



## **ComfortDelGro Corporation Limited**

### **Code of Conduct**

#### **1. Purpose**

The Employee Code of Conduct (Code) of ComfortDelGro Corporation Limited (ComfortDelGro) and its subsidiaries (Group or we) outlines the expected conduct of all employees across the Group globally.

The Code and the Group's values, are to be followed both in spirit and letter, always bearing in mind that every employee has a personal responsibility to incorporate, and to encourage others to incorporate, the principles of the Code and values into his/her work.

All employees are always accountable for their actions. It is every employee's responsibility to be kept updated on the requirements of the Code, to participate in mandatory training and to ask questions if he/she needs clarification. We encourage our employees to speak up and look for guidance where needed, and to make sure that they have all necessary approvals for key decisions. This minimises the risk of deviation from, or a violation of, the requirements set out in the Code.

#### **2. Scope**

The Code applies to everyone working for the Group, regardless of location, role or seniority. All employees employed by the Group are expected to know and comply with the Code. Failure to comply with the Code is treated very seriously and may result in disciplinary action, including dismissal. Failure to comply may also expose the Group and its personnel to other sanctions and liabilities.

While the Code is written specifically for our employees (whether permanent, temporary or otherwise), we also expect our extended workforce such as contractors, consultants, agents and any other third party who act in our name or on our behalf to follow the requirements of the Code. Where we participate in but do not control a joint venture relationship, we will encourage our partners to meet the requirements of the Code in relation to both the joint venture and their own operations. Failure of a member of our extended workforce to follow the Code can result in termination of their relationship with the Group.

#### **3. Our Purpose & Values**

##### **3.1. Our Purpose**

Mobility for a Better Future

At ComfortDelGro, we go beyond transporting people. We are committed to driving positive impact for a better future through:

- Providing innovative mobility solutions for safe, reliable journeys
- Building a more resilient and sustainable organisation

##### **3.2. Our Values**

Founded on decades of integrity and trust, our values are lived by every employee and felt by all who rely on us across the world.

### **3.2.1. We Collaborate to Succeed**

- As one team with valued partners.

### **3.2.2. We are Driven**

- Continuously innovate to drive positive impact.

### **3.2.3. We Invest in Growth**

- Strengthening our businesses and people.

## **4. Policy**

### **4.1. Our Conduct**

#### **4.1.1. Personal Responsibility**

- (a) It is the spirit and policy of the Code to prevent the occurrence of unethical or unlawful activities and to immediately stop any such activities that are detected and to discipline persons who engage in such activities. The Company and employees gain credibility by adhering to our commitment, displaying honesty and integrity and reaching company goals solely through honourable conduct. The Board and Senior Management lead by cultivating an environment and culture that promote good corporate governance and business integrity.
- (b) All employees of the Group are responsible for the full understanding of and compliance with the Code. It encompasses delivering quality services to our customers, maintaining independence and integrity of our services, and dealing fairly in business relations with our customers, suppliers and other stakeholders, and complying with all legal requirements and ethical business practices. While the Code gives specific instructions on what to do or what not to do, employees should always be guided by the underlying principle of commitment to professionalism and to support the Group's values and interests at all times. Depending on the severity, employees who knowingly violate any provisions of the Code will face disciplinary actions, including dismissal. Where local governmental or regulatory laws are breached, violators may be reported to the relevant authorities. In cases involving monetary or financial losses arising from fraudulent or unethical misconduct, the Group reserves its right to pursue the recovery of such losses at its discretion. Disciplinary actions will also be taken for conduct that is considered unethical or improper even if the conduct is not specifically covered by the Code. Adherence to the Code by each Business Unit's employees will be assessed as part of the Business Unit's performance appraisal under the Governance Perspective of its Balanced Scorecard (BSC).
- (c) If an employee has a concern about the integrity of another employee's conduct or any business dealings or transactions that contravenes the Code, such employee has a duty to report such concern to the Whistleblowing Hotline.
- (d) All reports will be handled discreetly and every effort will be made to maintain confidentiality of the information provided, within the limits allowed by the law.

#### **4.1.2. Responsibility to our Customers**

- (a) The Group is committed to providing products and services that meet or exceed our customers' expectations in terms of quality, reliability and value.

