

Extract of Whistleblowing Policy

Sun Hung Kai & Co. Limited and its subsidiaries (the “**Group**”) is committed to the highest possible standards of openness, probity and accountability and has an obligation to provide a channel for all employees to report material concern(s) regarding avoidance of internal controls, incorrect or improper financial or other reporting, or any alleged unlawful or improper practices or wrongful conduct taking place within the Group.

The Whistleblowing Policy (the “**Policy**”) applies to employees, contract staff, temporary staff, staff under secondment, contractors and directors at all levels and departments and outsiders those who deal with the Group (together the “Whistle Blower”) and it outlines the procedures for Whistle Blower to express grievance. A grievance is an expression of dissatisfaction by a member of staff about the treatment he/she has received from external counter parties, other staff in his/her or another department, or from management. However, the Policy is intended to cover serious concerns where there could be a material impact on the Group, such as actions (actual or suspected) that:

- may lead to incorrect financial reporting;
- are not in line with an applicable Group policy;
- are unlawful;
- significantly contravenes relevant legal and regulatory requirements that apply to the Group’s activities; or
- otherwise amount to serious improper conduct.

A Whistle Blower who has material concern(s) regarding avoidance of internal controls, incorrect or improper financial or other reporting, or any alleged unlawful or improper practices or wrongful conduct in the Group is encouraged to report as soon as possible/practicable, but in any case, within 30 calendar days after becoming aware of the same to the designated emails and address set out in the Policy. The reports should be made to the following designated addresses / email addresses. The Whistle Blower shall declare and confirm the information is true and complete to the best of his/her knowledge and does not have any intention to make false or reckless allegation.

Designated address:

Sun Hung Kai & Co. Limited
40/F, Lee Garden One
33 Hysan Avenue
Causeway Bay, Hong Kong

Designated email address:

whistleblow@shkco.com

(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.)