

AVANCE-ATLAS INFRATECH PRIVATE LIMITED
Whistle Blowing Policy

1. Objective

The objective of this policy (this "Policy") is to implement a well-defined procedure for employees (as defined in section 3 below) who wish to report valid concerns about malpractice or impropriety in the workplace.

2. Purpose

This Policy is intended to provide a trusted avenue for employees who believe that they may have discovered malpractice or impropriety in the workplace, to come forward and report such issues with confidence. Employees who make a report in compliance with the requirements of this Policy will not be dismissed, penalised or discriminated against by CapitaLand.

3. Scope of Policy

This Policy applies to all employees of the companies within the CapitaLand Group with the exception of those listed subsidiaries of the Group. Solely for the purposes of this Policy, references in this Policy to "employees" shall include those engaged under a contract of employment by the organisation as well as interns and those on work attachment, etc.

4. Reportable Conduct

The following is not a complete list of examples of reportable malpractice or impropriety. Some examples would include actual or suspected:

- forgery or alteration of any cheque, bank draft or any other financial or other document belonging or relating to CapitaLand
- misappropriation of funds, supplies, or other assets
- impropriety in the handling or reporting of money or financial transactions
- profiteering as a result of insider knowledge of corporate activities
- disclosing confidential or proprietary information to outside parties
- accepting or seeking anything of material value from contractors, vendors or persons providing services/materials to CapitaLand
- destruction, removal or inappropriate use of records, furniture, fixtures, and equipment
- any other financial malpractice, impropriety or fraud
- failure to comply with laws and regulations
- criminal activity
- violation of CapitaLand's social media policy e.g. posting content that is maliciously false, obscene, defamatory, threatening, harassing, discriminatory, or hateful to another person, race, religion or entity on social media
- any other improper conduct or unethical behaviour
- attempts to conceal any of the above

5. Confidentiality

- 5.1 CapitaLand shall maintain the confidentiality of the person making the report to the fullest extent reasonably practicable within the legitimate needs of law and any ensuing evaluation or investigation.
- 5.2 The identity of the employee making the allegation will be kept confidential and confined to the Investigating Committee (as referred to in section 7 below) so long as it does not hinder or frustrate any investigation.
- 5.3 The investigation process may reveal the source of the information to persons involved in the investigation or resolution of the investigation report. The Employee making the report may need to provide a statement as part of the evidence required.

6. Reporting Procedure

- 6.1 Employees who make a report shall do so only:
- in good faith;
 - in the reasonable belief that the reportable issue tends to show malpractice; or impropriety; and
 - after having acquired appropriate, though not necessarily complete, supporting detail and evidence.

Employees who make a report must not:

- contact the suspected individual in an effort to determine facts or demand restitution; or
 - discuss the case, facts, suspicions or allegations with anyone except the Investigating Committee or unless specifically asked to do so by it.
- 6.2 The employee should make the report via email to Whistleblowing.ACChair@capitaland.com or in writing to the Chairman of the Audit Committee C/O Head of Internal Audit. It is essential that the subject of any such message be shown as 'Whistle Blowing'. In his absence, one of the Audit Committee members will be appointed to take charge of the matter. The report should include the reporting employee's name.

7. Investigation Procedure

- 7.1 Audit Committee Chairman will consider the information made available to him and decide on:
- the creation and constitution of an Investigating Committee;
 - the person who will lead the investigation;
 - the procedure(s) to be followed; and
 - the scope of the concluding report.

7.2 Any investigation will be conducted as sensitively and speedily as possible. The investigation will include but not be limited to the following steps:

- full details of the allegation will be obtained;
- the allegation will be fully investigated; and
- the person who made the report will be informed of the outcome of the investigation, in due course and as appropriate, of any action taken.

7.3 At the appropriate time (subject to the progress and status of the investigation) the person against whom a report is made will be informed of it. He will be allowed to comment and make a rebuttal to the findings before the Investigating Committee before any investigation is concluded.

7.4 In some instances it may be necessary to refer the matter to an external authority for further investigation, particularly in cases alleging misuse of funds.

8. Conclusion

This Whistle Blowing Policy is designed to maintain the high standards of integrity and reputation of the CapitaLand Group and has been implemented to assure employees who make reports in good faith of malpractice or impropriety in the workplace that they will not be dismissed, penalised or discriminated against by CapitaLand as a result of the making of such reports.