

WHISTLEBLOWING POLICY

Gotrade believes in maintaining a high level of integrity and propriety in all dealings by itself and its subsidiaries. We do not tolerate any malpractice, impropriety, statutory non-compliance or wrongdoing by our personnel. We expect our employees to conduct themselves with a high standard of professionalism and ethics in the conduct of our business and professional activities.

To promote the disclosure of information about any misconduct within the Gotrade group of entities, our Whistleblowing Policy sets out the framework to promote responsible and secure whistleblowing by affording protection to the whistleblower. This policy provides avenues for legitimate concerns to be objectively investigated and addressed. Individuals will be able to raise concerns about illegal, unethical, or questionable practices in confidence without the risk of reprisal.

What can You Report

Whistleblowing is the deliberate voluntary disclosure, or reporting of inappropriate, unethical or unlawful behaviour, and organisational malpractices by an employee (which includes management). Such behaviour could be actual, suspected, or anticipated.

Who can Raise a Concern

We encourage anyone who is aware of any wrongdoing committed by our employees or representatives to disclose it to us. This includes former employees irrespective of nature of employment status, customers, and any other stakeholders/persons providing services to the Gotrade group of companies, including consultants, vendors, independent contractors, external agencies and/or any other party with a business relationship with the Gotrade group of companies. Unless required by law, the identity of the whistleblower will be kept in strict confidence and will not be disclosed without the consent or approval of the whistleblower.

How to Make a Report

Anyone can make a confidential report of improper behavior in writing and must provide the following details:

- What was the incident or behavior;
- Where and when did the incidence occur;
- Who is the individual involved;
- Particulars of witnesses, if any;
- Supporting evidence and/or documents (if available);
- Any other details which are relevant.

Where possible, you are encouraged to provide your name and contact details for the parties conducting the investigation to contact you for further details.

The report must be made directly to the dedicated reporting channel at whistleblowing@tr8.io.

What Happens after We Receive a Report?

The Whistleblowing Committee will conduct a preliminary investigation of the report. The findings of the preliminary investigation and recommendation shall be referred to the Executive Committee for a decision on whether to close the case or to proceed to a full investigation of the allegations. If any person on the investigation committee and deciding committee is the subject matter or is named in the report, such person shall be barred from taking part or being involved in any part of the investigation. The results and recommendations of the full investigation shall be reported to the board of directors. If the outcome results in a proven case of wrongdoing and confirms the allegations, relevant actions will be instituted against the related employees in accordance with our policies.

Where applicable, the Management shall institute the appropriate controls to prevent any further wrongdoings or damage to the Company.