Code of Ethics

Prepared by: Human Resources Department

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The English version of this Code shall prevail if there is any discrepancy between the English version and the Chinese version.
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CHAPTER 1 INTRODUCTION

Hysan is committed to maintaining a high standard of integrity and ethical behaviors in the business practices. Hysan believes that a reputation for honesty, trustworthiness and fair play is an important business asset and is essential to the long-term growth and success of the Company.

This set of Code of Ethics (“the Code”) applies to Directors, officers and employees (“Staff”) of Hysan Development Company Limited and its wholly owned subsidiaries.

The Code follows the guiding principles set out below.

Guiding Principles

- Respect for People
  Hysan values its staff members and is committed to maintaining an environment of courtesy and respect for everyone it encounters in its course of business. Hysan advocates an open communications culture throughout the organization. At the same time, it respects the privacy of its employees, customers and others and handles with utmost care of all personal and business information.

- Ethics and Business Integrity
  Hysan is committed to conducting all its business with the highest level of business ethics and integrity. We use every effort to comply with all applicable legal requirements and company policies and exercise ethics beyond the narrow sense of legal compliance. We strive to conduct all our business honestly and fairly with no conflict of interests or undue influence.

- Meeting Our Responsibility
  Hysan is committed to conducting its business responsibly and professionally. We require our staff to be fitted for his job and high level of performance of their duties. Staff are under an obligation to take reasonable care to ensure the Company meet the commitment to all its stakeholders.

All Directors, officers and employees are required to comply and act in accordance with the Code themselves and to do everything possible to influence those with whom they are working to ensure that they also act to similar standards of integrity and ethical behavior.

The adherence of the Code of Ethics should be observed in the different phases during the following process of the procurement and management of consultancy agreements.

The said process covers along from the identifying needs of consultants, preparing project brief, short-listing consultants, inviting and receiving tenders, evaluating tenders, conducting negotiations, awarding consultancy agreements, monitoring consultants’ performance, processing payment applications, monitoring variations to the consultancy agreement, and enforcing documentation.

The Company takes all complaints seriously and will undertake investigations promptly and impartially. Employees who are engaged in the breach of the Code of Ethics will be subject to disciplinary actions. The senior management fully supports those who in good faith report any potential or actual breaches of the Code. The Code will be reviewed from time to time and may be supplemented by specific codes where appropriate. Directors, officers and employees who have any
doubt, or any queries regarding the content of this Code of Ethics should seek the advice of Human Resources Department. Legal Department may also be consulted when legal issues are involved.

CHAPTER 2 NON-DISCLOSURE OF CONFIDENTIAL INFORMATION

‘Confidential Information’ refers to information relating to the Company’s business affairs, proprietary products, technology, research, development and trade secrets including those of its affiliated companies and certain entities with which the Company does business and information which the Company is under an obligation to keep confidential whether by law or listing rules or under contract or otherwise.

Each staff is required to covenant that he shall not at any time during his employment or after the termination of the employment disclose to any person or make use of any of the confidential information without the consent of his Supervising Manager (as defined in Appendix 7).

All notes, data, information and memoranda of any nature and in particular the confidential information which shall be acquired, received or made by the staff during the course of employment or relating to his duties shall be the property of the Company and shall be surrendered by the staff to the Company at the termination of employment or at the request of the Company at any time during the course of employment or at any time thereafter.

CHAPTER 3 CORPORATE & FINANCIAL REPORTING

Hysan is committed to presenting a clear and balanced assessment of the Company’s financial position and prospects. The Company always ensures the preparation of true, fair, timely and understandable picture in all corporate disclosure, reports and documents. Directors, officers and employees are prohibited from making any false or misleading financial statements or corporate disclosure.

Staff are required to cooperate fully with the external auditors, and is prohibited from destroying, altering or falsifying any records that are connected to an investigation, litigation or legal proceeding.

CHAPTER 4 PROTECTION OF COPYRIGHT

Staff should observe the provisions of the Copyright Ordinance. Knowingly use infringing copies of copyright works in the course of their employment could incur both civil and criminal liabilities.

