

SKYE RENEWABLES GROUP OF COMPANIES

WHISTLEBLOWING POLICY

1. PURPOSE & APPLICABILITY

Skye is committed to the highest standard of business integrity and corporate governance in all aspects of its business operations. As such, any report of alleged wrongdoing/improper conduct (“Misconduct”, see definition in Section 2.1 below) made of genuine concerns and on reasonable grounds, will be treated seriously and investigated promptly by Skye.

The purpose of this Whistleblowing Policy (“Policy”) is to encourage all former and present Employees and Business Partners working for or on behalf of Skye or any members of the public who came to be aware of / suspects acts of Misconduct happening within Skye, to speak up and report through the process and channel described in this Policy, without fear of retaliation.

The following definitions apply in this Policy:

“Skye”, “Group” or the “Organization” refers to Skye Renewables Energy Pte. Ltd. (“SRE”) and all its subsidiary companies collectively. “Skye Entity” refers to each company within the Skye Group.

“Employees” refer to employees hired by the Group, including permanent/part time/contract staff, personnel under secondment, interns, trainees.

“Directors” refer to member of the board of directors of any Skye Entity.

“Business Partners” refer to customers, suppliers, contractors, consultants, referral partners, advisors; including their employees, suppliers and consultants who are associated in discharging the scope of work or services performed for Skye.

This Policy should be read in conjunction with the prevailing version of all other business integrity policies and environmental, social & governance (“ESG”) policies, as may be established by Skye from time to time.

When there is a conflict between the provisions in this Policy and any relevant laws and regulations governing whistleblowing (“Applicable Whistleblowing Laws”), the provisions in the Applicable Whistleblowing Laws shall prevail.

2. WHEN TO MAKE A WHISTLEBLOWER REPORT?

2.1 Whistleblowing refers to the act of reporting or disclosing information that an individual reasonably believes indicates occurrence/likely occurrence of Misconduct committed by Skye’s Employees or Directors. The individual who makes a whistleblowing report in accordance with this Policy (“Whistleblowing Report” or “Report”) shall be referred to as a “Whistleblower”.

2.2 When an individual has reasonable grounds to believe and have genuine concerns in good faith one or more of the following matters (“Misconduct”) is happening or is likely to happen in the future:

- Criminal activity
- Breaches of legal or professional obligations or regulatory requirements
- Miscarriage of justice
- Bribery, corrupt practices
- Financial fraud or mismanagement
- Negligence
- Breach of internal policies and procedures such as Business Integrity and ESG related policies
- Health and safety risks
- Environmental damage
- Deliberate concealment of any of the above matters;

he/she may lodge a Whistleblowing Report pursuant to this Policy.

2.3 This Policy does not apply to personal grievances such as Employee’s terms of employment or performance matters. Such matters shall be dealt with in accordance with grievance procedure as may be detailed in Skye’s HR policies / advised by Management from time to time.

3. HOW TO MAKE A WHISTLEBLOWING REPORT?

3.1 Any concerns of Misconduct should be reported as soon as possible through the following channels:

- (a) Business Integrity Officer (email: businessintegrity@skyerenewables.com).
- (b) CEO (e-mail: rcoull@skyerenewables.com).
- (c) anonymous reporting channel via completing online Whistleblowing Form at [Skye – Whistleblowing Form](#). The form will be automatically forwarded and read by Business Integrity Officer, Corporate Governance Manager and the Head of ESGR Committee.
- (d) Mail to: Head of ESGR Committee, Skye Renewables Energy Pte. Ltd.
16 Raffles Quay, #09-01 Hong Leong Building
Singapore 048581

3.2 A Whistleblower is encouraged to provide as much details as possible in order to facilitate investigations by Skye. A Whistleblower is not required to disclose his/her contact information at all when making a Whistleblowing Report. In the event that the Whistleblower would like to receive further update/notification of the outcome of the investigation/resolution related to his/her Whistleblowing Report, he/she may choose to provide contact details.

4. PROTECTION TO WHISTLEBLOWER

4.1 Confidentiality

All Whistleblowing Reports will be treated with utmost confidentiality.

4.2 **Protection Against Retaliation**

Skye prohibits any acts, or attempted acts of interference, reprisal, retaliation, threats, coercion or intimidation (“Retaliation”) against a Whistleblower who has made Whistleblowing Report in good faith and on reasonable grounds in accordance with this Policy.

Skye will respond to any allegations or acts, or attempted acts of interference, reprisal, retaliation, threats, coercion or intimidation against a Whistleblower.

