

Code of Conduct



CONTENTS

1. OBJECTIVE	1
2. ELIGIBILITY	1
3. LEGAL REQUIREMENTS	1
3.1. Soliciting or Accepting Advantages	2
3.2. Offering Advantages	2
3.3. Observing Local Laws when Workings in Another Jurisdiction	2
3.4. Entertainment	3
4. CONFLICTS OF INTEREST	3
4.1. Gambling	4
4.2. Loans	4
4.3. Outside Employment	4
5. HANDLING CONFIDENTIAL INFORMATION / COMPANY PROPERTY	4
6. USE OF INFORMATION AND COMMUNICATION SYSTEMS	5
7. PERSONAL SOCIAL MEDIA ACTIVITIES	5
8. COMPLIANCE WITH THE CODE	7
9. WHISTLE BLOWING POLICY	8
9.1. Purpose	8
9.2. Policy	8
9.3. Procedure	9
10. RELATIONS WITH SUPPLIES AND CONTRACTORS	10
10.1. Fair and Open Competition	10
10.2. Meeting the Public Interest and Accountability Standards	10
10.3. Procurement and Tendering Procedures	10
10.4. Bribery and Corrupt Practices	11
10.5. Payment Procedures	11
11. RESPONSIBILITIES TO SHAREHOLDERS AND THE FINANCIAL COMMUNITY	11
11.1. Attractive Returns in Terms of Increased Earnings and Long-term Growth	11
11.2. Disclosure of Information	11
11.3. Keeping of Proper Books and Records	12

11.4. Segregating Duties and Functions	12
11.5. Insider Trading	12
11.6. Transactions in the Company’s Shares.....	13
12. RELATIONS WITH CUSTOMERS AND CUSTOMERS.....	13
12.1. Service to Customers	13
12.2. Commitment to Offering Quality and Fair-value Products.....	14
12.3. Safety and Fitness for Use of Goods	14
12.4. Prompt Product Recall and Related Practices	14
12.5. Product Policies	14
12.6. Pricing Policies	14
12.7. Customer Information.....	14
13. EMPLOYMENT PRACTICES	15
13.1. Equal Employment Opportunities Policy	15
13.2. Personal Data (Privacy) Policy	18
13.3. Occupational Health & Safety Policy.....	23
13.4. Communication	24
13.5. Development and Remuneration	25
13.6. Policy and Practice on Alcoholism and Illicit Drugs in the Workplace	25
14. RESPONSIBILITIES TO THE COMMUNITY.....	25
14.1. Environmental Policy	25
14.2. Support for Community Activities	25
14.3. Policy and Practice on Donations	26

1. OBJECTIVE

Hang Lung Properties believes that honesty, integrity and fair play are important company assets in business. It is therefore important for all directors and staff members of the Company and its direct or indirect holding company, and its direct or indirect subsidiaries (the “**Group Companies**”) to ensure that the Group Companies' reputation is not tarnished by dishonesty, disloyalty or corruption. In this Code of Conduct, unless the context otherwise requires, the expression "Company" refers to your legal employer. This Code of Conduct sets out the standards of behavior expected from the Company and the guidelines on how to handle different situations in business dealings.

2. ELIGIBILITY

Contents of this Code of Conduct are applicable to all directors, and full-time, part-time and temporary staff members of any Group Company who conducts business on behalf of any Group Company whether in Hong Kong or in any other jurisdiction, including but not limited to Mainland China.

3. LEGAL REQUIREMENTS

No director or staff member may solicit or accept an advantage in connection with his work without the prior permission of the employer. An “advantage” includes money, gift, loan, fee, reward, employment, contract, service and favor. A person who offers the advantage may also commit an offence.

The offeror and the recipient of a bribe are liable to prosecution if a verbal agreement of corruption is reached, notwithstanding that the purpose of bribery has not been carried out.

Any director or staff member who, with intent to deceive his employer, falsifies documents or furnishes false accounting records may be guilty of an offence.

3.1. Soliciting or Accepting Advantages

It is the company policy that no director or staff member may solicit or accept any advantage from any person having business dealings with the Company or any other Group Company (e.g. clients, suppliers, contractors). Directors and staff members should decline an offer of a gift if acceptance of it could affect their objectivity in conducting the Company's or any other Group Company's business, or induce them to act against the interest of the Company or any other Group Company, or lead to allegations of impropriety. If a staff member is being offered a gift (even if the gift is not accepted), he should make a declaration in writing and seek permission of disposal method of the gift(s) concerned from senior executives of the Company.

