

## **Speak Up Policy (the “Policy”)**

Effective Date: 1 July 2024

### **1. Introduction**

The DFI Retail Group (“DFI” or the “Group”) Code of Conduct requires all business units and departments to comply with all applicable laws and regulations and to maintain proper standards of business conduct. In support of this Policy, we have set out below a procedure for reporting matters of serious and genuine concern that may affect the operation of the Group’s business and its reputation.

The Group has introduced this procedure to encourage you to raise serious and genuine concerns about malpractice at the earliest practical stage, so that we can take appropriate and timely action. The Group encourages the good-faith reporting of any unlawful, unethical or other inappropriate activity, and assures you of protection from any form of retaliation or reprisal.

### **2. Applicability**

This Policy applies to:

- DFI and its majority owned or controlled subsidiaries and affiliates.
- All DFI employees including full-time, part-time, contract and temporary employees of all levels and any person who acts on DFI’s instructions.

### **3. What Are Matters of Serious Concern?**

These are non-exhaustive examples of the types of matters that should be reported:

- A criminal offence, e.g. fraudulent activities
- A failure to comply with any legal or regulatory obligation
- The health and safety of any individual being put at risk
- Racial or sexual harassment
- Financial irregularity
- The giving or receiving of bribes, other illicit payments or inducements
- A Code of Conduct violation
- Deliberate concealment relating to any of the above

### **4. How To Raise a Concern?**

**4.1** You can raise it with your immediate supervisor or line manager.

Or

**4.2** You can raise the matter with the People & Culture Head or the Legal Head of your business unit/department or of the Group.

Or

**4.3** You can also raise the matter through any one of the Speak Up channels below:

- **Speak-Up hotline** (please see below the international toll-free numbers for your reference):
  - Brunei: 8013012
  - Cambodia: 1800209176
  - Hong Kong: 800960669
  - Indonesia: 0078036510031 (mobile)
  - Macau: 800435
  - Malaysia: 1800806773
  - Philippines: 180016510792
  - Singapore: 18002132999
  - Taiwan: 00806651734
  - Vietnam: 120-32356 (VNPT, SPT) / 121-020087 (Mobifone) / 122-80316 (Viettel)
- **Speak-Up portal:**  
[www.dfiretailgroup.com/speakup](http://www.dfiretailgroup.com/speakup)
- **Speak-Up email:**  
[speakup@DFiretailgroup.com](mailto:speakup@DFiretailgroup.com)

The hotline, portal and email account are operated by an independent and reputable external provider that is committed to protecting the confidentiality of all matters reported and the anonymity of the reporter involved.

**4.4** If the reporting options have been followed and you still have concerns, or if you feel that you cannot discuss it through any of the above reporting options, please contact:

Matthew Bland  
Group General Counsel of Jardine Matheson  
Email: [matthew.bland@jardines.com](mailto:matthew.bland@jardines.com)

## **5. What a Report should Contain**

The matter should be reported in writing and contain all details and provide supporting documentation wherever possible to assist in following up on the report. If a report in writing is not possible, an oral report is acceptable. However, team members are encouraged to report in writing where possible.

If it is felt that it is necessary to report matters anonymously, team members may do so although team members are encouraged to identify themselves as this frequently makes the investigation and resolution process easier.

## **6. How We Will Handle the Matter**

Once you have told us of your concerns, the matter will be directed to the Speak Up team to assess what action should initially be taken. This may involve an internal inquiry or a more formal investigation and then it will be assigned for further investigation by any of the Loss Prevention, Internal Audit or People & Culture investigation teams. The Speak Up team will inform you who is handling the matter, how you can contact him/her, and whether your further assistance may be needed.

## **7. Confidentiality**

We shall protect and support anyone raising genuine matters of concern. Remember if you do not tell us who you are, it will be much more difficult for us to look into the matter or to protect your position or to give you feedback. If you ask us to protect your identity by keeping your confidence, we will not disclose it without your consent. It may, however, be more difficult for the Speak Up team or its managers to look into the matter or to protect the employee's position or to give feedback if the employee's identity is not revealed. In serious circumstances when information results in legal or criminal proceedings the authorities may require disclosure of your identity and we will comply.

## **8. Non-Retaliation**

The Group strictly prohibits retaliation against anyone who in good faith raises concerns or participates in the investigation of any suspected or actual unethical or illegal activity.

The protection against any form of retaliation extends to all team members, (regardless of their position or status), who:

- Report concerns of any wrongdoing,
- Participate in any investigation,
- Serve as a witness providing information about the complaint or concern,
- Make decisions or recommendations about sanctions and corrective measures as part of the investigation resolution process.

Retaliation is prohibited in any form, including, but not limited to:

- Demotion or termination
- Salary reduction or denial of benefits
- Negative performance evaluations or disciplinary actions
- Reassignment to less desirable duties or locations
- Intimidation, harassment, or ostracism.

The Group is committed to creating a work environment where team members feel absolutely safe and empowered to raise concerns without fear of retaliation and reprisal. Any team member who believes they have experienced retaliation for raising a concern should immediately report it in the channels identified in this Policy.

**9. External Contacts**

While we hope this Policy gives you the reassurance you need to raise such matters internally, it does not affect your rights or obligations to report criminal matters to the relevant authorities.

In case of any discrepancy, the English version shall prevail.

**Group Legal**

**July 2024**