

THE HONGKONG AND SHANGHAI HOTELS, LIMITED
(the “Company”)

SPEAK UP POLICY

OVERVIEW

The Company has set out detailed procedures enabling employees to raise their concerns about any suspected misconduct or malpractice within the Group in confidence and without fear of reprisal or victimisation.

The Group is committed to the highest standards of openness, probity and accountability. In line with that commitment, the Group welcomes suppliers, customers, and all other people with whom the Group engages in business relations to express any concerns they have about suspected illegal or illegitimate practices involving the Group.

REPORTING MATTERS

Reporting matters may include but are not confined to:

- 1 Breach of legal or regulatory requirements.
- 2 Criminal offences, breach of civil law and miscarriage of justice.
- 3 Malpractice, impropriety or fraud relating to internal controls, accounting, auditing and financial matters.
- 4 Endangerment of the health and safety of an individual.
- 5 Adverse impact to the environment and the community above and beyond the impact otherwise generated by a normal business in the hospitality or property development industry.
- 6 Improper conduct or unethical behaviour likely to prejudice the Group.
- 7 Deliberate concealment of any of the above.

REPORTING CHANNEL

All informers can raise their concerns to Group General Manager, Audit & Risk Management without fear of victimisation, discrimination or disadvantage, the contact details of whom are listed below:

The Hongkong and Shanghai Hotels, Limited
8th Floor, St. George’s Building,
2 Ice House Street,
Central, Hong Kong
Email: speakup@peninsula.com
Tel: (852) 2840 7308
Fax: (852) 2840 7425

Disclosures can be made in person or in writing. If the disclosure is made in writing, an informer is required to put his or her name to any disclosure in a sealed envelope clearly marked “Strictly Private and Confidential – To be Opened by Addressee” to ensure confidentiality. Anonymous complaints will usually not be considered.

INVESTIGATION PROCESS

- 1 The format and the length of an investigation will vary depending upon the nature and particular circumstances of each complaint made. The matters raised may be:
 - (a) investigated internally;
 - (b) referred to the relevant public or regulatory bodies;
 - (c) referred to the External Auditor; and/or
 - (d) form the subject of an independent inquiry.

- 2 The Group General Manager, Audit & Risk Management will write to the informer as soon as reasonably practicable after receipt of the communication:
 - (a) acknowledging that the concern has been received;
 - (b) advising whether or not the matter is to be investigated further and if so what the nature of the investigation will be; and/or
 - (c) giving an estimate of how long the investigation will take.

- 3 If there is evidence of criminal activity, activity on solicitation and acceptance of advantages or breach of legal and regulatory requirements, the Group General Manager, Audit & Risk Management may be legally obliged to inform the relevant public or regulatory bodies such as the police, the Independent Commission Against Corruption, the Hong Kong Stock Exchange and the Security and Futures Commission and etc., as appropriate.

CONFIDENTIALITY

All concerns will be treated in a sensitive manner and where possible in the strictest confidence, although in some cases the Company may be legally required to disclose the information.

Note: The Audit Committee of the Company approved this Speak Up Policy on 14 November 2016.