

WHISTLEBLOWING POLICY

1. Our Commitment

Myer is fully committed to conducting our business with the highest standards of probity, integrity and ethics. We strive to create a safe, fair, and honest working environment. We recognise the value of complying with applicable laws and standards and encourage our employees, customers, suppliers and other stakeholders to raise their concerns about misconduct.

Myer does not tolerate any discrimination against whistleblowers or anyone who contributes to investigations.

2. Purpose

This Policy aims to:

- encourage our stakeholders including employees, customers, suppliers, contractors and any other internal or external stakeholders associated with our business to raise serious concerns without fear of retaliation or unfair treatment,
- provide a transparent framework for stakeholders to raise these concerns and receive feedback on any action taken,
- ensure each concern is treated seriously and appropriately,
- reassure stakeholders that they will be protected from retaliation or victimisation for raising a serious concern in good faith.

3. What is whistleblowing?

Whistleblowing is the reporting of any actual, alleged or suspected misconduct that violates the internal policies of the Company, applicable laws and regulations and Business ethical, or that has detrimental effect on the public interest.

4. Who can report?

Reports can be made by our employees, customers, suppliers, contractors and any other internal or external stakeholders associated with our business.

5. Who can be reported?

Reports can be submitted about the misconduct of our employees, customers, suppliers, contractors, or any other individuals or entities associated with our business.

6. Which concerns may be reported?

The whistleblowing scheme can be used to alert us about serious risks affecting individuals, our company, society or the environment. This Policy encourages reporting of actual, alleged or suspected misconduct regarding:

- Criminal offences, such as corruption, fraud, bribery, or money laundering,
- Violations of competition and anti-trust laws,
- A failure to comply with applicable laws and regulations,
- Violation of key principles of Business Ethics,
- Misuse of business assets,
- Misuse of authority,
- Conflict of business interests
- Full or partial infringement of Myer's policies and commitments,
- Violation of human rights, such as child labour, forced labour, retaliation,
- A danger to the public or individuals' safety, health and security,
- Damage to the environment,
- Cover-up of misconduct,
- Any other legal or ethical concern.

This Policy is not intended to apply to personal grievances unless they evidence a systemic issue. Personal grievances such as bullying, unfair treatment, and any other complaints concerning the working relationship shall be reported via internal grievance channels.

7. Who is responsible for the Policy?

The Ethics and Risk Committee, which is led by the Director and General Manager, is responsible for overseeing the management of the Policy. The Committee has overall operational responsibility for this Policy.

8. How to raise your concerns?

We encourage our stakeholders to raise concern as soon as they become aware of any actual, alleged or suspected misconduct. Reports must be made in good faith, based on facts and without bias, and must comply with applicable laws and regulations.

8.1 Whistleblowing channels

For internal stakeholders (Employees):

1. Line manager
2. the Ethics and Risk Committee
3. Whistleblowing platform

For external stakeholders (e.g. customers, suppliers and contractors):

1. the Ethics and Risk Committee
 2. Whistleblowing platform
- In the first instance, employees are encouraged to report their concerns to their Line Manager. Should the employee's concern involve their Line Manager, they should report to the highest level of management without notifying the person concerned.
 - Should the disclosure relate to the manager, then a disclosure shall be made to the Ethics and Risk Committee, which can be reached out via whistleblowing@myer.com.hk.

8.2 Anonymity

We respect whistleblowers' right to choose to make anonymous reports. However, it may be more difficult to investigate an anonymous concern due to difficulty in obtaining details, questioning whistleblowers or providing feedback back to them. Therefore, anyone wishing to raise concerns is encouraged to avoid making anonymous reports where possible.

8.3 Supporting evidence

A minimum level of detailed information and reliable evidence shall be provided when raising concerns, where possible, including but not limited to:

- name of affected person, or organisation,
- description of the misconduct including witness, date, time, location of the incidents,

- the impact of the misconduct,
- any other evidence that substantiates the reporting, such as documents or videos.

9. How do we deal with your concerns?

9.1 Receipt of whistleblowing reports

All reports will be treated fairly and confidentially.

If an employee reports a concern to his/her Line Manager, the Line Manager will document the report and arrange an investigation into the issue. Before taking any action, the Line Manager will report to the Ethics and Risk Committee. The committee will help determine the next steps.

Reports raised to whistleblowing@myer.com.hk, and the whistleblowing platform are accessible only to the Ethics and Risk Committee.

9.2 Responding to whistleblowing reports

The initial review will be completed by the Ethics and Risk Committee within seven calendar days of receipt of the report.

The Ethics and Risk Committee will write to the whistleblower, where practicable within fourteen calendar days of receipt of the report.

- acknowledging the receipt of the concern,
- giving an estimate of how long it will take to provide a final response,
- informing the whistleblower whether further investigations will take place.

9.3 Investigation

Investigations will be conducted by the Ethics and Risk Committees. If necessary or appropriate, we may collaborate with an independent external team. We will ensure that anyone involved in the investigation are independent.

The whistleblower will be kept informed of the progress of the investigation.

All investigations will be conducted sensitively, thoroughly and promptly, and will be reported to the Executive Leadership Team.

9.4 Closing of reports

The Executive Leadership Team will examine the result of the investigation. If the allegations are inaccurate or not substantiated, the report will be closed. If the allegations are substantiated, further actions will be taken, including but not limited to legal actions, termination of employment or business relationship, revision of internal rules and any other corrective action.

10. Confidentiality

We will make our effort to disclose information provided in the report to people related to investigation on a need-to-know basis. Individuals who possess information of the report shall maintain confidentiality regarding personal data. Personal data shall not be disclosed if he/she does not want the data revealed.

11. Protection of whistleblowers

The protection of whistleblowers is essential to the success of our Whistleblowing Programme.

We will never reveal the whistleblower's identity without the person's consent. Whistleblower raising concerns in good faith are also protected from harassment, victimisation, disciplinary action or another disadvantage. We will neither retaliate nor tolerate any retaliation, discrimination, or other disciplinary action against any whistleblower for raising concerns in good faith.

However, protection will not be provided to:

- anyone who threatens a whistleblower,
- anyone who retaliates against a whistleblower,
- anyone who takes disciplinary action against a whistleblower,
- anyone who misuses this Policy, such as deliberately disclosing personal data,
- whistleblower who intentionally provide incorrect or misleading information.

Such misconduct will be treated seriously and may lead to disciplinary action or legal action.

Concerns raised in good faith which are subsequently realised to be untrue or unfounded will be treated as raised in good faith.

12. Data Retention

Personal data contained in the reports will be processed in compliance with applicable laws and regulations. We will retain personal data for the time necessary to investigate and address the concern raised. Personal data shall be deleted within two months of completion of the investigation. In some exceptional circumstances where the data must be retained, it will be anonymised.