



Code of Ethics

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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, the English version shall prevail.

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1 Introduction

Hysan is committed to maintaining a high standard of integrity and ethical behaviours 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 (“**Code**”) applies to **Staff** (including Directors, officers and employees of Hysan Development Company Limited and its wholly owned subsidiaries (the “**Group**”). In the case of joint ventures, Hysan representatives are expected to act in accordance with this Code themselves and to use reasonable endeavours to influence those with whom they are working to act to similar standard of integrity and ethical behaviour. Likewise, contractors and suppliers working for the Company are required, to follow the applicable Suppliers Code of Conduct during their contract term with the Company.

2 Guiding Principles

The Code follows the guiding principles set out below.

Guiding Principles

- **Respect for People**

Hysan values its Staff and is committed to maintaining an environment of courtesy and respect for everyone in all business dealings. Hysan advocates an open communications culture throughout the Company. 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 strong 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 businesses 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 fit for their jobs and of high level of performance of their duties. Staff are under an obligation to take reasonable care to ensure the Company meets its commitment to all its stakeholders.

Staff are required to comply and act in accordance with the Code and to use reasonable endeavours to influence those with whom they are working to ensure that they also act to similar standard of integrity and ethical behaviour.

Management of Consultancy Engagement The adherence of the Code should be observed in the different phases during the following process of the procurement and management of consultancy engagement.

The said process covers along from identifying 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 deviations from / breach of the consultancy agreement, and enforcing contractual terms and/or legal rights.

The Company takes all complaints seriously and will undertake investigations promptly and impartially. Employees who breach the Code 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. Staff who have any doubt, or any queries regarding the content of this Code should seek the advice of Human Resources Department. Legal Department may also be consulted when legal issues are involved.

3 Compliance with Laws and Regulations, Company's Policies and Procedures

Hysan is committed to complying with all applicable laws and regulations in the relevant jurisdictions of which Hysan has operations. Staff are required to adhere strictly to all applicable laws, regulations and statutory codes. The laws that apply to the particular international transactions and activities include those countries where the transactions occur.

Hysan requires all Staff to comply with the policies and procedures of the Company, including departmental management controls and practices. Questions or issues relating to the Company policies and procedures should be referred to the responsible department/unit heads who own and are responsible for overseeing the relevant policies or procedures.

4 Non-Disclosure of Confidential Information

"Confidential Information" refers to information relating to the strategies, plans and intentions, financial information and projections, business affairs, business intelligence and trade secrets of the Group and those of the Company's affiliated companies and business partners that are not within the public domain, including information which the Group 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/she shall not at any time during his/her 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/her supervisor(s).

All notes, data, information and memoranda of any nature and in particular the Confidential Information acquired, received or prepared by the Staff during the course of employment or relating to their 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.

5 Compliance with Financial Controls and Reporting Requirements

Hysan is committed to presenting a clear and balanced assessment of the Company's financial position and prospects. Company's books, invoices, records, accounts, funds and assets must be created and maintained to reflect fairly and accurately and in reasonable details. The underlying transactions and the disposition of the Company business must be properly recorded. The Company always ensures the disclosure and presentation of true, fair, complete, timely and understandable information in all corporate disclosure, reporting and documentations. Staff are prohibited from making any false or misleading financial statements or other entries in financial records or corporate disclosure or any document relating to the Company's financial position.

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

6 Protection of Company's Information, Records and Assets

Staff have a duty to safeguard the Company's assets and resources. The Company's assets and resources include properties, facilities, equipment, materials, Company's records, customer and tenant information, etc. Use of the Company's assets and resources shall follow Company's procedures and practices. All uses of Company's assets and resources, other than for the Company's authorised business purpose, require prior authorisation and reasonable justification and follow the Company's policies and procedures.

Staff should protect the Company's intellectual property rights in accordance with the relevant Company's requirements and the applicable laws and regulations. Any intellectual property and technology developed or created by the Staff in the course of their employment is the property of the Company. All messages created, sent or retrieved using Company's internet and email facilities remain the property of the Company. Staff as users shall ensure these facilities are used in an ethical, responsible and lawful manner in accordance with the Company's policies and procedures and applicable laws and regulations.

