

Whistleblowing Policy & Procedure

1. Purpose & Scope

Hatten Land Limited, together with its wholly owned subsidiaries (collectively referred to as “**the Group**”), does not tolerate any malpractice, impropriety, statutory non-compliance or wrongdoing by staff in the course of their work. This Whistleblowing Policy (“**the Policy**”) is intended to provide a framework to promote responsible and secure whistleblowing without fear of adverse consequences.

Employees and outside parties, such as suppliers, customers, contractors and other stakeholders, may use the procedures set out in the Policy to report any concern or complaint regarding questionable accounting or auditing matters, internal controls, disclosure matters, conflict of interest, insider trading, collusion with competitors, serious breaches of Group policy, unsafe work practices or any other matters involving fraud, corruption and employee misconduct.

The Policy allows for reporting by employees or outside parties of such matters to the Lead Independent Director, without fear of reprisal, discrimination or adverse consequences, and also permits the Group to address such reports by taking appropriate action, including, but not limited to, disciplining or terminating the employment and/or services of those responsible.

The Policy is meant to protect genuine whistleblowers from any unfair treatment as a result of their report. Frivolous and bogus complaints will be disregarded. The Policy is also not a route for taking up personal grievances. These should continue to be taken up directly with the relevant department heads.

2. Reporting Mechanisms

The Group encourages employees and outside parties to put their names to their allegations whenever possible. Concerns or irregularities expressed anonymously are more difficult to act upon effectively but they will be considered, taking into account the seriousness and credibility of the issues raised, and the likelihood of confirming the allegation from attributable sources and information provided. All concerns or irregularities raised will be treated with confidence and every effort will be made to ensure that confidentiality is maintained throughout the process.

Concerns may be raised verbally or in writing. As it is essential for the Group to have all critical information in order to be able to effectively evaluate and investigate a complaint, the report made should provide as much detail and be as specific as possible. The complaint should include details of the parties involved, dates or period of time, the type of concern, evidence substantiating the complaint, where possible, and contact details, in case further information is required. The Receiving Officer is the Lead Independent Director. The contact details of the Receiving Officer are as follows:

Hotline : 6100 9988

Email : whistleblow@hattenland.com.sg

Complaints raised to other parties within the Group will be directed to the Receiving Officer, who is responsible for maintaining a centralized repository of all reported cases and ensuring that

issues raised are properly resolved. All matters reported will be reviewed within a reasonable timeframe, and after due consideration and inquiry, a decision will be taken on whether to proceed with a detailed investigation. Guidance/direction may be sought from the Board of Directors and other appropriate parties.

The whistleblower email and hotline are for reporting irregularities such as -

- a) Fraud and/or Forgery;
- b) Violations of law, rules and regulations applicable to the Group and related to accounting, internal accounting controls and auditing matters;
- c) Intentional error or fraud in the preparation review or audit of any financial statement of the Group;
- d) Significant deficiencies in or intentional non-compliance with the Group's internal accounting controls; and
- e) Any Reportable Conduct which shall be defined to mean any one of the following:-
 - i. Misappropriation and/or Misappropriation of funds, classified documents and/or assets;
 - ii. Abuse and misrepresentation of power and authority;
 - iii. Discrimination on the basis of gender, race, disabilities;
 - iv. Harassment;
 - v. Unlawful, unethical, corrupt or improper conduct - conduct that is in breach of any policy of the Group;
 - vi. Any other conduct which may cause financial or non-financial loss to the Group or damage to the Group's reputation;
 - vii. Criminal acts, including theft, the sale or use of drugs, money laundering, violence or threatened violence and criminal damage against property - detrimental actions taken in reprisal against a whistle-blower; and
 - viii. Suppression or concealment of any information relating to any of the above actions.

If you have any feedback on our editorial processes or news articles, please go to <http://hattenland.com.sg/contact-us/for-media/media-contacts/>

If you would like to give feedback on other aspects of the Group's operations, please go to <http://hattenland.com.sg/contact-us/feedback/>

You can also visit the "Contact Us" tag found on the Group's corporate website www.hattenland.com.sg to give your feedback to the relevant departments.

3. Safeguards

The Group prohibits discrimination, retaliation or harassment of any kind against a whistleblower who submits a complaint or report in good faith. If a whistleblower believes that he or she is being subjected to discrimination, retaliation or harassment for having made a report under this Policy, he or she should immediately report those facts to the Lead Independent Director. Reporting should be done promptly to facilitate investigation and the taking of appropriate action.

At the appropriate time, the party making the report/complaint may need to come forward as a witness. If an employee or outside party makes an allegation in good faith but it is not confirmed by the investigation, no action will be taken against him or her. If, however, an employee has

made an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against him or her. Likewise, if investigations reveal that the outside party making the complaint had done so maliciously or for personal gain, appropriate action, including reporting the matter to the police, may be taken.

4. Handling of Complaints

The Receiving Officer, may, in consultation with the Board of Directors and/or senior management, direct the complaint to the division/department best placed to address it, or lead the investigation to ensure prompt and appropriate investigation and resolution. All information disclosed during the course of investigation will remain confidential, except as necessary or appropriate to conduct the investigation and to take any remedial action, in accordance with any applicable laws and regulations.

The Group reserves the right to refer any concerns or complaints to appropriate external regulatory authorities. Depending on the nature of the complaint, the subject of the complaint may be informed of the allegations against him or her and be provided with an opportunity to reply to such allegations. Employees who fail to cooperate in an investigation, or deliberately provide false information during an investigation, shall be subject to strict disciplinary action up to, and including, immediate dismissal.

If, at the conclusion of an investigation, the Group determines that a violation has occurred or the allegations are substantiated, effective remedial action commensurate with the severity of the offence will be taken.

5. Review and Modification

This policy will be reviewed regularly, and at least once every two years, to ensure that it remains relevant and effective.

The Group may modify this Policy to maintain compliance with applicable laws and regulations or accommodate organizational changes within the Group.

By Order of the Board,

Dato' Tan June Teng Colin @ Chen JunTing

16 June 2017