

HENDERSON LAND DEVELOPMENT COMPANY LIMITED

恒 基 兆 業 地 產 有 限 公 司

Incorporated in Hong Kong with limited liability

(Stock Code: 12)

SUPPLIER CODE OF CONDUCT POLICY

Purpose

Henderson Land Development Company Limited (the "Company") and its subsidiaries (collectively the "Group") are committed to maintaining the highest standards of ethics and conducting business legally, honestly and fairly. This Policy sets out the expectations on our suppliers, contractors and subcontractors and their subsidiaries (collectively the "Supplier") in relation to social, environmental and ethical compliance.

The Supplier is expected to:

- adhere to all applicable laws, regulations and standards of the countries in which it operates including those relating to human rights, non-discrimination, freedom of association and collective bargaining, anti-competitive behaviour and non-harassment.
- formulate appropriate policies on employee compensation and treatment including, working hours and fair remuneration.
- demonstrate the commitment of not using any form of forced, coerced and bonded labour as well as child labour.
- establish appropriate policies, codes of conduct and procedures to avoid all forms of bribery, corruption and fraud and ensure they are enforced.
- provide training to its employees and establish relevant policies and procedures with regard to health and safety so as to ensure the safety of their employees.
- seek to optimise pollution control and reduce emission, energy consumption and waste, and use natural resources within its own operation.
- minimise the adverse impacts on biodiversity and land management.
- have appropriate systems in place to assess, measure and seek to reduce environmental impacts of its operations.
- pursue sustainable procurement and give favour to sustainable materials and products, such as low embodied carbon materials, low volatile organic compound materials, recyclable materials and rapidly renewable materials.
- incorporate waste prevention management that comprises sorting, recycling and proper disposal;
- comply with all applicable data privacy laws in relation to its use, processing and storage of personal data.
- establish communications mechanisms and grievance procedures that allow employees to raise concerns and complaints with management.
- notify the Company if the supplier becomes aware of any perceived, potential, or actual conflict of interest in its business dealings with the Group.

Review of this Policy

The Company will review this Policy from time to time as appropriate, and in any event, once every three years.