

**Swire Pacific Limited**  
**(the “Company”)**

**REPORTING OF IMPROPRIETIES**

Set out below are procedures which those who deal with the Company and its subsidiaries (the “Group”) (for example customers and suppliers) can use to report concerns about improprieties relating to the Group. The Company has separate procedures under its corporate code of conduct which employees can use to report concerns about improprieties.

**MATTERS OF POSSIBLE CONCERN**

Matters which those who deal with the Group may wish to report include but are not confined to:

- Criminal offences or breaches of other legal or regulatory requirements.
- Breaches of contract.
- Misconduct, malpractice, negligence or unethical behaviour.
- Improprieties in financial reporting or internal controls.
- Putting people’s health and safety at risk.
- Deliberate concealment of any of the above.

**CONFIDENTIALITY**

All information received will be treated with confidence, except where the Company is required to disclose the information by law or regulation. The person providing the information must also keep it confidential unless required to disclose it by law or regulation.

**FALSE REPORTS**

All concerns must be raised in good faith. If a person makes a false report maliciously or for personal gain, the Company reserves the right to take appropriate action against that person, including to law enforcement authorities and to recover any loss or damage as a result of the false report.

**REPORTING CHANNEL**

Concerns should be reported to the Group Internal Audit Department. The contact details are below.

Head of Group Internal Audit Department,  
John Swire & Sons (H.K.) Limited

Email: [group.audit@jsshk.com](mailto:group.audit@jsshk.com)

Fax: (852) 2968 0037

Reports shall be made in writing. A person making a report is asked to identify himself or herself. Anonymous complaints will usually not be considered.