7 Privacy Compliance

Hysan respects personal data privacy and is committed to implementing and complying with the data protection principles under the Personal Data (Privacy) Ordinance (Cap. 486 of the Laws of Hong Kong) ("PDPO"), Personal Information Protection Law of the PRC ("PIPL"), Data Security Law of the PRC ("DSL") and other applicable data privacy laws (collectively, "Privacy Laws") in the relevant jurisdictions of which Hysan has operations. Staff are required to comply with the Privacy Laws and the Company's privacy compliance policies and procedures.

Staff are required to protect the personal information of customers, tenants, business partners etc. in strict compliance with the Privacy Laws. Appendix 1 sets out some Key Data Protection Principles of PDPO and PIPL.

The personal information collected should be used in the proper context only for authorised business purposes and shall be accessible only to those Staff who have a legitimate need to know.

Staff as well as the Company are liable to criminal sanctions under the Privacy Laws if found guilty of knowingly or recklessly contravening its provisions. Failure to act in accordance with this Code will be viewed as misconduct and is likely to result in disciplinary action against the Staff in breach.

8 Information Security

Unless otherwise authorised, 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 access the Company's computer with an 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 police investigation.

Only software authorised by the Company can be installed and used. Internet and email facilities are provided primarily for business purposes. The Company reserves the right to monitor all email messages and internet usage. Staff shall always comply with the Company's IT policies and procedures governing electronic communications.

9 Avoiding 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.

Staff 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 using the "Declaration Form – Conflict of Interest" (set out in Appendix 2a) and submit to their supervisor(s). Head of Human Resources and Administration may refer the matter to Chairman for approval if necessary or deemed appropriate.

Staff should ensure at all times that they do not place themselves in a position of obligation that may lead to a conflict of interest in dealing 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:

9.1 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.

9.2 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 organisation having business

dealings with the Company. There is, however, no restriction on normal bank borrowing or lending from banks or financial institutions on normal commercial terms.

9.3 Outside Employment

No Staff shall take up any directorship (Appendix 2a: Declaration Form- Conflict of Interest) or part-time employment (Appendix 2b: Declaration Form – Part-time Employment) of any corporations/organisations or offering services/ taking up positions in any external institutions on behalf of the Company (Appendix 2c: Form of “Application for Offering Services to External Institution”), except with prior written approval of the Company (approval authorities are set out in Appendix 6).

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.

9.4 Inside Information & Trading

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

Staff must abide by the requirements of all applicable securities codes and regulations. Directors and other specified employees (“**Restricted Employees**”) of the Company are further required to refrain from dealing with the Company’s securities at certain times and under certain conditions, and abide by the Company’s codes, policies and procedures on securities transactions. As soon as a Restricted Employee (who, because of his/her office, is likely to be in possession of unpublished inside information in relation to Hysan Group) becomes aware of or privy to any negotiations, agreements or unpublished information, which are or may be inside information of Hysan, he/she shall refrain from dealing in Hysan’s securities until proper disclosure of the information is made in accordance with the Listing Rules. A Restricted Employee should also avoid dealing in Hysan’s 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’s securities during the “black out period” or at any time when the Restricted Employee is in possession of unpublished inside information in relation to Hysan.

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

General enquires on these requirements may be directed to the Company Secretary.

9.5 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 carefully assess each particular situation and exercise due discretion and judgment with prudence and take appropriate measures to ensure that their decisions are made in the best interests of the Company.

10 No Bribery

The Company prohibits and does not tolerate any form of bribery and corruption. The term “**Bribe**” may include any illicit advantage offered or accepted as an inducement to or reward for performing or abstaining from performing any Company’s duties. Under Section 9(1) of the Prevention of Bribery Ordinance (“**PBO**”) (which is extracted in Appendix 3), any Staff soliciting or accepting an advantage in connection with his/her work without the permission of the employer commits an offence. The term “**advantage**”, as defined in the PBO, 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 PBO. Staff are also strictly prohibited from circumventing or manipulating the anti-bribery provisions through the use of agents, partners, contractors, family members or any others acting on someone’s behalf.