All employees should anticipate our customers' needs and constantly upgrade their skills and knowledge to deliver outstanding value and quality services.

- (b) We will engage in fair competition within the confines of applicable laws and maintain high ethical standards in all of our business dealings. Our credibility to our customers depends on our ability to fulfil our commitments, to earn their trust and to provide for their safety. We also aim to communicate clearly to our customers at all times.

#### **4.1.3. Workplace**

- (a) Respect for the Individual and Diversity

- (i) The Group is committed to providing a workplace that respects employees as unique individuals and supports the cultural and ethnic diversity of its workforce. We subscribe to creating a work environment that enables us to attract, retain and fully engage a diversity of talents.

- (ii) We are also committed to providing a workplace that treats each employee fairly and equitably regardless of age, gender, race or religion. We welcome employees' suggestions and participation to create a positive environment at the workplace. We will respect all points of view, and will help and encourage all employees to develop their full potential.

- (b) Harassment, Discrimination and Bullying

- (i) The Group strives to provide an inclusive and harmonious environment in which employees act with dignity and have mutual respect for one another, thereby promoting employee productivity and positive morale.

- (ii) The Group prohibits discrimination, harassment and bullying in any form – verbal, physical, or visual. If you believe you have been bullied, harassed, or discriminated against by anyone in the Group, or by a Group partner or vendor, we strongly encourage you to immediately report the incident to your supervisor, Human Resource (HR) Department or both. Similarly, supervisors and managers who learn of any such incident should immediately report it to HR Department. The HR Department will promptly and thoroughly investigate any complaints and take appropriate action.

- (iii) Workplace harassment occurs when a co-worker, manager or any other person at the workplace (e.g. a customer, contractor or volunteer) harasses, alarms or distresses another person with his or her behaviour. It may also pose a risk to the victim's safety and health.

- (iv) Any type of harassment is prohibited and disciplinary action will be taken against offenders. Harassment can also include actions, language, written words or objects that create an intimidating or hostile working environment. Humiliation, bullying and discriminatory acts are also forbidden.

Forms of harassment include but are not limited to:

- Threatening, abusive or insulting language or non-verbal gestures
- Cyber bullying
- Sexual harassment
- Stalking

Harassment can take place in any setting:

- Outside the office such as on business trips
- On clients' premises
- At any other work-related occasions

It can also happen through:

- Email
- Text messaging
- Social media

(c) Any conduct of a sexual nature which would create an intimidating, hostile, or offensive working environment would be deemed to be sexual harassment. Employees must not engage in sexual harassment, or conduct themselves in a way that could be construed as such.

(d) The Group will not tolerate undesirable behaviours such as discrimination, violence, intimidation or harassment, whether sexual, racial or otherwise. Any discrimination based on gender, age, race, religion, marital or family status, political beliefs, sexual orientation, disability or nationality is not acceptable.

(e) Any intimidation, coercion, threats, bullying or actions leading to bodily and/or mental harm are unacceptable at all times.

(f) Teamwork and Cooperation

A spirit of teamwork and cooperation is actively promoted and encouraged within the Group. As individual employees, we bring together our skills, knowledge and experience to deliver the best results to our customers, business partners, suppliers, shareholders, the authorities and communities we operate in. Leveraging on our initiatives and creativity, the Group will cohesively strive to build on our strengths and continue to grow and expand our businesses globally.

(g) Workplace Health and Safety

(i) The Group conducts business in accordance with applicable health and safety requirements and strives for continuous improvement in its health and safety policies and procedures.

(ii) The safety of our employees and customers are of paramount importance. Regulations and procedures are put in place to guide proper safe work practices for the well-being of all employees and customers.

(iii) Employees are to observe safety rules and carry out safe work practices that apply to their jobs to ensure a safe work environment for everyone.

(iv) All employees are expected to perform their work in compliance with applicable health and safety laws, regulations, policies and procedures and apply safe work practices at all times in all locations.

(v) Applicable safety and health requirements must be communicated to visitors, customers or contractors at any company location.

(vi) Employees are required to report workplace injuries, illnesses or unsafe conditions, including "near-misses" immediately.

