

| APPROVED POLICY

FCAM WHISTLEBLOWING POLICY

Effective Date 23 January 2026

Approved By Frasers Centrepoint Asset Management Ltd. Board

Contents

1	Introduction	3
2	Definitions	3
3	Core Policy Principles.....	4
4	Scope of Reportable Matters	5
5	Good Faith Reporting and Disclosures	6
6	Confidentiality and Identity Protection	6
7	Safeguards Against Reprisal Actions.....	7
8	Communications and Investigations	7
9	Accessibility and Awareness	8
10	Audit, Risk and Compliance Committee Statement	8
11	Attachment 1	9
12	Attachment 2	10
13	Attachment 3	11

1 Introduction

- 1.1 Robust reporting mechanisms are essential to maintaining high standards of corporate governance. In compliance with Provision 10.1(f) of the Singapore Code of Corporate Governance 2018 (the “**Singapore Code**”) and its Practice Guidance, **Frasers Centrepoint Asset Management Ltd.** (“**FCAM**” or the “**Company**”), as manager of **Frasers Centrepoint Trust** (“**FCT**”), has established this Whistleblowing Policy (“**Policy**”). This Policy provides a secure and confidential channel for reporting both suspected and actual misconduct and improprieties. Its objective is to ensure that all reported concerns are investigated independently and objectively, with appropriate follow-up actions taken in a timely manner.

The Policy applies to all entities within FCAM and FCT, and its directors, officers, employees (whether permanent, fixed-term or temporary), contractors, suppliers and consultants providing services for or on behalf of the Company across all jurisdictions. It defines the types of reportable matters and outlines the responsibilities for handling such reports. The FCAM Audit, Risk and Compliance Committee (“**ARCC**”) oversees the effectiveness of these procedures and reports significant matters to the FCAM Board. To maintain a consistent and compliant framework for addressing misconduct, the Policy is publicly disclosed and communicated to all employees and relevant stakeholders.

- 1.2 FCAM is committed to the principles set out in the Singapore Code, as well as to all other similar Codes of Corporate Governance, including other applicable laws and regulations in relation to whistleblowing of the jurisdictions in which FCAM and FCT operate.
- 1.3 FCAM has in place governance, risk management and control processes which include an independent feedback channel in handling whistleblowing and related complaints, including protections for Reporting Persons. These processes and this Whistleblowing Policy are intended to support detection, prevention and addressing wrongdoing or improper conduct.
- 1.4 FCAM upholds an open and transparent corporate culture that promotes accountability. The Company encourages the reporting of actual or suspected wrongdoing and improper conduct at the earliest opportunity and in an appropriate way.
- 1.5 This Policy does not seek to comprehensively set out all applicable rules and regulations pertaining to whistleblower protection in each jurisdiction where the Company operates. It is therefore important to read this Policy together with relevant internal policies and local rules and regulations applicable to relevant jurisdictions and / or addressing specific legal, compliance and / or regulatory obligations and requirements (if any). To the extent that a relevant jurisdiction prescribes more stringent legal, compliance and / or regulatory obligations and requirements, such legal, compliance and / or regulatory obligations and requirements must also be complied with.

2 Definitions

- 2.1 For the purposes of this Policy, the following terms are defined as follows:
- (a) **Group Receiving Officer** refers to a designated individual responsible for receiving, recording, and overseeing the handling of all whistleblowing reports across the Company. The Group Receiving Officer ensures that reports are managed in a timely, confidential, and consistent manner in accordance with this Whistleblowing Policy and applicable laws. The Head of Group Internal Audit (“**IA**”) is designated as the Group Receiving Officer. The Group Receiving Officer will coordinate investigations or escalate the matters to appropriate authorities. If the Head of Group IA is directly or indirectly implicated in the matter of concern, IA will not be involved in the receipt, recording, investigation or escalation of the matter. In such cases, appropriate alternative arrangements will be put in place to ensure independence and objectivity.
- (b) **Reporting Person** refers to any individual who, in good faith, reports or discloses concerns about actual or suspected misconduct, wrongdoing, or breaches of law, policy, or ethical standards within FCAM and FCT. This includes employees (whether permanent, fixed-term or temporary) and any other persons who are not employees (such as business partners, contractors and suppliers, and other third parties).