CHAPTER 5 DATA PROTECTION

Staff are required to comply with the Personal Data (Privacy) Ordinance. The ordinance is intended to regulate the use of personal data relating to individuals. The Personal Data (Privacy) Ordinance embodies six Data Protection Principles. The Company will strictly comply with the data protection principles. To assist efficient internal administration, staff are responsible for providing updated personal details to the Company for record purpose.
Staff are required to protect the personal information of customers and tenants in strict compliance with the Personal Data (Privacy) Ordinance. Appendix 1 sets out some explanatory notes of the Data Protection Principles.

The personal information of customers and tenants should be used in the proper context only for authorized business purposes and shall be accessible only to those staff who have a legitimate need to know.

**CHAPTER 6 COMPUTER SECURITY**

Unless otherwise authorized, staff are not allowed to add, alter, copy or delete any programme or data on their computer provided to them by the Company. Any act to cause the Company’s computer to malfunction or accessing a computer with intention to commit an offence, deceive, dishonestly gain or dishonestly cause loss to another is a serious offence and can lead to summary dismissal and report to the police.

Only software authorized by the Company can be installed and used. Internet and email facilities are provided primarily for business purposes. The Company reserves the right to monitoring all email messages and internet usage. Staff shall also comply with the Electronics Communications Guidelines set out in Appendix 2.

**CHAPTER 7 CONFLICT OF INTEREST**

A conflict of interest situation arises when the private interest of staff competes with or contravenes the interest of the Company. Private interest includes both the financial and personal interests of staff and those of their connections. Examples of connections can be but are not limited to family members, relatives, etc.

Directors, officers and employees should avoid any situation which may lead to an actual or perceived conflict of interest. Should such situation arises, staff should make a declaration in writing via the “Declaration Form – Conflict of Interest” (a sample is set out in Appendix 3a) and submit to his Supervising Manager (as defined in Appendix 7).

Directors, officers and employees should ensure at all times that they do not place oneself in a position of obligation that may lead to a conflict of interest in dealings with customers, suppliers, contractors and colleagues. Directors should disclose potential conflict of interest to the Board.

The circumstances in which a conflict of interest might arise include the following:

**7.1 Gambling**

Staff should not engage in frequent and excessive gambling of any kind, including games of mahjong, in particular with persons having business dealings with the Company. In social occasions with clients, suppliers or business associates, staff must exercise judgment and withdraw from any high stake games of chance.
7.2 Loans

Staff 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. There is, however, no restriction on normal bank borrowing or lending.

7.3 Outside Employment

No staff shall take up any directorship (Appendix 3a: Declaration Form- Conflict of Interest) or part-time employment (Appendix 3b: Declaration Form – Part-time Employment) of any corporations /organizations or offering services/ taking up positions in any external institutions on behalf of the Company (Appendix 3c: Form of “Application for Offering Services to External Institution”) , except with prior written approval of the Company (as defined in Appendix 7).

Approval to take up any directorship or part-time employment or external services will only be considered in circumstances where the interests of Hysan will not be prejudiced.

7.4 Insider Information & Trading

Staff are strictly prohibited from providing or making available confidential or insider information to anyone outside the Company without proper authorization, or using confidential or insider information for own benefit or to benefit or harm others whether through the use of agents, partners, contractors, family members or parties acting on his behalf or otherwise.

As soon as a Restricted Employee (who, because of their office, are likely to be in possession of unpublished price-sensitive information in relation to Hysan Group) becomes aware of or privy to any negotiations, agreements or unpublished information, which are or may be price-sensitive relative to Hysan securities, he shall refrain from dealing in Hysan securities until proper disclosure of the information in accordance with the Listing Rules. They should also avoid dealing in Hysan securities during a “black out period” as prescribed under the Listing Rules from time to time. A Restricted Employee must also seek to prohibit any person connected with him/her or acting on his/her behalf from dealing in Hysan securities during the “black out period” or at any time when the Restricted Employee is in possession of unpublished price-sensitive information in relation to Hysan.

Restricted Employees should not make any unauthorized disclosure of confidential information, whether to co-trustees or to any other person (even those to whom he owes a fiduciary duty) or make use of such information for the advantage of himself or others.

A Restricted Employee should not deal in any Hysan securities without first seeking clearance from Company Secretary.