#### **4.1.4. Business Ethics**

##### **(a) Conflicts of Interest**

- (i) Employees should avoid situations that will put themselves in a position that will present actual or potential conflict between their personal interests and the interests of the Group. A conflict of interest occurs when an employee's personal interest interferes with that of the Group. Employees should be committed to the Group and are expected to safeguard its best interests and exercise sound judgement at all times.
- (ii) An employee of the Group must not take additional employment with other organisations or operate his/her own business/commercial activity if such employment or activity will create an actual or potential conflict of interest with that of the Group. Prior written consent must be obtained from the Management or the HR Department, as appropriate, to engage in any such employment and/or business or commercial activities, whether such employment and/or activity is intermittent or continuing, and whether or not compensation is received. No prior approval is needed for volunteer work during personal time in a non-profit organisation.
- (iii) When dealing with external parties (e.g. suppliers, vendors), employees who have relatives holding senior appointments in these companies, or working as vendors dealing directly with us, are to declare their interests to their immediate superiors and ensure that there is no conflict of interest. Where there is actual or potential conflict of interest, the employee should abstain from participating in the decision-making process.
- (iv) An employee of the Group must not directly supervise a family member or related family member or anyone with whom the employee has a close personal relationship. An employee must not allow a friendship or any personal relationship with another employee to influence his/her judgement in work-related matters such as hiring, job assignments, appraisals, promotions and compensation decisions.

##### **(b) Integrity of Accounts**

- (i) The Group's financial, accounting and other reports and records should accurately and factually reflect the transactions and financial condition of the businesses in accordance with recognised and accepted accounting standards and principles. No payment may be requested, approved or made with the intention that any part of such payment is to be used for any purpose other than as described in the supporting documents.
- (ii) Internal accounting, financial controls and disclosure controls that are in place must be strictly adhered to and complied with. Financial, accounting and other reports must be accurately and fully disclosed. The financial accounts of the Group must be reconciled on a regular basis in accordance with the applicable accounting controls.
- (iii) The Group prohibits false or misleading entries in its books and/or records for any reason and will not condone any undisclosed or unrecorded bank accounts or assets established for any purpose.

- (iv) Expenses incurred by employees in performing the Group's business will be reimbursed through the filing of expense reports, which must be documented accurately and completely.

(c) Gifts, Entertainment, Loans, Donations or other Favours

- (i) Business gifts and entertainment are courtesies that build goodwill and sound working relationships among business partners. However, the Group does not tolerate improper use of gifts or entertainment to gain any special advantage in a business relationship.
- (ii) The Group is committed to winning business only on the merits of our services and people while complying with all legal requirements for receiving and giving of gifts and hospitality.
- (iii) Employees shall not solicit gifts or entertainment, or seek favours or preferential terms for personal benefit from any business partners. A gift of money or in any other form should never be given or accepted from customers or suppliers if doing so might compromise, or appear to compromise, the ability to make objective business decisions for the Group.
- (iv) Receiving gifts in whatever form or accepting entertainment, loans or other favours may compromise an employee's ability to make objective, independent and fair business decisions. Offering excessive gifts in whatever form or entertainment to others can be open to misinterpretation. Employees are therefore not permitted to offer or accept any gifts or entertainment without first seeking their supervisor's authorisation.
- (v) Business gifts and entertainment presented on the Group's behalf, the type and amounts of which must be appropriately scaled to be consistent with generally accepted business practices, customs and ethical standards and must not violate any applicable laws, regulations or policies of any country we operate in or company which we have dealings with.
- (vi) Employees who receive gifts, directly or indirectly in relation to their course of employment with the Group, and which may violate the spirit or intention of the Code should promptly notify their supervisor and declare such gifts to their respective HR Departments.
- (vii) Employees must not, on behalf of the Group, make any contributions or donations (whether monetary or non-monetary) to any political parties, organizations or candidates or election agents involved in parliamentary or presidential elections, nor carry out any lobbying on behalf of any such parties.
- (viii) Employees must not make charitable donations or sponsorships to gain an improper advantage for himself/herself or the Group or improperly influence business decisions. The Group will only authorise charitable donations and sponsorships that are lawful and ethical in accordance with local laws and practices. All charitable donations and sponsorships require approval as per the Group's Delegation of Authority.