If acceptance of the gift would not affect the staff's objectivity and integrity in carrying out his or her duty, they are allowed to accept (but not solicit) the gifts without the need of raising a declaration form if the gift is:

- advertising or promotional gifts of a nominal value; or
- given on festive or special occasions subject to a maximum limit of HK\$1,000 in value.

3.2. Offering Advantages

Under no circumstances may a director or staff member offer an advantage to any person or company for the purpose of influencing such person or company in any business dealings. Any advantage given in the conduct of the Group Companies' business should be in accordance with the prevailing policies on such matters and prior written approval of senior executives of the Company should be obtained.

3.3. Observing Local Laws when Workings in Another Jurisdiction

Sections 3.1 and 3.2 above apply whether the solicitation, acceptance and offering of advantages are within or outside the boundary of Hong Kong. Any director or staff member who conducts business on behalf of the Company or any other Group Company in another jurisdiction must abide by the laws of that jurisdiction, including laws and regulations on anti-corruption such as those in Hong Kong and mainland China, and all other laws and regulations pertaining to ethical business conduct.

3.4. Entertainment

The expression “entertainment” refers to food or drink provided for immediate consumption on the occasion, and of any other entertainment provided at the same time. Although entertainment is an acceptable form of business and social behavior, staff must not accept lavish or frequent entertainment from persons with whom any Group Company has business dealings (e.g. suppliers or contractors) to avoid placing themselves in a position of obligation to the offeror.

Directors and staff members should be particularly vigilant to entertainment offered to them within and / or outside Hong Kong or Mainland China, and turn down invitations to meals or entertainment that are excessive in nature or frequency.

Without prior consent of the Company, acceptance of these advantages is strictly prohibited.

4. CONFLICTS OF INTEREST

A conflict of interest situation arises when the private interest of a director or staff member competes or conflicts with the interest of any Group Company. Private interest includes both the financial and personal interests of staff members and those of their connections. Connections include family members, relatives, and close personal friends.

Directors and staff members should avoid any situation which may lead to an actual or perceived conflict of interest. Staff members should make a declaration in writing to senior executive of the Company when such a situation arises.

Some common examples of conflicts of interest include:

- The requirement of disclosure of interest by directors as required by the relevant legislation in Hong Kong and mainland China,
- A staff member involved in the procurement process is closely related to or has a beneficial interest in a company which is being considered by the Company in the

selection of a supplier or service provider; or

- One of the candidates under consideration in a recruitment or promotion exercise is a family member, a relative or a close personal friend of the staff member responsible for the recruitment or promotion.

4.1. Gambling

Directors and staff members are advised not to engage in gambling of any kind, including games of mahjong, with persons having business dealings with the Company or any other Group Company. In social games of chance with clients, suppliers or business associates, they must exercise judgment and withdraw from any high stake games.

4.2. Loans

Directors and staff members or their immediate family members should not grant or guarantee a loan to, or accept a loan from or through the assistance of, any individual or organization having business dealings with the Company or any other Group Company. There is, however, no restriction on normal bank lending.

4.3. Outside Employment

If staff members wish to take concurrent employment or external engagement, either on a regular or consulting basis, they must seek the prior written approval of senior executives of the Company before accepting the employment or engagement.

5. HANDLING CONFIDENTIAL INFORMATION / COMPANY PROPERTY

All directors and staff members are prohibited from disclosing any trade secrets or confidential information relating to the business or affairs of the Group Companies to anybody without authorization. Those who have access to or are in control of such information should at all times ensure its security and prevent any abuse or misuse of the information. Examples of misuse include disclosure of information in return for monetary rewards, or use of information for personal gain.

In addition, if any director or staff member intends to participate in any interview or survey in which he may be asked to disclose such trade secrets or confidential information relating to the business or affairs of the Group Companies, the prior written approval of his immediate supervisor should be obtained.

All directors and staff members are strictly prohibited from appropriating the Company's or any other Group Company's property for personal use or for resale. All company property, including corporate mainframes, minicomputer systems, data networks, software packages or equipment shall be used only for conducting the Company's or any other Group Company's business or for purposes authorized by the management.

