

Purpose

In line with supporting Notore's culture of open communication and commitment to good business practice, as well as Global best practice, the company has introduced a Whistle Blowing Policy.

The purpose of this policy is to create a channel whereby any stakeholder who has a bona fide concern about any misconduct or unethical business practice in the Company can report it. This policy seeks to encourage stakeholders to safeguard the Company's interest by voicing concerns that may adversely affect the Company.

Objective

- To provide a secure medium for any stakeholder to raise concerns about practices that breach company policy and values.
- To timely inform the Company of any unethical business practice.
- To serve as a deterrent to employees who may otherwise consider an act that is illegal, improper or unethical.
- To help maintain a culture of openness integrity and accountability

Definition

Whistle Blowing is the disclosure by any Company Stakeholder- employee, customer, shareholder, or general public- of alleged misconduct by any of these Stakeholders that will impact the company and stakeholders adversely. Such acts may currently be happening or may have occurred in the past.

Scope

This policy governs the reporting and investigation of unethical, improper, or illegal activities at Notore Chemical Industries Limited, including all Subsidiaries of the Company.

General Guidance

The Company assumes that claims will be made in good faith. Disciplinary action will be taken against employees who knowingly make false claims for malicious intent. Employees who file claims pursuant to this policy are not exempt from the Company's job performance standards and are otherwise expected to adhere to the Company's policies and procedures.

This process should not be used to file a grievance; there is a separate policy that stipulates guidelines and process on grievances. Unlike grievances, claims from a Reporter do not affect the person directly. If there is personal interest, the Reporter must fully disclose at the outset of lodging the claim(s).

Confidentiality

The Reporter can choose not to disclose their identity, although not encouraged. The claims and identity of Reporter is held in strict confidence and the Reporter is protected from any form of retaliation from their department or the organization. It is also expected that a Reporter will not disclose to others, that a claim has been made, thereby jeopardizing the investigation.

It is however possible that your identity be disclosed should the allegations warrant the investigation of a third party.

WHISTLE BLOWING POLICY

1.1 Reporting

The Ethics Committee which comprises Head, Compliance/Company Secretary, Group Head, Human Resources and Group Chief Financial Officer will be responsible for evaluating allegations that are reported. Head, Compliance/Company Secretary is the Secretary of the Committee.

Committee members have an ethical and professional duty to keep all identity and claims made to them, confidential.

Claims can be made via telephone or in person to any of the committee members, however, all claims will have to be put in writing to ensure a clear understanding of the issues being alleged. Written reports should be sent to a dedicated email account that all three members will be able to access.

The Reporter is not expected to be able to prove beyond a reasonable doubt, that the claim is true, but should be able to demonstrate sufficient proof that will support an investigation. If a genuine concern is raised and the employee acted in good faith, but it is found that the claims is not true, no action will be taken against such an employee. However, if a malicious claim is raised with the intent to harass or discredit another person, disciplinary action will be taken against such an employee.

In order to act fairly and effectively, the Company encourages Reporters to reveal their identity to the Committee or the member to whom they are making a claim. This will enable the committee to launch a proper investigation and ask follow-up questions. All information received will be handled with strict confidence.

If a claim involves an Ethics Committee member, the Reporter should direct the claim to another Committee member, instead of the joint email account.

Reporters will not be harassed or victimized for making a claim, and there will be no retribution for making claims.

At the discretion of the Company, an appropriate incentive can be offered to Reporters whose actions lead to an investigation that averts liability to the Company.

1.2 Claims include, but are not limited to the following:

- Criminal Offences/Criminal Background
- Bribery, Money laundering and/or corruption
- Risks to Health and Safety
- Environmental damage
- Breach of internal control
- Financial Fraud/Malpractice
- Plot to destroy/sabotage company property/machinery
- Plot to endanger human life
- Conduct of contractor/vendor
- Acts of interference in processes for unjust or illegal financial advantage for the business unit or personally
- Coercion or intimidation
- Acts that may lead to civil liability
- Concealment of any of the above

1.3 Who can use the Whistle Blowing Procedure:

- An Employee
- A Vendor
- A Contractor
- An Outsourced staff
- A Former employee
- Dealers

- Any member of the general public with knowledge of any activities that are considered misconduct

1.4 Procedure

1. All reports should be made using the Report Form or calling the confidential Whistle-Blowing Hotline on 0705.942.6363 or sending an email to 'whistleblowing@notore.com'.
2. The Reporter, if identity is disclosed, will be notified of receipt of the claim.
3. The Committee members shall meet to discuss and agree that i) the allegations indeed constitute serious wrongdoing, ii) on the interpretation of the facts presented, and iii) an appropriate investigation plan. In the event of a conflict, the concerned member will be excused.
4. Investigation, if necessitated, will commence within 1-5 business days of receipt of claim.
5. The Committee will decide the appropriate function to investigate the allegation.
6. The Committee will inform the employee whom the allegations have been brought against, as soon as practicably possible, unless there is substantial risk that notification will jeopardize an effective investigation and the Company's ability to gather evidence.
7. If the employees whom the allegations have been brought against cannot be informed immediately due to risk, they will be informed and interviewed at a suitable time as part of the investigation.
8. It is possible that some claims are resolved through agreed action and may not result in an investigation or disciplinary action being taken.

1.5 Definitions

Stakeholder:	Any person that has an interest in or association with the Company- Employee, Applicant, Vendor, Customers, Shareholder, Contractor, Dealer, Client or any person of the general public.
Whistle Blower/Reporter:	A person or entity making a disclosure about unethical, improper, or illegal activities conducted by a Stakeholder.

Good Faith: To act in a way that is without malicious intent or consideration of personal interest or benefit. To have reasonable basis to believe that misconduct has occurred.

Misconduct/Improper Activities: Activities or conduct that breaches the Company's policy and ethical codes. Any conduct that can cause liability to the Company