(d) Fraud

- (i) Fraud is defined as deliberate deception by the employee to secure unfair or unlawful gain or benefit for himself or herself (or such persons as may be under

his/her control, influence or instruction), whether in cash or in kind, either directly from the Group or indirectly from the Group's business partners. It also includes false representations to third parties that the employee is authorised by the Group to conduct certain acts.

(ii) Employees should adhere to the overriding principle of upholding the Group's interests and always acting in the best interests of the Group.

(iii) Fraud can be broadly categorized into three groups. Examples of fraud include but are not limited to:

1. Theft/Cheating

- Cash fraud
- Cheque / electronic banking fraud
- Payroll fraud
- Personal use of Group's assets
- Theft of Group's assets including technology and intellectual property
- Falsification of expense claims
- Destruction or removal of records or other property without approval

2. Accepting bribery, kickbacks and other illegal payments

- Procurement fraud
- Vendor kickbacks
- Customer kickbacks

3. Failure to disclose an interest or intentionally distorting financial statements or other records to mislead, misrepresent, or conceal the misappropriation of assets or otherwise for gain

- Insider trading
- Conflict of interest
- Fraudulent financial reporting
- Falsifying company records / expenses / invoices
- Making commitments fraudulently in the name of the Group
- Forgery of signature or documents to secure credit or financial commitment in the name of the Group
- Misrepresentation of authority to third party.

(e) Bribery

The Group adopts a 'zero tolerance' approach to any acts of fraud, corruption or bribery. Bribes, kickbacks, illegal or unauthorised payments, donations, political contributions, and any other offer of items of value that may be intended to inappropriately influence or reward a customer to order, purchase or use our products and services, whether provided directly or through a third party such as a distributor, customs broker or other agent are strictly prohibited. The Group complies with all the laws of the jurisdictions in which it operates. All employees are responsible for following the Group's procedures, including audit controls, for carrying out and reporting business transactions.

This section is to be read in conjunction with the Group's Fraud Policy, which provides detailed guidance on the definition, types, and procedures for preventing, detecting, and reporting fraud.

#### **4.1.5. Our Corporate Environment**

##### **(a) Corporate Social Responsibility**

The Group endeavours to build an inclusive and diverse workforce, in which all employees are valued for their diverse skills, abilities and creative potential that they bring to the workplace. To cultivate a sustainable work-life culture, the Group strives to promote respect, integrity, teamwork, achievement and acceptance regardless of race, gender, pregnancy or maternity, parental status, age, marital or partnership status, religion, socio-economic status, colour, national origin, citizenship, disability, sexual orientation, military status or any other characteristic protected by law.

##### **(b) Environmental Protection**

The Group is committed to operating in an environmentally responsible manner, from the provision of products and services, to the operation of its offices and facilities, selection of suppliers and other business activities.

The Group complies with all applicable environmental laws and regulations as well as self-directed commitments to sustainability practices and environmental protection.

##### **(c) Political Activities**

- (i) The Group is an independent business organisation, not affiliated to any political party and remains a neutral party to whichever partisan politics in the countries it operates in.
- (ii) An employee's participation in any political party and/or its activities is completely personal and voluntary. However, association with political party(ies) when there is a conflict of interest with that of the Group or participation in unlawful political activities will not be tolerated.
- (iii) Political views expressed by employees must be entirely personal and in no way associated with or attributed to the Group.

#### **4.1.6. Business outside company time**

##### **(a) An employee shall not, without prior approval from the Group:**

- (i) have an interest in any organisation which has or is seeking business dealings with the Group where there is an opportunity for preferential treatment, except where the interest comprises securities which are publicly-listed;
- (ii) serve, whether for reward or otherwise, as an officer of other organisations, or be in any management capacity for or as consultant to, any individual or organization;
- (iii) buy, sell or lease any property, facility or equipment from or to the Group or any organisation doing or seeking business with the Group, and;
- (iv) undertake any part-time or contract work which will, in the opinion of the Group, interfere with or affect the performance of his/her duties.