No director or staff member of the Company should alter equipment, facilities or install software without specific authorization or develop his own applications without management approval. Security precautions should be exercised when using personal computers, and personal computer software should be obtained only from sources identified in the Company's relevant policy. All computer software should be used in strict compliance with the relevant law in Hong Kong and mainland China.

6. USE OF INFORMATION AND COMMUNICATION SYSTEMS

Directors and staff members are not allowed to browse any unauthorized websites or to download, e-mail, store or print any materials that may be considered inappropriate, offensive or disrespectful to others. Besides, the e-mail system of the Company is to be used primarily for business purposes. The Company reserves the right to monitor all e-mail messages and internet usage.

Directors and staff members are responsible for protecting and keeping confidential their own passwords and all other network access information. Any attempt by an unauthorized person to obtain sensitive information or to gain access to secure corporate locations, computers and internal information systems should be reported at once to the management.

7. PERSONAL SOCIAL MEDIA ACTIVITIES

With the popular use of digital social media networks, the lines between public and private,

personal and professional are blurred. By identifying themselves as employees of the Company within a social network, directors and staff members are connected to their colleagues, managers and even the Company's clients. Whilst the Company respects their personal freedom, nonetheless, in order to protect the Company or any other Group Company from any possible loss and damage, compliance with the following codes are essential and critical:

- 7.1.** Before using the Company's or any other Group Company's logos or trademarks, directors and staff members must obtain prior approval or consent from their Department Head and/or Legal & Secretarial Department. In all circumstances, do not misuse these logos or trademarks in their personal social media platforms. For example, the Company's trademarks or logos in their personal screen name or other personal social media ID (e.g. Facebook, Weibo, WeChat etc.) should not be used.
- 7.2.** Directors and staff members must make sure they do not disclose or use the Company's or any other Group Company's confidential or proprietary information in any online social computing platform. Confidential or proprietary information are information that they have obtained in their capacity as an employee of the Company and which is not freely available to the public.
- 7.3.** Some sensitive issues relating to the Company or any other Group Company should never be discussed, even if directors and staff members are expressing their own opinion and using a disclaimer. Sensitive issues include but do not limit to the Company's or any other Group Company's future business performance, business plans, unannounced strategies or prospects, potential acquisitions or divestitures and other such similar matters involving our competitors or information about any of the Company's clients.
- 7.4.** The Company supports open dialogue and encourages the exchange of ideas, but only those officially designated by the Company have the authorization to speak on behalf of the Company.
- 7.5.** For the Company's protection as well as directors' and staff members' own protection, it is imperative that they respect the laws governing copyright and fair use of copyrighted material owned by others, including the Company's or any other Group Company's own copyrights and brands.

- 7.6.** The Company's or any other Group Company's clients, business partners or associates should only be cited or referenced after obtaining their prior approval.
- 7.7.** All directors and staff members are personally responsible for the content they publish on-line, whether in a blog, social computing site or any other form of social media platforms (e.g. Facebook, Weibo, WeChat). Be mindful that what they published will become public information and could be kept for a long time. It is possible for what appears to be anonymous content to be traced back to its author. On the other hand, they should protect their privacy and take care to understand the sites they used and their service providers' terms of service.
- 7.8.** If directors and staff members identify themselves as an employee of the Company in digital social networks, they must ensure that their profile and related content is consistent with how they wish to present themselves with colleagues and clients and aligns with the position of the Company.
- 7.9.** Directors' and staff members should not publish content that might allow inferences to be drawn which could damage the Company's or any other Group Company's reputation or image or a client relationship with us.
- 7.10.** Directors' and staff members must respect audience and coworkers, and must not publish discriminatory remarks, personal insults, obscenity, or engage in any similar conduct that would not be appropriate or acceptable in the Company's workplace. Proper consideration for others' privacy should be shown.

8. COMPLIANCE WITH THE CODE

It is the duty of every director and staff member to understand and comply with this Code of Conduct. Managers should also ensure that their subordinates understand well and comply with the standards and requirements stated in this Code of Conduct.

Anyone who is in breach of this Code of Conduct will be subject to disciplinary action, including termination of employment. In cases of suspected corruption or other criminal offences, a report will be made to the appropriate authorities.

