

## Extract of Anti-Bribery and Anti-Corruption Policy

This Anti-Bribery and Anti-Corruption Policy (the “**Policy**”) sets out the principles and requirements to ensure that a consistent and standardized approach is applied to manage potential and actual bribery and corruption risk across Sun Hung Kai & Co. Limited and its subsidiaries (the “**Group**”). The purpose of this Policy is to provide a framework in identifying and preventing bribery and corruption in order to protect the integrity and reputation of the Group.

Business units of the Group shall implement this Policy by developing their own tailor-made policy for the purpose of complying the requirements herein, any licensing requirements, other specific business requirements and/or extra-territorial legal obligations, provided that the terms of such policy shall be no less stringent than those set out in this Policy.

The Group regards honesty, integrity and fair play as our core values that must be upheld by all staff at all times, adopts zero tolerance approach to bribery and corruption, and considers such activities to be unethical and contrary to good corporate governance.

The following overarching principles must be applied to all activities undertaken by all staff, including but not limited to relationships between Group and stakeholders.

All activities:

- must be conducted without intent to bribe or corrupt;
- must be reasonable and transparent; and
- must be appropriately documented and recorded with business rationale.

All staff are **prohibited from engaging in active or passive bribery, and any form of corruption**. Employee bribery and corruption can arise from staff’s interactions or relationships with third parties and customers that could be perceived to induce or reward an improper performance or action by any person, or to obtain or retain business or an advantage in business. All staff must comply with this Policy when undertaking any activities on behalf of SHK Group and should notify Group Head of Legal and Compliance as soon as possible if they believe or suspect that a conflict with this Policy has occurred. Any breach, or suspected breach of this Policy will be investigated, disciplinary actions (including termination of employment) may be instigated and appropriate action (which may include reporting to the appropriate authorities) will be taken as necessary. In circumstances where the bribery or corruption relates to the Group’s customers, the Group may have obligations to report the conduct to government bodies.

Staff must cooperate fully and openly with any investigation by the Group into alleged or suspected corrupt activity or breach of this Policy. Failure to cooperate or to provide truthful information is a breach of this Policy.

*(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.)*