##### **(b) Approval shall be given by Group Chief HR Officer, in consultation with the relevant Group Officer or Business Unit Head.**

#### **4.1.7. Outside Employment**

- (a) Outside Employment refers to work, whether paid or unpaid, with an external organisation, while still employed by the Group. This includes work during paid or unpaid leave.
- (b) All employees wishing to engage in outside employment must seek and obtain approval through the Group's declaration platform before engaging in that employment and abide by any specific conditions attached to that approval.
- (c) In deciding to approve such applications for outside employment, the Group will consider if such work presents any real, perceived or potential conflict of interest with the employee's official duties, and whether it will adversely affect the employee's performance at the Group.
- (d) Employees granted approval for outside employment must observe the following conditions:
  - (i) Under no circumstances should an employee supply services to the Group as part of his work outside the Group.
  - (ii) The outside employment does not present any real, perceived or potential conflict of interest with the employee's official duties.
  - (iii) The outside employment must not adversely affect the performance of his official duties (eg. fatigue or limited availability).
  - (iv) The outside employment does not cause damage the Group's reputation or interests, or be in conflict with the Group's interests.
- (e) Any approval to engage in work outside the Group may be revoked if any of the above conditions are not met.
- (f) It is the duty of the employee to inform the Group to review such approval if the nature or circumstances of the outside employment changes, or if their official duties change in a way which will adversely affect any of the above conditions in subsection (d).
- (g) Subject to the conditions in subsection (d), no prior approval is needed for volunteer work during personal time in a non-profit organisation.

#### **4.1.8. Directorships**

- (a) As a general policy, consent will not be given to employees to accept directorships in another organisation.
- (b) Exceptions may be considered in instances where the companies are related to the Group, Statutory Boards/Public Service and family businesses and approval has been given by the relevant Group Officer and in consultation with the Group Chief HR Officer; and
- (c) All employees who have been granted permission to sit on the Board of other companies not related to the Group may be required to surrender part of their directors' fees to the Group.

#### **4.1.9. Investment in private companies**

- (a) The Group shall as a general rule, grant permission to employees to invest in unlisted private companies or businesses provided that:

- (i) the interest is purely for investment, and will not lead to any conflict of interest;
- (ii) the employee cannot be a director or hold any official position in the company, and
- (iii) there is no opportunity for preferential treatment in transactions pertaining to the supply or purchase of goods and services with the Group.

In all instances, specific application in writing must be submitted to the Group Chief HR Officer through the relevant Group Officer or Business Unit Head for approval.

#### **4.1.10. Public Appearance**

- (a) An employee may participate in public programmes including commercially sponsored programmes, modelling for screening or publication in other media provided that:
  - (i) prior approval is given by the Group;
  - (ii) such activities are carried out during the employee's own personal time; and
  - (iii) such programmes do not compete with the Group's business and interests.

Approval shall be given by the Group Chief HR Officer, in consultation with the Group Officer or Business Unit Head.

#### **4.1.11. Legal Proceedings**

- (a) Employees shall immediately inform the relevant Group Officer or Business Unit Head, giving details, of any pending civil or criminal action, lawsuit, court proceedings, police investigation or any other equitable charges that may be brought against him that is capable of affecting and/or interrupting his employment with the Group. HR will advise on such action or proceeding and wherever necessary, implement any measures, interim or otherwise, to address the effect that such action or proceeding may have on the employee, the area of his work and the Group.

#### **4.1.12. Conduct and Use of Information & Assets**

- (a) Handling Information

Information is a valuable corporate asset. Open and effective dissemination of information, subject to business confidentiality, is essential to our success.

Any information which is not public knowledge outside of the Group or not released to the public is considered confidential. If an employee acquires any information in relation to the Group or its businesses in the course of employment, he/she must not share it with others, including fellow colleagues, unless they need to know it for legitimate business reasons and such sharing will not compromise the Group or violate any law or regulation.

- (b) Privacy and Protection of Personal Data

The Group values and safeguards the privacy of all our employees, job applicants, business partners and consumers. It is every employee's responsibility to adhere to the following core principles when we handle personal data:

- (i) Process data lawfully, fairly and in a transparent manner.
- (ii) Collect data for specified, explicit and legitimate purposes only.
- (iii) Do not collect or process data you do not need.
- (iv) Keep data accurate and up to date.
- (v) Limit how long you keep collected data.

- (vi) Ensure appropriate security of personal data.
- (vii) Keep personal data confidential.

Employees are to always act in accordance with the Personal Data Protection and Privacy Policy.