Channels of complaint are open to all shareholders and potential shareholders, customers and consumers, suppliers and contractors and all directors and staff members of the Company. Any enquiries about this Code of Conduct or complaints on possible breaches of this Code of Conduct should be channeled to senior executive of the Company for advice and action. The Company will consider all complaints impartially and efficiently. Subject to any legal requirements, all information received will be kept confidential.

9. WHISTLE BLOWING POLICY

9.1. Purpose

The Company is committed to establishing and maintaining best practices in corporate governance matters. Employees at all levels are expected to conduct themselves with integrity, impartiality and honesty. It is every employee's responsibility and in all interest of the Company to ensure that any inappropriate behavior or organizational malpractice that compromise the interest of shareholders, investors, customers and the wider public does not occur. The Whistle Blowing Policy is designed to encourage employees to raise serious concerns internally, without fear of reprisal or victimization, in a responsible and effective manner rather than overlooking a problem or blowing the whistle outside.

9.2. Policy

This policy is intended to assist individual employees to disclose internally and at a high level, information which the individual believes shows malpractice or impropriety. Whistle blowing matter may include but are not confined to:

- Breach of legal or regulatory requirements;
- Criminal offence, breach of civil law and miscarriage of justice;
- Violation of code of conducts applicable within the Company;
- Endangerment of the health and safety of an individual;
- Any use of the Company's funds or property for any illegal, improper or unethical purpose; and

- Any effort to mislead, deceive, manipulate or fraudulently influence any internal or external parties in connection with the preparation, examination, audit or review of any records of the Company including but not limited to financial statements, service contracts and personnel records.

All reports of complaints will be treated on a confidential basis. Anonymous complaints will not be entertained.

There will be no retaliation or other action taken against any employee who, in good faith, reports a complaint. Anyone engaging in retaliatory conduct will be subject to disciplinary action by the Company, which may include termination.

9.3. Procedure

- 9.3.1. Employee can inform the Deputy Director - Corporate Audit of the illegitimate malpractice concerns. The Deputy Director - Corporate Audit will treat all disclosures in confidence and will involve only those individuals who need to be involved in order to investigate such complaint. The Company has also encouraged the contractors to report any issues concerning fraud, corruption and/or bribery arises with the employee(s) of the Company in connection with business dealings and/or agreements.

Complaints should be communicated in writing and addressed to:

Deputy Director - Corporate Audit

Internal Audit Department

Hang Lung Properties Limited

28/F., Standard Chartered Bank Building,

4 Des Voeux Road Central, Hong Kong

- 9.3.2. If the complaint is against the Deputy Director - Corporate Audit, the complaint should be sent to the Chairman of the Audit Committee.
- 9.3.3. The format and the length of an investigation will vary depending upon the nature and particular circumstances of each complaint made. The matters raised may be investigated internally or referred to the relevant regulatory

bodies such as the police, the securities regulator and any anti-corruption authority, as appropriate.

- 9.3.4. Upon receipt of a complaint, the Deputy Director - Corporate Audit would acknowledge receipt to the sender as soon as practicable and shall endeavor to provide the complainant with an estimate of how long the investigation will take to provide a final response.

10. RELATIONS WITH SUPPLIES AND CONTRACTORS

10.1. Fair and Open Competition

The Company promotes fair and open competition and aims to develop and secure long-term relationships with suppliers and contractors based on mutual trust.

10.2. Meeting the Public Interest and Accountability Standards

The procurement of supplies or services should be conducted in a manner consistent with the highest ethical standards which assure a quality end product as well as the continued confidence of customers, suppliers and the public.

10.3. Procurement and Tendering Procedures

The contracting of services and the purchase of goods should be based solely upon price, quality and need.

Procurement and tendering actions should be conducted according to the following principles:

- The impartial selection of capable and responsible suppliers and contractors;
- The maximum use of competition;
- The selection of appropriate contract types according to need;
- Compliance with laws, relevant regulations and contractual obligations; and
- The adoption of an effective monitoring system and management controls to detect

and prevent bribery, fraud or other malpractice in the procurement and tendering process.

Procurement and tendering processes implemented according to this policy will specifically include procedures and practices designed to detect and prevent fraudulent activity.

10.4. Bribery and Corrupt Practices

The Company prohibits bribery and corrupt practices. Directors and staff members must follow company policy on the acceptance of advantages. Those involved in the selection of and purchase from suppliers and contractors must avoid any misuse of authority or engage in situations which could affect or appear to affect their ability to make free and independent decisions regarding the purchase and procurement of goods and services.

