

Whistleblowing Policy

Introduction

At Hongkong Land Holdings Ltd., (“Hongkong Land”) we require our business units and departments to maintain proper standards of business conduct and to comply with all applicable laws and regulations. To support this policy, we have established a procedure for reporting matters of serious concern that may affect the operation of Hongkong Land’s business and its reputation.

We have introduced this procedure to encourage our employees to raise serious concerns at the earliest practical stage, so that senior management can take appropriate and timely action.

Matters of Serious Concern

Below are examples of the types of matters that we would like our employees to report:

- Criminal offences, such as fraudulent activity
- Failures to comply with legal or regulatory obligations
- When the health and safety of any individual is being put at risk
- Racial or sexual harassment
- Financial irregularity
- Deliberate concealment of any of the above
- Violations of our Code of Conduct

Raising a Concern

Option One

If an employee has a serious concern about an act or omission that will impact Hongkong Land’s business or its reputation, or will harm or put an individual at risk, the employee should raise it first with their immediate superior or line manager. This may be done orally or in writing.

Option Two

If an employee feels unable to raise the matter with their immediate superior or line manager, the employee can raise the matter with:

- The head of their department or the head of business unit for which they work
- or
- The head of Human Resources.

Option Three

If an employee is still uncomfortable, the employee can raise the matter with:

The Chief Financial Officer of Hongkong Land
or
The Executive Director of the Relevant Business Division
or
The Group Counsel

Option Four

If the employee feels that the matter cannot be discussed through any of these options or if the first three options have been followed and an employee still has concerns, the employee can contact the Group General Counsel of Jardine Matheson

How We Will Handle the Matter

Once an employee has raised a concern, Group Counsel will review the matter to assess what action should be taken. In the event a concern is raised under Option Four, Group General Counsel of Jardine Matheson may take charge of the matter. This may involve an internal inquiry or a more formal investigation. The Group Counsel, or Group General Counsel, will inform the employee of whether they need further assistance from the employee.

Confidentiality

Hongkong Land and its managers will protect and support anyone raising genuine matters of concern. If the employee asks Hongkong Land to protect their identity, Hongkong Land and its managers will not disclose the employee's identity without his/her consent. However, in serious circumstances, when the information results in legal or criminal proceedings, the authorities may require disclosure of the employee's identity by law where our compliance may be required.

We hope this policy gives our employees the reassurance they need to raise such matters internally. It does not affect their rights or obligations to report criminal matters to the relevant authorities.