7.5 Business Decisions

Staff involved in the procurement process or evaluation of business proposals or the selection of the Company’s suppliers and contractors should avoid situations that could interfere, or appear to interfere with their ability to make fair and impartial decisions (e.g.
staff involved in decision making is closely related to or has a beneficial interest in a prospective business associate of the Company).

The aforementioned circumstances are not exhaustive; staff should exercise due discretion and judgment with prudence in each particular situation.

**CHAPTER 8  THE PREVENTION OF BRIBERY ORDINANCE**

The Company prohibits bribery and corrupt practices. Under Section 9(1) of the Prevention of Bribery Ordinance (which is extracted in Appendix 4), any staff member soliciting or accepting an advantage in connection with his work without the permission of the employer commits an offence. The term “advantage”, as defined in the Ordinance, includes money, gift, loan, fee, reward, employment, contract, service and favour. The person who offers the advantage may also commit an offence under Section 9(2) of the Ordinance. Staff are also strictly prohibited from avoiding the anti-bribery provisions through the use of agents, partners, contractors, family members or any others acting on someone’s behalf.

**CHAPTER 9  PERSONAL BENEFITS**

Hysan is committed to conducting all business without undue influence. Staff are required to exercise good judgment and practise moderation in giving or receiving business gifts and entertainment to or from anyone, including a current or prospective supplier, vendor, contractor or tenant of the Company, to avoid any possibility of compromising, or appearing to compromise, the objectivity of business decisions.

9.1 Offer of Advantage

Directors, officers and employees are prohibited from offering advantages to any directors, officers and employees or agent of another company or organization, for the purpose of influencing such person in any dealing, or any public official, whether directly or indirectly through a third party, when conducting the Company’s business. Even when an offer of advantage carries no intention of improper influence, it should be ascertained that the intended recipient is permitted by his employer/principal to accept it under the relevant circumstance before the advantage is offered.

When giving gifts to and entertaining external business associates, staff must ensure that these are offered only in connection with legitimate business interests and purposes and are not excessive or too frequent. Business gifts and entertainment expenses must be processed through proper budget, approval, record-keeping and documentation procedures.

9.2 Acceptance of Advantage

Staff must not solicit and must decline any form of advantage, personal benefit or gift offered by any external business associates unless they are of nominal and non-cash value, such as promotional or advertising souvenirs or gifts of consumable nature (e.g. gift baskets, flowers) of modest value given on festive seasons or special occasions which are shared among colleagues. Anyone who receives or is offered a gift value of more than HK$500.00
must declare the details on the “Report on Business Entertainment/ Personal Benefits” and seek approval from his Supervising Manager (as defined in Appendix 7). The declaration should be submitted to the Supervising Manager (as defined in Appendix 7) as soon as practicable in any event within one month from the date of receipt. A proper disposal method should then be reviewed and authorized.

Staff must not solicit “Lai See” from any external business associates in any circumstances. The Company also does not encourage the acceptance of “Lai See” from any external parties. However, the management acknowledges the tradition of giving “Lai See” during Chinese New Year as a friendly gesture. Please refer to the Administrative Guideline for Way of Handling “Lai See” set out in Appendix 6.

Staff must decline invitation to any form of incommensurate entertainment (such as luxurious or frequent entertainments) offered by any external business associates. If a staff has received an invitation for incommensurate entertainment, he must declare the details on the “Report on Business Entertainment/ Personal Benefits Form” and submit the declaration to his Supervising Manager (as defined in Appendix 7) as soon as practicable and in any event within one month from the date of invitation or when he becomes aware of the incommensurate nature of the entertainment.

Examples of the advantages that staff should decline if the acceptance could:
- affect the objectivity or induce the staff to act against the Company’s interest
- lead to questions or complaints of bias or impropriety
- make the staff feel obliged to return a favour in connection with any business dealings

Duly approved declaration form/application form should be sent to Human Resources Department for record as soon as practical.

**CHAPTER 10  RELATIONS WITH SUPPLIERS 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 on the basis of fair play.

**10.2 Meeting the Public Interest and Accountability Standards**

Procurement process for supplies or services should be conducted in a manner consistent with the highest ethical standards to 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 procedures should be conducted according to the following principles:
- Impartial selection of capable and responsible suppliers and contractors;
- Maximization of competition;
- Selection of appropriate contract types according to need;
- Compliance with laws, relevant regulations and contractual obligations; and
- Adoption of 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.

