

# STAKEHOLDER ENGAGEMENT POLICY

## 1 BACKGROUND

Hang Lung Group Limited and Hang Lung Properties Limited (collectively, the “Group”) are committed to becoming one of the world’s most sustainable real estate companies. This Stakeholder Engagement Policy (the “Policy”) outlines our principles, commitments, and governance framework to deliver long-term positive impacts for all stakeholders while advancing sustainable development.

We believe that meaningful engagement builds mutual understanding, enabling us to align our business strategies with stakeholder expectations. Our engagement spans key groups, including stakeholders directly connected to our operations and other interested organizations.

To ensure accountability and transparency, we disclose key sustainability updates through annual sustainability reports, corporate communications, and our dedicated Sustainability website. By fostering collaboration with diverse stakeholders, we aim to catalyze collective action, drive industry-wide changes, and uphold our leadership in sustainability.

## 2 SCOPE

The Policy defines the scope and nature of the Group’s stakeholder engagement across all business activities, including new developments and existing properties.

It applies to all stakeholders along the value chain including internal stakeholders (employees) and external stakeholders including investors and shareholders, tenants and customers, suppliers and contractors, local communities, NGO partners, academia and industry associations, governments and regulators, and media.

This policy covers all the Group’s operations in Hong Kong, mainland China, and any future markets, and is implemented through integration with our Code of Conduct, Sustainable Procurement Policy, Code of Conduct for Contractors, Staff Handbook and other corporate policies.

## 3 PRINCIPLES AND COMMITMENTS

We are committed to:

- Identifying and prioritizing stakeholder groups based on their dependency, influence, and impact, with special attention to affected communities and vulnerable groups;
- Complying with all national and local legislative requirements and seeking best-in-class stakeholder engagement practices where regulations are absent;

- Providing accurate, timely, accessible and relevant financial and non-financial disclosures through multi-channel platforms;
- Engaging stakeholders in business activities update and decision making through grievance mechanisms for existing operations, and structured community consultations for new developments proportional to project scale and risk with documented impact assessments;
- Involving stakeholder groups in annual double materiality assessments to identify key and emerging sustainability issues, and validating the findings through stakeholder engagement via independent-facilitated surveys, interviews, and focus group discussion;
- Conducting dialogues with stakeholders at least annually to review sustainability performance against expectations, including perception surveys benchmarked against industry peers at all operational regions;
- Engaging stakeholders in key sustainability issues through capacity building, education, and regular surveys. The sustainability issues include but are not limited to climate mitigation, pollution minimization, water stewardship (with priority engagement in water-stressed regions), biodiversity, circularity, human rights, and business ethics;
- Communicating our expectations on abovementioned sustainability issues to all stakeholders via documents (e.g., Code of Conduct for Contracts with zero-tolerance human rights clauses), websites, and meetings;
- Collaborating with supply chain partners to explore and adopt best practices in sustainable procurement covering abovementioned key sustainability issues;
- Ensuring all stakeholders engagement programs are accessible across all operational regions;
- Ensuring stakeholders have accessible, multilingual channels to raise concerns, with confidential, impartial, and transparent handling, while providing formal acknowledgement of all grievances and resolution updates as soon as possible;
- Promptly addressing significant concerns raised by stakeholders through tiered escalation protocols, with mediation by independent experts for high-risk cases. Corrective actions are tracked and reported to the Sustainability Steering Committee biannually, with systemic issues elevated to the Board;
- Encouraging and engaging stakeholders to organize and support community initiatives, and leveraging their expertise to address the unique needs of each community we serve;
- Enhancing stakeholder engagement capabilities through structured internal knowledge-sharing, including cross-functional meetings where employees exchange best practices and experiences. These efforts aim to improve the quality and effectiveness of stakeholder interactions across all operations;
- Documenting all stakeholder engagements through maintained records of consultation minutes, feedback logs and decision trails, demonstrating how stakeholder input has influenced business activities in our annual Sustainability

Report; and

- Implementing this Policy Group-wide through mandatory training programs for all customer-facing staff and high-risk supply chain partners annually, with annual internal audits following internationally recognized stakeholder engagement standards to ensure consistent application across all operating properties.

## 4 APPROACH

### 4.1 Identification & Prioritization

We identify stakeholders across our value chain—including employees, communities, tenants and customers, NGO partners, academia and industry associations, investors and shareholders, media, suppliers and contractors, government and regulators, and other business partners—prioritizing engagement based on materiality, operational impact, and mutual dependency. We conduct localized mapping to ensure inclusive representation, with additional consideration for potentially affected communities and vulnerable groups where relevant.

