

## **Trailblazer Foundation Ltd. (“TRBLZ”) Whistleblowing Policy**

### **Objective**

TRBLZ’s Whistleblowing Policy (the “Policy”) provides a platform for individuals to disclose any observed improprieties that involve TRBLZ’s Board Directors and/or other stakeholders, without fear of reprisal. It also provides an assurance that all reports will be properly addressed and treated with confidentiality.

The Policy addresses TRBLZ’s commitment to promoting a culture of compliance, accountability, integrity, and transparency.

### **Scope**

This Policy is designed to enable any individual and/or stakeholder to report any concerns of misconduct or malpractice that may be detrimental to TRBLZ’s and/or public interest.

### **Roles and Responsibility**

The Audit Committee (AC) oversees the Whistle-Blowing Policy in TRBLZ. AC is assisted by the Honorary Executive Director who leads the whistle blowing process and ensures that the procedures are carried out in accordance with the Policy.

### **Whistle-blowing Process**

All instances of whistleblowing will be independently reviewed and investigated by an Investigation Committee to be established on an ad-hoc basis on the authority of the AC. Results of any investigation will also be reported to the AC.

Whistleblowers should report their concerns in good faith. Disciplinary action will be taken against any individual for any false report made for personal gain or with malicious motive.

Reportable suspected wrongdoings include but are not limited to:

- (a) misconduct relating to financial reporting, accounting or other financial matters;
- (b) corruption, misappropriation or blackmail;
- (c) any major offences or failure to comply with a legal or regulatory obligations;
- (d) significant breaches of TRBLZ policies or internal controls;
- (e) endangerment of the health and safety of an individual; or
- (f) concealment of any of the above.

To enable TRBLZ to effectively investigate reported incidents, the following information should be provided, where possible:

- Contact information of the whistleblower.
- Name(s) of person(s)/company(ies) involved;
- Relationship between the whistle-blower and the reported person(s)/company(ies);
- Detailed description of the incident (including date, time, location, methods and action/behaviour);
- Period of time the impropriety had been perpetuated;
- Whether the Administrator had been informed (if yes, please provide the notification date and contact information of the person notified);
- Physical evidence and any other information that may substantiate the incident.

We encourage whistleblowers to provide their names and contact numbers to facilitate investigations. All assessments and outcomes are to be properly documented, with decisions clearly communicated to the appropriate parties on a timely basis. Legal advice may be sought on whether the matter should be referred to the relevant authority for appropriate action.

Whistleblowers may report their concerns via the following reporting channels:

- Postal mail  
Attention: Hon. Executive Director  
Trailblazer Foundation Ltd.  
456 Alexandra Road  
#14-01 Fragrance Empire Building  
Singapore 119962
- Email at [DPO\\_WB@trustedservices.com.sg](mailto:DPO_WB@trustedservices.com.sg)

In cases where key management is involved or the concern is exceptionally serious, the whistleblower may also report the concern directly to the AC.

### **Confidentiality and Protection**

TRBLZ respects the confidentiality of whistle-blowers. It also allows anonymous reporting.

Under circumstances where the reported information is required by law to be revealed to external parties such as lawyers, the police or investigators, TRBLZ shall inform the whistle-blower.

### **Communication**

The Policy is posted on TRBLZ's website.

### **Policy Review**

The Policy shall be reviewed every 2 years, where the Policy may be modified, to maintain compliance with applicable laws and regulations or accommodate organisational changes.