

THE PLACE HOLDINGS LIMITED
(Company Registration Number: 200107762R)
(Incorporated in the Republic of Singapore)

**RESPONSE TO QUERY RAISED BY SINGAPORE EXCHANGE REGULATION ON THE COMPANY'S
FY2021 ANNUAL REPORT**

The board of directors (the “**Board**” or the “**Directors**”) of The Place Holdings Limited (the “**Company**”, and together with its subsidiaries, the “**Group**”) refers to the query from the Singapore Exchange Regulation (“**SGX Regco**”) raised on 19 April 2022 on its annual report for the financial year ended 31 December 2021 which was announced on 8 April 2022. The Company sets out its response to the query raised by the SGX Regco below:

Query:

Please explain how the issuer is in compliance with Rule 1207(18B)(a), (c) and (d) of the SGX-ST Listing Manual (Mainboard Rules).

Response to SGX Regco’s Query:

Listing Rule 1207(18B) requires an explanation on (a) how the Company has designated an independent function to investigate whistleblowing reports made in good faith; (c) its commitment to ensure protection of the whistle-blower against detrimental or unfair treatment; and (d) how the Audit Committee is responsible for oversight and monitoring of whistleblowing.

Rule 1207(18B)(a) - The issuer has designated an independent function to investigate whistle-blowing reports made in good faith

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 employees and other external parties (whistle-blowers) may report possible or suspected improprieties, wrongful activities or wrongdoings in the workspace directly to all Independent Directors and/or Chairman of the Audit Committee (“**AC**”) (the “**Receiving Officers**”) through a dedicated email at feedback@theplaceholdings.com, the access to which is restricted specifically to all the Independent Directors and Chairman of the AC; or mail the report in sealed envelope marked as “Private and Confidential” to the following address:

6 Battery Road
#16-06
Singapore 049909
Attention: Independent Director / Chairman of the Audit Committee

The Receiving Officers will conduct an independent investigation on all reported incidents and discuss the details with the Chief Executive Officer before reporting the findings to the AC members for further investigation and appropriate follow up action. In the event that the Receiving Officer is the subject of the whistle-blowing, the Board of the Company will assess and re-assign the appropriate replacement

officer.

Rule 1207(18B)(c) - The issuer discloses its commitment to ensure protection of the whistleblower against detrimental or unfair treatment

The objective of the Company's whistle-blowing policy is to encourage the reporting of such incidents so that employees or external parties making such whistle-blowing reports in good faith will be able to do so with the confidence that they will be treated fairly and, to the extent possible, be protected from reprisal, discrimination or adverse consequences. The Company is committed to ensuring protection of the genuine whistle-blowers against detrimental or unfair treatment as a result of their report.

Whistle-blowers who believe that they are discriminated or retaliated against or who are harassed for making a report may immediately report those facts to the Independent Directors, AC Chairman or Chairman of the Company. Reporting should be done promptly to facilitate investigation and the taking of appropriate action. The Company will take all necessary steps to ensure that the whistle-blower will be protected from harassment or victimisation within the Group, or any other form of retaliatory action even if the report proves to be unfounded, provided the report was made in good faith.

Rule 1207(18B)(d) - The Audit Committee is responsible for oversight and monitoring of whistleblowing

The AC is responsible for oversight and monitoring of the investigation of whistleblowing reports made in good faith. The AC, may, in consultation with the CEO and/or senior management, direct the complaint to the division/department best placed to address it, or lead the investigation to ensure prompt and appropriate investigation and resolution. The AC reviews all such whistle-blowing reports, findings, follow up actions and outcomes at its scheduled meetings.

By Order of the Board

Ji Zenghe
Executive Chairman

20 April 2022