CHAPTER 11 EQUAL OPPORTUNITIES

The Company is committed to recruit and develop people with suitable qualifications, experience, skills, potential and performance, regardless of sex, marital status, family status, pregnancy, disability, age, sexual orientation, race, colour, descent, national or ethnic origins, nationality and religion.

Staff should observe the requirements of the Sex Discrimination Ordinance, the Disability Discrimination Ordinance, the Family Status Discrimination Ordinance and the Race Discrimination Ordinance and their respective related Codes of Practice. Staff who engages any act or conduct of discrimination or sexual harassment will be subject to disciplinary proceedings.

Any queries should be referred to the Human Resources Department. All cases will be thoroughly investigated and treated in the strictest confidence.

CHAPTER 12 HANDLING THE BREACH OF CODE OF ETHICS

It is the responsibility of Directors, officers and employees to understand and comply with the Code. Managers should also ensure that their subordinates understand the Code well.

Any staff who becomes aware of any existing or potential breach of any of the Code are required to report promptly to the Company’s designated person (set out in Appendix 8). The identity of any complainant will be kept confidential. The Company will investigate reports of breach and will take such action it considers appropriate including disciplinary action, termination of employment or preventive action. Cases of suspected corruption or other criminal offences, will be reported to the ICAC or other appropriate authorities.
APPENDIX 1 – Explanatory Notes on Data Protection Principles

The following explanatory notes set out the concepts behind the principles, please refer to schedule 1 of the Personal Data (Privacy) Ordinance Cap 486 for details of the actual principles.

**Principle 1 -- Purpose and manner of collection.** This provides for the lawful and fair collection of personal data and sets out the information a data user must give to a data subject when collecting personal data from that subject.

**Principle 2 -- Accuracy and duration of retention.** This provides that personal data should be accurate, up-to-date and kept no longer than necessary.

**Principle 3 -- Use of personal data.** This provides that unless the data subject gives consent otherwise personal data should be used for the purposes for which they were collected or a directly related purpose.

**Principle 4 -- Security of personal data.** This requires appropriate security measures to be applied to personal data (including data in a form in which access to or processing of the data is not practicable).

**Principle 5 -- Information to be generally available.** This provides for openness by data users about the kinds of personal data they hold and the main purposes for which personal data are used.

**Principle 6 -- Access to personal data.** This provides for data subjects to have rights of access to and correction of their personal data.
APPENDIX 2 – Electronic Communications & Information System Guidelines

1. The electronic communication and information systems and related equipment ("the Systems") provided by Hysan and all information residing in or carried by the Systems are the property of Hysan. As a condition of use of the Systems, all users are deemed to have acknowledged and agreed that Hysan may, at its discretion and for legitimate business purposes, inspect, use, or disclose all communications and related information in the Systems without further notice. The use of email and Systems for personal matters should be avoided and must be kept to an absolute minimum.

2. Unauthorized access to the Systems is prohibited, and Hysan takes reasonable precautions to secure the Systems from such access. Authorized users must exercise reasonable care to maintain the security of the Systems, including the use and management of required passwords. However, password protection is for the security of Hysan and the Systems, and does not imply that communications are private or confidential to individuals.

3. Unauthorized connection to Hysan electronic communication and information systems with electronic devices not provided by Hysan including but not limited to mobile devices, notebooks, external storages or otherwise is prohibited, and Hysan takes reasonable precautions to secure the Systems from such access.

4. The Systems are intended for Hysan business. The Systems may not be used for personal gain, for purposes not reasonably related to the conduct of Hysan business, or in any manner that harms other individuals or Hysan.

5. Use of the Systems should be businesslike, courteous, and civil, and must comply with laws and regulations such as those regulating trademarks, copyrighted material, threatening or obscene material, and confidential, proprietary, or trade secret information. Uses that are harassing, discriminatory, defamatory, disruptive or offensive to others, illegal or criminal, or that involves obscene, vulgar, or sexually explicit content, are prohibited. Use of the Systems indicates consent that Hysan may, at its discretion, inspect, use, or disclose any resulting information. However, Hysan does not make any guarantee on the security of the Systems and depends upon users to report inappropriate, offensive, or illegal material to Hysan management.

