

Whistleblower Policy (Approved by the Board of Directors, 16 December 2019)

"Whistle Blowing" is defined here as a voluntary disclosure of organization or individual malpractice by a person who has privileged access to data, information or event about a wrongdoing or malpractice, which can be actual or suspected, within GLG Corp Ltd. There are two categories of whistle blowers, namely:

- a) Internal Whistle Blowers, where employees or management are expected to report incidents of misconduct involving their superior, supervisor or peer or senior;
- b) Management to the relevant reporting authority;
- c) External Whistle Blowers, which can be customers, suppliers, service providers or other members of public who report wrongdoings of the employees or management of GLG Corp Ltd to the CEO or other relevant authority.

1. PURPOSE

This policy is part of the Corporate Governance of GLG Corp Ltd and where GLG Corp Ltd including its subsidiaries are engaged in an environment of which there is specific concern for integrity or transparency. The Board of GLG Corp Ltd and its management team are committed to listen to any concern from any whistleblower who raises the risk to the company, in terms of values, integrity, etc. such as suspicion of fraud, corruption, criminal acts or acts of reputation risk in relation to the staff/employees/management of the organization. On the basis of this commitment, this policy is intended to serve the purpose of outlining the procedures for a) reporting and processing such information and b) conducting an investigation into the issues raised by the whistleblower for final resolution including remedial action.

2. APPLICATION

This policy is intended to apply to the following parties:

- 1) GLG Corp Ltd and its subsidiaries
- 2) All employees including those of its subsidiaries, and not limited to the following:
 - directors
 - officers
 - staff including part-time, trainees, seconded staff, interns
- 3) External Parties, which are broadly defined as members of the public or those who are impacted by business activities of GLG Corp Ltd and its subsidiaries.

3. WHAT TO REPORT

If a whistleblower has information on misconduct or wrongdoing or believe that such acts may have occurred or could occur, please follow the procedures on how to report it. The Company understands that the whistleblower may want to seek further information or perhaps, consult

with other employees or management before making a report. The Company advise the whistleblower to avoid sharing unnecessarily the identity of individuals affected by the whistleblower's report to other employees. The Company also advise the whistleblower not to undertake his/her own investigations or collecting evidence before reporting. The aim of this policy is to allow the Company to address the issue or problem before or as soon as they arise. Hence, it is imperative that the whistleblower report to the Company of his/her concern quickly so that the Company can undertake a fair and impartial examination promptly of the matters raised.

4. HOW AND TO WHOM TO REPORT

The whistleblower is encouraged to raise it with his/her immediate supervisor, however if it is not practical and for other reasons, the whistleblower can also report to the CEO or any member of the senior management team. The issue or concerns raised may be done verbally or in writing. It is essential for GLG Corp Ltd and its subsidiaries to have all the critical information in order to evaluate and investigate the complaint. Hence, the Company advise the whistleblower to provide as much detail and be as specific as possible.

The Company encourages the whistle blower to put his/her name whenever possible, as concerns or irregularities expressed anonymously are more difficult to act upon. All valid concerns raised will be acknowledged and treated confidentially. However, the Company will consider anonymous issues raised taking into account of the seriousness, credibility, etc. of the concerns.

The recipients of the information on behalf of the Company have the duty to ensure that appropriate follow-up action is taken.

5. ASSESSMENT OR INVESTIGATION

The Company will investigate all matters under this policy as soon as practicable, after the matter has been reported. The investigation will be conducted in an objective and fair manner. All information provided by the whistleblower will remain confidential during the course of investigation. The Company may refer the concern or complaints to appropriate external authorities, depending on the nature of the allegations. Employees or management staff who are the subject of the complaint made by the whistleblower, may be informed of any allegations against him/her and will be provided the opportunity to respond to such allegations. They will be subject to disciplinary action if they fail to co-operate in the investigation. At the conclusion of the investigation, appropriate remedial action will be taken if the allegation is substantiated and results in the occurrence of a violation. Non-anonymous whistleblower will be informed that action has been taken without divulging confidential information.

6. WHISTLEBLOWER PROTECTION

If the whistleblower reports a concern, the whistle blower is not required to prove that his/her report is true. No action will be taken against the whistleblower if the information in whistleblower's report is proven to have an innocent explanation or cannot be proven. The Company will protect the whistleblower from any form of retaliation or discrimination resulting from your whistleblower's report.

7. POLICY REVIEW AND AMENDMENT

This policy cannot be amended without the approval of the Board of GLG Corp Ltd. It will be reviewed from time to time, to ensure its effectiveness and ability to meet the needs of the Company and its subsidiaries.