(c) Insider Trading

Using confidential material and/or price-sensitive information for trading securities or tipping others to trade is both unethical and illegal. No employee can deal in (i) the securities of ComfortDelGro and its listed subsidiaries, SBS Transit Ltd and VICOM Ltd on short-term considerations and/or while in possession of unpublished material price-sensitive and/or trade-sensitive information relating to the relevant securities; and (ii) the securities of other listed companies while in possession of unpublished material price-sensitive and/or trade-sensitive information relating to those securities. Confidential material and/or trade-sensitive information is any information about a company that has not reached the general marketplace and is likely to be considered important by investors in deciding whether or not to buy or sell securities of that company. Care must be taken not to make such information available to others who might profit from it. To prevent even the appearance of improper insider trading, the Group adopted a "Policy on Securities – Restrictions Against Dealings" (Policy) for all of its directors, officers and employees and their family members, as well as for others who have access to information through business relationships with the Company.

(d) Computer Resources

The Group takes a serious view and will not tolerate any illegal use or misuse of computer resources, including the downloading and sending of information which will infringe third party's copyright; sending information that is derogatory or offensive to a third party; and causing damage directly or indirectly to the Group.

(e) Trade Control and Anti-Competition

The Group practises fair competition and complies with all competition and anti-trust laws. It does not deal with sanctioned countries, entities and individuals in the course of business, neither does it participate in anti-competitive agreements or abuse its power in a dominant position through practices which harm or exclude competitors, customers and suppliers.

(f) Anti-Money Laundering and Countering Financing of Terrorism

The Group complies with all applicable laws on money laundering and terrorism financing. It only conducts legitimate business activities, with funds derived from legitimate sources, and ensures there are risk-based customer due diligence processes and ongoing monitoring to detect and report any suspicious activities.

(g) Ethical Procurement

The Group is committed to understanding and minimising the social and environmental consequences of our business operations.

All suppliers and business partners are required to adhere to the values and principles consistent with the Group's, such as:

- (i) Compliance with laws and regulations
- (ii) Ethical business dealings
- (iii) Work labour, health and safety
- (iv) Human rights and discrimination
- (v) Environmental protection and conservation

(vi) Personal data protection and confidentiality

#### **4.1.13. Conflict of Interest & Declaration**

A conflict of interest normally occurs when an employee's personal activities, investments or associations compromises their judgment or ability to act in the Group's best interests. Employees should avoid situations that can give rise to conflicts of interest and ultimately affect their productivity in the company.

Employees are required to disclose any relationships, associations or activities that could create actual, potential, or even perceived, conflict of interest, as soon as they become aware of it.

Prospective employees are required to declare any potential conflicts of interests during the stage of offer of employment.

The Group conducts an annual declaration exercise where all employees are required to confirm that their employee personal information is up-to-date and declare that they have read and agree to comply with the Code and other policies of the Group. This annual declaration exercise is conducted via the relevant HR system. Ad-hoc declaration of employees' personal information and Code of Conduct can be made via the same system throughout the year. Any employee who fails to do so shall be deemed to have violated the Code and subject to disciplinary proceedings.

Employees are required to declare any situations which may give rise to an actual or potential conflict of interest as and when they arise to the HR department.

### **4.2. Our Commitment**

#### **4.2.1. Whistleblowing Policy**

(a) What is Whistleblowing?

As employees are expected to abide by the principles of the 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.

(b) 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 Group or employee, has witnessed or has knowledge that an employee of the Group has previously engaged, is currently engaging or will be engaging in practices/activities that are in violation of the Code, or unethical or unlawful business conduct or dealings, and decides to highlight these practices/activities/conduct/dealings to Management with a view that necessary corrective actions will be taken to prevent the occurrence of such undesirable practices/activities/conduct/dealings.

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 just cause or to hold an employee ransom. Any act of whistleblowing must be genuine, substantiated with proper evidence, and directed to the Whistleblowing Hotline within a reasonable time. Where necessary, the whistleblower must be prepared to testify or provide a statement in respect of the contents of his/her report. Whistleblowing reports should not be based on unfounded or malicious allegations

made against another employee. ComfortDelGro will not tolerate the abuse of its whistleblowing process.

A whistleblower does 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 are 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.

Our whistleblowing 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, disciplinary action or terminating the employment and/or services of those responsible.