2 Definitions

2.1 For the purposes of this Policy, the following terms are defined as follows:

- (c) **Reprisal Action** refers to any adverse treatment or threat against a Reporting Person for making a report in good faith. This includes, but is not limited to, dismissal, demotion, harassment, discrimination, intimidation, reduction in duties or benefits, or any form of retaliation intended to punish or deter the Reporting Person.
- (d) **Whistleblower Protection Officer** refers to a designated individual responsible for safeguarding whistleblowers from retaliation and ensuring their confidentiality is maintained throughout and after the reporting process. The Whistleblower Protection Officer monitors the treatment of whistleblowers, addresses any concerns of retaliation or victimisation, and ensures compliance with applicable local whistleblower protection laws. The role will be appointed in jurisdictions where such protection is legally required or strongly encouraged. In jurisdictions without specific legal requirements for locally-based Whistleblower Protection Officer, the responsibilities of the Whistleblower Protection Officer will be assumed by the Head of Group IA, supported by Group Legal and Group Compliance functions as necessary. Should a Whistleblower Protection Officer be appointed, he / she will report to the Head of Group IA for the management of whistleblowing cases.
- (e) **Whistleblowing** refers to reporting made in good faith on any real or perceived misconduct within the Group.
- (f) **Whistleblowing Channel** refers to the formal avenues (postal mail, email and hotline) available for submitting a whistleblowing report.
- (g) **Whistleblowing Register** refers to a secure record of all whistleblowing reports received, including key details such as the nature of the concern(s), date received, actions taken, and case status, etc. for tracking and compliance purposes.

3 Core Policy Principles

3.1 FCAM is committed to maintaining high standards of integrity, transparency and accountability, to safeguard unitholders' / shareholders' interests and FCT's / the Company's assets and reputation. The Whistleblowing Policy has been formulated in line with this commitment.

3.2 The Whistleblowing Policy is guided by the following core principles:

- (a) **Confidential and Accessible Reporting Channels:** FCAM provides secure and accessible channels that allow Reporting Persons to report concerns about possible improprieties in financial reporting or other matters, as described in **Paragraph 4** below, in confidence, and receive feedback from the Company on actions, if any, taken in respect of such concerns.
- (b) **Good Faith Reporting:** Reports should be made honestly and in good faith, with a reasonable belief that the information is true, even if not subsequently substantiated. Whistleblowing reports should not be made falsely, recklessly, maliciously, and / or for personal gain. They should generally not include the following types of disclosures:
 - (i) Operational matters which should be dealt with at the department level under FCAM; or
 - (ii) Human resources or other (personal) issues for which there are resolution procedures set up by the Company.

Any Reporting Person who makes a report recklessly, without having reasonable grounds for believing it to be substantially true, or makes it for purposes of personal gain, or maliciously, may be subject to appropriate action by the Company.

3 Core Policy Principles

3.2 The Whistleblowing Policy is guided by the following core principles:

- (c) **Confidentiality and Identity Protection:** FCAM is committed to protecting the confidentiality of Reporting Persons and will take reasonable steps to safeguard their identity.
- (d) **Protection Against Retaliation:** Safeguards are in place to protect Reporting Persons against reprisal actions as set out in **Paragraph 7** below.
- (e) **Independent and Fair Investigation:** All reports will be assessed and, where appropriate, independently investigated in an objective, timely, and fair manner.

