

Supplier Code of Conduct

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

This Code is applicable to suppliers, contractors, subcontractors and business partners (collectively: the Suppliers) of SHKP and its subsidiaries (collectively: the Group), and covers the following areas:

Legal Compliance and Commitment

- Suppliers should meet or exceed all applicable legal requirements, as well as environmental and social standards, in the respective jurisdictions of their operations.

Governance

- Suppliers are encouraged to have a sustainable procurement policy in place, and to develop their own policies and code of conduct to ensure robust control and governance on their suppliers and operations.

Business Ethics

- Suppliers should strictly prohibit any corruption, anti-competition, fraud, false declaration or other malpractices, abide by all the relevant laws and regulations of anti-bribery, anti-corruption and anti-competition, and establish anti-corruption policies and programmes.
- Suppliers should avoid and report any perceived, potential, or actual substantial conflict of interest in their business activities with the Group.
- Suppliers should report any suspicious activity of corruption, anti-competition, fraud, false declaration or other malpractices to the Group following the related whistleblowing procedure.

Environmental Protection

- Suppliers should identify the environmental impact associated with their operations, and take measures to control any negative impacts. Adequate resources and training should be provided for their employees.
- Suppliers should minimize their impact on the environment by carefully managing their greenhouse gas emissions, energy, waste and resource efficiency and strive to prevent pollution. Suppliers should also seek to preserve biodiversity, avoid deforestation and conserve land where possible.
- Suppliers should use sustainable timber as much as possible, and for example, we will ensure that all timber used in temporary works at construction sites in Hong Kong are sustainable. Suppliers should require all these timber suppliers to provide certification issued by the Forest Stewardship Council (FSC) or other eco-certified sources. Other than sustainable timber, Suppliers should proactively promote the use of sustainable material in their service and business.

Occupational Health and Safety

- Suppliers should commit to providing a safe and healthy work environment for their employees. Adequate resources and training should be provided to ensure employees' safety, health and wellness.
- Onsite contractors should be subject to regular safety compliance check and review by the Group's site-safety professionals, and bi-annual compliance audits by external professionals where applicable.

Human Rights and Equal Opportunities

- Suppliers should respect the human rights of their employees, and comply with all applicable laws and regulations including but not limited to freedom of association, right to collective bargaining and equal remuneration. Suppliers are required to bargain in good faith with association representatives.
- Suppliers should not tolerate discrimination of any kind, including, but not limited to, gender, age, religion, race, pregnancy, family status, marital status and disability.

Labour Practices

- Suppliers should not employ any child labour or persons under the legal working age unless they are employed via recognized apprenticeship programmes, and are prohibited from any forms of human trafficking.
- Suppliers should not tolerate forced labour situations, including, but not limited to, threats, debt bondage, withholding of wages, or retention of identity documents.
- Suppliers should ensure a discrimination and harassment free workplace.
- Suppliers should not use any form of corporal punishment against their employees.
- Suppliers should recognize and abide by local statutory requirements for minimum wage, minimum benefits and working hour limits, and provide a decent working environment with good working conditions.

Confidential Information and Privacy

- Suppliers should not disclose confidential information regarding the Group's business without the Group's prior written consent. They are required to formulate their own policies to prevent leakage of confidential information.
- Suppliers should take good care of the Group's assets and ensure the economical use of the Group's resources. They should follow the Group's procedures and practices regarding the use of the Group's assets and resources.
- Suppliers should protect the privacy of their employees and customers and comply with the relevant laws, such as Personal Data (Privacy) Ordinance of the HKSAR, when collecting, handling, storing or using personal data in Hong Kong.
- Suppliers are encouraged to report any concern about any malpractice or impropriety involving any staff of the Group that they become aware of by informing the head of the department concerned, the Group Head of Internal Affairs, the Head of Internal Audit, the Chairman and Managing Director of SHKP or the Audit and Risk Management Committee of SHKP. Examples of malpractice or impropriety and details of how investigations are conducted are set out in the Whistleblowing Policy of SHKP.

Intellectual Property Rights

- Suppliers should recognize and respect the intellectual property rights of the Group and other owners in respect of their trademarks, service marks, logos, copyrights, designs, inventions and patents.

Communication and Monitoring

- The Board of Directors, through Sustainability Steering Committee, and business units of the Group oversee the compliance of all their suppliers regarding this Code and monitor the enforcement across the Group's operations through the implementation of environmental, social and governance (ESG) programmes.
- Relevant departments and the Sustainability Steering Committee will review this Code periodically to ensure its 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.