10.5. Payment Procedures

The Company undertakes to pay suppliers and contractors on time and according to the agreed terms of trade.

11. RESPONSIBILITIES TO SHAREHOLDERS AND THE FINANCIAL COMMUNITY

11.1. Attractive Returns in Terms of Increased Earnings and Long-term Growth

The Company endeavors to achieve growth in earnings for shareholders over the long term. Shareholders and the financial community shall benefit from the productive, efficient and competitive operations of the Company.

11.2. Disclosure of Information

The Company respects the right of shareholders and potential shareholders to obtain all information necessary for evaluating how their investments are being managed.

True and accurate information regarding the management of the Company, its financial position and its general plans shall be available to anyone with an interest in the Company.

The Company has different effective communication channels to make transparent, regular and timely public disclosures to the shareholders, such as corporate website, annual reports, press releases, and annual general meetings.

11.3. Keeping of Proper Books and Records

It is the policy of the Company to maintain complete and accurate records and accounts. All accounting records must be kept in compliance with all applicable laws.

The books and records of the Company should, in reasonable and accurate detail, reflect all the transactions entered into by the Company and the Company's assets and liabilities. Detailed guidelines as to accounting controls and financial reporting are available to the directors and staff members of the Company.

No false, incorrect or misleading statements or entries should be made in the Company's books, accounts, electronic records, documents or financial statements. Any director or staff member who has information regarding any hidden funds or false entries in the Company's records should report the matter promptly to the senior management of the Company.

11.4. Segregating Duties and Functions

Major duties and functions which are susceptible to abuse or corruption should be assigned to different staff members to enhance checks and balances.

11.5. Insider Trading

The Company will not tolerate the use of insider information by directors or staff members to secure a personal advantage at the expense of the Company or of those not in the Company. The use for personal gain of insider information that has not been made public is illegal, unethical and strictly prohibited.

Directors and staff members of the Company should not disclose any insider information to anyone of the Company or any other Group Company who does not need to know this information for operational purposes or to anyone outside of the Company or any other Group Company. They should not circumvent these guidelines by acting through another party or by giving insider information to others for their use even if the Company will derive a financial benefit from this.

11.6. Transactions in the Company's Shares

Any director or staff member who is likely to be in possession of unpublished price-sensitive information in relation to the Company's or any other Group Company's shares must not deal in those shares at a time when he would be prohibited from dealing by the applicable legislation or regulation.

Some common examples of what might be regarded as price-sensitive information include:

- major acquisitions or disposal transactions involving connected persons;
- award of an important contract;
- fund-raising exercises;
- cancellation of an agreement which was previously the subject of an announcement; or
- events beyond the control of the listed company but are of material significance to the company's business, operations or financial performance.

12. RELATIONS WITH CUSTOMERS AND CUSTOMERS

12.1. Service to Customers

The Company seeks to provide an efficient and courteous customer service in order to maintain customer satisfaction and co-operation with the Company. The Company shall keep its customers informed of the exact nature of the Company's capabilities and shall avoid making any misrepresentation, exaggeration or overstatement.

12.2. Commitment to Offering Quality and Fair-value Products

The Company shall always put customers first by providing them with good quality products at prices which represent good value for money.

12.3. Safety and Fitness for Use of Goods

It is the policy of the Company to offer to its customers products that meet high standards of safety, quality and reliability.

12.4. Prompt Product Recall and Related Practices

The Company will bear full responsibility for all products which do not meet the required standards of safety, quality and reliability. In cases where product recalls are required, they shall be implemented promptly and expediently.

12.5. Product Policies

The Company accepts its social responsibility to improve its products in order to promote a higher quality of life.

12.6. Pricing Policies

The Company believes in the economic system of the free market, in which price is determined by supply and demand. The Company also seeks to provide customers with the highest quality products at fair prices which allow the Company a reasonable profit in relation to the value provided.

12.7. Customer Information

All directors and staff members of the Company must be committed to protecting the personal information of customers in strict compliance with the applicable legislation or regulation on protection of personal data including those in Hong Kong and mainland China. The personal information of customers should be used in the proper context only for authorized business purposes and shall be accessible only to those

employees who have a legitimate need to know.

