

Whistleblower Policy

Introduction

At ADAMftd Pte Ltd, we are committed to maintaining the highest standards of integrity and transparency in all aspects of our business. This Whistleblower Policy is designed to provide a safe and confidential environment for employees, partners, and stakeholders to report any unethical or illegal activities without fear of retaliation.

Purpose

The purpose of this policy is to encourage the reporting of any conduct that is illegal, unethical, or in violation of ADAMftd's policies and to ensure that such reports are handled appropriately and investigated thoroughly.

Scope

This policy applies to all employees, partners, contractors, and stakeholders of ADAMftd Pte Ltd. It covers reports of suspected misconduct including, but not limited to:

- Fraud and financial irregularities
- Corruption and bribery
- Harassment or discrimination
- Violations of company policies, including the Code of Conduct
- Safety violations
- Environmental harm
- Any other illegal activities

Reporting Mechanisms

Whistleblowers can report concerns through multiple channels, ensuring confidentiality and protection from retaliation:

- **Email:** Send an email to whistleblower@adamftd.com.
- **Telephone:** Call our dedicated whistleblower hotline at +1 202 991 2218
- **In-Person:** Reports can be made directly to the Compliance Officer or a member of the executive team.

Anonymous reports are accepted, though providing contact information may facilitate a more thorough investigation.

Protection Against Retaliation

ADAMftd strictly prohibits any form of retaliation against whistleblowers who report concerns in good faith. Retaliatory actions, including termination, demotion, harassment, or any form of discrimination, are grounds for disciplinary action, up to and including termination of employment.

Investigation Process

Upon receiving a report, ADAMftd will:

1. Acknowledge receipt of the report within five business days.
2. Conduct a preliminary assessment to determine if the report warrants further investigation.
3. Assign an independent team to investigate the allegations thoroughly and confidentially.
4. Take appropriate corrective actions if the investigation confirms misconduct.

5. Inform the whistleblower of the investigation's outcome, subject to legal and confidentiality constraints.

Confidentiality

All reports and investigations will be treated confidentially to the fullest extent possible. Information will only be disclosed to individuals with a legitimate need to know in order to conduct a thorough investigation and take appropriate action.

Compliance with Laws

ADAMftd's Whistleblower Policy is designed to comply with relevant laws and regulations, including Singapore's Employment Act and any applicable whistleblower protection laws.

Training and Awareness

All employees will receive training on ADAMftd's Whistleblower Policy, including how to report concerns and the protections available to them. Awareness campaigns will be conducted regularly to reinforce the importance of ethical behavior and the channels available for reporting misconduct.

Review and Updates

This policy will be reviewed annually and updated as necessary to ensure it remains effective and compliant with legal and regulatory requirements. Changes to the policy will be communicated to all employees and stakeholders.

Contact Information

For questions or further information about this policy, please contact:

- **Compliance Officer:** compliance@adamftd.com
- **Phone:** +1 202 991 2218

Additional Resources

- [Anti-Slavery Policy](#)
- [CSR Policy](#)
- [Code of Conduct](#)

This statement constitutes ADAMftd's Whistleblower Policy. It was approved by the board of directors of ADAMftd Pte Ltd on 30th June 2024.

Signed,



James York
Chief Executive Officer
ADAMftd Pte Ltd
30th June 2024