6. Communications must clearly disclose the originator, sender, and intended recipient. If you receive a communication by mistake, you should stop reading as soon as you realize it was not meant for you and notify the sender or your system administrator immediately. It is not permissible, and may be illegal, to purposely read communications intended for another person without the permission of that person or of Hysan. If you forward a communication originated by someone else, do not make changes without clearly disclosing that you have done so.

7. Communications outside of Hysan, for example, via the Internet, Electronic Data Interchanges, direct modem connections, or otherwise, often travel through systems not under the control of Hysan, and might be intercepted and misused. Therefore, confidential information must not be communicated outside of Hysan unless clearly marked as to its confidential status.
8. Hysan’s guidelines might require the use of encryption to ensure confidentiality. However, encryption may be employed only where Hysan has authorized its use and has been provided with all keys necessary for decryption. You should not intentionally encode or encrypt files to make them unreadable by authorized Hysan representatives. However, it should be noted that communications that are confidential does not necessarily protect them from unauthorized disclosure or misuse.

9. Use of the Systems creates records that can be difficult to eliminate. Communications or related information might be printed or saved and might exist on backup media or otherwise be retrievable from the Systems for indeterminate periods of time. Therefore, you should be aware that mere "deletion" of a communication does not ensure removal of it or of related information from the Systems. Consider this when drafting and sending communications.

10. There is limited data storage for the electronic communication and information systems allocated to you. You should be responsible for monitoring your available storage, deleting unnecessary or duplicated files, and making hard copies. Hysan reserves the right to delete old files from you data storage if your limit is exceeded.
APPENDIX 3a – Declaration Form - Conflict of Interest

Part I: To be completed by the applicant 由申請人填寫

☐ I would like to declare the following *existing / potential conflict of interest situation arising or which may arise:-

(For instance, the “directorship in any companies” and “family members or close relatives currently working in Hysan Group”) 本申請人此申報 *現有 / 可能出現 的利益衝突情況如下：

(例如 “作為任何公司董事之職” 及 “有家庭成員或親屬現任職於希慎集團”) 本申請人此申報 *現有 / 可能出現 的利益衝突情況如下：

Persons/companies with whom/which I have official dealings and/or personal interests

________________________________________________________________________

Brief description of my duties which involve the persons/companies mentioned above

________________________________________________________________________

☐ I am not engaged in any kind of situation which may cause conflict of interest with the company.

本人就此聲明沒有跟公司有任何利益衝突情況存在。

Declaration 調明

I declare that the information provided above are true, complete and correct. A false statement or dishonest information may be grounds for my immediate discharge from employment.

本人聲明上述填報之資料全部正確無誤。如有虛假，本人願接受公司以此為理由即時解僱本人。

Applicant’s Name 申請人姓名

Position / Department 職位 / 部門

(For existing staff only 只適用於現職員工)

Applicant’s Signature 申請人簽署

Date 日期

Part II: For Management Review and Approval 公司審批及批准

☐ *Accept / Not accept the application of hiring (apply to new recruitment only)

*接受 / 不接受此工作申請 (只適用於招聘之用途)

☐ The applicant should refrain from performing or getting involved in performing the work, as described in Part I, which may give rise to a conflict.

申報之同事應避免參與相關工作，因以上之申報可能導致利益衝突情況出現

☐ The applicant may continue to handle the work as described above, provided that there is no change in the information declared above.

如以上申報之資料不變，同事可繼續參與相關工作

☐ Others (please specify) 其他 (請註明)： __________________________

(1) Approved by 批准：

Unit Head 部門主管

Date 日期:

(2) Approved by 批准：

General Manager, HR & Admin 總經理，人力資源及行政

Date 日期:

(3) Approved by 批准：

CEO 行政總裁

Date 日期:

Remarks:

a. For Head Office employees, approval from (1), (2) and (3) should be obtained. 為寫字樓同事，申請需獲 (1), (2) 及 (3) 批閱

b. For BMT employees, approval from (1) and (2) should be obtained. 為大廈物管團隊同事，申請需獲 (1) 及 (2) 批閱

c. The Declaration Form should be submitted to Human Resources Department for filing. 此表格須交到人力資源部存檔

