

WHISTLEBLOWING POLICY AND PROGRAMME (hereinafter called the “Programme”)

Version : 1.0
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1. INTRODUCTION

Centurion Asset Management Pte. Ltd. (as manager of Centurion Accommodation REIT (“**CAREIT**”)) (the “**Company**”) is committed to maintaining the best employment practices and the highest standards of openness, probity, accountability and corporate governance. To achieve accountability and transparency, the Company is adopting a programme which provides a mechanism to enable employees of the Company and any other persons to communicate their concerns over fraudulent activities, malpractices or improprieties relating to the Company or CAREIT and its officers, in a responsible and effective manner.

The Programme is designed to provide guidance to employees of the Company and any other persons, to enable them to make reports or raise concerns to the Company on misconduct or wrongdoing relating to the Company or CAREIT and its officers, and to disclose information which the individual believes involves malpractices or improprieties. When an individual discovers information which he/she believes involves serious malpractice or impropriety within CAREIT or the Company, then this information should be disclosed to the Company without fear of reprisal. This Programme sets out the procedures/arrangements to enable this to be done independently of line management.

The Audit and Risk Committee (“**ARC**”) of the Company is responsible for oversight and monitoring of whistleblowing. The Company and/or ARC may in its absolute discretion designate an independent function/party as it deems fit to investigate whistleblowing reports made in good faith.

It should be emphasised that this Programme is intended to assist individuals who believe they have discovered fraudulent activities, malpractices or improprieties. It is not designed to question financial or business decisions taken by the Company nor should the Company use it to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the “whistleblowing” procedures are in place, it is reasonable to expect employees and any other persons to use them rather than voice their complaints outside the Company.

2. POLICY STATEMENT

The Company encourages officers and employees of the Company and any other persons to observe the highest standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the Company, officers and employees of the Company must practice honesty and integrity and comply strictly with all applicable laws, rules and regulations.

In its pursuit of good corporate governance, the Company encourages its officers and employees, vendors/contractors, consultants, suppliers and/or any other parties with whom the Company has a business relationship, to provide information that evidences unsafe, unlawful,

unethical, fraudulent or wasteful practices. Towards this end, the Company will protect the whistle-blower from any form of retaliation, harassment, adverse employment consequences or other discriminatory acts and against detrimental or unfair treatment for providing information relative to violations of Company policies, rules and regulations.

3. OBJECTIVES

The objectives of the Programme are:

- To communicate the Company's expectations of its employees in detecting fraudulent activities, malpractices or improprieties.
- To guide employees and any other persons on the course of action when addressing their concerns or suspicions of fraudulent activities, misconduct, wrongdoing, malpractices or improprieties in financial reporting, internal control or other matters.
- To provide a process for independent investigations and management reporting, and for appropriate follow-up action to be taken.
- To establish policies for protecting whistle-blowers against reprisal or detrimental/unfair treatment by any person internal or external to the Company.

4. SCOPE

This Programme is intended to deal with concerns over misconducts or wrongdoings that fall within the following activities:

- Financial malpractice or impropriety;
- Fraud or corruption or any dishonest act;
- Criminal activity including forgery or falsification of and alteration to Company documents/accounts;
- Breach of legal obligation (including negligence and breach of contracts);
- Danger of destruction to and unsafe practices in the work environment;
- Improper conduct or unethical behaviour (e.g., disclosure of confidential and proprietary information to party(ies) without prior authorisation and a need-to-know basis, accepting/seeking anything of material value from business associates, e.g. vendors);
- Attempts to conceal any of the above; and
- Any other similar or related inappropriate conduct or activities that might lead to other damaging implications to the Company.

The above list is not exhaustive.

5. REPORTING PROCEDURES

The whistle-blower shall report to the ARC Chairman and its members any conduct or activity that he/she reasonably believes in good faith to be a reportable conduct as defined in this Programme.

