



Archipelago Capital Partners Whistleblowing & Grievance Policy

Archipelago Capital Partners (“ACP” or the “Company”) sets out below the Whistleblowing & Grievance Policy (the “Policy”) to encourage all employees and members of the public to raise genuine concerns about possible improprieties in matters of financial reporting and other malpractices at the earliest opportunity in an appropriate way.

1. Policy scope

This Policy applies to ACP, its affiliates, the funds it manages or advises, and the portfolio companies owned by any funds or accounts managed by ACP or its affiliates. The Board of Directors of each portfolio company should adopt this policy as adapted to the local laws and regulations it is subject to and ensure that the portfolio company can ensure compliance with this policy on an ongoing basis.

2. Objective

The objective of the Policy is to:

- support our corporate values;
- ensure employees can raise concerns without fear of retribution; and
- provide a transparent and confidential process for dealing with concerns.

3. Principles

- All concerns raised will be treated fairly and properly.
- We will not tolerate the harassment or victimisation of anyone raising a genuine concern.
- Any individual making a disclosure will retain their anonymity unless they agree otherwise.
- We will ensure that any individual raising a concern is aware of who is handling the matter.
- We will ensure no one will be at risk of suffering some form of retribution as a result of raising a concern even if they are mistaken. We do not however extend this assurance to someone who maliciously raises a matter they know to be untrue.

4. Complaints procedure

2.1 Who can make a report?

Everyone connected to our Company should do the right thing to protect our employees, clients, assets, reputation, and each other.

We are open to complaints from all our internal or external stakeholders including employees, suppliers, contractors, customers of ACP or its portfolio companies, and others who acquire information of potential wrongdoings arising from their current or past work activities with ACP or its portfolio companies.

2.2 What can I report?

You can report any legitimate concern about malpractice or wrongdoing in the workplace concerning our Company that may be a breach of our Corporate Governance Policy, Compliance Manual or [ESG Policy](#).

This can include, but not limited to:

- Improprieties in matters of financial reporting;
- Fraud;
- Corruption, bribery or blackmail;
- Money laundering
- Criminal offences;

- Failure to comply with a legal or regulatory obligation;
- Miscarriage of justice;
- Endangering the health and safety of an individual;
- Actual or potential abuses of human rights;
- Serious environmental concerns; and
- Concealment of any of the above.

2.3 How do I report?

Your leader/leadership team: For employees, you can discuss or report this immediately to your own line manager.

Compliance team: If you are external stakeholders or an employee who are reluctant to discuss the issue directly with your leader, you can report your concerns by filling in the [Complaint Form](#) and submitting it to ACP's Compliance Officer and ESG Officer through the following channels:

By mail	<p>Please send a mail in a sealed envelope marked "Private & Confidential".</p> <ul style="list-style-type: none"> • Attention: Compliance Officer and ESG Officer • Address: 83 Clemenceau Avenue, #12-06, UE Square, Singapore, 239920
By email	esg@arxpelago.com

2.4 What happens after I report?

Acknowledgement of receipt: Within 1 business day from filing a report, you will receive an acknowledgement in writing.

Communication of process: Following the receipt, the assigned party at ACP will follow up to inform you of who is handling the matter, how you can make contact with the assigned complaint manager and if there is any further assistance required. We will give as much feedback as we can without any infringement of a duty of confidence owed by us to someone else.

Complaints handling and resolution: ACP's Corporate Governance Policy, Compliance Manual, ESG Policy, and other relevant rules and regulations shall guide us in determining the appropriate measures of reported violations.

5. Confidentiality & Non-Retaliation

We encourage whistleblowers to provide their names and contact numbers to facilitate investigations.

Your identities will not be disclosed without prior consent. Where concerns are unable to be resolved without revealing the identity of the employee raising the concern, (e.g., if their evidence is required in court), we will enter into a dialogue with you as to whether and how we can proceed.

We will not tolerate retaliation against anyone who speaks up and raises a genuinely held concern in connection with perceived wrongdoing.

6. Training and Communication of the Policy

The Policy shall be available and readily accessible to all internal and external stakeholders through appropriate communication mechanisms (e.g., publication on website, integration to Employee Handbook).

Training on this Policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this Policy.

7. Who is responsible for the Policy?

The CEO has overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Compliance Officer has primary and day-to-day responsibility for implementing this Policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy and are given adequate and regular training on it.


8. Monitoring and review

The Compliance Officer will monitor the effectiveness and review the implementation of this Policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective.

All employees are responsible for the success of this Policy and shall ensure they use it to disclose any suspected risk or wrongdoing.

Employees are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Compliance Officer.

This Policy may be amended at any time.



Signed

Effective Date

Jovasky Pang, CEO

12 July 2024

WHISTLEBLOWING / GRIEVANCE FORM**Complainant Information****Full name**

Note: Name and contact details will be solely used to facilitate the investigation and will not be disclosed without prior consent. Anonymous reporting may pose limitation to the investigation and resolution of the complaint.

- I wish to raise my complaints anonymously.
 I request not to disclose my identity without my consent.

Contact information

Please mark how you wish to be contacted (mail, telephone, email).

- By Post:
 By Phone:
 By E-mail:

Preferred language for communication

- English
 Chinese
 Others (please specify the language:)

Complaint Details**Complaint Category**

- Grievances (concerning maltreatment relating to you, e.g., breach of your employment rights, harassment, discrimination, etc.)
 Whistleblowing (wrongdoing or malpractice that concerns wider stakeholders, e.g., corruption, legal breach, endangering health and safety of workplace, etc.)
 Suggestion
 Others (please specify:)

What happened?**Where did it happen?****When did it happen?**

- Date:
 One-time incident or grievance
 Happened more than once
 On-going (currently experiencing the problem)

Who was involved?

Provide the name, title, and identifiable characteristics of people involved

What's your relationship with the reported person / entity involved?**What are the consequences?**

How are you or the people you are representing affected?

Evidence

Please provide physical evidence or any other information that may substantiate the incident.

What would you like to see happen to resolve the issue?**Signature**

Date (YYYY-MM-DD):