Any Employee found to have retaliated against a Whistleblower will face disciplinary action, up to and including termination of employment.

4.3 **Exclusion**

However, the above protection will not be made available to individuals who make false or malicious reports, or without any reasonable grounds. Skye reserves the right to take actions against anyone who knowingly provides false information or acts in bad faith, including disciplinary actions and legal actions.

5. **INVESTIGATION PROCESS**

5.1 **Responsibility of Skye**

Each Whistleblower Report will be investigated promptly and comprehensively jointly by Skye’s Environmental, Social & Governance and Risk Committee (“ESGR Committee”), Legal Manager and Business Integrity Officer (“Whistleblowing Committee”). The Whistleblowing Committee shall recommend appropriate actions to be undertaken by Skye pursuant to such Reports, including seeking external advice where appropriate. Depending on the nature of the alleged Wrongdoing disclosed in the Report, Skye may be required to report to the relevant authorities or enforcement agencies.

Skye will ensure a fair and impartial conduct of the investigation, maintaining confidentiality to the extent possible. Where possible/practical, Skye will update the Whistleblower on the outcome of the investigation and when the investigation has been closed.

5.2 **Responsibility of Whistleblowers**

Whistleblowers have a responsibility to share all known information regarding any reported allegations. However, they should refrain from obtaining evidence for which they do not have a right of access. They are not to act on their own in any investigation, nor shall they have a right to participate in any investigative activities other than as requested by the Whistleblower Committee.

In the event that the Whistleblower chooses to provide his/her contact details, he/she may be contacted to provide further information or clarification to Skye to assist in the investigation process.

5.3 Process Flows

1. Upon receipt of a Whistleblowing Report, Skye's Business Integrity Officer shall acknowledge receipt of the Report to the Whistleblower within five working days (assuming the Whistleblower provided contact information), and promptly share a copy of the Report with all members of the Whistleblowing Committee (excluding any member who is implicated in the Report). Any member of the Whistleblowing Committee who is a subject of the reported concern in the Whistleblowing Report, shall be excluded from the entire investigation process. If the Whistleblower Report is concerning the Business Integrity Officer, the Whistleblowing Committee shall nominate alternative personnel to carry out the role of the Business Integrity Officer throughout the investigation process of the particular Whistleblowing Report.
2. Within two weeks from receipt of the Report, the Whistleblowing Committee shall make preliminary investigations and provide an initial assessment if the alleged Misconduct was likely to have been committed. The Business Integrity Officer shall communicate the results of the initial assessment with the Whistleblower and inform if an investigation will follow suit (if his/her contact information was provided).
3. Based on the initial assessment, the Whistleblowing Committee may then commence the investigation process. External parties such as legal advisors may be solicited to assist during the investigation.
4. The Whistleblowing Committee will aim to conclude the investigation process at the soonest possible time or within two months from the date of receipt of the Report. However, this process may take longer depending on the nature of the alleged Wrongdoings.
5. If, after Skye has conducted a detailed investigation and concluded that there are no reasonable grounds to believe or there is lack of supporting evidence to prove that alleged Wrongdoing has taken place, the Whistleblowing Report shall be rejected.
6. The detailed report, outcome of the investigation and proposed resolution/actions to be taken shall be communicated to SRE's Board and Skye's shareholders promptly. The Business Integrity Officer shall also communicate the outcome of the investigation with the Whistleblower as soon as practical, if his/her contact details were provided. If the Whistleblower is not satisfied with the outcome of the investigation, he/she can make an appeal to the Head of ESGR Committee. The Head of ESGR Committee shall further consult the SRE Board for further course of actions.

6. RECORD KEEPING

- 6.1 Skye's Business Integrity Officer shall maintain a register for all Whistleblowing Reports made in accordance with this Policy ("Whistleblowing Register" or "Register"). Details of the Reports, resulting investigations (if any) and outcomes of the investigations shall be recorded in the Register.

6.2 This register helps to ensure that all Whistleblowing Reports are documented, investigated, and resolved, for the purpose of transparency, accountability & compliance enforcement.

6.3 The Whistleblowing Register and related documents shall be stored confidentially and securely.

7. REVIEW AND UPDATE

This Policy is subject to review and update by Business Integrity Officer, Legal Manager, SRE's Board of Directors or its ESGR Committee annually or as when required, to ensure its relevance to latest applicable laws and regulations and its effectiveness.

8. CONTACT INFORMATION

Should you have any questions or require further clarification regarding this Policy, please contact Business Integrity Officer at businessintegrity@skyerenewables.com.

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