Non-compliance may lead to breach of criminal or civil laws and result in severe criminal or civil penalties. Staff acting in contravention may also face disciplinary action including termination of employment with immediate effect without any compensation.

Any Staff who receives an offer of bribery or is suspicious of any breach must immediately report it to his/her supervisor or internal audit and cooperate fully with any investigation. Please also refer to the Anti-bribery and Corruption Policy of the Company for details.

11 Moderation in Gifts and Entertainment

Hysan is committed to conducting all businesses 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.

11.1 Offer of Gifts

Staff are prohibited from offering gifts or advantages to any directors, officers and employees or agent of another company or organisation, 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 gift or advantage carries no intention of improper influence, it should be ascertained that the intended recipient is permitted by his/her employer/principal to accept it under the relevant circumstance before the gift or 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. When providing gifts, Staff must emphasise they are for the benefit of the recipient company rather than for specific individuals.

11.2 Acceptance of Advantage

Staff must not solicit and should decline any form of advantage, personal benefit or gift offered by any external business associates. However, in the course of conducting our business, the Company recognises that there will be occasion when it is appropriate, upon courtesy and relationship building, to give or receive small gifts of nominal and non-cash value, such as promotional or advertising souvenirs or gifts of consumable nature (e.g. gift baskets, flowers), or business entertainment to and from external business associates. Anyone who receives or is offered a gift with value of more than HK\$500.00 must declare the details and seek relevant supervisor's approval in accordance with Appendices 4, 5 and 6. The declaration should be submitted to the relevant supervisor as soon as practicable and in any event within one month from the date of receipt. A proper disposal method should then be reviewed and authorised.

Staff must not solicit red packet(s) from any external business associates in any circumstances. The Company also does not encourage the acceptance of red packet(s) from any external parties. However, the management acknowledges the tradition of giving red packet(s), etc. during festive seasons as a friendly gesture. Please refer to the "Administrative Guideline for Way of Handling Red Packet(s)" set out in Appendix 5.

Staff must decline any invitation to any form of incommensurate entertainment (e.g. luxurious, excessive, or too frequent) offered by any external business associates. If a Staff has received an invitation for any incommensurate entertainment, he/she must declare the details and seek relevant supervisor's approval in accordance with Appendices 4 and 6 as soon as practicable and in any event within one month from the date of invitation or when he/she becomes aware of the incommensurate nature of the entertainment.

In any event, Staff should decline any form of advantages, personal benefit or gift or incommensurate entertainment 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 should be sent to Human Resources Department for record as soon as practicable.

12 Relationships with Suppliers and Contractors

12.1 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.

12.2 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.

12.3 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;
- Maximisation 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.

12.4 Competition and Antitrust

Hysan is committed to complying with all applicable competition and antitrust laws. Staff should acquaint themselves and comply with the applicable competition laws to which their businesses are subject. These are laws that aim to protect competition by prohibiting anti-competitive behavior. Breach of competition laws is a serious offence and may expose Hysan to severe penalties and other sanctions, and individuals to imprisonment. A non-exhaustive list of anti-competitive behavior which would potentially amount to an infringement of competition laws is set out below:

- Participating in price fixing, bid-rigging, collective boycotts or market sharing arrangements;
- Exchanging competitively sensitive information with competitors;
- Imposing restrictions on customers or suppliers, including retail price maintenance; and
- Abusing a position of substantial market power or market dominance.

13 Equal Opportunities

The Company is committed to recruiting and developing people with suitable qualifications, experience, skills, potential and performance, regardless of sex, marital status, family status, pregnancy, disability, age, sexual orientation, gender identity, 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 engage in any act or conduct of discrimination or sexual harassment will be subject to disciplinary actions.

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

14 Health, Safety and the Environment

Hysan is committed to doing its best to safeguard the health and safety of its Staff, business partners and the communities within which it operates. Hysan is also dedicated to creating long term value for its shareholders. Hysan pursues sustainable growth and strives to deliver positive financial results by effectively managing our business operations, assets, and investments. To this end, Hysan is mindful of its responsibility as a corporate citizen to be a good steward of the natural resources and biodiversity within its sphere of influence and is committed to ensuring that all potential adverse impacts of our operations on the environment are identified and mitigated reasonably.

