

Whistle-blowing Policy

The Group has implemented a whistle-blowing policy where wrongful acts or concerns can be raised without fear of reprisal. The whistleblowing policy is part of the Group's commitment to create an environment of integrity and transparency. Employees and external suppliers are strongly encouraged to report any concerns or wrongful act to the whistleblowing line. Any reported instance of unethical conduct will be thoroughly investigated and followed with appropriate disciplinary action.

Interested Person Transactions

The Group has adopted an internal policy in respect of any transactions with interested persons and established procedures for the review and approval of such transactions.

All interested person transactions will be properly documented and submitted to the AC for quarterly review to ensure that they are carried out on an arm's length basis, on normal commercial terms and will not be prejudicial to the interests of the shareholders.

The Company has not adopted any interested person transaction mandate which requires approvals from our shareholders.

Dealing in Securities

The Group has adopted and implemented policies in line with the SGX-ST's best practices in relation to the dealing of shares of the Company. The policies have been made known to directors, executive officers and any other persons as determined by Management who may possess unpublished material price-sensitive information of the Group.

The Group has advised Directors and all key executives not to deal in the Company's shares during the period commencing one month prior to the announcement of the Company's interim, half-yearly and full-year results and ending on the date of the announcement of the results.

The Group has reminded our Directors and officers that it is an offence under the Securities and Futures Act, Chapter 289, for a listed issuer or its officers to deal in the listed issuer's securities as well as securities of other listed issuers when the officers are in possession of unpublished material price-sensitive information in relation to those securities. Directors and executives are expected and reminded to observe insider-trading laws at all times even when dealing in securities within permitted trading periods. The Group has further reminded our Directors and officers not to deal in the Company's securities on short-term considerations.

Anti-corruption

Oceanus takes a strong stance against corruption and malpractice in the Group. All employees are educated on the Group's zero tolerance for corruption practices.

In the event of reported corruption incidents, independent investigations will be carried out in an appropriate and timely manner as and when required. Mitigating and preventive measures will be implemented to improve on the existing internal controls and policies to prevent recurrence.