**Whistleblowing Policy**

1. Purpose

Country Garden Group (the “Group”) is committed to the highest possible standard of honesty and integrity. In line with that commitment, the Group continues to strike on behaviors of misconduct, malpractice and improprieties. This Policy is therefore formulated and enforced to assist Whistleblowers to disclose relevant information through a confidential and complete channel.

1. Whistleblowers

Any employee of the Group and related Third Parties (e.g. customers, suppliers, etc., who deal with the Group) are encouraged to raise concerns, in confidence, about possible misconduct, malpractice or improprieties in any matter with the Group.

1. Types of misconduct, malpractice or improprieties

Behaviors of misconduct, malpractice or improprieties may include but are confined to:

1. Breach of legal or regulatory requirements;
2. Breach of rules or policies of the Group;
3. Dereliction of duty at work;
4. Endangerment of the health and safety of an individual;
5. Other behavior that might prejudice the Group;
6. Deliberate concealment of any of the above.
7. Protection for Whistleblowers

Whistleblowers making genuine and appropriate reports under this Policy are assured of fair treatment and strict protection. Even if the concerns raised turned out to be unsubstantiated, the Whistleblowers are assured of protection against unfair treatment at workplace (as employee) or daily business dealings (as Third Parties).

Retaliation against Whistleblowers are strictly prohibited. The Group reserves the right to take appropriate actions against anyone who initiates or threatens to initiate retaliation against the Whistleblowers.

1. Confidentiality

The Group will make every effort to keep the Whistleblower’s identity confidential. In order not to jeopardize the investigation, the Whistleblower should also keep confidential the details of his/her reporting and the identity of those involved.

Should an investigation lead to a criminal prosecution, the matter might be handed over to relevant authorities and therefore the Whistleblower might have to provide evidence or be interviewed as required.

1. Reporting Channel

Whistleblowers could make their reports to the Center of Risk Management, Audit and Discipline Inspection or the Audit Committee:

1. Center of Risk Management, Audit and Discipline Inspection
* Hot-line: 0757-26395969 Ext 4
* Email: jtjcb@countrygarden.com.cn
* Postal Address: No.1 Country Garden Avenue, Shunde District, Foshan City, Guangdong Province, China (528311)
1. Audit Committee:
* Postal Address: 1702 Dina House, Ruttonjee Centre, 11 Duddell Street, Central Hong Kong, China
1. Reporting

In order to facilitate the investigation, Whistleblowers should specify the target of reporting, provide detailed information including the time, location and process of the violation of rules and discipline, and attach documentary evidence, photos, audio recordings, videos and other evidence as much as possible.

The Group treats every single reporting fairly and endeavors to look into all the reportings with clear description and sufficient evidence. Whistleblowers may choose to report anonymously, however, it is recommended to provide contact information so that further communication could be carried out to facilitate the investigation.

Whistleblowers should report matters based on the fact. The Group reserves the right to take appropriate actions against false reportings that are made maliciously with ulterior motives

1. Investigation

The Group will endeavor to acknowledge receipt of the reportings as soon as reasonably practicable. Screening and investigation of the reportings will be carried out following the Group’s internal process. The Group’s management team and the Board of Directors will be regularly briefed of the investigation process of the major reportings. If there is sufficient evidence to suggest that a case of possible criminal offence exists, the matter will be reported to the relevant authorities and the Group will cooperate as required by the authorities.

1. Implementation and Review of the Policy

This Policy has been approved by the Board of Directors of the Group. The Center of Risk Management, Audit and Discipline Inspection is responsible for the execution of the Policy under the supervision the Audit Committee. Periodic review of the Policy will be carried out and briefed to the management team and the Board of Directors of the Group.