

UIB REIT MANAGEMENT PTE. LTD.

WHISTLEBLOWING POLICY

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1. Purpose

- 1.1 UIB REIT Management Pte. Ltd. ("**UIB RM**") is committed to maintaining high standards of integrity, ethical conduct, transparency and corporate governance in the management of UI Boustead REIT (the "**UIB REIT**").
- 1.2 UIB RM has a zero-tolerance policy against fraud, corruption or unlawful behaviour. To assist in early detection of misconduct that have a harmful effect on the reputation and business of the UIB RM and UIB REIT, this whistleblowing policy has been established with the approval of the Audit and Risk Committee of UIB RM ("**ARC**") to outline the options for whistle blowing, the procedures for investigation of whistle blower complaints, and protection of whistle blowers from reprisal.
- 1.3 The purpose of this Policy is to:
- encourage employees and external stakeholders to report actual or suspected misconduct in good faith;
 - provide a safe, confidential and independent channel for reporting concerns;
 - ensure that reports are investigated fairly, objectively and promptly;
 - protect whistleblowers against retaliation or victimisation; and
 - promote compliance with applicable laws, regulations, internal policies and ethical standards.
- 1.4 The ARC oversees the whistleblowing framework and receives periodic reports on whistleblowing matters.

2. Scope

- This Policy applies to all directors, employees (whether permanent, temporary, or contract), secondees, or interns of UIB RM. This Policy also extends to non-employees who have information on actual or suspected improper conduct of UIB RM, including but not limited to, consultants, service providers, contractors, suppliers, business partners, and any other persons dealing with UIB RM or UIB REIT.

3. Reportable Conduct/Incidents

- 3.1 A report may be made where there are reasonable grounds to believe that misconduct has occurred or is likely to occur.
- 3.2 Examples include, but are not limited to:
- 3.2.1 Fraud and Dishonesty
- fraud or attempted fraud;
 - theft or misappropriation of assets;
 - falsification of records;
 - accounting irregularities;
 - financial statement manipulation.
- 3.2.2 Bribery and Corruption
- bribery;

- corruption;
- facilitation payments;
- kickbacks;
- improper gifts or entertainment;
- conflicts of interest that have not been disclosed.

3.2.3 Regulatory and Compliance Breaches

- breach of applicable laws or regulations, including the Securities and Futures Act 2001;
- breach of regulations or licence conditions imposed by the Monetary Authority of Singapore;
- breach of the Listing Rules issued by Singapore Exchange Securities Trading Limited;
- breach of the Trust Deed governing UIB REIT;
- breach of internal policies;
- market misconduct;
- insider trading;
- misuse of confidential information;
- money laundering or terrorism financing;
- sanctions violations.

3.2.4 Workplace Misconduct

- abuse of authority;
- serious harassment or victimisation;
- retaliation against whistleblowers;
- serious unethical conduct.

3.2.5 Other Matters

- deliberate concealment of wrongdoing;
- destruction of evidence;
- conduct likely to cause significant financial loss;
- conduct likely to damage the reputation of UIB REIT or UIB RM;
- any other serious misconduct.

The above list is intended to give an indication of the kind of conduct which might be considered as “wrong-doing”. In cases of doubt, the whistleblower should seek to speak to his or her immediate superior or follow the procedure for reporting under this Policy.

4. Good Faith Reporting

- 4.1 Reports should be made honestly and in good faith.
- 4.2 The whistleblower is not expected to prove the allegation but should provide sufficient information to enable an investigation.
- 4.3 Reports made in good faith will be protected even if they are ultimately not substantiated.
- 4.4 Knowingly making a false, malicious or frivolous allegation may result in disciplinary action or other appropriate action.

5. Reporting Channels

5.1 The Whistleblowing Committee of UIB RM reviews all whistleblowing reports and updates the ARC of all whistleblowing reports received.

5.2 When there is a concern, the whistleblower could make a report through any of the following channels:

Email: whistleblowing@uibreit.com

Mail: **Chairman of Audit and Risk Committee**
UIB REIT Management Pte. Ltd.
82 Ubi Avenue 4
#08-01 Edward Boustead Centre
Singapore 408832

5.3 Any report received will be routed directly and automatically to the Chairman of the ARC.

5.4 For the reporting, the whistleblower has to first consider whether it is a reporting of an incident or of a suspicion. An incident report should be made if there is an occurrence of an actual event that gives rise to the report. A suspicion is raised when there are no events that trigger the report.

