



Panorama Construction & Development Co. Ltd

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[**WHISTLE BLOWING POLICY**]

PANORAMA requires all employees from top management to rank and file to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Company, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

This Whistleblowing Policy intends to:

- Encourage all ascertained/discovered unethical or illegal behaviour to be identified and challenged at all levels within PANORAMA;
- Ensure all employees feel supported in speaking up in confidence by providing assurance that all disclosures will be handled seriously, treated as confidential and managed without fear of reprisal of any form;
- To provide clear procedures for reporting and handling serious infractions against our Code of Business Conduct and Ethics Policy;
- To proactively prevent and deter misconduct which could impact the financial performance and damage the company's reputation;
- To help promote and develop a culture of openness, accountability and integrity.

PANORAMA requires that its Employees be candid and fully cooperate with its internal and/or external auditors and legal advisors. Failure to cooperate with any investigation being conducted may be grounds for disciplinary action, including dismissal with cause.