

WHISTLE-BLOWING POLICY

In compliance with the *Listed Companies (Code of Corporate Governance) Regulations, 2019, Chapter III, Regulation 10(4)(xv)*, the Board of Directors of Treet Corporation Limited (hereinafter “Company”) have adopted this Whistle-Blowing Policy (hereinafter “Policy”) on February 25, 2021.

1. Policy Statement

- 1.1 The Company/Group is committed to achieving and maintaining high standards of behavior at work from its employees. Employees are expected to conduct themselves with integrity, impartiality and honesty. The Company/Group seeks to develop a culture where inappropriate behavior at all levels is challenged. To achieve this, the Company/Group encourages reporting of genuine concerns of malpractices, illegal acts or failures to comply with recognized standards of work without fear of reprisal or victimization.
- 1.2 The Company/Group will not tolerate harassment or victimization of a genuine whistle blower (including informal pressures) and will treat such conduct as gross misconduct, which if proven, may result in dismissal.
- 1.3 The Board of Directors reserves the right to amend this Policy and Procedure as necessary to meet any change in requirements.
- 1.4 By knowing of a malpractice at an early stage, the Company/Group can take necessary steps to safeguard the interests of others and protect the organisation. Please do not hesitate to “blow the whistle” on wrongdoing.

2. What is Whistleblowing?

- 2.1 This Policy is designed to deal with concerns raised in relation to specific issues which are detailed in paragraph 2.2 below.

The Company’s other policies and procedures deal with matters not covered by paragraph 2.2 below. The relevant policy should be followed where appropriate.

- 2.2 Whistleblowing is specific and means a disclosure of information made by an employee where he/she reasonably believes that one or more of the following matters is happening now, took place in the past or is likely to happen in the future:

- Criminal activities;
- Fraud, forgery or defalcation

- Bribery or corruption
- Provision of misleading information or the falsification of financial or other records;
- Breaches of copyright, patents and licences;
- Violation of environmental legislation;
- Violation of restraint of trade legislation;
- Failure to comply with other legal obligations
- Violation of the Code of Conduct;
- Violations of human rights, of child rights, use of child labour, workplace harassment, unfair treatment of employees;
- Insider trading in the Company/ Group Entities shares;
- Falsification of statutory reports and records, including the financial statements and accounting records;

Breaches of other policies and procedures (including, without limitation, breaches of financial controls and reporting requirements) and concealing or overlooking any of the above.

- 2.3 This Policy does not extend to mismanagement which may arise from error of judgment or incompetence.
- 2.4 This Policy does extend to matters arising out of a personal grievance which should continue to be pursued through your line managers.
- 2.5 Only genuine concerns should be reported. Disclosures must be made in good faith with a reasonable belief that any information and/or allegation is substantially true, and that the disclosure is not made for personal gain. Malicious or false allegations will be treated as a serious disciplinary offence.

3. Who does the policy apply to?

- 3.1 This Policy applies to all officers, staff, trainees, temporary employees, and contract employees (including those employed by third party contractors).

4. The Company's Whistleblowing Procedure

- 4.1 If you wish to disclose information as contemplated in this Policy you may send a written communication to the Whistleblowing Committee at the address and e-mail notified by the Company/Group.

All incidences of whistleblowing reported to the Whistleblowing Committee are to be reported by the Whistleblowing Committee to the Members of the HR Committee of the Board of Directors at the immediately next Board Meeting.

- 4.2 The Whistleblowing Committee shall consist on three (3) members; and one of its members will act as Coordinator. The Managing Director/Chief Executive will appoint the members of the Whistleblowing Committee. To avoid a conflict of interest, if a whistleblowing instance involves a member of the Whistleblowing Committee, the Managing Director/Chief Executive will reconstitute the Whistleblowing Committee.
- 4.3 Anonymous allegations are not automatically disregarded but given the safeguards which are in place for those making allegations under this Policy, anonymous allegations are less powerful than those from named individuals.
- 4.4 The Whistleblowing Committee will decide how the investigation should proceed.
- 4.5 If you are unhappy with the response that you receive you may report the matter to the Chairman of the Audit Committee. This option will not apply where an allegation has been dismissed following an investigation.
- 4.6 If in doubt, you should speak to the Company Secretary. Your conversation will be treated in absolute confidence.

The investigation

- 4.7 The Whistleblowing Committee will decide how to respond in a responsible and appropriate manner under this Policy. An investigation will be conducted as speedily and sensitively as possible. An official written record will be kept at each stage of the procedure.

A decision as to whether a preliminary investigation should be carried out will be made within two (2) weeks of the complaint having been received. Where this is not possible, the employee making the complaint will receive an explanation of the delay.

- 4.8 You are entitled to be accompanied by a work colleague throughout the proceedings when reporting your concerns.

Outcome of the investigation

- 4.9 If there is a case to answer, and if appropriate, the disciplinary proceedings will be initiated against the person(s) who are the subject of the allegation(s).
- 4.10 You will be informed of the outcome of the investigation within 5 working days of completion of the investigation (including any disciplinary investigation). However, the exact nature of any disciplinary action taken against any person will remain confidential.

- 4.11 Whether there was a case to answer or not, and provided that your disclosure was made in good faith because you reasonably believed it to be true, the Company will ensure that you are protected from reprisal or victimization as a result of your complaint.
- 4.12 Only where it is established that your allegations were false and made maliciously will disciplinary action be taken against you. Such disclosures will be treated as gross misconduct and may result in your dismissal without notice or payment in lieu of notice.
- 4.13 If, as a result of investigations you are implicated in some way in any wrong doings disciplinary action may be taken against you. The fact that you have blown the whistle will be taken into account if an action is considered.