

CSC Holdings Limited

WHISTLE-BLOWING POLICY

1.	Introduction
	<p>CSC Holdings Limited (the "Company") and its Board of Directors (the "Board") are fully committed to conducting business with integrity and consistent with the highest ethical standards, and compliance with all applicable laws and regulatory requirements. The Company strongly believes that the actions and conduct of all employees of the Group, as well as other persons acting on behalf of the Company and/or its subsidiaries, are essential to maintaining these standards.</p> <p>In line with this commitment and the Singapore Code of Corporate Governance, the Audit Committee approved and adopted this Whistle-blowing Policy (the "Policy") to provide an avenue for employees and any other persons to raise concern about possible improprieties without fear of reprisals in any form.</p> <p>Pursuant to the Singapore Code of Corporate Governance, the Audit Committee of the Company shall have the overall authority and oversight of this Policy from time to time. The Audit Committee shall ensure that arrangements are in place for such concerns to be raised and independently investigated, and for appropriate follow-up action to be taken. The Audit Committee may in its absolute discretion delegate the investigation of the whistle-blowing reports and implementation of this Policy to such person as it deems fit.</p> <p>This policy applies to all Company's employees including overseas subsidiaries and associates and any other persons.</p>
2.	Safeguards
	<p><u>Harassment or victimization</u> The Company will not tolerate harassment or victimization and will take reasonable and appropriate action to protect the whistle-blowers when the whistle-blowers raise a concern in good faith.</p> <p><u>Confidentiality</u> Information received will be treated with the utmost confidentiality.</p> <p>The identity of the whistle-blower will not be made known to anyone other than the following:</p> <ul style="list-style-type: none">-the Audit Committee and Board-Group Chief Executive Officer ("CEO") (provided the whistle-blowing in question is not concerned with the integrity of staff directly reporting to the Group CEO or the Group CEO himself).-parties to whom the identity of the whistle-blower is required to be disclosed by law. <p>The whistle-blower's consent will be obtained when his / her identity is to be revealed to anyone other than in the above circumstances.</p>

	<p><u>Anonymous Report</u> The Company strongly encourages the whistle-blowers to put their name to their report. The Company is committed to protecting whistle-blowers who make reports under this policy, so there should be no reason to report anonymously. Subsequent investigation may be hindered if contact cannot be made with the whistle-blowers to obtain clarification or further information.</p> <p><u>Malicious Allegations</u> Whistle-blowers making any such reports should ensure that they do so in good faith and not with any malicious intent. Whistle-blowers may be the subject of disciplinary or other legal action if the reports or allegations are malicious, frivolous or simply to cause anger, irritation, or distress.</p>
3.	Whistle-blowing Reporting/Communication Channels
	<p>All whistle-blowing reports relating to employment-related concerns shall be reported through the normal channels such as through immediate supervisor, General Manager or to the Chief Financial Officer. Guidance / direction may be sought from the CEO and / or the Senior Management.</p> <p>In the event that the whistle-blowing report involving any Director or member of the Senior Management, the reports shall be escalated to the Chairman of the Audit Committee and/or the CEO, as appropriate, for their attention and further action as necessary, in the following way:-</p> <p>CSC Holdings Limited 2 Tanjong Penjuru Crescent, Singapore 608968 <u>Attention: Chairman of the Audit Committee / Chief Executive Officer</u> <u>Email: tan.hupfoi@cschl.com.sg</u></p>
4.	How to Make a Report
	<p>When making a report, the whistle-blower should as far as possible include the following information:</p> <ul style="list-style-type: none"> -Date, time and place of the actions/transactions; -Identity and particulars of parties involved; -Circumstances leading to the improprieties; -Any other relevant information or documentation or evidence that would assist in the evaluation of the report; -Name and contact details of the whistle-blowers in case further information are required.
5.	How will the Company Respond
	<p>All matters reported will be reviewed within a reasonable timeframe, and after due consideration and inquiry, a decision will be taken on whether to proceed with a detailed investigation. All investigations shall be reported to the Audit Committee for their attention and further action as necessary. The matters raised may:</p> <ul style="list-style-type: none"> -be investigated internally -be referred to external auditor -be referred to appropriate law enforcement agencies

	<p>-be investigated by an independent inquiry</p> <p>The whistle-blower will be given the opportunity to receive follow-up on their concern in two weeks:-</p> <ul style="list-style-type: none"> -Acknowledging that the concern was received; -Indicating how the matter will be dealt with; -Giving an estimate of the time that it will take for a final response; -Telling him / her whether initial inquiries have been made.
6.	Scope of Improprieties
	<p>Possible improprieties which should be reported pursuant to this Policy may include but are not limited to the following:</p> <ul style="list-style-type: none"> -Violation of existing legislation, rules and regulations applicable to the Company relating to its accounting, financial reporting, internal controls and/or policies; -Destruction / removal / inappropriate use of Company's records / assets / facilities; -Accepting or seeking anything of material value from vendors, contractors or any persons providing goods and/or services to the Company; -Insider trading / disclosing confidential or proprietary information to external parties; -Conflict of interest; -collusion with competitors; -serious breaches of Group policy; -unsafe work practices; -employee misconduct; -Any fraudulent act or forgery <p>This Policy does not and cannot reasonably detail or cover every situation that should be reported pursuant to this Policy. If you are in any doubt as to how you should apply any provisions of this Policy, at any point in time, you are strongly encouraged to seek guidance from the immediate supervisors or, where appropriate, the Company's Senior Management or the Audit Committee.</p>
7.	Implementation of the Policy
	<p>A copy of the Policy shall be made available on the Company's intranet and website for transparency and ease of access by all employees and any parties who have business relationship with the Company.</p> <p>All new employees shall be briefed on the Policy as part of their orientation program.</p> <p>Regular communications shall be made to stress to all employees the importance of this Policy as well as to maintain awareness of the Board's continued commitment to this Policy.</p>