

COMFORTDELGRO WHISTLEBLOWING POLICY

Last Updated: August 2021

(i) What is Whistleblowing?

As employees are expected to abide by the principles of the Code of Business Conduct (“Code”) and also maintain and demonstrate the highest professional standards and ethical conduct in the performance of their duties, they are encouraged to bring to the attention of Management any violations of the Code; and/or any unethical or unlawful business conduct or dealings, with the intention for necessary corrective actions to be taken to address the violations.

(ii) Who is a Whistleblower?

A whistleblower may be an employee or external party who, in the course of his/her duties or personal engagement with the Company or employee, has witnessed or who has knowledge that another fellow employee has previously engaged, is currently engaging or will be engaging in practices/activities that will be in violation of the Code, or unethical or unlawful business conduct or dealings, and decides to highlight these practices to Management with a view that necessary corrective actions will be taken to prevent the occurrence of such undesired practices/activities.

Whistleblowing is not a means by which anyone including a disgruntled employee can abuse, wreak revenge on or sabotage another person or fellow employee without any just cause or to hold an employee at ransom. Any action of whistleblowing must be genuine, substantiated with proper evidence, and directed to the ComfortDelGro Alert Line within a reasonable time. Where necessary, employees must be prepared to testify or provide statement of such actions. It should not be unfounded or malicious allegations made against another employee. ComfortDelGro will not tolerate the abuse of this Whistleblowing process.

A whistleblower need not have to be directly or indirectly affected by or have a personal interest in the outcome of the actions giving rise to the whistleblowing. So long as an employee has a genuine concern and reasonable grounds to believe that the actions of a fellow employee is in breach or will be in breach of the Code or principles of ethical conduct and fair dealing, he can be a whistleblower. However, the whistleblower must act in good faith at all times.

The Policy allows for reporting by Employees or External Parties of such matters, without fear of reprisal, discrimination or adverse consequences, and also permits ComfortDelGro to address such reports by taking appropriate action, including, but not limited to, disciplining or terminating the employment and/or services of those responsible.

(iii) Activities Giving Rise to Whistleblowing

Listed below are some activities that could potentially give rise to whistleblowing. It is not an exhaustive list:

- Theft, damage or misappropriation of company's properties, using company's properties for own benefit or any unlawful purpose, or unlawful dissemination or disclosure of company's proprietary information, know-how and trade secrets;
- Fraud. For example
 - (i) falsification or alteration of company's records, accounts or financial information;
 - (ii) submission of false invoices and claims for reimbursement of expenses;
 - (iii) failure to account or misuse of company's monies in possession; and
 - (iv) knowingly provide information which is false or misleading;
- Engaging in activities prohibited by law; or activities in breach of any legal or contractual obligations. For example failure to perform any material terms of any contract or agreement without any lawful reason;
- Unlawful or Unethical conduct. For example violence, threatened violence, bullying, bribery or acceptance of monies, gifts or monetary benefits in exchange for personal favours;
- Making statements or remarks which are defamatory or cause disruption to racial harmony;
- Sexual harassment or adopting discriminatory practices;
- Trading in the shares of ComfortDelGro and its subsidiaries while in possession of materially confidential and price-sensitive information including the procuring or providing of such information to any third party to deal in such shares;
- Misuse, including the downloading and sending of information which will infringe third party's copyright; information that is derogatory or offensive to a third party;
- Engage in activities or practices that will pose a danger to the health and safety of others or the environment;
- Conflict of interest without disclosure. For example, a superior and his/her direct reporting subordinate are in a relationship; and
- Breach of ComfortDelGro's policies or the Code of Business Conduct

(iv) ComfortDelGro Alert Line

The ComfortDelGro Alert Line comprising the following personnel has been set up to facilitate the reporting of incidents and the handling of information or evidence on matters that will give rise to whistleblowing:

- Group Chief Internal Audit Officer at DID: +65 6383 7010 or by email to gcao@comfortdelgro.com

Mail address:

205 Braddell Road, Singapore 579701,
East Wing Level 7, GCIAO Office

Alternatively, the complainant may submit the concerns via the intranet <https://hress.comfortdelgro.com.sg/WhistleBlowing/WhistleBlowing.asp>

- Any complaints involving the Group Chief Internal Audit Officer may be reported to the Chairman of the Audit & Risk Committee (ARC) via this email: ARC_Chairman@comfortdelgro.com
- The submission of complete information is important and helps in investigations. Please provide the following, where possible:
 - (i) Name(s) of person(s)/company(ies) involved
 - (ii) Date, time and location of incident
 - (iii) Frequency of occurrence of the incident
 - (iv) Value of any money or assets involved
 - (v) Physical evidence
 - (vi) Details of incident
 - (vii) Any other information that may substantiate the feedback/complaint

(v) Investigations and Disciplinary Actions

All reports of incidents, including information or evidence provided, on matters relating to whistleblowing will be handled discreetly and every effort will be made to maintain confidentiality of the information provided, within the limits of the law. Whistleblow in letters or other sources like those received by Corporate Communication/Human Resources departments would also be circulated to Group Chief Internal Audit Officer (GCIAO).

Reported incidents will be dealt with promptly and thoroughly. GCIAO will administer and assess the cases, other than incidents involving Group Chief Internal Audit Officer. For those significant cases, GCIAO will propose to the ARC Chairman for decision to proceed for investigation.

Group Internal Audit will lead the investigation and work with HR or Business Units, whichever the case is relevant to that party. The outcome of the investigation would be formally reported to the Management and ARC.

After consultation with relevant senior management of ComfortDelGro, appropriate and fair disciplinary actions, including dismissal may be taken if it is determined that a violation has occurred or that the allegations are substantiated. ComfortDelGro Group reserves the right to refer or report any concern or complaint to the relevant regulatory authorities. The ARC will also be informed of the outcome of all investigations. Where appropriate, internal control measures and procedures will be improved upon or additional measures put in place to prevent the recurrence of such incidents.

The number of whistleblow cases regardless of significance will be registered by GCIAO, and will be updated to the ARC quarterly.

To ensure that employees who whistleblow are not victimised, black-listed or discriminated by his/her supervisors or fellow colleagues, ComfortDelGro will not reveal the employees' identities or information leading to their identities being known. ComfortDelGro views such victimisation, black-listing or discrimination seriously and will not hesitate to take disciplinary actions against those who are involved in such practices.

All employees are responsible to ensure the highest standards of ethics, honesty, openness and accountability in line with the ComfortDelGro's commitment to enhance good governance, transparency and safeguard the integrity of ComfortDelGro. Training is provided regularly to remind staff to adhere to this Policy.

ComfortDelGro will periodically review this Policy to ensure its continued effectiveness.