



Code of Conduct

Sun Hung Kai Properties Limited (“SHKP”) is committed to upholding high standards of ethics, integrity and fairness, and conducting its businesses in an open and responsible manner to create greater value for its stakeholders.

This Policy is applicable to SHKP and its subsidiaries (collectively: the Group). Business units of the Group are expected to abide by the Policy. Where applicable, they will establish, review and update their own policy in accordance with their business nature. The Group’s associated and joint venture companies are encouraged to comply with this Policy while our supply chain partners, including suppliers, contractors, subcontractors, joint ventures, and other service providers should comply with our Supplier Code of Conduct. This Policy covers the following areas:

Legal Compliance and Commitment

- Meet or exceed all applicable legal requirements as well as environmental and social standards in the respective jurisdictions of the Group’s operations.

Prevention of Bribery

- Prohibits bribery and corrupt practices and abides by all anti-bribery laws and regulations. A ‘bribe’ may include any illicit advantage offered or accepted as an inducement to, or reward for, performing or abstaining from performing any company duties. An ‘advantage’ includes money, gifts, loans, fees, rewards, employment, contracts, services or other favours.

Soliciting or Accepting Advantages

- No employee may solicit or accept advantages, gifts or entertainment from any business partners of the Group, such as customers, suppliers or sub-contractors. Any employee who receive red packets or gift valued at over HK\$500 should seek approval from their department head before accepting them. Individual departments may lower the departmental ceiling for acceptance of red packets and other gifts if needed.

Offering Advantages

- Prohibit for offering gifts, advantages or entertainment to any person or company for the purpose of influencing the person or company in any business dealings. When providing gifts or entertaining, they must be offered only in connection with the Group’s legitimate business interests and purposes. Gifts bearing the Company logo are preferred. Business gifts and entertainment expenses must be processed through proper approval with records maintained. When dealing with government departments or public sector corporations that have more restrictive regulations or prohibitions against accepting gifts or entertainment, we must follow their standards.

Conflict of Interest

Conflict of interest arises when the private interest of an employee competes or is in conflict with the interest of the Group. ‘Private interest’ includes any financial or personal interest of the employees

and those of their related parties, which may include family members, relatives or close personal friends. Common examples of standards of behaviour include, but are not limited to, the following:

- Avoid any actual or perceived conflict of interest and report to Internal Affairs Department immediately if such a situation arises. Failure to avoid or declare a conflict of interest may be regarded as an act of favouritism, abusing authority, or even corruption;
- Must not accept outside employment regardless of whether it is paid or unpaid without prior written approval from the Internal Affairs Department. In any circumstances, employee must not take up any outside employment that may lead to a conflict of interest with the Group;
- Obtain prior approval from the Internal Affairs Department for employees who wish to make direct or indirect investments in non-publicly listed shares or engage in direct or indirect activities related to the Group's business that could lead to a conflict of interest;
- Report and make full disclosure to the Internal Affairs Department through department head to avoid a violation of legal requirements in the respective jurisdictions of our operations, including the Prevention of Bribery Ordinance, if employees or their spouse or relatives engage in activities that may be in conflict with the interests of the Group during the discharge of their official duties;
- Should not abuse their official authority to obtain benefits for their personal interests or accept advantages, including commissions or rebates. Employee are not allowed to provide a company guarantee to any person or organization;
- Should not accept any loans from individuals or organizations having business dealings with the Group or have those individuals or organizations act as guarantors for loans; and
- Should not engage in frequent or excessive gambling with individuals having business dealings with the Group.

Handling of Confidential Information

- Without the written consent of management, employees are not allowed to disclose confidential information regarding the Group's business, including financial information and trade secrets, to any person directly or indirectly. Unauthorized leakage of such information may lead to disciplinary and/or legal action.
- Employees who are authorized to access or manage the Group's information should take appropriate security measures and handle it with the utmost care to avoid any abuse, misuse or loss of information. Examples of abusing information include disclosing information in exchange for monetary benefits and making use of information for personal interest.
- If a government authority or regulatory body approaches any employee in relation to work and (i) requests any company information or documents, or (ii) requests an interview with them or their colleagues, or (iii) asks any questions:
 - (1) They should immediately inform and seek advice and assistance from the Legal Department before taking any steps or action to accede to any such request; and
 - (2) When so doing, they should approach the Legal Department in person, since issues of confidentiality may be involved, which may not be properly maintained if written memoranda or e-mails are used.

Protection of Information and Company Property

- Take good care of Group's assets and ensure the economical use of the Group's resources. All files, books and documents of the Group should be kept in a proper manner. Use of the Group's assets and resources shall follow Group's procedures and practices. All use of the Group's assets and resources, other than for the business purposes, requires prior authorization and proper justification, following the Group's policies and procedures.