15 Compliance with the Code and Obligation to Report

Hysan is committed to ensuring full compliance of the Code by its Staff. It is the responsibility of Staff to understand and comply with the Code. Supervisors have the responsibility to ensure that their subordinates understand and comply with the Code.

To facilitate the reporting of any existing or potential breaches of the Code, the Company has adopted a separate whistleblowing policy which is available on the website of the Company.

Any Staff who becomes aware of any existing or potential breach of any of the Code provisions is required to report promptly to the Internal Audit or the Company's designated independent third party, who will report to the Audit and Risk Management Committee of the Group directly.

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 actions, termination of employment or preventive action. Cases of suspected corruption or other criminal offences, will be reported to the ICAC or other appropriate authorities as considered appropriate.

Staff should not seek to circumvent or manipulate these provisions by using agents, partners, contractors, family members, controlled companies or parties acting on their behalf.

Appendix 1 Key Data Protection Principles of PDPO and PIPL

Data Processing Activities	Requirements under the PDPO	Requirements under the PIPL
Data Collection	<p>Lawfulness & fair</p> <ul style="list-style-type: none"> Data must be collected for lawful purpose and by fair means <p>Necessity</p> <ul style="list-style-type: none"> Data collected should be necessary but not excessive. <p>Openness to Public</p> <ul style="list-style-type: none"> Take practicable steps to ensure that the targets receive the PICS and privacy policy. 	<p>Lawfulness & fair</p> <ul style="list-style-type: none"> Data must be collected for a lawful, clear and reasonable purpose, directly related to the processing purpose <p>Necessity</p> <ul style="list-style-type: none"> Collection of data shall be limited to the minimum scope necessary for achieving the processing purpose and shall not be excessive. <p>Openness & Transparency</p> <ul style="list-style-type: none"> The rules of collecting and processing of data shall be disclosed The purposes, methods, and scope of processing shall be expressly stated.
Data Use & Transfer	<ul style="list-style-type: none"> Data must be used and transferred for the purpose for which it is collected or for a directly related purpose in accordance with the PICS. 	<p>Use</p> <ul style="list-style-type: none"> Data must be used and within the purpose and scope of processing means and data types for which it is collected or for a directly related purpose in accordance with the PICS. For use or processing of sensitive personal data, personal information protection impact assessment (PIA) shall be conducted in advance and regularly audited. <p>Transfer</p> <ul style="list-style-type: none"> Before external transfer, a personal information PIA) shall be conducted in advance. For cross-border-data-transfer data processor should conduct a self-assessment of the risks in the outbound data transfer. When certain conditions in PIPL and Measures for the Security Assessment of Outbound Data Transfer are met, data processor shall apply to the national cyberspace administration for the security assessment
Data Retention	<ul style="list-style-type: none"> Take practicable steps to ensure data is accurate and not kept longer than is necessary. Safely destroy and delete all records after use. 	<ul style="list-style-type: none"> A retention period of personal information shall be the shortest time necessary to achieve the processing purpose Safely destroy and delete all records after the processing purpose has been achieved.
Data Security	<ul style="list-style-type: none"> Take practicable steps to safeguard data from unauthorised or accidental access, processing, erasure, loss or use. 	<ul style="list-style-type: none"> Develop internal management systems and operating procedures to prevent unauthorized access as well as the leakage, tampering or loss of personal information Conduct classified management of personal information Take corresponding security technical measures such as encryption and de-identification Develop and organize the implementation of emergency plans for personal information security incidents

Access to Data	<ul style="list-style-type: none">• Allow targets to access and/or correct their data.	<ul style="list-style-type: none">• Disclose the contact information of the person who is in charge of personal data protection• Allow targets to access and/or correct their data, and to request Hysan to delete their data.
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Appendix 2a 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 example, "family members or close relatives currently working in Hysan Group" or "personal interests in any companies/suppliers/tenants dealing with Hysan Group", etc.)

