

## REPORTING MATTERS OF SERIOUS CONCERN (‘WHISTLE-BLOWING’)

### A. POLICY STATEMENT

#### 1. REPORTING MATTERS OF SERIOUS CONCERN (‘WHISTLE-BLOWING’)

Whistle-blowing refers to the disclosure by employees, of malpractice as well as illegal acts or any incidences without any fear of being reprimanded or facing repercussions.

The JC&C Group encourages the reporting of matters of serious concern that may affect the professional and compliant operation of the Group’s businesses and its reputation.

The raising of genuine concerns about malpractice (whether by employees or third parties on behalf of the company) at the earliest practicable stage enables the JC&C Group companies to take appropriate action in a timely and ethical manner.

#### 2. WHAT SHOULD BE DISCLOSED

The matters that are relevant for disclosure relate to the ethical and compliance aspects of JC&C Groups’s businesses and which may affect the Group or any business unit’s reputation. Examples of the type of matters that should be reported include but are not limited to the following:

- (i) a criminal offense or potential criminal conduct, e.g. fraudulent activities;
- (ii) a failure to comply with any legal or regulatory obligation;
- (iii) the health and safety of any individual being put at risk;
- (iv) any racial or sexual harassment
- (v) any financial irregularities;
- (vi) the giving or receiving of bribes, other illicit payments or inducements; or
- (vii) deliberate concealment relating to any of the above.

#### 3. REPORTING PROCEDURE

An employee who wishes to report any reasonable suspicions of malpractice should raise the matter with his or her Head of Division. If the matter cannot be reported through normal reporting lines, then the report should be made to the Designated Director. If an employee has raised a malpractice concern and feels that having done so, the issue is not being dealt with in an appropriate manner, then the employee should also report the matter to the Designated Director or the Group Managing Director.

The Designated Director for **Jardine Cycle & Carriage Group** is **Mr. Jeffery Tan, JC&C Group General Counsel & Director of Group Corporate Affairs**. His contact details are via email: [Jeffery.tan@jcclgroup.com](mailto:Jeffery.tan@jcclgroup.com) or DID at +65 6470 8111.

Details such as full name, contact details and the case (i.e. background of the concerns, and probable reasons to be concerned about the situation) should be included in the report.

If an employee feels that it is necessary to report his or her concerns on an anonymous basis, he or she may do so. However, please bear in mind that it is generally easier to investigate and resolve the issues if the identity is known. Priority will be given to reports with complete details given of the whistle-blower.

#### **4. INVESTIGATION**

The matter giving rise to serious concern should be reported in writing and supporting documentation provided wherever possible. If this is not possible, oral reporting is acceptable.

The JC&C Group must investigate matters brought to its attention thoroughly and sympathetically.

All reported matters of serious concern are to be made available to Group Audit, who will bring any material matters to the attention of JC&C Group's Audit Committee at its regular meetings. Appropriate feedback should be given to the employee if they have identified themselves.

The JC&C Group's policy is to protect and support anyone who reports genuine (non-malicious or vexatious) matters of concern, but it is inevitable that in serious circumstances when the information results in legal or criminal proceedings the authorities would require the identity of the "discloser". It may also be that the actual information reveals the identity of the discloser. Anyone reporting matters of concern and believed that having done so, have been treated detrimentally, the employee concerned should raise this immediately to the Designated Director or the Jardine Matheson ('JM') Group General Counsel, Mr. Jeremy Parr.

#### **5. REPORTING TO THE JM GROUP GENERAL COUNSEL**

All employees may report directly to the JM Group General Counsel any matters of serious concern that they feel unable to report directly under their company's own procedures, as envisaged above, or if they believe that such matters have not been properly addressed by existing procedures.

#### **6. LEGAL OBLIGATIONS**

This policy does not affect the rights or obligations of any employee to report a criminal matter or other matter requiring disclosure to an external party as may be required by law.

#### **7. FALSE ALLEGATIONS**

If an employee deliberately makes an allegation that is false and malicious or for personal gain, disciplinary action will be taken against the employee on a case-by-case basis. Hence, employees are reminded not to abuse the policy but to raise genuine concerns. Employees are advised to make use of the existing procedures and channels, whenever practicable, to raise their concerns.

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