

Whistleblowing Policy

1.0 Objectives and scope

1.1 The objectives of this policy are:

- To deter wrongdoing and to promote standards of good corporate practices;
- To provide proper avenues for employees and other stakeholders of the Company to report serious concerns and possible corporate improprieties related to fraud, misconduct, governance or ethics;
- To ensure that reliable arrangements are in place to facilitate independent investigations of the reported concerns and for proper follow-up actions; and
- To provide whistleblowers with the assurance that they will be protected from reprisals or victimisations for reporting a concern in good faith.

1.2 Employees' grievances (if any) would be addressed via human resource procedures and not covered under this policy.

1.4 No employee shall use his/her position to prevent other employees from complying with their obligations under this policy which conforms with the guidelines set out in the Code of Corporate Governance 2018.

2.0 Reportable incidents

Actual and suspected wrongdoings within the Group can be reported and include, but not limited to, the following:

- a) misconduct relating to financial reporting, accounting or other financial matters;
- b) corruption, misappropriation or blackmail;
- c) conduct which is an offence or breach of law;
- d) significant breach of the Company's policies or internal controls;
- e) endangerment of the health and safety of individual(s);
- f) any other serious improper matters which may cause financial or non-financial loss to the Company, or damage to the Company's reputation; and
- g) concealment of any of the above.

3.0 Confidentiality

3.1 All whistleblowing reports, including information or evidence provided, will be handled with strict confidentiality, unless the Group is under legal obligation to disclose information;

3.2 The identity of whistleblower shall be kept confidential so long as it does not obstruct or frustrate any investigation. However, the investigation process may reveal the source of the information and the whistleblower making the disclosure may need to provide a statement as part of evidence gathering.

4.0 Protection against reprisals (Retaliations)

4.1 The Company prohibits harassment or victimization of any kind against whistleblower who submits a report in good faith.

4.2 No one should suffer reprisal as a result of reporting a genuine concern, even if the concern turn out to be a misunderstanding;

- 4.3 While this policy is meant to protect whistleblowers from any unfair treatment as a result of their report, the Company does not condone any frivolous or malicious allegations. If investigations reveal that the whistleblower making the allegation had done so maliciously for personal reason, appropriate action may be taken in accordance with the law.

5.0 Whistleblowing channel

- 5.1 A whistleblower can report his/her concern directly to the Chairman of the Audit and Risk Committee of the Company (Email: **whistle@nikspro.com**).

6.0 Making a report

- 6.1 All concerns raised will be independently reviewed to ensure that they are fairly and properly considered.
- 6.2 As it is essential to have all critical information in order to be able to effectively evaluate and investigate a case, the report should be submitted in writing, detailing out the chronological events and also providing areas of concerns. In short, to provide as much information and be as specific as possible.
- 6.3 Concerns conveyed anonymously are difficult to verify and may hinder investigation. Accordingly, the Company will consider and decide if anonymous reports should be further investigated based on the merits of each circumstance. Hence, the whistleblower is encouraged to provide their contact details so that clarifications could be sought during the course of investigation.
- 6.4 Subject to legal constraints, the whistleblower will receive follow-up notification on his/her concern and/or outcome of any investigations.

7.0 Policy review

- 7.1 This policy shall be reviewed annually by management and any substantial change(s) shall be approved by the Audit and Risk Committee of the Company.