本人謹此申報*現有/可能出現的利益衝突情況如下:-

(例如“有家庭成員或親屬現任職於希慎集團”或“於跟希慎集團有業務往來的公司/供應商/租戶有個人利益”等))

Details as follows (including names of family members or close relatives currently working in Hysan Group, companies/suppliers/tenants with Hysan Group and brief description of the scope, etc.)

詳情如下 (包括“現任職於希慎集團家庭成員或親屬資料”“跟希慎集團有業務往來的公司/供應商/租戶的資料及關係”等)

- 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 聲明

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訛。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
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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): _____

Approved by 批准:

(2) Approved by 批准:

(3) Approved by 批准:

Department Head 部門主管
Date 日期:

Unit Head
組別主管
Date 日期:

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

Remarks:

- a. For all employees, approval from (1),(2) and (3) should be obtained. Where necessary or deemed appropriate by the approvers, approval from Chairman should also be obtained. 所有同事之申請需獲(1),(2)及(3)之批閱。如有必要/批准人認為適當時，亦應獲得主席的批閱。
- b. 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 2b Declaration Form – Part-time Employment

Part I : To be completed by the applicant 由申請人填寫		
Name : 姓名	Employee ID : 員工號碼	
Position : 職位	Department : 部門	
Details of the Part-time Employment 兼職詳情		
Name of the Part-time Employer: 僱主名稱	Business Nature of the Part-time Employer: 業務性質	
Address: 工作地點	Working Hours: 工作時間	
Pay Rate: 薪酬		
Descriptions of your job title and job duties 描述工作職位及職責:		
<p><u>Declaration 聲明</u></p> <p>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.</p> <p>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。</p>		
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: _____		
<p>(1) Approved by 批准: _____</p> <p>(2) Approved by 批准: _____</p> <p>(3) Approved by 批准: _____</p>		
Department Head 部門主管 Date 日期:	Unit Head 組別主管 Date 日期:	General Manager, HR&Admin 總經理，人力資源及行政 Date 日期:
<p>Remarks:</p> <p>For all employees, approval from (1) ,(2) and (3) should be obtained..所有同事之申請需獲(1),(2)及(3)之批閱。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</p>		

Appendix 2c Application for Offering Services to External Institution

Part I : To be completed by the applicant <i>(Attach supporting documents, e.g. invitation letter)</i>		
Name :	Employee ID :	
Position :	Department :	
Details of the Services:		
Name of Institution :	Nature of Institution :	
Fees offered : Yes / No (if yes, please state amount : _____)		
Required to attend meetings / perform duties for the external institution during office hours : Yes / No If yes, please provide estimation of time required :		
Descriptions of your role and the services which will be offered to the external institution :		
Reasons / benefits to the Company for offering the services :		
<p>Declaration</p> <p>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.</p>		
Applicant's Signature: _____		Date: _____
Applicant's Name: (_____)		
Part II : Management Approval		
Comments : _____ _____		
<p>(1) Approved by 批准:</p> <p>_____</p> <p>Department Head 部門主管 Date 日期:</p>	<p>(2) Approved by 批准:</p> <p>_____</p> <p>Unit Head 組別主管 Date 日期:</p>	<p>(3) Approved by 批准:</p> <p>_____</p> <p>General Manager, HR&Admin 總經理，人力資源及行政 Date 日期:</p>
<p>Remarks:</p> <p>a. For all employees, approval from (1) ,(2) and (3) should be obtained.. 所有同事之申請需獲(1),(2)及(3)之批閱。</p> <p>b. The Application Form should be submitted to Human Resources Department for filing. 此表格須交到人力資源部存檔</p>		

Appendix 3 The Prevention of Bribery Ordinance (Cap. 201)

Section 9 Corrupt Transactions 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 4 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)

Event Date 日期	Details of Offeror 饋贈人資料		Benefits Offered 利益申報 (*Please delete as appropriate.)					Actual / Estimated Value* 實際/估計*價值 (*delete as appropriate) (將不適用者刪去)	Recommended Ways of Disposal (Refer to below list) 建議處置方法 (請參閱下表)
			(Mark an "x" as appropriate) (請於適當位置劃上“X”)			Brief Descriptions (Mode of entertainment, sort of food, type of gift, etc.) 簡述 (款待模式、禮品種類、食品名稱等)	Business Entertainment 款待		
	Name & Title 饋贈人姓名及職銜	Company 公司							

