

Extract of Staff Code of Conduct

Sun Hung Kai & Co. Limited (the “**Company**”) and its subsidiaries (collectively the “**Group**”) are committed to promote a safe, supportive and professional working environment for all employees.

This Code of Conduct Policy (the “**Policy**”) outlines the standards of behaviour expected by the Group, and it is the Group’s expectation that the principles in this Code of Conduct will be followed and respected by each employee of the Group at all times.

- i. behave honestly and with integrity and act with care and diligence in the performance of their work;
- ii. treat everyone, including but not limited to, colleagues, contractors, visitors, clients and customers, with respect, courtesy and honesty;
- iii. foster a work environment that encourages equal opportunity, embraces diversity and does not tolerate discrimination or harassment of any kind;
- iv. behave in a way that upholds the integrity and good reputation of the Group;
- v. comply with all policies of the Group;
- vi. comply with any lawful and reasonable directions of the Company and the Group;
- vii. use the Group’s resources and assets in a proper manner and for a proper purpose;
- viii. behave in a manner that ensures a safe and healthy workplace for all;
- ix. not provide false or misleading information to the Company or the Group, and to any third parties including but not limited to clients and regulators; and
- x. not improperly use their duties, status, power or authority with the Group to gain, or seek to gain, a benefit or an advantage for the Staff or any other person or entity.

The Policy also covers a range of topics, including attendance, ethics and business conduct, equal opportunities and non-discrimination, harassment and bullying, confidentiality, proper use of company property and facilities, use of computers and equipment, smoking, alcohol and drugs, conflict of interest, anti-bribery and corruption, insider trading, media and public relations, privacy, and compliance with laws in Hong Kong and other jurisdictions. The Policy also outlines consequences for breaching the Policy and allows for regional variations to be made.

This Policy is applicable to the Group, including all Group’s business divisions and support functions, and applies to all employees, directors and other staff (including contract staff, staff under secondment, temporary staff, officers, agents and licensed persons accredited to any SFC licensed subsidiaries of SHK Group).

(This is an extract of the Policy and if there is any inconsistency and ambiguity between the English version and the Chinese version, the English version shall prevail.)