



# Whistleblowing Policy

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**Revision:** 3  
**Date:** 23-05-2022  
**Policy owner:** Head of HR

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## 1. Purpose

The Swire Bulk Holdings Pte Ltd (Swire Bulk) takes ethical behaviour and the importance of upholding the integrity of its brand and reputation seriously. The purpose of the Whistleblowing Policy is to provide clarity on how and when to report suspected instances of unethical or inappropriate acts, events, behaviour or practices and any potential breach of the Corporate Code of Conduct via an external party, Group Internal Audit.

## 2. Policy Statement

This policy provides a framework to promote responsible and secure whistleblowing without fear of adverse consequences, in accordance with the Swire Bulk Corporate Code of Conduct.

## 3. Application

This policy applies to all companies within the Swire Bulk group globally, Swire Bulk staff and outside parties such as suppliers, clients and other stakeholders.

This policy applies to any suspected questionable practices in accounting or auditing matters, conflict of interest, anti-trust issues, collusion with suppliers or any other matters involving fraud, corruption and staff misconduct (including harassment and discrimination) to relevant staff.

## 4. Definitions

<b>Whistleblower</b>	A person who exposes any kind of information or activity that they consider to be illegal, unethical or not correct within an organization. The alleged wrongdoing can be classified a number of ways including (but not limited to) violation of company policy/rules/laws/regulations, a threat to public interest/national security, fraud or corruption.
<b>Level 1 reporting channel</b>	Dealing with concerns personally or within the respective line management structure
<b>Level 2 reporting channel</b>	Reporting concerns through the Confide hotline/email or by escalating to the local Human Resources team. Refer to Confidential Reporting guidance material for further information
<b>Level 3 reporting channel</b>	Reporting concerns via Swire Group Internal Audit (SGIA)
<b>Whistleblowing Committee (WBC)</b>	An internal committee including the Chief Executive Officer (CEO), the Finance Director and the Swire Bulk Head of HR, engaged to investigate and/or make decisions based on level 1 or 2 reporting processes

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## 5. Policy Details

### 5.1 Relevant Whistleblowing concerns

Relevant concerns can be incidents that have happened, are happening currently or have the potential to happen in the future; they can include misconduct, malpractice and unethical behaviour. It is not possible to give an exhaustive list. Examples include the following:

- Fraud
- Theft, misappropriation of funds and/or classified documents
- Abuse, conflict of interest and misrepresentation of power and authority
- Criminal offences or breaches of other legal or regulatory requirements
- Corruption and bribery
- Breaches of financial reporting or internal control requirements
- Breaches of contract
- Action or inaction that could lead to financial loss to the Company and/or damaging the Company's reputation
- Violations of the [SB Principle – Corporate Code of Conduct](#)
- Violation of any other CNCo policies

Concealment of any of the above

Relevant concerns also include harassment and workplace bullying but these should be reported under the [Respect in the Workplace Policy](#) instead of this policy.

### 5.2 Reporting a concern

All staff and/or outside parties are encouraged to raise concerns through the Level 1 and Level 2 internal reporting channels in the first instance.

**Level 1 internal reporting channel** - Dealing with concerns personally or within the respective line management structure

**Level 2 internal reporting channel** - Please use any of the confidential channels below or by escalating to your local Human Resources team. You may choose to remain anonymous.

**Telephone**

+65 9668 9460 (for sea staff)  
+65 9649 6217(for office staff)

**SMS**

+65 9668 9460 (for sea staff)  
+65 9649 6217(for office staff)

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**Email** [confide@swirebulk.com](mailto:confide@swirebulk.com)

**By post**

Swire Bulk (Confidential Reporting)  
300 Beach Road, #28-02, The Concourse  
Singapore 199555

**Level 3 external reporting channel** - In the event that the above channels are not appropriate, staff or outside parties are encouraged to report concerns externally to the Swire Group Internal Audit by email or by post:

**Email** [ia@jssldn.co.uk](mailto:ia@jssldn.co.uk)

**By post**

Group Head of Internal Audit - marked "Private and Confidential".  
John Swire & Sons Limited  
Swire House, 59 Buckingham Gate  
London SW1E 6AJ United Kingdom

### 5.3 Confidentiality

All information received from a Whistleblower will be kept confidential, except where there is a legal or regulatory requirement to disclose it or where it is disclosed to law enforcement or comparable authorities. In addition, the identity of a Whistleblower may need to be disclosed in order to investigate the concern raised by the Whistleblower.

