

Vanke Group Whistleblowing Policy

1. Objective

China Vanke Co., Ltd. (hereinafter referred to as “Vanke”) adheres to the most serious management on whistleblowing, encouraging the staff and outsiders to actively report any potential irregularities.

2. Scope of Application

This policy covers Vanke’s directors, supervisors, senior management, all employees, suppliers and partners, and applies to all whistleblowing matters about violations of business ethics, which mainly include:

- o Accepting commercial bribes or kickbacks;
- o Embezzling, misappropriating or stealing the Company’s assets;
- o Leaking confidential information about the company;
- o Taking advantage of one’s position for personal gain, or other acts of conflict of interest;
- o Harming the personal rights and interests of employees;
- o Other acts that harm the economic interests of the company or seek improper economic interests; and
- o Other acts that violates the *Sunshine System--Vanke Red Line Requirements for Employees*, the *Letter of Reminder for Integrity Risks*, the *Code of Conduct for Employees*, the *Sunshine Cooperation Agreement*, the *Principles for Whistleblowing*, and so on.

3. Responsibilities

The Vanke Risk Control Centre shall be responsible for finding relevant clues through such ways as collecting internal and external whistleblowing and conducting internal screenings, and shall carry out independent investigations.

4. Our Measures

Whistleblowing channels

- Internal consulting/whistleblowing channels: if potential violations are detected, the whistleblowers may report via public channels like the website (5198.vanke.com), the 5198 whistleblowing mailbox (5198@vanke.com), and the “Vanke Integrity” WeChat official account. All Vanke employees can counsel and inquire about the anti-fraud system or compliance of personal behaviours via the above-mentioned ways.

Whistleblowing management

- Whistleblowing requirements: the whistleblowers shall indicate the reported person's identity information, and the reason and demand of the whistleblowing, and shall provide appropriate evidence and whistleblowing materials as well, so as to ensure the whistleblowing is authentic and that the investigation will be launched in a timely manner.
- Priority to real-name whistleblowing: Vanke respects the whistleblowers' desire to report anonymously, and encourages real-name whistleblowing. Real-name whistleblowing shall be handled in priority, acceptance and processing outcomes of which shall be fed back and notified promptly. The whistleblowers' information shall be kept secret strictly.
- Protection of whistleblowers:
 - o Vanke follows the principle that the legal rights and interests of the whistleblowers are inviolable, with a commitment to controlling the internal whistleblowing information management strictly and implementing independent whistleblowing management procedures to the extent permitted by law.
 - o The extent to which the whistleblowing information is known shall be strictly controlled. The investigators shall be strictly prohibited from giving the whistleblowers' basic information directly or in any way indirectly to any third party (including the reported person, and the department/company where the reported person works), and the information and materials involved in the investigation shall be strictly kept confidential.
 - o If an employee is subject to disciplinary punishment or other unfair treatment as a result of whistleblowing, relevant departments shall correct that according to their management authority. If somebody is found to have made retaliations against the whistleblowers, he shall be held accountable by relevant departments, and suspected crimes shall be referred to the judiciary.
 - o If the personal safety of the whistleblowers are threatened, relevant departments shall take protective measures in a timely manner. Where the reputation or property of the whistleblowers and relatives is infringed upon because of whistleblowing, the whistleblowers shall have the right to ask the infringer to stop the infringement, make an apology and compensate for the loss. The whistleblowers can also file a suit with the court.
- Reward for verified whistleblowing: Whistleblowers, whether internal staff or outsiders, will get material rewards corresponding to nature and impacts of incidents reported and their assistance in whistleblowing, whose information will be kept confidential strictly.

Procedures for handling whistleblowing cases

Vanke arranges special personnel to receive and process the collected whistleblowing information, and the Risk Control Centre shall follow the seven procedures below to handle whistleblowing cases:

- 1) Make a research analysis;
- 2) Set up a verification team;

- 3) Carry out verification;
- 4) Issue a preliminary verification report;
- 5) Give feedback to the whistleblowers, and collect opinions from the investigated person;
- 6) Issue a formal verification report; and
- 7) Make an announcement.

5. Monitoring and Regular Review of Policies

Vanke Risk Control Centre continuously monitors and regularly reviews the effectiveness and integrity of this Whistleblowing Policy, and updates its contents as appropriate.