4 Scope of Reportable Matters

4.1 The misconduct that Reporting Persons may report under this Whistleblowing Policy includes the following matters, actual or suspected:

- (a) Financial or professional misconduct, including concerns about accounting, internal controls or auditing matters.
- (b) Improper conduct, including dishonest, fraudulent or unethical behaviour.
- (c) Criminal offence, regulatory breach, irregularity or non-compliance with laws / regulations or the Company's / FCT's policies and procedures, and / or internal controls.
- (d) Workplace violence, hazards, violations of health and safety regulations.
- (e) Corruption or bribery.
- (f) Conflicts of interest without proper disclosure.
- (g) Deliberate attempts to cover up and / or conceal misconduct.
- (h) Environmental damage, threats to cybersecurity and personal data processing and protection, as well as infringement of human rights.
- (i) Matters required by applicable laws and regulatory requirements in the relevant jurisdiction.
- (j) Any other improprieties or matters that may adversely affect unitholders' / shareholders' interests in, and the assets of, the Company / FCT, and its reputation.

4.2 Grievances of a personal nature are not a whistleblowing concern. These include concerns over terms of employment, remuneration and performance appraisal, which should be escalated to the relevant head of department under FCAM or Group People & Culture ("P&C") department, as appropriate. Any such reports submitted through the whistleblowing channels will be redirected to the appropriate parties by the Group Receiving Officer.

5 Good Faith Reporting and Disclosures

- 5.1 Any Reporting Person who has a reasonable belief that there is misconduct, actual or suspected, in respect of any of the matters set out in **Paragraph 4** above, should inform the Company by providing information in **Section 8.2** to the Group Receiving Officer via any of the modes of communication below:
- (a) Postal mail address: Frasers Property Corporate Services Pte Ltd, Privy Box No. 921168 Singapore 929292 (Please post in a sealed envelope marked "Private and Confidential").
 - (b) Email: reporting@frasersproperty.com
 - (c) Telephone no.: +65 6277 2553
- 5.2 In jurisdictions where the law requires or recommends a Whistleblower Protection Officer, the appointed Whistleblower Protection Officer(s) must notify the Group Receiving Officer of all reports they received, and support the review and investigation process in accordance with this Whistleblowing Policy.

6 Confidentiality and Identity Protection

- 6.1 A Reportable Matter can be reported by any Reporting Person in a way that is either attributed to the individual raising the matter or can be reported anonymously.
- 6.2 Subject to **Paragraph 6.3** below, the Company will protect the identity of the Reporting Person who made the report in good faith. Unless required by laws or in legal proceedings, such information and the contents of the report will be held in the strictest confidence by the Company. The Reporting Person who made the report should similarly hold the contents of his / her report and any communications with the Company thereon in the strictest confidence.
- 6.3 It must be appreciated that the investigation process, including any report that may have to be made to the relevant authority or the police, may reveal the source of the information, and a statement by the Reporting Person may be required as part of the evidence.
- 6.4 Where the Company discloses information to external auditors or investigators in accordance with **Paragraph 8.6** below, or to its legal counsel to obtain professional advice, such information will be given on a strictly confidential basis.
- 6.5 The Singapore Personal Data Protection Act and any other applicable local data protection laws and regulations will be observed in processing personal data. Personal data irrelevant to a specific report will not be collected or will be deleted without undue delay.
- 6.6 All documents and other materials relating to reports under this Whistleblowing Policy will be stored securely; and only a restricted number of people who are directly involved in handling and investigating the reportable concern will be made aware of the identity of the Reporting Person or information that is likely to lead to the identification of the Reporting Person.
- 6.7 All whistleblowing reports, along with their corresponding investigations and outcomes, shall be documented in a detailed and accurate manner. This includes, but is not limited to, the initial report, investigation procedures, findings, decisions, and any remedial actions taken. These records must be maintained securely and made accessible only to authorised personnel, in accordance with applicable data protection laws and regulatory requirements.
- 6.8 If a Reporting Person becomes aware that there has been a breach of confidentiality in relation to a report made in accordance with this Policy, he / she should contact the Group Receiving Officer or relevant Whistleblower Protection Officer.
- 6.9 In jurisdictions where specific whistleblower protection laws apply, the Company will ensure compliance with the applicable legal requirements regarding confidentiality and privacy.