* Please delete as appropriate. 請刪除不適用者。
**APPENDIX 3b – Declaration Form – Part-time Employment**

<table>
<thead>
<tr>
<th>Part I : To be completed by the applicant 由申請人填寫</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name :</td>
</tr>
<tr>
<td>姓名</td>
</tr>
<tr>
<td>Position :</td>
</tr>
<tr>
<td>職位</td>
</tr>
</tbody>
</table>

**Details of the Part-time Employment 兼職詳情**

| Name of the Part-time Employer: | Business Nature of the Part-time Employer: |
| 僱主名稱 | 業務性質 |
| Address: | Working Hours: |
| 工作地點 | 工作時間 |
| Pay Rate: | |
| 薪酬 | |

**Descriptions of your job title and job duties 搭述工作職位及職責**

**Declaration 聲明**

I declare that the information provided above are true, complete and correct, and such part-time employment does not have conflict of interest with my current duties or affect my job performance. If my application is approved, I agree to report and declare again should there be any potential conflict of interest arise or change of my duties during the course of my part-time employment. I understand and agree that the company reserves the right to review my application at any time when deemed necessary.

本人聲明上述申報之資料全部正確無訛，並與現時之工作沒有任何利益衝突及影響現時的工作表現。倘若此申請獲接受，並在上述申報之兼職期間，出現任何潛在性的利益衝突或職責改變，本人會再次作出申報。本人明白及同意公司保留在任何時間及需要的情況下，對上述申報再作審批之權利。

**Applicant’s Signature :**

申請人簽署

**Date :**

日期

**Part II : For Management Review and Approval 公司審批及批准**

**Comments 意見**

(1) Approved by 批准：

(2) Approved by 批准：

(3) Approved by 批准：

**Unit Head 部門主管**

Date 日期:

**General Manager, HR&Admin 總經理，人力資源及行政**

Date 日期:

**CEO 行政總裁**

Date 日期:

**Remarks:**

a. For Head Office employees, approval from (1), (2) and (3) should be obtained. 此表格須交到人力資源部存檔

b. For BMT employees, approved from (1) and (2) should be obtained. 大廈物管團隊同事之申請需獲(1)及(2)之批閱

c. The Declaration Form should be submitted to Human Resources Department for filing. 此表格須交到人力資源部存档
APPENDIX 3c – Application for Offering Services to External Institution

<table>
<thead>
<tr>
<th>Part I : To be completed by the applicant (Attach supporting documents, e.g. invitation letter)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Name</strong> :</td>
</tr>
<tr>
<td><strong>Position</strong> :</td>
</tr>
<tr>
<td>Details of the Services:</td>
</tr>
<tr>
<td><strong>Name of Institution</strong> :</td>
</tr>
<tr>
<td><strong>Fees offered</strong> : Yes / No (if yes, please state amount : )</td>
</tr>
<tr>
<td><strong>Required to attend meetings / perform duties for the external institution during office hours</strong> : Yes / No</td>
</tr>
<tr>
<td><strong>If yes, please provide estimation of time required</strong> :</td>
</tr>
<tr>
<td><strong>Descriptions of your role and the services which will be offered to the external institution</strong> :</td>
</tr>
<tr>
<td><strong>Reasons / benefits to the Company for offering the services</strong> :</td>
</tr>
<tr>
<td><strong>Declaration</strong></td>
</tr>
<tr>
<td>I declare that the services offered to the external institution do not have conflict of interest with my current duties. If my application is approved, I agree to share the collected relevant information to the Company whenever required.</td>
</tr>
<tr>
<td><strong>Applicant’s Signature</strong> : ___________________________ <strong>Date</strong> : __________________________</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Part II : Management Approval</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Comments</strong> : ____________________________________________</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>(1) <strong>Approved by</strong></th>
<th>(2) <strong>Approved by</strong></th>
<th>(3) <strong>Approved by</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Unit Head</strong> 部門主管</td>
<td><strong>General Manager, HR&amp;Admin</strong> 總經理，人力資源及行政</td>
<td><strong>CEO</strong> 行政總裁</td>
</tr>
<tr>
<td><strong>Date 日期</strong> :</td>
<td><strong>Date 日期</strong> :</td>
<td><strong>Date 日期</strong> :</td>
</tr>
</tbody>
</table>