13. EMPLOYMENT PRACTICES

13.1. Equal Employment Opportunities Policy

The Company is dedicated to the achievement of equality of opportunity for all of its employees. The purpose of formulating the Equal Employment Opportunities Policy (“EEO Policy”) is to provide a work environment that is free from all forms of unlawful discrimination. This policy is applicable to all human resources policies and practices including, but not limited to, staff recruitment and selection, staff transfer, promotion, training & development, discipline, employment termination, staff compensation and benefits.

13.1.1. Discrimination in Employment

The Company recognizes that success of the Company depends on the full contribution of its employees. All employees are treated as individuals solely according to their abilities to meet their job requirements.

The Company’s EEO Policy provides equal employment opportunities for all our employees. The Company prohibits discrimination in employment on the grounds of gender, age, marital status, family status, pregnancy, disability, race, ethnic origins or religion (“**Protected Attributes**”). Unlawful discrimination in employment includes the following situations:

- treating an applicant or an employee less favorably on the ground of a Protected Attribute;
- discriminating against a person seeking to be a member (or a person who is a member) of a trade union;
- discriminating against a person on the ground of a Protected Attribute seeking or undergoing training which would help the person to fit for that employment; and

- discriminating against a person who is a contract worker or a commission agent on the ground of a Protected Attribute.

13.1.2. Harassment in Employment

The Company does not tolerate unlawful harassment in any form. Sexual, disability and racial harassment is unlawful. Without limiting the meaning of harassment, the following behavior can be regarded as unlawful harassment:

13.1.2.1. Sexual Harassment

- unwelcome sexual advances – leering and lewd gestures, touching, grabbing or deliberately brushing up against another person;
- unwelcome requests for sexual favors – suggestions that sexual co-operation or the toleration of sexual advances may further a person’s career;
- unwelcome verbal, non-verbal or physical conduct of a sexual nature – sexually derogatory or stereotypical remarks; persistent questioning about a person’s sex life; or
- conduct of a sexual nature that creates a hostile or intimidating work environment – sexual or obscene jokes around the workplace; displaying sexist or other sexually offensive pictures or posters.

13.1.2.2. Disability Harassment

- insulting comments about a person's disability;
- offensive jokes about disabled persons;
- unnecessary gestures mimicking someone’s disability; or

- intentionally disclosing or threatening to disclose information on disability or medical history in circumstances that would offend, humiliate, or intimidate the employees with a disability.

13.1.2.3. Racial Harassment

- racially derogatory remarks or insults; for instance, name calling which people of certain racial groups may find offensive or impolite should be avoided;
- display of graffiti or slogans or other objects offensive to certain racial groups;
- racist jokes, banter, ridicule or taunts;
- using a disparaging or offensive tone when communicating with people on the ground that they belong to certain racial groups;
- ostracize people on the ground that they belong to certain racial group; or
- imposing excessive workloads or unrealistic performance targets on people on the ground of their race, color, descent, national or ethnic origins.

13.1.3. Employees' Responsibilities

While the Company has the main responsibility for eliminating unlawful discrimination and harassment, and providing equal opportunities, employees at all levels have responsibilities as well as rights in the work environment that is created.

- Employees are personally liable for their acts even if done in the course of employment. They must ensure that they do not engage in unlawful discrimination and harassment, and comply with all anti-discrimination laws and regulations;

- Employees subjected to unlawful discrimination or harassment should immediately report the incident to their Department Head or Division Head and Human Resources Department. All complaints will be promptly and thoroughly investigated.

Such investigation will, to the maximum extent feasible, remain confidential, on a strict need-to-know basis. However, investigation of such complaints may require disclosure to the accused individual and to other witnesses in order to gather pertinent facts. At the conclusion of its investigation, the Company will take whatever action, if any, it believes appropriate under the circumstances or to prevent the occurrence of such conduct in the future, including, but not limited to, training, reassignment, demotion, compensation adjustment, or disciplinary action up to and including termination of employment.

13.1.4. Disciplinary Action

Any act of unlawful discrimination or harassment in the workplace involving employees, customers, and/or suppliers will not be tolerated and offenders will be subject to severe disciplinary action, including possible termination of employment.

13.1.5. Victimization

Any victimization of or retaliation and/or reprisals against an individual who in good faith reports or provides information in an investigation about behavior that may violate this policy is unlawful and will not be tolerated.

