confidentiality of the information.
- Employees are expected to protect confidential information even after they cease to work for the organization.
- Employees are prohibited from recording any of the company's business on video or audio tapes / recorders/ mobile phones or any other recording device.
- The company also discourages the employees from discussing any business-related matter outside appropriate work channels including online on chats/blogs/social media platforms like Twitter, WhatsApp or any other online discussion forums.
- The disclosure of such confidential information is detrimental to the organization's growth and may result in disciplinary/legal action.
- By virtue of working at Lighthouse Canton, employees may have access to "inside information" that general public may not have. It is essential for employees to maintain the strictest secrecy on such information. Only official spokespersons of the company are authorized to share information publicly with entities like the press.
- To avoid uncertainty, employees are directed to regard information as public only after the organization has released it officially to the press, internet or other media sources.
- Employees are encouraged to access and use business information that they have business reason to use.

Business Conduct and Ethics

It is essential for every employee to note that their conduct has a direct impact on the reputation of Lighthouse Canton, therefore the following principles of business conduct and ethics need to be adhered to at all times:

- Provide professional recommendations, services or advice only for those services or products that you have the necessary skill/knowledge or license to provide.
- Deliver high quality service to all customers respecting their rights and differences.
- Treat all teammates with respect despite their individual differences.

- Respect the organization's property and avoid theft or misuse of any of them.
- Borrow or displace company's resources only with prior permission.
- When unable to report to work, the employee should inform the manager on time.
- Always provide correct information about employment records, employment information or other company records.
- Avoid the following during work hours or at the workplace –
    - Committing a fraudulent act or breach of trust under any circumstances.
    - Being involved in any unlawful harassment of another person.
    - Being a part of or provoking any fight during office hours or on company property.
    - Using any sort of abusive language
    - Carrying firearms or any other dangerous weapons.
    - Engaging in criminal activities on or off work premises.
    - Violating any company policy or procedure.
    - Causing disruption at work
    - Insubordination
    - Using the company's resources to work for another employer
    - Taking up additional employment that causes conflict of interest, conflict with employee's work schedule or hampers employee's performance.
    - Possession or use of prohibited drugs
    - Use of alcohol

Whistleblower Principles

- The Firm's Employees have the opportunity to report any concerns or suspicions of improper activity at the Firm by a fellow Employee or other party confidentially and without retaliation.
- Whistleblowing is the act of reporting perceived unethical conduct of employees, management, directors and other stakeholders by an employee or other persons to the appropriate person within the Firm. The Firm encourages its employees and other relevant stakeholders to report any breaches and non-compliance actions to the designated person within the Firm, in a confidential manner, without any fear of harassment, intimidating, or reprisal of anyone for raising such concern(s). The whistleblower is expected to act in good faith and should refrain from making any false accusations.
- The Firm will take seriously any report regarding a potential violation of Firm policy, or other improper or illegal activity and the Firm recognizes the importance of keeping the identity of the reporting person from being widely known. Employees must be assured that the Firm will appropriately manage all such reported concerns or suspicions of improper activity in a timely and professional manner, confidentially and without retaliation.
- The Firm's Whistle-blower Policy covers the treatment of all concerns or complaints relating to suspected improper activity, including but not limited to the following:
    - Use of Firm resources for the personal benefit of anyone other than the Firm;
    - Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Firm;

- Fraud or deliberate error in the recording and maintaining of financial records of the Firm;
- Misrepresentations or false statements to or by a senior officer or accountant;
- Deviation from full and fair reporting of the Firm's financial situation; and
- The retaliation, directly or indirectly, or engagement of others to do so, against anyone who reports a violation of this policy.

Responsibility of the Whistle-blower

Employees must act in good faith in reporting a complaint or concern under this policy and must have reasonable grounds for believing a breach of these Policies and Procedures. A malicious allegation made by an employee known to be false is considered a serious offense and will be subject to disciplinary action which may include termination of such individual's employment.

Handling of the Reported Improper Activity

An employee of the firm should promptly report suspected improper activity to the Whistleblowing committee to enable the matter to be investigated. If the suspected improper activity involves the Compliance Officer, the employee should promptly report such activity to the Firm's Whistleblowing Committee

No-Retaliation Policy

It is the Firm's policy that no employee who submits a complaint in good faith will be subject to retaliation, harassment or unfavourable or adverse employment consequences. An employee who retaliates against a person reporting a complaint will be subject to disciplinary action, which may include termination of such employee's employment. An employee who believes he or she has been subject to retaliation or reprisal as a result of reporting a concern or making a complaint is to promptly report such action to the Whistleblowing Committee. The person making the disclosure has protection as mentioned under Article 68A of the Regulatory Law (DIFC Law No. 1 of 2004) and any other relevant law.

Reporting and Redressal Process

1. Any employee / relevant stakeholder can write in to ombudsperson@lighthouse-canton.com to report any perceived unethical conduct. This email account shall only be accessed by the members of the Whistleblowing Committee, for the purpose of investigating any reports. The confidentiality of the whistleblower's identity shall be preserved at all times. The whistleblower retains the right to submit their report anonymously.
2. Upon receipt of such a report, an investigator from the committee will be assigned to investigate the complaint. The investigator assigned should be impartial and be free from any (or perceived) conflicts of interest. The investigation process may include conducting interviews with the whistleblower and any relevant parties, and to collect evidences. The investigation will be conducted while maintaining strict confidentiality of people and evidences. If the complaint is made against an employee, he/she should be given a fair chance to prove her/his point of view.
3. An investigation report should be completed within a stipulated time frame, based on facts obtained from the interviews and from the available supporting evidences. The investigator shall also prepare the investigation report with recommendations, follow-up (if any), and any suggestions to improve the culture within the Firm to avoid any re-occurrence.
4. Once the Whistleblowing committee / Board of Directors completes the investigation, a summary of action(s) taken will be sent to both the whistleblower and any relevant party. Should any party be not agreeable with the recommended

solution / result, it will be escalated to the CEO or Board of Directors for the necessary follow up.

Details of Whistleblowing Committee

- Email ID of the Committee: ombudsperson@lighthouse-canton.com
- The Whistleblowing Committee comprises of the following executives:
    1. Sambit Rout – VP, HR
    2. Audrey Tang- Managing Director and COO
    3. Dinesh Gogia- Chief Risk and Compliance Officer
    4. Charu Kunwar- Executive Director and Head of HR

Reporting to External Authorities

Whistleblowers may escalate the concerns to the relevant regulator (MAS, DFSA, SEBI etc.) if not satisfied with the action(s) of Whistleblowing Committee/ Board of Directors. The whistleblower may also choose to report concerns directly to the relevant regulator if they deem it appropriate.

Reporting to Board of Directors

The whistleblower committee is to present whistleblower activity report/ register at least once a year to the Board of Directors.