

WHISTLEBLOWING POLICY

At Eco World London (being Eco World London Development Company Limited and Eco World London Holdings Limited together with its subsidiaries and associated companies, together “we” or “us” as the context requires) we are committed to the highest standards of quality, probity, openness and accountability. All employees are expected to maintain high standards in accordance with our Code of Conduct and Business Ethics. The aim of this policy, which applies to all individuals working at all levels of our business, is to encourage employees to raise any genuine concerns about suspected wrongdoings within our business without fear of reprisal, to provide guidance on how to raise those concerns and to enable us to investigate such concerns and deal with them appropriately.

Whistleblowing is defined as the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- Criminal activity;
- Miscarriages of justice;
- Danger to health and safety;
- Damage to the environment;
- Failure to comply with any legal obligation or regulatory requirements;
- Bribery;
- Financial fraud or mismanagement;
- Negligence;
- Conduct likely to damage our reputation;
- Unauthorised disclosure of confidential information; or
- The deliberate concealment of any of the above matters.

There is no need for an employee to prove that the breach or failure that they are alleging has occurred or is likely to occur; a reasonable suspicion will suffice i.e. where the employee reasonably believes that the information disclosed is substantially true.

Employees should be assured that there will be no adverse repercussions from raising a legitimate concern about our business or the actions of any manager(s) and/or colleagues.

Whilst it may be more challenging to properly investigate an anonymous report, we recognise that a whistleblower has a right to report anonymously and will do all we can to protect such confidentiality if this has been requested by the whistleblower.

We respect the confidentiality of all employees and therefore individuals (including the person who raised the matter) may not be informed of the results of investigations or proposed actions.

Procedure

Employees should raise their concern in a timely manner with their line manager or people representative as appropriate.

This person will, insofar as is possible, treat the matter in confidence. It is likely that an investigation will be necessary and the employee who has made the disclosure may be required to attend an investigatory hearing and/or a disciplinary hearing (as a witness). Appropriate steps will be taken to ensure that the employee's working relationships are not prejudiced by the fact of the disclosure.

Where the matter is more serious, or the individual prefers not to raise it with the people outlined above for any reason, contact should be made with the Chief Executive Officer or Dato' Teow Leong Seng as designated Company board member.. The concern will normally be acknowledged within five working days and the matter will be investigated in a timely manner by an appropriate manager.

This policy and procedure should not, however, be used for complaints relating to personal circumstances, such as the way an individual has been treated at work. In those cases an individual should use the Grievance Procedure or Dignity at Work Policy as appropriate.

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. The law recognises that in some circumstances, it may be appropriate for the concern to be reported to an external body such as a regulator or a body or person specifically designated as a responsible person by the Employment Rights Act 1996; however, in most cases it should not be necessary to alert anyone externally. We strongly encourage employees to seek advice before reporting a concern to anyone externally.

Action

If an employee reasonably believes that the nature of their concern relates to any of the areas set out above and they disclose this information to the appropriate person under this policy in good faith, no action will be taken against them for making the disclosure.

We will also take action if an individual is victimised or is subject to retaliation because they used this procedure.

This policy does not form part of any employee's contract of employment and it may be amended by us at any time.

Appendix 1 Acknowledgement Form for Whistleblowing Policy

Version Number	Document Reference	Owner	Date of approval	Scheduled review date
1.0	EWI-LDN-LG-PL02	Legal	2 September 2019	1 April 2021
2.0	EWI-LDN-LG-PL02	Legal	9 June 2021	1 April 2022

Appendix 1

Acknowledgement Form for Whistleblowing Policy

I confirm that I have read and understood the Whistleblowing Policy.

Full Name:	
Job Title:	
Business Unit (Eco World employees only):	
If not an Eco World employee, company name:	
Signature:	
Date:	