

WHISTLEBLOWING POLICY

Updated: 10th November 2025

1. Purpose

Acting with integrity is fundamental to reinforcing the status of Jardine Cycle and Carriage Limited (“**JC&C**”) as a responsible employer and business partner of choice in Southeast Asia.

JC&C is committed to ensuring that all our employees as well as other stakeholders feel safe to report conduct which does not meet our values via JC&C’s whistleblowing reporting procedures as set out in this policy.

2. Reportable Matters

This whistleblowing policy is for the reporting of any suspected misconduct or wrongdoing involving the employees or business partners of the JC&C Group. Examples of reportable matters include the following:

- (a) Fraud
- (b) Conflict of Interest
- (c) Bribery/Corruption
- (d) Abuse of Influence
- (e) Bullying/Harassment
- (f) Discrimination
- (g) Health/Safety/Environment
- (h) Theft
- (i) Breach of Law
- (j) Breach of Company Policies
- (k) Other Unethical Behaviour or Misconduct

If an employee wishes to make a report that is not related to the above-mentioned matters, please contact the Head of Department/Division or Human Resources representative.

3. Whistleblowing Reporting Channels

An employee who wishes to report any suspected misconduct or wrongdoing should first consider raising the matter with his or her Head of Department/Division. If the matter cannot be reported through normal reporting lines or if an employee has previously raised a concern but feels that the issue was not dealt with in an appropriate manner, the report should be made via JC&C's whistleblowing platform.

Suppliers, customers and other third parties may report any suspected misconduct or wrongdoing via JC&C's whistleblowing platform.

The following JC&C whistleblowing channels have been set up:

How to report

1. Online form: <https://www.jcclgroup.com/sustainability/governance>
2. Email: whistleblowing@jcclgroup.com

Reports may be made anonymously or on an identified basis. Any information about or provided by the whistleblower will be kept strictly confidential.

4. Independent Investigation

JC&C will independently investigate matters brought to its attention thoroughly. Appropriate feedback will be given to the reporting employee if they have identified themselves.

All reported matters of serious concern are made available to JC&C's internal audit function. Material matters are brought to the attention of JC&C's Audit & Risk Committee, which has oversight of the whistleblowing process.

JC&C's policy is to protect all whistleblowers, who report in good faith, from retaliation and unfair treatment. It is inevitable that in serious circumstances when the information results in legal or criminal proceedings, the authorities would require the identity of the whistleblower. It may also be that the actual information reveals the identity of the whistleblower. Anyone who has reported a matter of concern and believes that having done so, has been treated detrimentally, should raise it immediately via JC&C's whistleblowing platform.

5. 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.