

CHAPTER 8 WHISTLEBLOWING POLICY

1. Scope

This Whistleblowing Policy applies to all employees working at all levels of the Company, including but not limited to the Company's existing and former directors, officers, managers, employees, trainees, part-timers and contractors working on-site at the Company's premises, and families of such persons. All the above- mentioned individuals are eligible to be whistleblowers.

This Policy covers the following areas:

- Fraud or forgery
- Dishonest acts
- Bribes
- Remove/inappropriate use of Company's assets and records
- Violation of Company policies, material laws and regulations
- Conduct that is an offence under any Commonwealth law that carries a penalty of twelve (12) months or more for imprisonment
- Harassment/Discrimination

This whistleblowing Policy does not cover complaints relating to personal circumstances in the Company, slander, complaints about salary or compensation, complaints about personal relationship, which would normally be dealt with under the relevant policy or procedures of the Company, for example under the Grievance Handling Procedure in the employee handbook.

2. Reporting and Communication Channels

2.1 When in doubt about the best action in a particular situation, you should talk to your managers. In making a report, you should provide as much details as possible, such as names, dates, time of the incident(s) and supporting information or other evidence.

2.2 We will not tolerate any harassment or retaliation of any employee who makes a report in good faith and any such conduct may be subject to disciplinary action.

2.3 The individual should report his or her concerns to the Whistleblowing Committee comprising the Executive Committee, Regional General Counsel, Regional Director - Head of Operations and PAPAC HR Director. The Whistleblowing Committee is responsible for handling all reported cases and ensuring that issues raised are properly resolved by the manager or such parties as appropriate. If the matter is substantiated, it will be referred to the police or other law enforcement agencies where appropriate. In the event that the Whistleblowing report involves any member of the Whistleblowing Committee, the Whistleblower may escalate the report to PERSOL Holdings' compliance office.

2.4 The available communication channels are as follows:

Email	whistleblowing@persolapac.com or where the complaint is regarding the Whistleblowing Committee, to: compliance@persol.jp
Mail	PERSOL Asia Pacific Pte. Ltd. 6 Battery Road, #29-04, Six Battery Road, Singapore 049909 <u>Attention: Whistleblowing Committee</u> Or where the complaint is regarding the Whistleblowing Committee, to: PERSOL Holdings Co., Ltd. 1-15-5 Minami Aoyama, Minato-ku, Tokyo 107-0062, Japan <u>Attention: Compliance Office</u>

3. Confidentiality

All concerns raised will be independently assessed by the Whistleblowing Committee to ensure that they are fairly and properly considered. Any individual making a whistleblowing report can choose to remain anonymous or reveal his or her name. If you choose to reveal your name, we will not disclose it without your consent. We reserve the right to take disciplinary action against any employee who makes a report in bad faith. All reports will be retained for a period of five (5) years from the date of the report, and kept strictly confidential, unless required by law or court order.

4. Protection for Whistleblowers

The Whistleblower shall inform the Whistleblowing Committee immediately if he/she believes that he/she is being subjected to retaliation as a result of raising concerns under this Whistleblowing Policy. The Whistleblowing Committee will take the following steps where possible:

- Assess the protection needs of the Whistleblower;
- Advise the Whistleblower of types of protection available to him/her; and/or
- Listen and respond to any concern of harassment, intimidation or victimisation of the Whistleblower for making the report

Any reporting under this Whistleblowing Policy will not result in disciplinary action unless the Whistleblower makes an allegation despite knowing or believing it to be false or it is made in bad faith. Any employee who victimises or retaliates against the Whistleblower will be subjected to disciplinary action.

The Whistleblower reporting a wrongdoing or improper conduct that he/she has committed will not be relieved from potential prosecution, but such reporting will be taken into consideration in the determination of the disciplinary action against the Whistleblower.

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