**Remarks:**

a. For **Head Office employees**, approval from (1), (2) and (3) should be obtained. **寫字樓同事**之申請需獲(1), (2)及(3)之批閱.
b. For **BMT employees**, approval from (1) and (2) should be obtained. **大廈物管團隊同事**之申請需獲(1)及(2)之批閱.
c. The Declaration Form should be submitted to Human Resources Department for filing. 此表格須交到人力資源部存檔.
APPENDIX 4 – The Prevention of Bribery Ordinance

Section 9 Corrupt Transaction with Agents

(1) Any agent who, without lawful authority or reasonable excuse, solicits or accepts any advantage as an inducement to or reward for or otherwise on account of his-

(a) doing or forbearing to do, or having done or forborne to do, any act in relation to his principal's affairs or business; or

(b) showing or forbearing to show, or having shown or forborne to show, favour or disfavour to any person in relation to his principal's affairs or business, shall be guilty of an offence.

(2) Any person who, without lawful authority or reasonable excuse, offers any advantage to any agent as an inducement to or reward for or otherwise on account of the agent’s-

(a) doing or forbearing to do, or having done or forborne to do, any act in relation to his principal's affairs or business; or

(b) showing or forbearing to show, or having shown or forborne to show, favour or disfavour to any person in relation to his principal's affairs or business, shall be guilty of an offence.

(3) Any agent who, with intent to deceive his principal, uses any receipt, account or other document-

(a) in respect of which the principal is interested; and

(b) which contains any statement which is false or erroneous or defective in any material particular; and

(c) which to his knowledge is intended to mislead the principal, shall be guilty of an offence.

(4) If an agent solicits or accepts an advantage with the permission of his principal, being permission which complies with subsection (5), neither he nor the person who offered the advantage shall be guilty of an offence under subsection (1) or (2).

(5) For the purposes of subsection (4) permission shall-

(a) be given before the advantage is offered, solicited or accepted; or

(b) in any case where an advantage has been offered or accepted without prior permission, be applied for and given as soon as reasonably possible after such offer or acceptance, and for such permission to be effective for the purposes of subsection (4), the principal shall, before giving such permission, have regard to the circumstances in which it is sought.
APPENDIX 5 – Report on Business Entertainment/ Personal Benefit Form

Part A – Declaration 申報饋贈 (To be completed by Receiving Staff 由申請人填寫)

<table>
<thead>
<tr>
<th>Event Date 日期</th>
<th>Details of Offeror 饋贈人資料</th>
<th>Benefits Offered 利益申報</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Name &amp; Title 饋贈人姓名及職銜</td>
<td>Business Entertainment 款待</td>
</tr>
<tr>
<td></td>
<td>Company 公司</td>
<td>Gift 禮品</td>
</tr>
<tr>
<td></td>
<td></td>
<td>CNY Red Packet 農曆新年利是</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Brief Descriptions 簡述</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Actual / Estimated Value 实際/估計價值</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Recommended Ways of Disposal 建議處置方法</td>
</tr>
</tbody>
</table>

Ways of Disposal 處置方法

A Retained by the receiving staff 由獲饋贈員工保留
B Retained for display / as a souvenir in the office 存放於公司作陳列或紀念之用
C Share among the office 與其他同事分享
D Reserve as lucky draw prize at staff function 在員工活動中作抽獎之用
E Donate to a charitable organization 送贈慈善機構
F Return to offeror 退回饋贈人
G Others 其他 (please specify 請註明)

Applicant’s Name 申請人姓名
Position / Department 職位 / 部門
Applicant’s Signature 申請人簽署
Date 日期

Part B – Acknowledgement 回條 (To be completed by Approving Authority 由批核人填寫)

- Receiving the above business entertainment / gift / CNY red packet is approved.
- 不同意接受上述商業款待/禮品/農曆新年利是之處置方法

Comments 意見/ Remarks 備註：

(1) Approved by 批准:
(2) Approved by 批准:
(3) Approved by 批准:

Remarks:

a. For Head Office employees, approval from (1), (2) and (3) should be obtained.
b. For BMT employees, approval from (1) and (2) should be obtained.

c. The Declaration Form should be submitted to Human Resources Department for filing.
APPENDIX 6 – Administrative Guideline for Handling “Lai See”/ Red Packet

This guideline applies only to “Lai See” or red packets received during Chinese New Year. “Lai See” or red packets in other occasions must be treated in the same way as the acceptance of personal benefits.