13.2. Personal Data (Privacy) Policy

It is the Company's policy to protect the data privacy and confidentiality of employee personal data, and to comply with the applicable local legislations. The obligations set out in this policy must be read in conjunction with and subject to any applicable legislation, including those in Hong Kong and mainland China.

13.2.1. Principles

The following data protection principles applicable to employment-related personal data in the Company will be upheld by the Human Resources Department and all other divisions / departments:

- personal data will only be collected for a necessary purpose by lawful and fair means. All practicable steps will be taken to ensure that data subjects will be informed on or before the collection whether they are obliged to provide the data; the consequences if they do not do so; the purposes of collection; the classes of persons to whom the data may be disclosed; and of their access and correction rights;
- all practicable steps will be taken to ensure that personal data held are accurate and not kept longer than is necessary;
- personal data will only be used for the purpose for which they are collected or for a directly related purpose;
- all practicable steps will be taken to ensure that personal data are protected against unauthorized or accidental access, processing, erasure or other use;
- information on policies and practices in relation to personal data and the type of data kept and purpose of use will be made available upon enquiry; and
- access or correction requests from data subjects will be complied with, and reasons for refusal (i.e. on the ground of an applicable exemption) will be given.

13.2.2. Exemptions

In general, employees are entitled to access their personal data. However, to the extent not prohibited by the relevant legislation, the Company may refuse to provide or be exempted from providing the personal data or

complying with the obligations set out above. These circumstances may include where a staff planning process is involved or if the data is related to the prevention or detection of a crime, or if the data is covered by legal professional privilege.

13.2.3. Employment Related Personal Data Held by the Company

Employees are required to supply personal data in relation to their employment for various human resources purposes. These purposes include, but not limited to:

- processing their employment applications, verifying or obtaining additional information about the employee from third parties including education institutions, present and past employers and credit reference agencies, assessing promotion and career development, performance appraisal, training, administering the Company's policies, determining fitness for work, maintaining attendance records, making tax returns and other related decisions;
- providing and maintaining remuneration and benefits for employees and their dependant(s);
- placing the employees for employment within the companies of Hang Lung in Hong Kong or the Mainland;
- facilitating communication between the employees and the Company, maintaining contacts in case of emergencies;
- providing reference of employees;
- for disciplinary purposes arising from conduct or ability to perform job requirements;
- providing information to statutory or regulatory bodies for compliance with all laws and regulations or other competent authority; and

- any other incidental or associated purposes related to the above purposes.

Unless indicated otherwise provision of the requested personal data is compulsory. Failure to supply the required personal data may result in the Company not being able to fulfill its objectives. In addition, employees have the duty to inform the Company of any changes in their personal data held by the Company.

13.2.4. Subject to the terms of the relevant legislation, personal data held by the Company relating to an employee is kept confidential except that the Company may release or transfer the information within Hong Kong or to a destination outside Hong Kong, to:

- any subsidiaries, holding company and associated companies, any agent, contractor, or third party service provider who provides administrative and professional services to the Company in connection with the operation of its business (including any medical practitioner);
- person seeking employee references;
- any other person who is contracted to provide benefits and service for employees, including workers, external auditors, insurance brokers and underwriters, provident fund trustee and administrator and lawyers;
- any person to whom the Company is requested to make disclosure by any government or statutory body or obliged to make disclosure under the requirements of any law, regulations, order of any government, court, tribunal, or other competent authority;
- in the case of the merger or acquisition of all or any part of the Company's or Group Company's business, any actual or proposed purchaser, merger partner or subscriber for the Company's or the Group Company's shares, or their legal and financial representatives.

13.2.5. Employees have the right to:

- check whether the Company holds personal data about them and access to such personal data;
- require the Company to correct any personal data about them which is inaccurate; and
- ascertain the Company's policies and practices in relation to the personal data and to be informed of the kind of personal data held by the Company.

13.2.6. The Company has the right to charge a reasonable fee for the processing of any data access request. All requests for access to data or correction of data or information regarding policies and the kinds of personal data held should be in writing and addressed to Human Resources Department of the Company.

The personal data collected may be retained as hard copies or soft copies (e.g. on local and global processing systems and databases, communication, payment, CCTV, card access and other systems). The Company will also take such steps as are appropriate to ensure the security of such personal data.