Relationship with Suppliers and Contractors

Fair and Open Competition

The Group embraces fair competition and pursues the development of a prudent and fair supply chain. The Group is committed to complying with all applicable competition and antitrust laws. Employees should acquaint themselves and comply with the applicable competition laws to which their businesses are subject. A non-exhaustive list of anti-competitive behaviours that violate competition laws is set out as follows:

- Participating in price fixing, collective boycotts or market-sharing arrangements;
- Exchanging competitively sensitive information with competitors;
- Imposing restrictions on customers or suppliers, including retail price maintenance; and
- Abusing a position of substantial market power or market dominance.

Procurement and Tendering

Contracting services and purchasing of goods should be based solely upon price, quality and need. The procurement and tendering process should be conducted according to the following principles:

- Impartially selecting appropriate, capable and responsible suppliers and contractors;
- Maximizing competition;
- Selecting appropriate contract types according to need; and
- Adopting an effective monitoring system and management controls to detect and prevent bribery, fraud or other malpractice in the procurement and tendering process.

Relationship with Shareholders

Keeping Proper Books and Records

- Commit to keeping proper records and following sound accounting policies. All books, records, accounts, invoices and other documents must be properly created and maintained. No false or misleading statements or entries should be made in the Group's books, accounts, electronic records, documents or financial statements.

Insider Dealing

- Prohibit for providing or making available confidential or insider information to anyone without proper authorisation, or using confidential or insider information to secure advantage through the use of agents, partners, contractors, family members, or parties acting on their behalf or otherwise.

Relationship with Customers

- Work in a professional and responsible manner. Absenteeism, wilful neglect of duties and procrastination are unacceptable. In case of heavy workload, employees should prioritize their job assignments according to their urgency and importance, or seek assistance from their supervisor if needed. Conducting personal activities during working hours and using company facilities for personal purposes are not allowed.
- Believe customers come first. Employee should serve customers in a polite, sincere and patient manner to uphold the good reputation of the Group's customer service.

Environment, Health and Safety

- Commit to providing a safe and healthy environment for its employees and others who might be affected by its operations. It aims to create long-term value for its stakeholders. Achieving this depends on the sustainable development of its businesses and the communities in which it operates. To this end, the Group is dedicated to being a good steward of the natural resources and biodiversity

under its influence and to ensuring that all potential adverse effects of its operations on the environment are identified.

Equal Opportunity and Diversity

- Promote and integrate the principles of equal opportunity, discrimination-free, harassment-free and inclusive excellence at the workplace. Employee should follow reasonable instructions from supervisors and maintain a cooperative and mutually respectful work relationship with colleagues. In case of any different viewpoints, employee should seek advice from their supervisors. Employee should work with their colleagues with a cooperative team spirit and be courteous at all times.
- Abide by all applicable legal requirements in the respective jurisdictions of our operations, including the Sex Discrimination Ordinance, Disability Discrimination Ordinance, Family Status Discrimination Ordinance, and Race Discrimination Ordinance of the HKSAR. Any complaints of unlawful discrimination or potential cases of abuse will be dealt in accordance with the grievance procedure set out by the Group, or through the normal communication channels, including the Whistleblowing Policy and suggestion box.

Privacy

- We are committed to protecting the privacy of our stakeholders, including employees and customers, and abiding by all applicable legal, statutory or regulatory requirements. For instance, in Hong Kong, the Group complies with its Customer Data (Privacy) Policy and other relevant laws, such as the Personal Data (Privacy) Ordinance of the HKSAR, when collecting, handling and using personal data. Employee should take appropriate steps to protect the privacy of others and confidential information received.

Compliance with the Code

- Show good conduct, comply with the applicable laws, and comply with the Group's Code of Conduct. Any breach of the Code or engagement in activities that are detrimental to the Group's reputation will lead to disciplinary action.
- Encourage to report concerns about any malpractice or impropriety that violates this Code of Conduct. Employee can raise the malpractice concerns with their immediate supervisor or department manager, or direct to the Group Head of Internal Affairs, the Head of Internal Audit, the Chairman and Managing Director, and the Audit and Risk Management Committee. Examples of impropriety and details of how investigations are conducted are set out in the Whistleblowing Policy.

Communication

- Ensure that all employees understand this Policy and that it is enforced throughout the Group's operations.
- Provide the necessary procedures, training, supervision and environment so that all employees have the highest attainable level of ethics.
- Review this policy by the Group Head of Internal Affairs, Sustainability Steering Committee, and Human Resources Committee periodically for adequacy and effectiveness, as appropriate.

If there is any inconsistency or ambiguity between the English version and the Chinese version, the English version shall prevail.