

DATAPULSE TECHNOLOGY LIMITED

WHISTLE BLOWING POLICY

1. POLICY OBJECTIVES AND SCOPE

Datapulse Technology Limited (“**Datapulse**”) is committed to a high standard of transparency, integrity, compliance and accountability. The whistle blowing policy aims to provide a means through which Datapulse’s employees and external parties, in good faith, report any activity that infringes on the Datapulse’s code of ethics, By-Laws or violates the law so that Datapulse may take the relevant action.

2. WHISTLE BLOWING CONCERNS

This Policy seeks to address serious concerns that could have a significant impact on Datapulse. These include:

- a) fraudulent activity;
- b) incorrect financial reporting;
- c) unlawful activities;
- d) misconduct or unethical conduct; and
- e) attempts to conceal any of the above.

3. CONFIDENTIALITY AND PROTECTION

Datapulse is committed to ensure that:

- (a) the identity of the whistle-blower will strictly be kept confidential unless disclosure is required by law or regulatory authorities.
- (b) the whistle-blower is protected against detrimental or unfair treatment, intimidation, retaliation or adverse employment actions. Whistle-blowers who believe that they have been retaliated against may file a written complaint with the Chairman of the Audit Committee. Any complaint of retaliation will be promptly investigated and appropriate remedial measures will be taken if allegations of retaliation are proven. This protection from retaliation is not intended to prohibit managers or supervisors from acting, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

4. REPORTING CHANNELS

If Datapulse employees have cause to suspect serious concerns, a report should be made by e-mail or by postal mail marked “Private & Confidential” to the following:

The Audit Committee Chairman
Datapulse Technology Limited
c/o ZICO Corporate Services Pte. Ltd.
77 Robinson Road,
#06-03 Robinson 77,
Singapore 068896

Email: whistleblow@datapulse.com.sg

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WHISTLE BLOWING POLICY

(Continued)

4. REPORTING CHANNELS (Continued)

All reports should preferably be submitted using the report form set up in the Annex. Reports received via the above email address will be automatically forwarded by the system to the Audit Committee Chair. The Audit Committee Chair will review the reports and channel them to the Chairman of Datapulse for review and follow-up as appropriate.

Where an alternative reporting channel other than the Audit Committee Chair of Datapulse is considered appropriate, the report may be sent directly to the Chairman of Datapulse to the Datapulse registered office address as above.

5. ASSESSMENT OF CONCERNS AHEAD

Assessment of the concern is based on the nature and severity of the concern raised and the credibility of the information, including the source of information. The Audit Committee (and/or the Datapulse Chairman as the alternative channel in Section 4 above) shall decide whether an investigation is required to examine the issues raised. For serious concerns (e.g. alleged criminal offence), the matter will be reported to the relevant agency.

6. INVESTIGATION

On receiving a report, the Audit Committee Chair and/or the Datapulse Chairman shall decide on the severity and authenticity of the concern. When there are issues to be further examined, the Audit Committee Chair will set-up an Investigation Team, comprising at least three independent members (i.e. those who are not connected to the concern reported). The Investigation Team may consist of external parties who have the required skills and expertise to conduct the relevant investigations. The whistle-blower will be kept informed of the progress of the investigations and, if appropriate, of the final outcome.

7. ANONYMOUS ALLEGATIONS

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously would be less credible, but they may be considered at the discretion of the Institute.

In exercising this discretion, the factors to be taken into account will include the:

- seriousness of the issues raised;
- credibility of the concern; and
- likelihood of confirming the allegation from attributable sources.

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WHISTLEBLOWER REPORT FORM

Please provide the following details for any suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Institute. Please note that you may be called upon to assist in the investigation, if required.

Note: Please follow the guidelines as laid out in the Whistle Blowing Policy.

| WHISTLE-BLOWER'S CONTACT INFORMATION | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-------|--|
| (This section or any part of the fields may be left blank if the reporter wishes to remain anonymous) | | | |
| Name | | | |
| Designation | | | |
| Company name | | | |
| Phone | | Fax | |
| Email | | | |
| Can you be contacted for more information? | | | |
| | | | |
| ALLEGED PARTY'S INFORMATION | | | |
| Name | | | |
| Designation | | | |
| Department | | | |
| Phone | | Fax | |
| Email | | | |
| WITNESSES'S INFORMATION (IF ANY) | | | |
| Name | | | |
| Designation | | | |
| Company name | | Phone | |
| Address | | Fax | |
| | | Email | |
| CONCERN/COMPLAINT: Briefly describe the misconduct/improper activity and how you have come to know about it. Specify what, who, where and how. If there is more than one allegation and use as many pages as necessary. | | | |
| 1. What misconduct/improper activity occurred? | | | |
| | | | |
| 2. Who committed the misconduct/improper activity? | | | |
| | | | |
| 3. When did it happen and when did you notice it? | | | |
| | | | |
| 4. Have you approached the person? If yes, what did he/she say? | | | |
| | | | |
| 5. Is there any evidence that you could provide us? | | | |
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WHISTLEBLOWER REPORT FORM

(Continued)

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| 6. Are there any other parties involved other than the suspect stated above? If yes, who are they? | |
| 7. Do you have any details or information which would assist us in the investigation? | |
| 8. Have you reported the incident internally or through any other channels? If yes, to whom have you made the report? | |
| 9. Any other comments? | |
| HOW TO SUBMIT THE FORM? | |
| For mailing, please mark "Private & Confidential" and send to: Audit Committee Chairman Datapulse Technology Limited c/o ZICO Corporate Services Pte. Ltd. 77 Robinson Road, #06-03 Robinson 77, Singapore 068896 | Email to whistleblow@datapulse.com.sg |
| SIGNATURE | |
| Signature | |
| Name | |
| Date | |