The Company retains the data of unsuccessful applicants for a period of 12 months unless there is a subsisting reason that obliges the Company to retain the data for a longer period. Thereafter, the data will be confidentially disposed of, unless the individual has accepted employment with the Company or any of the Group Companies, in which case such data will have been transferred to the individual's personnel file.

The Company retains data in respect of employees for a period of 7 years after the date the employee leaves the Company's employment unless there is a subsisting reason that obliges the Company to retain the data for a longer period.

13.3. Occupational Health & Safety Policy

The Company is committed to providing a safe and healthy environment for the employees, and takes all reasonable steps to do so. At the same time, all directors and staff members are expected to strictly observe the occupational safety guidelines of the Company.

13.3.1. Employer's Role

- The Company shall make health and safety considerations an important element in the design, operation and maintenance of its office facilities and the conduct of its business;
- The Company shall communicate openly with all directors and staff members on occupational health and safety issues;
- The Company shall educate all directors and staff members regarding their responsibilities for achieving the health and safety objectives of the Company;
- Human Resources Department and the operation departments shall, from time to time, provide all directors and staff members with appropriate job skills and safety training;
- Administration Department shall monitor and conduct regular review on the safety management system and the performance of office facilities such as water & ventilation system and safety and cleanliness of work environment;
- Administration Department shall organize fire drills at different work sites periodically as required by law. All directors and staff members are encouraged to familiarize themselves with the fire precautionary measures and safety procedures in their workplace; and
- Leasing & Management Department shall maintain a complete set of

work safety guidelines and procedures for operational employees and strictly require all operational employees to follow the safety guidelines and procedures when performing their duties.

13.3.2. Directors and staff members' Role

- Directors and staff members should comply with the safety and health measures instituted by the Company and cooperate in all safety-related tests, drills and auditing;
- Directors and staff members should be fully aware of their personal responsibilities regarding occupational safety and health. They must be constantly alert to potential risks and hazards related to their activities, and should avoid improper behavior or operation that may lead to accidents or occupational diseases or injury; and
- Directors and staff members liaising with external contractors should ensure that those contractors will meet the same safety standards and requirements as the Company.

13.3.3. Accident at Work

If an employee is injured at work, he/she must report the incident to his/her supervisor immediately and obtain necessary treatment from a registered medical practitioner. The Division / Department Head concerned should report the case to the Human Resources Department in a timely manner in accordance with the applicable legislations in the relevant jurisdictions. Human Resources Department shall report and file the employee's injury case with the relevant authorities.

13.4. Communication

Employees shall be kept informed of the Company matters affecting them including the Company goals, directions and performances. Channels for open communication which foster an atmosphere of mutual trust and respect between the Company and

employees always exist. If an employee wishes to discuss any matter about the Company, he may speak to his supervisor or any higher level of management.

13.5. Development and Remuneration

The Company shall provide an open, challenging and involving environment for all employees. The Company aims to provide opportunities for the development of the skills of employees to the fullest extent possible within the constraints of the Company.

The Company's pay structures shall aim at rewarding individual abilities and personal performance.

13.6. Policy and Practice on Alcoholism and Illicit Drugs in the Workplace

The Company prohibits the use and abuse of alcohol and illegal drugs during the working hours or at the Company's facilities. Possession or sale of illegal drugs by employees at the Company shall be reported immediately to the Police. Alcoholism and use of illicit drugs in the workplace that negatively affects work performance shall not be tolerated.

14. RESPONSIBILITIES TO THE COMMUNITY

14.1. Environmental Policy

Care for the environment is one of the Company's main concerns. The Company policy aims at manufacturing, handling and disposing all materials in compliance with present laws and regulations and in a responsible manner without creating risks to human health or the environment.

14.2. Support for Community Activities

The Company encourages employees to participate in community and civic affairs. As

regards participation in political activities, it is entirely personal and voluntary.

14.3. Policy and Practice on Donations

Charitable Donations

The Company supports charitable organizations and encourages employees to contribute to charities and/or organize fund-raising events.

Political Donations

The Company shall not make any illegal or improper payment or contribution to any public official, person or entity with political background for the purpose of seeking improper advantages.

NB: The Code of Conduct disclosed here is identical to the internal version provided to our employees, with the exception of two changes to assist with comprehension by external stakeholders: internal acronyms have been paraphrased, and references to internal forms and documents have been removed.