### 4.2 Engagement Methods

Stakeholder Groups	Form of Engagement
Employees	<ul style="list-style-type: none"><li>• Biannual two-way performance check-in and review</li><li>• Regular drinks sessions with management</li><li>• Annual dinner</li><li>• Regular staff wellbeing programs</li><li>• Regular corporate newsletter</li><li>• Annual sustainability-focused interviews, surveys and focus groups</li><li>• Sustainability Champions initiative with designated sustainability representatives from each department</li><li>• Annual employee engagement survey and follow-up engagement plans for each department</li><li>• Internal awards to recognize outperforming staff, e.g.: Emerald Award, CEO Award, Long Service Award</li><li>• Annual conference, e.g. management conference, functional conference</li><li>• Ongoing digital platform communication through office's digital panels, intranet and social media e.g.: LinkedIn and WeChat</li><li>• Regular staff activities</li><li>• Exit interviews</li><li>• Regular eDMs to share sustainability updates with employee</li><li>• Hang Lung As One Volunteer programs</li><li>• Town halls</li></ul>
Communities	<ul style="list-style-type: none"><li>• Regular two-way communication with international and local communities at the Board level</li><li>• Ongoing community investment initiatives</li></ul>

	<ul style="list-style-type: none"> <li>• Social impact assessment for applicable community investment initiatives</li> <li>• Ongoing community events</li> <li>• Regular corporate newsletter</li> <li>• Occasional one-on-one interviews by independent consultants</li> </ul>
Tenants and Customers	<ul style="list-style-type: none"> <li>• Regular customer engagement surveys</li> <li>• Annual tenant satisfaction surveys and interviews</li> <li>• Tenant and customer surveys with sustainability focus</li> <li>• Ongoing social media communication through various media</li> <li>• Regular corporate newsletter</li> <li>• Quarterly sustainability newsletter for tenants (and other interested readers)</li> </ul>
NGO Partners, Academia and Industry Associations	<ul style="list-style-type: none"> <li>• Regular collaboration on sustainability and community investment initiatives</li> <li>• Regular participation in conferences, seminars, and networking events</li> <li>• Social impact assessment for applicable community investment initiatives</li> <li>• Occasional one-on-one interviews by independent consultants</li> </ul>
Investors and Shareholders	<ul style="list-style-type: none"> <li>• Annual sustainability reporting, benchmarks and indices</li> <li>• Maintain open and regular communication with shareholders through circulars, interim and annual reports, press releases, announcements and notices of meetings</li> <li>• Regular investor interviews, meetings, roadshows, and investor conferences</li> <li>• Actively respond to investors' enquiries</li> <li>• Arrange property visits for the investment community</li> <li>• Annual General Meeting</li> </ul>
Media	<ul style="list-style-type: none"> <li>• Biannual results announcements and press conferences</li> <li>• Media briefings, interviews and luncheons</li> <li>• Adhere to protocols for approving media content</li> </ul>
Suppliers and Contractors	<ul style="list-style-type: none"> <li>• Regular project meetings</li> <li>• Screening and performance evaluation</li> <li>• Focus group discussions</li> </ul>
Governments and Regulators	<ul style="list-style-type: none"> <li>• Regular meetings</li> <li>• Occasional site visits by government officials</li> <li>• Government consultations</li> </ul>

### 4.3 Feedback & Grievance Mechanisms

Any stakeholder or group of stakeholders who believe they are adversely affected by our operations may lodge a complaint email, hotline, or in-person channels (see regional contacts on (see regional contacts on [Contact Us | Hang Lung](#))

Process Assurance:

- All grievances will be treated confidentially, assessed impartially, and handled transparently;

- Employee-specific channels are outlined in the Group's Staff Handbook;
- All grievances record is maintained in a prescribed form, including the tracking process of resolution; and
- Whistleblowing protection will be ensured for employees and third parties reporting serious concerns through the Group's whistleblowing channels.

## **5 ENDORSEMENT AND REVIEW**

This Policy shall be reviewed by the Sustainability Steering Committee from time to time, with consideration given to changes in legislation, business context and the evolution of best practices of stakeholder engagement. Any material changes or updates to this Policy shall be proposed by the Sustainability Steering Committee to the Board Executive Committee of the Group for endorsement.

**This Policy was endorsed by the Executive Committee of the Group in September 2025.**

## **6 ENQUIRIES**

We welcome your feedback on our Policy. Please share your views with us at [Sustainability@HangLung.com](mailto:Sustainability@HangLung.com).

Further information about our stakeholder engagement strategies and actions is provided in our annual [Sustainability Report](#).