7 Safeguards Against Reprisal Actions

- 7.1 The Company recognises that the decision by an employee to report any one or more of the matters set out in **Paragraph 4** above, may be a difficult one to make, and that there may be concerns of reprisal which, for employees, may take the form of discrimination, harassment, intimidation, demotion and / or termination.
- 7.2 The Company will not tolerate reprisal actions against any Reporting Person, and will ensure, to the extent possible, that such Reporting Person who makes a disclosure in good faith:
- (a) will not be penalised or suffer any adverse treatment for doing so; and
 - (b) will not be personally disadvantaged by having made the report.
- Appropriate action will also be taken by the Company against those who take reprisal actions.
- 7.3 The Company wishes to maintain an open and transparent culture and to this end, disclosures made in good faith and for the benefit of the Company will be considered seriously. To facilitate effective investigation, a Reporting Person must be prepared to assume responsibility for his actions.
- 7.4 In jurisdictions where specific whistleblower protection laws apply, the Company will comply with the relevant legal requirements concerning the protection and support of the Reporting Persons.

8 Communications and Investigations

- 8.1 A Reporting Person is encouraged to provide his / her name, contact details and relationship or interest, if any, in connection with the concerns raised as the Company may need to contact the Reporting Person for further details in connection with the investigation or other appropriate action, as well as monitoring his / her wellness and protections against reprisal (see **Paragraph 7**). In cases of anonymous reports, the Company may decide to proceed with an investigation where the information provided is deemed sufficient to warrant an investigation (taking into account, among others, the seriousness of the issues raised, the credibility of the concern or information, and the likelihood of confirming the concern or information from credible sources).
- 8.2 Concerns are better raised in writing, in the form set out in **Attachment 1**. The information provided should be factual and precise and to the extent possible, provide an appropriate and meaningful level of detail.
- 8.3 If it is not convenient to place the concern in writing, a Reporting Person may leave a telephone message at the telephone number as set out in **Paragraph 5** above.
- 8.4 The chart in **Attachment 2** shows the channel of communication and the procedures to be followed by the Company, following the receipt of a report.
- 8.5 Where a report concerning one or more of the matters set out in **Paragraph 4** is received through channels other than as set out in **Paragraph 5**, the recipient(s) of the report should immediately forward it to the Group Receiving Officer who will handle it in accordance with the Whistleblowing Policy. The recipient(s) must also maintain strict confidentiality and seek clarification from the Group Receiving Officer if unsure how to do so.
- 8.6 The actions that may be taken by the Company in connection with the report will depend on the nature of the disclosure made by the Reporting Person and the Company's legal obligations. The concern raised may be:
- (a) Investigated internally;
 - (b) Referred to the police or other appropriate authority;
 - (c) Referred to internal or external auditors; and / or
 - (d) Referred to an external party to be appointed by the Company to conduct the investigation.

8 Communications and Investigations

- 8.7 As soon as reasonably practicable and to the extent legally permissible, the Company will write to the Reporting Person who has reported the matter in good faith:
- (a) Acknowledging that the report has been received;
 - (b) Requesting for further information from the Reporting Person; and / or
 - (c) Providing updates on the progress or outcome of the investigation, to the extent deemed appropriate and in accordance with legal and confidentiality considerations.
- 8.8 The Group Receiving Officer will maintain and update a consolidated Whistleblowing Register for the Company and FCT. Any further access to the registers and contents of the whistleblowing reports is strictly on a need-to-know basis and requires approval from the Group Receiving Officer. Such access is granted only when necessary for investigation, oversight, or assurance purposes.
- 8.9 A quarterly summary report which provides the statistics below will be submitted by the Group Receiving Officer to the FCAM ARCC.
- (a) The number of reports received, per quarter.
 - (b) For each report, the type of misconduct alleged, the level of seniority of the alleged wrongdoer and the credibility and seriousness of the risk.
 - (c) For each report, the time taken to investigate it.
 - (d) The conclusion of each investigation (upholding or dismissing the report) and the nature of the action taken (such as disciplinary action).

