

Whistle Blowing Policy and Procedure

Introduction

1. Pavilion Energy Group (the “Group”) is fully committed to conducting business with integrity and professionalism and in accordance with all applicable laws, rules and regulations.
2. Whilst the Group’s internal controls and procedures are intended to detect, prevent or deter fraud or suspected fraudulent practices, the Group recognises that even the best of systems cannot provide absolute safeguards against fraudulent practices and wrongdoings.
3. The objective of this policy is to provide an avenue for board directors, employees and external parties, such as suppliers, customers, contractors and other stakeholders to raise, in confidence and without fear of retaliation or victimisation, concerns over fraudulent practices and wrongdoings in the Group so that damage control or remedial action can be taken promptly and decisively. This policy also helps ensure that everything is above board and no one including the Chairman and CEO is above the system.

Spirit of the Policy

4. The Policy is not a route for taking up personal grievances and does not replace the management reporting channel. A board director or employee should normally raise any concerns that he may have through the management reporting channel such as by escalating the matter to, as appropriate, the supervisor, the Head of Department, Head of Human Resources, Head of Legal or Chief Financial Officer.
5. It is intended that a board director or employee uses the process under this policy to report any concerns over fraudulent practices and wrongdoings in the Group if he has genuine concerns that his report has not been or will not be properly addressed by the management reporting channel.

Reportable Fraudulent Practices and Wrongdoings

6. Some examples of reportable fraudulent practices and wrongdoings under this policy include:
 - Corruption or bribery
 - Embezzlement, cheating or theft
 - Violation of laws and regulations
 - Irregularities in financial reporting
 - Misuse of funds and resources
 - Non-compliance with the Group’s internal controls and procedures
 - Serious conflict of interest without disclosure
 - Sexual harassment

The above list is not exhaustive and intended to give only an indication of the kind of conduct which might be considered as fraudulent practices or wrongdoings.

Reporting Mechanisms

7. Concerns under this policy are to be raised in writing (using the form in Appendix 1) to the Whistle Blowing Receiving Officer. Whistleblower must provide their name and contact details in the report.

The contact details of the Whistle Blowing Receiving Officer are as follows:

The Whistle Blowing Receiving Officer
Company Secretary
Pavilion Energy Pte Ltd/ Pavilion Gas Pte Ltd
3 Lim Teck Kim Road
#01-03 Genting Centre
Singapore 088934

8. Whistleblower should act in good faith and should not make false accusations when reporting. Any employee who knowingly or recklessly makes statements or disclosures that are not in good faith may be subjected to disciplinary procedures, which may include termination of their employment with the Group. Likewise, if investigations reveal that the outside party making the report had done so frivolously, maliciously or for person gain, appropriate action including reporting the matter to the police, may be taken.
9. The Group will endeavour to keep the Whistleblower's identity confidential and not disclose the identity of the Whistleblower without his consent. There may however be circumstances in which the concern raised has to be reported to external authorities and it may be necessary for the identity of the Whistleblower to be revealed to the authorities. If such circumstances exist, the Group will inform the Whistleblower that his identity will be disclosed.

Anonymous Report

10. As there may be little or no corroborated evidence to substantiate the allegations in an anonymous report, it is very difficult to assess whether or not an anonymous report is genuine or malicious. Whilst the Group may consider an anonymous report, it may not start an investigation.

Procedures for Handling Report

11. The Whistle Blowing Receiving Officer would report any concern or issue raised against anyone including senior management and board directors (except for CEO, Chairman of the Audit Committee and Chairman of the Board) to CEO.
12. Promptly upon receipt of a report, CEO shall assess if the matter is minor or frivolous. If the matter is minor or frivolous, CEO shall, in consultation with the Chairman of the Audit Committee ("Audit Chairman"), resolve the matter as he deems fit. If however, the matter is not minor or frivolous, CEO shall, in consultation with Audit Chairman, constitute an investigation committee to investigate.
13. The constituted investigation committee will carry out the investigation using appropriate resources and expertise and report its findings and recommendations to CEO, Audit Chairman and Audit Committee.

14. If the investigation committee during the course of conducting its investigation assesses that there are reasonable grounds to suspect that an offence has been committed and the Group has a duty to make a report to any regulatory or enforcement authority under any law or regulation, the investigation committee shall promptly inform CEO and a report shall be lodged immediately with the authorities, after consultation with both Audit Chairman and Board Chairman.
15. Where the concern raised is against CEO or Chairman of the Board (“Board Chairman”), the Whistle Blowing Receiving Office would report the matter to Audit Chairman and the Audit Chairman shall constitute an investigation committee to investigate.
16. Where the concern raised is against the Audit Chairman, the Whistle Blowing Receiving Office would report the matter to Board Chairman and the Board Chairman shall constitute an investigation committee to investigate.
18. The Group reserves the right to modify this policy as and when deemed necessary.



Appendix 1

WHISTLE BLOWING POLICY & PROCEDURE

RECORD OF MATTER/S REPORTED BY WHISTLEBLOWER

Name (Dept, if applicable) : _____

Date : _____

Brief Description of Events/Incidence (including basis of belief and date(s) of occurrence):

Individuals believed to be involved:

Individuals not involved but believed to be aware:

List of Attachments enclosed:

Have you reported/made your concerns known to anyone else either inside or outside Pavilion Energy/Pavilion Gas? If so, please provide details of the name of the individual, the organisation and the date on which you made your concerns known:

