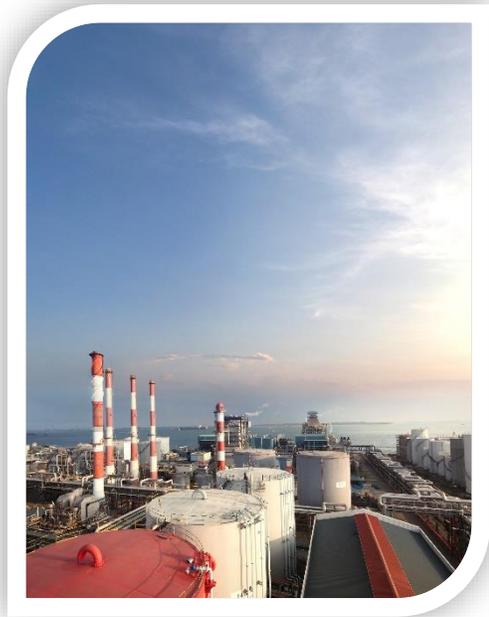




**Whistleblowing
Policy**



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1. Purpose

Sembcorp Industries Ltd and its subsidiaries (“Sembcorp”) are committed to maintain a high standard of transparency, accountability and integrity in our business conduct.

This Whistleblowing Policy (“this Policy”) aims to:

- provide a safe and reliable avenue for persons to report any wrongdoings including actual or suspected fraud or violation of Sembcorp’s Code of Conduct or any applicable law or company policy (a “reportable concern”) without fear of reprisals when whistleblowing is done in good faith; and,
- ensure that arrangements are in place to facilitate independent, fair and robust investigation of the reported concern and for appropriate follow up actions to be taken.

The Audit Committee (“AC”) oversees the effective implementation of this Whistleblowing Policy. It is assisted by Group Integrated Audit and the Whistleblowing Review Committee (“WBC”), which is chaired by Head of Group Integrated Audit (“GIA”) and includes the General Counsel and Chief Corporate and HR Officer. The WBC provides guidance and high-level oversight on high priority investigations.

2. Scope and Accountability

This Policy applies to all persons, including Sembcorp’s Board of Directors and all employees (permanent, temporary, contract) working in Sembcorp, including joint ventures and associates where Sembcorp has management control.

Employees seconded to companies where Sembcorp does not have management control are also expected to abide by this Policy. Joint ventures and associates without management control are strongly encouraged to adopt this Policy or incorporate key elements of best practices in this Policy into their existing policy.

Any deviation from this Policy or subsequent changes must be approved by the Policy Owner.

3. Reportable Concern

Employees and external parties are encouraged to come forward to report any actual or suspected fraud or wrongdoings (“reportable concern”) listed below as soon as he/she becomes aware of it.

- Fraud or theft
- Bribery and corruption
- Fraudulent accounting practices
- Conflict of interest violation
- Non-compliances with laws and regulations

- Non-compliances with company policies & procedures, including Code of Conduct
- Unethical or improper conduct, including discrimination / harassment
- Health, safety, security and environmental matters

Other reports that are not within the ambit of this Policy, such as service complaints, operational matters and staff grievances should be made to the relevant Market Departments or Group Human Resource for follow-up actions.

4. Whistleblowing Channels

All persons can report or redirect reportable concerns to GIA via the following channels:

- Email: gia.cases@sembcorp.com
- Call: +65 6723 3220
- Website: Whistleblowing Portal (<https://wbportal.sembcorp.com>)
- Postal: Head of Group Integrated Audit
Sembcorp Industries Ltd
30 Hill Street, #05-04
Singapore 179360

The type of information required when reporting a reportable concern include:

- Your name and contact details
- Your relationship with Sembcorp
- Names of the people / organisations involved and their relationship with Sembcorp
- The details of the incident (what happened, where, when and how often did it occur)
- Whether management has been notified (if so, whom)
- How you got to know of the incident
- Provide supporting evidence to substantiate the allegations

5. Confidentiality and Non-retaliation

Sembcorp is committed to use reasonable endeavours, within the limits of applicable laws and regulations, to protect the identity of the Whistleblower, and all persons involved in the investigations of potential fraud or misconduct. The identity of the Whistleblower will be disclosed on a need-to-know basis to the AC, WBC and GIA, or as required under any applicable law.

Whistleblowers are encouraged to provide their names and contact details in confidence, rather than anonymously. However, should the Whistleblower choose to remain anonymous, the GIA's investigation process and ability to address the concerns may be hindered if he / she cannot be contacted for clarification.

Sembcorp does not tolerate the harassment or victimisation of a Whistleblower who reports a concern in good faith. If it is determined that a Whistleblower was subject to retaliatory actions because of his / her report, appropriate remedial actions will be taken by the WBC under the AC's directives.

6. Frivolous and Malicious Whistleblowing

Sembcorp treats all reported concerns, including anonymous reports, seriously. Sembcorp strives to handle each report with impartiality, fairness and confidentiality. As such, Sembcorp does not tolerate the misuse of whistleblowing channels for personal gains nor condone frivolous and/or malicious whistleblowing.

If the results of the investigation show that the Whistleblower acted maliciously in reporting his / her concern, appropriate actions will be taken, including disciplinary action up to and including termination of employment.

Examples of frivolous and malicious whistleblowing includes, but is not limited to:

(a) having no reasonable grounds to believe that the information he / she provided was true and accurate; or

(b) knowingly spreading false information with the intent to damage another party's reputation or cause distress to that party.

7. Communication of this Policy

This Policy shall be communicated to external parties via the corporate website, and Sembcorp's employees via onboarding and refresher trainings and as and when requested by the AC or Board of Directors.