9 Accessibility and Awareness

- 9.1 This Whistleblowing Policy will be available on the Company's intranet and will be provided to all new employees upon joining the Company. Key Policy statements are also available on the Company's website, for information of and reference by the public.
- 9.2 Group P&C, in collaboration with Group IA and Group Compliance, will provide training programmes to educate employees and raise awareness about this Policy.
- 9.3 All new employees will receive training on this Policy as part of their induction programme. In addition, annual refresher training on whistleblowing procedures will be included in internal training programme for existing employees.
- 9.4 Employees appointed as the Group Receiving Officer and Whistleblower Protection Officers will undergo training on their roles, obligations, and responsibilities under this Policy prior to assuming their duties. They will also receive refresher training at least annually thereafter.

10 Audit, Risk and Compliance Committee Statement

The FCAM ARCC, assisted by IA, is responsible for oversight and monitoring of whistleblowing activities. This Whistleblowing Policy will be reviewed and updated regularly to ensure ongoing compliance with legal and regulatory changes.

ATTACHMENT 1

STRICTLY PRIVATE AND CONFIDENTIAL

**Frasers Centrepoint Asset Management Ltd. Whistleblowing Policy
Form of Report**

1.	Full Name: If you are an employee, please state: *Designation: *Department:
2.	History of the concern(s) giving names, dates, places, relationship or interest in connection with the concern(s), and other relevant details and information, where possible.
3.	Reasons for the concern(s):