Staff must not solicit “Lai See” from any external business associates in any circumstances. The Company also does not encourage the acceptance of “Lai See” from any external parties. However, management acknowledges the tradition of giving “Lai See” during Chinese New Year as a friendly gesture. “Lai See” during Chinese New Year should be treated in the following way.

HEAD OFFICE

Staff must not solicit Lai See from any external business associates and should decline to accept wherever possible. In case Lai See is being offered and is difficult to decline, staff may accept and should make a declaration of the Lai See received using the “Report on Business Entertainment/ Personal Benefits” (refer to Appendix 5) as soon as practicable in any event within one month from the date of receipt and the Supervising Manager (as defined in Appendix 7) will determine the way of disposal. Duly approved declaration should be sent to Human Resources Department for record as soon as practical.

BUILDING MANAGEMENT TEAM

Staff must not solicit Lai See from any external business associates and should decline to accept wherever possible. In case Lai See is being offered and is difficult to decline, Lai See may be received and surrendered to Management Office of the relevant building to be pooled. The pooled Lai See may be allowed for distribution among all Building Management Team staff of the particular building.

A detailed record of the amount received and the details of the offeror must be made at the Management Office. In case the Lai See are given by any suppliers, vendors or contractors, the name of the offer or must be clearly registered in the record.(refer to Appendix 5) The record together with the recommended distribution of the pooled Lai See must be sent to the Supervising Manager (as defined in Appendix 7) for approval.

Upon Supervising Manager’s (as defined in Appendix 7) approval, the pooled Lai See can be distributed amongst staff. Staff must sign an acknowledgement of receipt and send to the Supervising Manager (as defined in Appendix 7).

Duly approved record / distribution and acknowledgement of receipt should be sent to Human Resources Department for record as soon as practicable in any event within one month.
## APPENDIX 7 – Approval Authorities

<table>
<thead>
<tr>
<th></th>
<th>Head Office/Building Management Team</th>
<th>Unit Head</th>
<th>CEO</th>
<th>HR</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Chapter 2) Waiver of confidentiality undertaking</td>
<td>All</td>
<td>Approve</td>
<td>Approve</td>
<td>-</td>
</tr>
<tr>
<td>(Chapter 7) Declaration Form – Conflict of Interest</td>
<td>Head Office</td>
<td>Approve</td>
<td>Approve</td>
<td>Approve</td>
</tr>
<tr>
<td></td>
<td>Building Management Team</td>
<td>Approve</td>
<td>-</td>
<td>Approve</td>
</tr>
<tr>
<td>(Chapter 7) Declaration Form- Part-time employment</td>
<td>Head Office</td>
<td>Approve</td>
<td>Approve</td>
<td>Approve</td>
</tr>
<tr>
<td></td>
<td>Building Management Team</td>
<td>Approve</td>
<td>-</td>
<td>Approve</td>
</tr>
<tr>
<td>(Chapter 7) Form- Application for Offering Services to External Institutions</td>
<td>Head Office</td>
<td>Approve</td>
<td>Approve</td>
<td>Approve</td>
</tr>
<tr>
<td></td>
<td>Building Management Team</td>
<td>Approve</td>
<td>-</td>
<td>Approve</td>
</tr>
<tr>
<td>(Chapter 9) Report on Business Entertainment/Personal Benefits</td>
<td>Head Office</td>
<td>Approve</td>
<td>Approve</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Building Management Team</td>
<td>Approve</td>
<td>-</td>
<td>Approve</td>
</tr>
</tbody>
</table>
APPENDIX 8 – Reporting Channel

Mr. C.L. Kwong, CPA

<table>
<thead>
<tr>
<th>Telephone no.</th>
<th>6971 2029</th>
</tr>
</thead>
<tbody>
<tr>
<td>Email address</td>
<td><a href="mailto:whistleblowing@attglobal.net">whistleblowing@attglobal.net</a></td>
</tr>
</tbody>
</table>
| Address        | 17th Floor, Hing Yip Commercial Centre  
272-284 Des Voeux Road Central  
Hong Kong |