



恒基兆業地產有限公司

HENDERSON LAND DEVELOPMENT COMPANY LIMITED

Policy Position on Artificial Intelligence Governance and Use

Henderson Group recognises the growing role of artificial intelligence (“AI”) in supporting innovation, operational efficiency and business processes. The Group is committed to the responsible, ethical and secure use of AI, supported by appropriate governance, oversight and safeguards.

Our approach to AI is guided by the principles of accountability, transparency, fairness, privacy and security, and is aligned with applicable legal and regulatory requirements, as well as our internal policies and standards.

Our policy position

- We support the development, implementation and use of AI in accordance with sound governance and risk management practices.

Governance and oversight

- AI applications are subject to ongoing oversight and periodic review, with AI-related risks addressed through clear accountability, documentation and internal control processes.
- AI-related incidents are managed through established response and escalation procedures.

Responsible and ethical use

- AI applications should be designed and used in a reasonably fair manner and without unjust bias or unlawful discrimination, and AI should not be used for harmful, destructive or otherwise inappropriate purposes.
- AI systems intended for unauthorised biometric surveillance or other prohibited uses should not be developed, procured, used or deployed. The use of sensitive or higher-risk AI applications should be limited to authorised business purposes and subject to applicable internal policies, regulatory requirements and approval processes.

Accuracy, fairness and human oversight

- We recognise that AI outputs may be subject to limitations, uncertainty and potential inaccuracies, and users should be made aware of these limitations.
- AI outputs should be subject to appropriate human review and verification before being relied upon, and decision-making processes involving AI should include human oversight and judgement where appropriate, and the capabilities, reliability or accuracy of AI applications should not be overstated or misrepresented.
- Deployed AI models and applications should be assessed regularly for accuracy, fairness and bias, with appropriate corrective action taken where material issues are identified.
- AI models and applications should be reviewed periodically to identify material drift, degradation or changes in performance over time, with validation, recalibration or retraining undertaken where necessary.

Privacy and data protection and security

- We are committed to protecting personal data and other sensitive information used in connection with AI applications, and where personal data is processed, appropriate safeguards should be applied, including anonymisation, pseudonymisation and relevant technical controls, where applicable.
- Personal data should be collected and used only for specified and legitimate purposes and in accordance with applicable requirements, consent should be obtained where required,



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and appropriate consideration should be given to the data practices of third-party AI providers before personal data is processed through such tools.

- Appropriate access controls, vulnerability assessments, and logging, traceability and control measures should be maintained to protect AI applications and associated data from unauthorised access, and to support accountability, oversight and investigation where necessary.

Transparency and disclosure

- AI-generated or significantly altered content should be distinctly labelled or otherwise clearly disclosed when it is intended for an external audience and could be mistaken for factual, human-created work.
- Where AI is used in decisions that could have a significant impact on individuals, the role of AI and the resulting outcome should be communicated clearly, where relevant and practicable.

Third-party AI tools, impacts and continuous improvement

- The use or integration of third-party AI applications should be subject to appropriate review and safeguards.
- The Group should consider the environmental impacts associated with the development, procurement and use of AI systems, including third-party AI models, services and data centres, and, where practicable, prioritise solutions with a lower ecological footprint. Engagement with relevant suppliers and service providers may also support the efficient use of computing resources and related services.
- Where relevant and practicable, the impacts associated with the use of AI applications, including operational efficiency gains, resource optimisation and other relevant outcomes, may be monitored and quantified to support responsible deployment and continuous improvement.
- Relevant employees should be provided with appropriate guidance and training in relation to the responsible, ethical and secure use of AI.
- Where AI-supported decisions may directly affect individuals, appropriate mechanisms should be available for affected parties to seek clarification. Concerns relating to such outcomes may be raised through established channels where relevant and practicable.
- The Group will continue to monitor relevant developments in AI governance practices and standards, where appropriate.

Note: The Policy Position on Artificial Intelligence Governance and Use statement applies to all jurisdictions where we have operations.