

(The English version shall always prevail in case of any discrepancies or inconsistencies between English version and its Chinese translation.)

Whistleblowing Policy

1. Purpose

This policy aims to set out and formalize the reporting channels on suspected misconduct, malpractice or non-compliance within Guoco Group Limited (“the Company”) and applicable subsidiaries based on which management can take appropriate action.

2. Scope of Application

This policy applies to the Company and its subsidiaries other than those subsidiaries which are covered by a separate subsidiary board-approved whistleblowing policy as guided by their jurisdiction rules and guidelines (together, “the Group”). Subsidiaries that are covered under separate whistleblowing policies include GuocoLand Limited, GuocoLand (Malaysia) Berhad, The Rank Group Plc., Clermont Hotel Group and Manuka Health New Zealand Limited, and any actual or suspected misconduct, malpractice or non-compliance relating to these subsidiary groups should be raised via their respective established reporting channels.

3. Policy Statement

The Company is committed to high corporate governance and probity standards and ethical and compliant business practices, and encourages reporting of concerns and actual or suspected misconduct, malpractice or non-compliance by any staff and/or external parties in any matter related to the Group.

4. Parties that May Raise Concerns

Any person (whether natural persons or legal entities or otherwise) may voice concerns under this policy about suspected misconduct, malpractice or non-compliance relating to any employee of the Group or any person or party which provides services to or have a business relationship with the Group.

5. Reportable Concerns

This policy focuses on actual or suspected misconduct, malpractice or non-compliance within the Group. These include failure to comply with legal or regulatory requirements, malpractice, impropriety or fraud, whether relating to internal controls, accounting, auditing and financial matters, danger to the health and safety of any individual, bribery or corruption. Deliberate or knowing participation in concealment of the foregoing are also reporting concerns.

This policy does not cover dissatisfaction solely on the grounds of customer service or personal grievance that does not relate to suspected misconduct, malpractice or non-compliance. Complaints about customer service and personal grievances should be dealt with separately by the customer service department and the human resources department as the case may be in accordance with established policies and procedures.

6. Reporting Channels

Report of any actual or suspected misconduct, malpractice or non-compliance may be raised via the following channels:

- By email: whistleblowing@guoco.com
- In writing:
Group Internal Audit
Guoco Group Limited,
50/F, The Center,
99 Queen's Road Central,
Hong Kong.

The whistle-blower is encouraged to provide his or her contact details as well as details of his/her concern, together with supporting documentation considered relevant. The whistle-blower may make use of the attached reporting form to provide the details required.

7. Protection for Whistle-blowers

The whistle-blower will be protected from retaliation, adverse employment action or legal action by the Group where the report is made in good faith.

8. Confidentiality

All information received and whistle-blowers' identities will be kept strictly confidential during the investigation process. Information received will be made available only to relevant parties involved in the investigation, and for investigation purposes only of the suspected misconduct, malpractice or non-compliance.

9. Investigation Process

To facilitate investigation and follow-up actions, the whistle-blower is encouraged to make reports on a named basis and provide his or her contact information.

All information received shall be investigated by Group Internal Audit or other relevant persons instructed by senior management, with the findings reported to senior management and the Board Audit and Risk Management Committee of the Company.

Management may take disciplinary action against any persons found to have committed misconduct, malpractice or non-compliance, and the matter may be reported and information provided to the police or relevant authorities / governing or professional bodies as the findings may call for.

Investigation findings will be documented to ensure accountability.

10. Prohibition Against False Allegations and Malicious Allegations

Any intentional or reckless making of false allegations or malicious allegations is strictly prohibited. Persons found to have intentionally or recklessly made false allegations or malicious allegations may be subject to disciplinary action or legal action where appropriate.

11. Implementation, Review and Disclosure of the Policy

This policy is approved and adopted by the Board of Directors of the Company. The Board Audit and Risk Management Committee of the Company has the overall responsibility for the oversight and periodic review of the policy, with implementation delegated to Group Internal Audit. The policy should be reviewed at least annually to ensure that the whistleblowing mechanism remains effective.

A copy of this Policy shall be disclosed on the Company's website.

WHISTLEBLOWING REPORTING FORM

You may send the report, marked confidential and addressed to Group Internal Audit, by post to the relevant address below or by email as follows:

By Post: Group Internal Audit
Guoco Group Limited
50/F, The Center,
99 Queen's Road Central,
Hong Kong

By email: whistleblowing@guoco.com

Name of the Reporter*:	
Contact Details*:	
If you are an employee of Guoco Group Limited or its subsidiary, please indicate the name of the employer company and department you belong to:	
If you are not an employee of Guoco Group Limited or its subsidiary, please indicate your relationship with the latter (e.g. a customer, supplier, contractor) and the name of the firm involved:	
The names of those involved (if known):	
Details of your concern (please provide as much details as possible for investigation purpose):	
Supporting document(s) attached? (Please tick)	Yes <input type="checkbox"/> No <input type="checkbox"/>

* Not mandatory but providing such information will enable us to follow up with the report and facilitate the investigation as may be necessary