(c) Activities Giving Rise to Whistleblowing

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

- (i) 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;
- (ii) Fraud. This covers instances which include:
  - falsification or alteration of company's records, accounts or financial information;
  - submission of false invoices or claims for reimbursement of expenses;
  - failure to account for or misuse of company's monies in possession; and
  - knowingly provide information which is false or misleading;
- (iii) 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;
- iv) Unlawful or unethical conduct. Such conduct includes but not limited to violence, threat, bullying, bribery, acceptance of any benefits (whether monetary or non-monetary) in exchange for personal favours;
- v) The offering and acceptance of money, gifts, donations and political contributions (whether monetary or non-monetary) that are unlikely to be unauthorised or deemed appropriate;
- (iv) Making statements or remarks which are defamatory or cause disruption to racial harmony;
- (v) Sexual harassment or adopting discriminatory practices;
- (vi) Trading in the shares of ComfortDelGro and/or its listed subsidiaries on short-term considerations and/or while in possession of unpublished material price-sensitive information related to those securities, including the procuring or providing of such information to any third party to deal in such securities;

- (vii) Misuse, including the downloading and sending of information which will infringe third party's copyright or information that is derogatory or offensive to a third party;
- (viii) Engaging in activities or practices that will pose a danger to the health and safety of others or the environment;
- (ix) Conflict of interest without disclosure. For example, a superior and his/her direct reporting subordinate are in a relationship; and
- (x) Breach of ComfortDelGro's policies or the Code.

(d) Whistleblowing Hotline

The Whistleblowing Hotline 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 (GCIAO) at DID: +65 6383 7010 or by email to [GCIAO@comfortdelgro.com](mailto:GCIAO@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 GCIAO may be reported to the Chairman of the Audit & Risk Committee (ARC) via this email: [ARC\\_Chairman@comfortdelgro.com](mailto: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

(e) 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. Whistleblowing through letters or other sources like those received by Group Corporate Communications/HR departments will also be circulated to the GCIAO.

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

Group Internal Audit will lead the investigation and work with HR or the Business Unit to which the case relates. The outcome of the investigation will 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 meted out against those who are found guilty. In instances where the relevant laws have been infringed, ComfortDelGro will report such infringement to the relevant regulatory authorities. 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 whistleblowing cases that proceed for investigation will be tracked and recorded 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 whistleblowers' 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 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 whistleblowing policy.

ComfortDelGro will periodically review this whistleblowing policy to ensure its continued effectiveness.

## **5. Violation of the Code**

The Group encourages all employees to ask questions, raise issues and report any violation of the Code without any fear of retaliation from the Group or any person. All reported incidents will be treated seriously and thoroughly investigated with the highest confidentiality within the limits of the law.

Employees should report their concerns in good faith. The employees' identities and the concerns raised will be kept confidential, unless as required by the law to reveal to parties such as lawyers, the police or investigators.

Suspected unethical, illegal or suspicious behaviour should be reported immediately.

## **6. No Retaliation**

The Group does not condone any retaliation against anyone who uses the whistleblowing channel or any other avenues to raise reportable concerns. The Group prohibits retaliation against anyone who reports or participates in an investigation of a possible violation of our Code, policies, or the law. If you believe you are being retaliated against, please contact the Group Chief HR Officer.

## **7. References and Related Documents**

Conflict of Interests Declaration Form for New Hires / Ad-hoc declaration for existing employee.

Annual Declaration of Employees' Personal Information and Code of Conduct administered via the relevant HR system, Ad-hoc Declaration of Employees' Personal Information and Code of Conduct can be declared via same HR system throughout the year.

Related policies: Personal Data Protection and Privacy Policy, Whistleblowing Policy, Fraud Policy.

## **8. Administration of the Code**

The Code is designed to ensure consistency in how employees conduct themselves. No set of rules can cover all circumstances. Nothing in this Code should lead to the contravention of local laws, which, wherever contrary, will prevail.

The Group reserves the right to amend or alter the Code at any time and for any reason.

## **9. Policy Ownership & Interpretation**

The Group HR Department owns the Code. If there are any doubts or queries on the interpretation, please direct these to the Group Chief HR Officer. The final interpretation of the policy resides with the Group Chief HR Officer.

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