

BANYAN TREE HOLDINGS LIMITED

(Incorporated in the Republic of Singapore)

(Company Registration Number 200003108H)

RESPONSE TO A QUERY RAISED BY SINGAPORE EXCHANGE LIMITED (“SGX”) ON COMPANY’S 2021 ANNUAL REPORT ANNOUNCED ON 6 APRIL 2022

The Board of Directors (the “Board”) of Banyan Tree Holdings Limited (the “Company”, and together with its subsidiaries, the “Group”) would like to announce the following in response to the query raised by SGX on the Company’s 2021 Annual Report announced on 6 April 2022:-

SGX’s Query on 11 April 2022

We refer to the Company’s whistle-blowing policy in its Annual Report for the financial year ended 31 December 2021. Listing Rules 1207 (18B) (a) and (c) require an explanation on how the Company has designated an independent function to investigate whistle-blowing reports made in good faith, and its commitment to ensure protection of the whistle-blower against detrimental or unfair treatment. This was not addressed in the Company’s disclosure regarding its whistle-blowing policy. Please disclose accordingly.

Company’s Response

The Company’s whistle-blowing policy provides clear details of the scope of the policy, the channels for reporting concerns, the procedures for managing them and the protection offered to whistle-blowers who report in good faith. The Company’s employees (“Associates”) have access to the whistle-blowing policy and related procedures from the Company’s internal policies and procedures administered by Human Resource and the policy is also disclosed on the corporate website. The Policy is designed to enable Associates or third parties to raise concerns without fear of reprisal, discrimination or unfair treatment.

The Audit and Risk Committee (“ARC”) oversees the whistle blowing policy. The Head of Group Internal Audit, who reports independently to the Chairman of the ARC, serves as the Company’s officer to independently receive whistle-blowing reports and ensures that all concerns raised through the various whistle-blowing channels (which includes a dedicated e-mail address and a hotline) are properly attended to and reported to the ARC.

The whistle-blowing policy specifies the Company’s commitment to ensure the confidentiality of whistle-blowers’ concerns and their identities throughout the investigation process. Where it is necessary to disclose such information to facilitate the investigation and remedial actions, this is done in consultation with the ARC and in accordance with applicable laws and regulations.

Whistle-blowers who believe that they are discriminated or retaliated against or who are harassed for making a report have recourse to the Whistle Blowing Evaluation Team, which comprises independent members of the Company’s ARC and the Head of Group Internal Audit. The Whistle Blowing Evaluation Team ensures protection of the whistle-blower against detrimental or unfair treatment.

By Order of the Board
Moy Keen Choy
Company Secretary
13 April 2022