The report may be made in writing to the ARC Chairman and its members in the following manner, to allow independent investigation of the matter raised and appropriate follow-up action:

- By email to whistleblow@ca-reit.com which will be routed directly to the ARC Chairman and its members; or
- By mail for the attention of the ARC Chairman at the following address:

45 Ubi Road 1 #04-01, Singapore 408696

The Company does not encourage anonymous reporting since it will be difficult for the Company to follow up and obtain further information for making a proper assessment.

All reports of any of the above actions will be forwarded immediately to the Chairman of the ARC who will decide the appropriate action to be taken, including constituting an independent investigation committee ("Investigation Committee"). The Investigation Committee shall comprise the Chairman of ARC and members of ARC and any other persons who are considered independent as considered necessary and appropriate by ARC.

All employees must provide full cooperation and support to the Investigation Committee.

The Company views whistleblowing seriously and would:

- Not allow the whistle-blower(s) to be victimized;
- Treat victimization of whistle-blower(s) as a serious matter that may lead to disciplinary action including dismissal; and
- Take disciplinary action if any employee destroys or conceals evidence or makes untrue allegations.

The employee or any other person who has reported a suspicion of fraudulent activities, malpractices or improprieties in good faith and in compliance with the provisions of this Programme would not be prejudiced in his/her position in any way as a result of having made a report.

The Company will (a) treat all information/whistleblowing reports received as well as all information disclosed during the course of investigation confidentially; and (b) protect the identity of all whistle-blowers to the best of the Company's ability, except as necessary or appropriate to conduct the investigation and to take any remedial action and subject to legal or regulatory requirements.

This Programme is not intended for personal complaints or for employees or any other persons to seek personal gain or who otherwise do not act in good faith and the Company will not tolerate any such malicious acts. Disciplinary action(s) may be taken against such informant(s).

6. INVESTIGATION

All reports made/received shall be thoroughly investigated by the Investigation Committee with the objective of locating evidence that either substantiates or refutes the claims made by the whistle-blower.

The Investigation Committee may contact the whistle-blower and any party(ies) or personnel for further information and/or any documents that can shed light to the investigation during the course of the investigation.

The Investigation Committee may enlist, at the expense of the Company, the assistance of outside legal, accounting or such other advisors and professionals, as may be appropriate or required to conduct the investigation.

The Investigation Committee shall exercise great care, sensitivity and timeliness whilst carrying out the investigation to avoid "misleading or wrongful" conclusions or actions which might affect the evidence of the investigation or result in wrongful accusations of any party(ies).

The Investigation Committee shall maintain a register (the "Reports Register") for the purposes of recording all reports received, the date of such reports made and the nature of such reports made, a summary of their investigations and their observations. Periodic updates of such reports should be submitted to the Board of Directors of the Company as and when required. The Investigation Committee shall make the Reports Register available for inspection upon approval by the Board of Directors of the Company.

Investigation results are confidential and will NOT be disclosed or discussed with anyone other than those with a legitimate need to know. The whistle-blower will not be updated on the outcome of the investigations other than to receive confirmation that the matter has been dealt with by the Company. This is to safeguard all parties, including the Company.

The applicable laws, rules and regulations shall be observed in any investigation arising out of a whistle-blower report. As such, the person against whom the allegation is made shall be given the right to due process, including the opportunity to present evidence to disprove the allegation.

7. ADMINISTRATION

The Chairman of ARC (and at the discretion of the ARC, with the assistance of Head of Human Resources of Centurion Corporation Limited, the Company's holding company, or such other person/party as the ARC deems appropriate) will be responsible for administration of this Programme. This Programme will be reviewed by the ARC, as and when deemed appropriate, with recommendations, if any, made to the Board of Directors for approval.

8. IMMUNITY FROM DISCIPLINARY ACTION

The Company encourages the reporting of fraudulent practices and inappropriate activities and in pursuit thereof, shall grant administrative immunity to whistle-blowers.

A whistle-blower acting in good faith and who has not himself or herself engaged in serious misconduct or illegal conduct shall be protected from detrimental or unfair treatment and any forms of harassment, retaliation, adverse employment or career advancement consequence or discrimination, including but not limited to demotion, dismissal or reduction of compensation or privileges of employment.