

WHISTLEBLOWING POLICY

Policy Statement

The Group encourages anyone to bring any ethical and legal violations that they are aware of to the Management's attention so that appropriate action can be taken to address the issue, and to minimize the Group's exposure to any damage that may occur when employees circumvent or overstep internal processes.

Objective

This policy reaffirms the Group's commitment to good corporate governance and is intended to provide a framework to promote responsible and secure whistle blowing, without fear of reprisal, discrimination or adverse consequences.

The procedures set out in this policy allow employees and anyone outside of the Group to report any concerns or complaints in relation to any irregularities, inappropriate behavior, legal or ethical violation or other serious breaches of internal processes in a responsible manner. This policy also permits the Group to address such concerns or complaints by taking appropriate corrective or remedial action. Frivolous and bogus complaints will be disregarded. This policy is not a means for a disgruntled individual to abuse and is also not a route for taking up personal grievances.

Scope

- a. This policy applies to all employees in the Group, including full-time, part-time or contract employees.
- b. It also applies to all external parties such as customers, suppliers, contractors and other stakeholders who may have a business relationship with the Group.

Reportable Incidents

The following is a non-exhaustive list of concerns that may be raised under this policy:

- fraud;
- corruption and bribery;
- improper accounting;
- theft and misappropriation of funds;
- forgery of documents;
- misuse of classified documents or classified information;
- breach of the Personal Data Protection Act (including misuse of customer information);
- abuse or misrepresentation of power and authority;
- professional or ethical malpractices;
- discrimination of others (i.e. on the basis of gender, race or disabilities);
- causing danger to the health or safety of others;
- causing damage to the environment; or
- failure to comply with laws, regulations or internal processes.

Reporting Channels

- a. When an employee or an individual who is not an employee has witnessed or becomes aware of a reportable incident involving ethical and legal violations or inappropriate behaviour, he or she may raise the matter via any of the following reporting channels:

Email	whistleblow@starhub.com or AC_Chair@starhub.com
Mail	67 Ubi Avenue 1 #05-01 StarHub Green Singapore 408942 Attention: General Counsel or Audit Committee Chairman

- b. Apart from the reporting channels above, employees may also choose to raise any concerns to their immediate superior or escalate their concerns to their next-level superior. All such complaints raised will be channelled to the General Counsel or the AC Chairman, who will review the complaints and determine the appropriate follow-up action.

Investigation and Follow-Up Action

- a. All complaints will be promptly and thoroughly investigated and the investigation will be dealt with in confidence and on a need-to-know basis.
- b. Following the receipt of a complaint, the General Counsel will disseminate all relevant information to the AC Chairman.
- c. The AC Chairman and the General Counsel will review the complaint and decide on the necessary course of action.
- d. Where an investigation is deemed necessary, the outcome of the investigation with a recommendation on the necessary actions to be taken will be reported to the AC Chairman and the General Counsel, for a decision on the appropriate course of action.
- e. On a quarterly basis, a consolidated report of all whistle blowing cases for the quarter will be submitted for review by the Audit Committee ("AC").

Protection and Confidentiality

- a. Every effort will be made to protect the complainant's identity. The identity of the complainant will be confidential save where:
- the identity of the complainant is material to any investigation;
 - the information is given on a confidential basis to legal or auditing professionals for the purpose of obtaining professional advice;
 - it is required by law, or by the order or directive of a court of law, regulatory body or by the Singapore Exchange Securities Trading Limited or such other body that has jurisdiction and authority of law to require such identity to be revealed;
 - the AC has opined that it would be in the best interests of the Group to disclose the identity of the complainant;
 - it is determined that the complaint was frivolous, made in bad faith, in abuse of this policy or lodged with malicious or mischievous intent; or
 - the identity of such complainant is already public knowledge.
- b. Employees can be assured that those who have raised any concerns in good faith and reasonably believing them to be true, will be protected from possible reprisals or victimisation. As part of preserving integrity and protecting the Group's assets, every employee is encouraged to speak up about genuine concerns. It applies whether or not the information is confidential. The Group views victimisation of whistle blowers as a serious matter and will not hesitate to take disciplinary action.

- c. If a whistle blower believes that he or she is being subjected to reprisals or victimisation for having made a report under this policy, he or she should immediately report those facts to the AC Chairman or the General Counsel.

Frivolous or Malicious Complaints

Any person who files a complaint which is frivolous, made in bad faith, in abuse of this policy or lodged with malicious or mischievous intent, will not be protected and may be subject to legal, administrative and/or disciplinary actions, including but not limited to the termination of employment or other contract, as the case may be.