Signature: _____

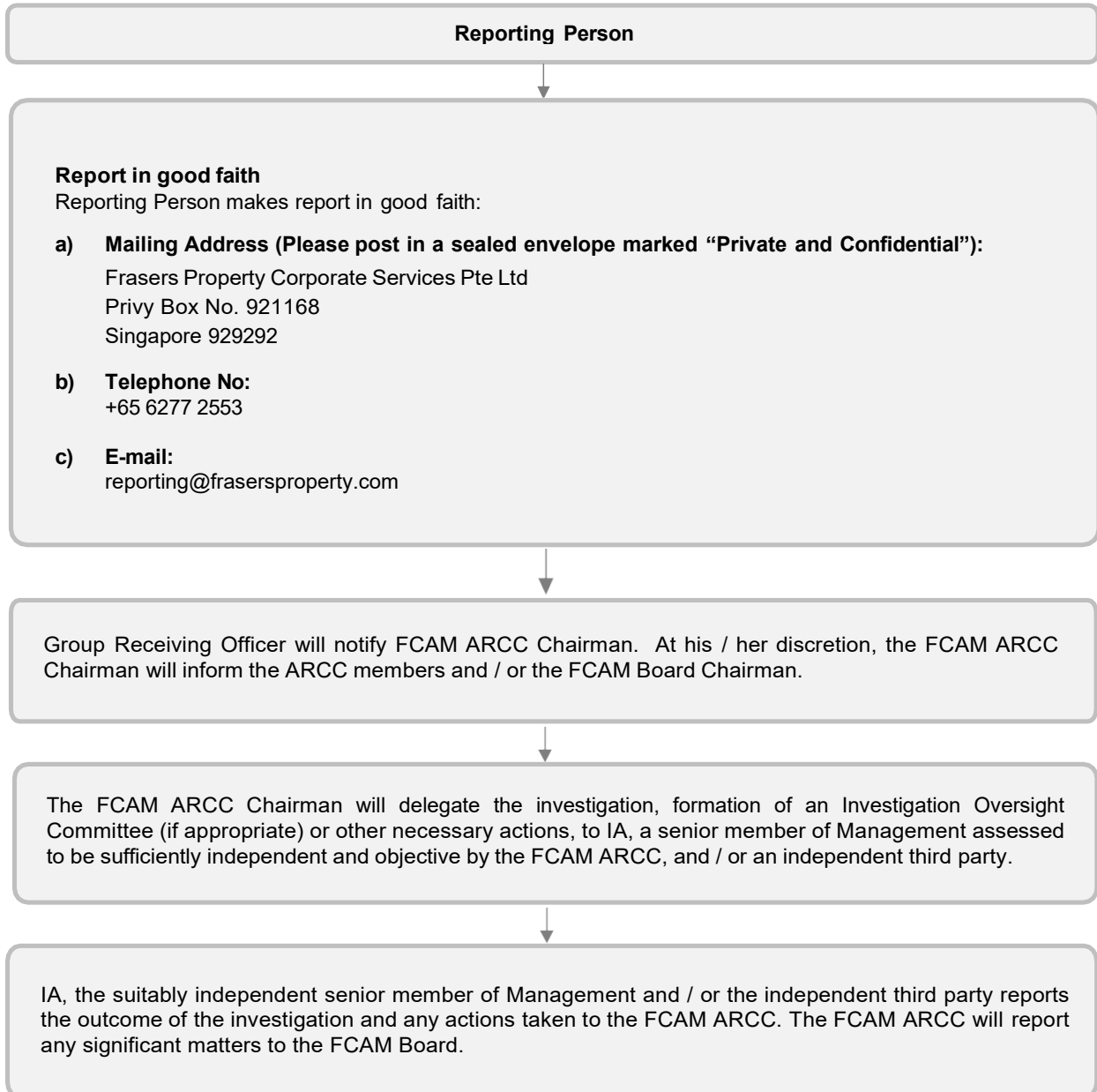
Contact No.: _____ Email: _____

Address: _____

Date: _____

ATTACHMENT 2

**Frasers Centrepoint Asset Management Ltd. Whistleblowing Policy
Channel of Communication**



ATTACHMENT 3

A) Appointment of Whistleblower Protection Officer (“WPO”)

- 1) One WPO shall be appointed in each jurisdiction in which FCAM and FCT operate, where the law requires or recommends a WPO.
- 2) In the event where a WPO is required to be appointed outside of Singapore, the appointment of WPO shall be subject to administrative control and oversight by FCAM CEO, including the following:
 - Review the suitability of nominated individuals, ensuring they have sufficient organisational authority and independence, as well as a sound understanding of applicable whistleblower protection laws and best practices in their jurisdiction;
 - Approve the appointment decision, with support from Head of Group IA; and
 - Maintain a register of all appointed WPOs across jurisdictions.

B) Roles and Responsibilities of WPO

- 1) **Safeguarding Reporting Persons:** Protect the identity of reporting persons and safeguard their interests throughout the reporting and investigation process.
- 2) **Access to Expertise:** Adequately trained and has access to independent financial, legal, and operational advisers as required.
- 3) **Initial Report Assessment:** Support the Group Receiving Officer in conducting an initial assessment of all received reports to determine whether they fall within the scope of the Whistleblowing Policy.
- 4) **Support and Fair Process:** Provide ongoing support to reporting persons, ensuring a fair process is maintained, including the reception and handling of any reports of alleged detriment.
- 5) **Compliance with Local Regulations:** Engage in joint consultations with Group Receiving Officer to verify that all aspects of whistleblower protection—including confidentiality, document / data protection, and adherence to local regulatory requirements—are effectively implemented.
- 6) **Reporting and Record-Keeping:** Notify the Group Receiving Officer of all reports he / she has received and maintain a comprehensive Whistleblowing Register.
- 7) **Facilitating Investigation:** Support the review and investigation process in accordance with the Whistleblowing Policy.
- 8) **Policy Review and Improvement:** Periodically review the Whistleblowing Policy in collaboration with Group IA and Group Legal to ensure ongoing alignment with regulatory updates and industry best practices.

C) Appointed WPO in Each Relevant Jurisdiction and Whistleblowing Reporting Email Address

S/N	Entity	WPO	Whistleblowing Reporting Email Address
1	<To be determined>	<To be determined>	<To be determined>
2			