5.5 The report should include, where available:

5.5.1 Incident Reporting

- Name of the whistleblower (unless anonymous)
- Date and time of incident
- Place of incident
- Parties involved in the incident
- Description of the incident
- Supporting documents
- Any other relevant information

5.5.2 Raising a Suspicion

- Name of the whistleblower (unless anonymous)
- Nature of suspicion
- Basis of suspicion
- Supporting documents
- Any other relevant information

Whistleblower may provide the evidence or state what evidence could lead to proving the incident.

5.6 While reports may be made anonymously, anonymous reports are generally less persuasive and may impede investigations, as it may be more difficult to follow up on the matter or to provide protection to the whistleblower. Nevertheless, the Whistleblowing Committee will consider such reports, and any concerns raised or information provided anonymously will be assessed and investigated based on their merits.

6. Whistleblower Protection

- 6.1 UIB RM does not condone any retributive action taken against employees or external stakeholders who raise concerns through any of the avenues of reporting. No whistleblower who makes a report in good faith shall suffer retaliation.
- 6.2 Employees who are whistleblower, will be protected from:
- dismissal;
 - demotion;
 - suspension;
 - harassment;
 - discrimination;
 - intimidation;
 - victimisation;
 - adverse changes to employment; or
 - any other retaliatory action.
- 6.3 However, these protections will not be given to anyone misusing the avenues of reporting to make a frivolous, mischievous or malicious allegation.
- 6.4 Any employee engaging in retaliation may be subject to disciplinary action, including dismissal.

7. Confidentiality

- 7.1 UIB RM encourages the whistleblower to identify himself/herself when raising a concern or providing information. All reports (including the whistleblower's identity) will be kept strictly confidential.
- 7.2 Circumstances where UIB RM could or would disclose the whistleblower's identity or information provided include:
- where UIB RM is under a legal or regulatory obligation to do so;
 - where the information is already in the public domain;
 - where the information is disclosed, on a strictly confidential basis, to legal or auditing professionals for the purpose of obtaining professional advice;
 - where the information is disclosed to law enforcement or regulatory authorities for the purposes of investigation.
- 7.3 Where practicable, UIB RM will inform the whistleblower before his or her identity is disclosed.

8. Whistleblowing Committee

All reports will be forwarded to the members of the Whistleblowing Committee, which consists of:

- Two members of the ARC (including the Chairman of the ARC)
- Such other personnel as may be appointed by the Chairman of the ARC

9. Assessment of Reports

- 9.1 After the receipt of a report, the Whistleblowing Committee will determine whether the report falls under the scope of this Policy.

- 9.2 Any concern raised or information provided will be investigated, but consideration will be given to these factors:
- Severity of the issue raised
 - Credibility of the concern or information
 - Likelihood of confirming the concern or information from attributable sources
- 9.3 Depending on the nature of the concern raised or information provided, the investigation may be conducted involving one or more of these persons or entities:
- The ARC
 - The External or Internal Auditor
 - Forensic Professionals
 - The Police or Commercial Affairs Department
- 9.4 The amount of contact between the whistleblower and the person(s) investigating the concern raised and information provided will be determined by the nature and clarity of the matter reported. Further information provided may be sought from the whistleblower during the course of the investigation.
- 9.5 The investigating officer(s) will communicate the findings of the investigation(s) to the Audit & Risk Committee for their necessary action.
- 9.6 The findings will also be communicated to the Chairman of the Board as well as the Chief Executive Officer and Chief Financial Officer of UIB RM for their necessary action.

10. Conflicts of Interest

- 10.1 Where a whistleblowing report involves:
- a member of management;
 - a member of the investigation team; or
 - a member of the ARC,
- that individual shall immediately recuse himself or herself from the review and investigation.
- 10.2 If the allegation concerns the Chairman of the ARC, the matter shall be referred to the Chairman of the Board.

11. Reporting to the Audit & Risk Committee

- 11.1 The ARC shall receive periodic reports on:
- whistleblowing reports received;
 - status of investigations;
 - findings and actions taken.
- 11.2 Material matters shall be reported to the ARC promptly.

12. Record Keeping

- 12.1 All whistleblowing reports, investigation records and supporting documentation shall be maintained securely and confidentially in accordance with UIB RM's record retention policies and applicable legal and regulatory requirements.

12.2 Access to such records shall be restricted to authorised personnel.

13. Policy Review

13.1 The ARC shall review this Policy at least once every two years, or earlier where required by changes in applicable laws, regulations or governance practices.

13.2 Any amendments shall be subject to approval by the Board of Directors.