The Whistleblower must, except where there is a legal or regulatory requirement to disclose, keep confidential the existence and subject matter of the report and the identities of all those mentioned in the report.

### 5.4 Information required when making an internal report

The Company encourages staff and outside parties to include their names in any report submitted whenever possible. Reports raised anonymously are more difficult to act upon effectively but they will be considered, taking into account the seriousness and credibility of the matter raised and the likelihood of being able to investigate the matter and confirming allegation from attributable sources and fairness to any staff mentioned in the report.

In order to assist the facilitate the thorough and expedient investigation of any matter reported it is requested that, to the extent possible, the following information is captured in the report made:

- Details of the parties involved,
- Dates or period of time,
- The type of concern,

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- Supporting evidence(s) on the report and/or witnesses where possible, and
- Contact details, in case further information is required.

## 5.5 Internal Report Assessment

Upon the receipt of any internal report, a member of the Whistleblowing Committee (WBC) is required to acknowledge its receipt and report it to the full WBC within 3 working days. The WBC will assess all concerns reported within a reasonable timeframe and decide the following:

- If there are no grounds for proceeding with a detailed investigation, the person making the report will be informed of this decision and the reasons for this, if possible.
- If the concern falls within the scope of the policy, the person making the report will be informed, if possible, and a designated staff/team will be appointed to carry out the investigation.
- If the concern falls outside the scope of the policy, the person making the report will be informed, if possible, and the matter will be referred to the relevant staff for appropriate action if any.

## 5.6 Internal Report Investigation

If a report results in an internal investigation, the WBC will ensure that a prompt, impartial and appropriate investigation is conducted, whilst having regard to the nature and complexity of the matter.

A member of the WBC will lead any investigation depending on the nature of the report received.

The WBC will make every effort to keep all the information disclosed during the investigation and the identity of the person making the report confidential except where there is a legal requirement or moral responsibility to refer the matter to the appropriate external regulatory authorities, or for the appropriate conduct of the investigation. At the appropriate time, the person making the report may be asked to comment on any additional evidence obtained and/or the need to come forward as a witness, as appropriate.

Depending on the nature of the concern, the subject of the report may be informed of the allegations against him or her and be provided with an opportunity to reply to such allegations. Any staff member who fails to cooperate in an investigation, or deliberately provides false information during an investigation, shall be subject to disciplinary action up to, and including immediate dismissal.

## 5.7 Recommended Corrective Action

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Once the matter has been investigated, the WBC will determine what action, if any, should be taken in the circumstances for resolution. This decision is based on the facts and circumstances of the breach and the results of the investigation.

If it has been determined that a violation has occurred or the allegations are substantiated, effective remedial action commensurate with the severity of the offence will be taken. Corrective action may include, but is not limited to:

- Disciplinary action,
- Dismissal,
- Recovery of assets,
- Recommendations to improve the internal controls and
- Initiation of legal proceedings

All corrective actions will be reviewed and approved by the WBC and communicated to all relevant parties.

All reports raised and corrective action taken in response to the reports will be recorded and will be retained for 5 years by HR.

## 5.8 Whistleblower Protection

If an individual reports a concern in good faith but it is not substantiated by the investigation, no action will be taken against them.

If a concern is reported frivolously, maliciously or for personal gain, disciplinary action may be taken and/or the matter reported to the police.

If the individual who has reported a concern believes they are being subjected to discrimination, retaliation or harassment for having made the report under this Policy, they should immediately report this to the Global Head of HR. This should be done promptly to facilitate timely investigation and action if necessary.

## 6. Governance

### 6.1 Policy Owner

The policy owner is stated at the beginning of this policy. If the policy owner changes, the policy must be re-issued to document this.

### 6.2 Failure to Comply

Employees must adhere to the conditions of this policy at all times. Non-compliance must be communicated to the policy owner immediately.

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### 6.3 Exceptions

From time to time instances arise where exceptions to this policy may be required. Any exception requests must be submitted to the policy owner for consideration and approval.

### 6.4 Changes to Policy

Swire Bulk reserves the right to amend this policy at its sole discretion. In case of amendments, the policy owner will inform staff appropriately.

### 7. Related Documents

Level2	Level3a	Level3b	Level4
<ul style="list-style-type: none"><li><a href="#">Respect In the Workplace policy</a></li></ul>			

### 8. Policy History

Amendment Date	Section	Revision Number	Description
16-08-2021		2	
23-05-2022		3	Amendment in the Group Internal Audit contact due to the change in function

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