

Whistleblowing Policy

28 OCTOBER 2026

Document Control Log

Version No.	Approved Date	Approved By
1.0	7 February 2012	Board
2.0	17 February 2015	NGC and Board
2.0	12 May 2016 Reviewed with no amendments made	ARMCo and Board
2.0	8 August 2018 Reviewed with no amendments made	NGC and Board
2.0	13 May 2019 Reviewed with no amendments made	ARMCo and Board
3.0	12 August 2021	ARMCo and Board
4.0	27 October 2022	ARMCo and Board
5.0	28 October 2026	NGC and Board

Whistleblowing Policy

Global Investments Limited

---

1. Purpose

Global Investments Limited ("**GIL"** or "**Company**") and its board of directors ("**Board**") are committed to high standards of transparency and accountability so as to promote shareholder and general market confidence in the Company. In line with this commitment, this policy aims to provide an avenue for stakeholders such as employees of the manager of GIL ("**Manager**"), shareholders, vendors and members of the public (collectively term as "**Whistleblower**") to step forward to report any issues or areas of genuine concern on misconduct or wrongdoing relating to the Company or its officers.

2. Scope

This whistleblowing policy is intended to protect the Whistleblower if he/she reports any issues or genuine concerns on misconduct or wrongdoing relating to GIL or its officers in the following areas which is non-exhaustive:

- GIL's accounting treatment, internal controls and/or auditing matters;
- impropriety, corruption, acts of fraud, theft and/misuse of GIL's properties, assets or resources;
- conduct which is an offence or breach of regulatory laws;
- abuse of power or authority;
- serious conflict of interest without disclosure;
- intentional disclosure/provision of incorrect information to members of the public or investors;
- concealing information about any malpractice or misconduct;
- any other serious improper matters which may cause financial or non-financial loss to the Company, or damage to GIL's reputation.

3. Protecting Confidentiality

3.1 All reports and submissions will be treated in strict confidence, subject to investigation, legal or regulatory requirements. Investigations into whistleblowing allegations will be conducted discreetly – any clarifications from the affected director, Manager's employee and/or department will be sought privately.

3.2 The Company will take all reasonable steps to protect the confidentiality and identity of the Whistleblower – subject to legal or regulatory requirements. In instances where the Company is legally obliged to disclose the identity of the Whistleblower, for example to governmental or regulatory entities as part of investigations into allegations, the Whistleblower will be informed if legally permitted.

4. Anonymous Complaints and Bad Faith Complaints

4.1 All reports and submissions will be treated fairly and appropriately, and will be assessed based on the merit of their content, without regard to the identity of the Whistleblower or the accused.

4.2 **Anonymous Complaints –** Concerns expressed anonymously will be assessed appropriately, but consideration will be given to:

- the seriousness of the issue raised;
- the credibility of the concern; and
- the likelihood of confirming the allegations from attributable sources.

4.3 **Bad Faith Complaints –** Although the Whistleblower is not expected to prove the truth of a complaint, he or she should be able to demonstrate that the report is being made in good faith.

5. Whistleblowing Channels

The independent directors of GIL ("**Independent Directors**") have been designated by the Board to independently investigate whistleblowing reports. The Audit and Risk Management Committee of GIL ("**ARMCo**") is responsible for oversight and monitoring of whistleblowing.

5.1 An individual or institution wishing to raise his/her/its concern or complaint about the Company or its officers should do so through the Independent Directors. The Independent Directors can be reached via the following avenues:

Email to: whistleblowing@globalinvestmentslimited.com

Post in a sealed envelope marked "Private & Confidential", addressed to any one or all of the Independent Directors at the Company's address:

Independent Director(s)
Global Investments Limited
250 Tanjong Pagar Road,
#09-01 St Andrew's Centre
Singapore 088541

5.2 All reports of issues and concerns would be directed to the Independent Directors for follow-up action. A register of complaints ("**Register**") will be kept in-confidence by the Company.

5.3 The Register will be submitted to the ARMCo and the Board at the periodic meetings. The ARMCo will report to the Board the significant matters raised through the whistleblowing channel. The ARMCo shall approve making the Register available for inspection upon any request by regulatory authorities.

6. Process for handling whistleblowing allegations

6.1 The Independent Directors will assess all issues or concerns raised independently to ensure that they are fairly and properly considered. The actions taken by GIL in response to a report of issue or concern under this policy will depend on the nature of the concern.

The matters raised may be investigated internally, referred to the external auditor or referred to the relevant authorities. Any person who is the subject of the reported allegation shall not be involved in the handling of any investigation. The Independent Directors will endeavour to acknowledge all reports within seven (7) working days of receipt and update the Whistleblower on the matter (where possible) within three (3) months of the initial acknowledgment.

6.2 The Independent Directors may not assess cases

- which are clearly frivolous, vexatious or meant solely for abuse; or
- where matters upon which regulatory authorities' position has already been fully given and no further update is necessary.

6.3 The Independent Directors are responsible for the review of any issues or concerns raised through the abovementioned whistleblowing arrangements. The Independent Directors will have jurisdiction over all investigative and disciplinary matters. The Independent Directors will have the power to appoint independent investigating officers and effect disciplinary follow-up action if necessary.

When required, the Independent Directors may request more information from the whistleblower and/or request a meeting to discuss further details or the nature of allegation. It is important that relevant, actionable information is provided in order for allegations to be substantiated and to aid in investigations.

The investigation officers will record their findings in the investigation report as set out in Annex A and communicate their investigation findings to the Independent Directors for their necessary action. For each significant case, the details and outcome of the investigation will be provided to the ARMCo.

6.4 Following the review of the investigation report, the Independent Directors will inform the Whistleblower within five (5) working days upon conclusion of the investigation whether or not actions were taken and reasons for the decision. For anonymous Whistleblower, considering that they do not provide contact information (e.g. email address, contact number etc.), the Independent Directors will not inform him/her of the investigation outcome and actions taken, if any.

7. Policy of prohibition against obstruction or reprisals

The Board is committed to ensure protection of the Whistleblower against detrimental or unfair treatment. The Board prohibits reprisal or retaliation against any person for reporting or intending to report violations or participating in the investigation of reported violations of this policy. Any acts of obstruction of reporting or investigation of a violation will not be condoned and shall be dealt with accordingly.

8. Policy review

This policy will be periodically reviewed by the ARMCo, where the policy may be modified, to ensure compliance with applicable laws and regulations or to reflect organisational changes. All changes to this policy are subjected to the approval of the Board and will be published on GIL's corporate website and annual report.

Annex A

Investigation Report

Name of the whistleblower:	
Contact:	
Email	
Date of receipt	
The nature and detail of the concern raised	
Name and details of the person who received the report	
The allegation is to be investigated:	Yes / No
Name of Investigation Officer(s):	
Period of Investigation:	
Details of Investigation:	
Outcome of Investigation:	
Recommended Action(s):	