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

Limit of Financial Approval Authority	Actual / Estimated Value 實際/估計價值	Self-declaration with Supervisor 自行向上司申報	Form submitted to HR with following approval of *Remarks 申報批閱後須交由人力資源部存檔			
			Supervisor(1a)	Unit/Dept Head (1b)	HR (2)	Chairman (3)
Gift 禮品	< \$500	✓				
	\$500 - \$10,000		✓	✓	✓	
	> \$10,000		✓	✓	✓	✓
Red Packet 利是	HD Employees: < \$500	✓				
	HD Employees: ≥ \$500		✓	✓	✓	✓
	HPML Employees		✓	✓	✓	
Business Entertainment 商業款待			✓	✓	✓	✓

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 / red packet is approved.

備悉及同意接受上述商業款待/禮品/利是之處置方法

Comments 意見/ Remarks 備註:

Receiving the above business entertainment / gift / red packet is **NOT** approved.

不同意上述商業款待/禮品/利是之處置方法

(Please specify the reason 請註明原因:

(1a) Approved by 批准:

(1b) Approved by 批准:

(2) Approved by 批准:

(3) Approved by 批准:

Supervisor
上司
Date 日期:

Unit / Department
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:

Chairman 主席:
Date 日期:

*Remarks:

a. For **HD employees**, approval from (1a), (1b), (2) and (3) (if required) should be obtained. 寫字樓同事之申請需獲(1a), (1b), (2)及(3)(如果需要)之批閱

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

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 5 Administrative Guideline for Handling Red Packet(s)

This guideline applies only to red packet(s) received during festive seasons. Red packet(s) received in other occasions must be declined.

Staff must not solicit red packet(s) from any external business associates in any circumstances. The Company also does not encourage the acceptance of red packet(s) from any external parties. However, management acknowledges the tradition of giving red packet(s) during festive seasons as a friendly gesture. Red packet(s) during festive seasons should be treated in the following way.

Employee of Hysan Development Company Limited (“HD Employee”)

HD Employee must not solicit red packet(s) from any external business associates and should decline to accept wherever possible. In case red packet(s) is being offered and is difficult to decline, HD Employee may accept and should make a declaration of the red packet(s) received using the “Report on Business Entertainment/ Personal Benefits Form” and seek relevant supervisor’s approval in accordance with Appendix 4 as soon as practicable and in any event within one month from the date of receipt. Duly approved declaration should be sent to Human Resources Department for record as soon as practicable.

Employee of Hysan Property Management Limited (“HPML Employee”)

HPML Employee must not solicit red packet(s) from any external business associates and should decline to accept wherever possible. In case red packet(s) is being offered and is difficult to decline, red packet(s) may be received and surrendered to Management Office of the relevant building to be pooled. The pooled red packet(s) may be allowed for distribution among all HPML Employees 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 red packet(s) is given by any suppliers, vendors or contractors, the name of the offeror must be clearly registered in the declaration (refer to Appendix 4) The declaration together with the recommended distribution of the pooled red packet(s) must be sent to the supervisors for approval in accordance with Appendix 4 (i.e. Supervisor, Department Head, Unit Head and Human Resources Department).

Upon all the relevant supervisors’ approval in accordance with Appendix 4 (i.e. Supervising Manager, Department Head, Unit Head and Human Resources Department), the pooled red packet(s) can be distributed amongst HPML Employee. HPML Employee must sign an acknowledgement of receipt and send to the the direct supervisor.

Duly approved declaration and acknowledgement of receipt should be sent to Human Resources Department for record as soon as practicable and in any event within one month.

Appendix 6 Approval Authorities

	HD Employees / HPML Employees	Unit/Department Head	Chairman	HR
(4. Non-Disclosure of Confidential Information) Waiver of confidentiality undertaking	All	Approve	Approve	-
(9. Avoiding Conflict of Interest) Appendix 2a Declaration Form – Conflict of Interest	HD Employees	Approve	Approve (if deemed appropriate)	Approve
	HPML Employees	Approve	-	Approve
(9. Avoiding Conflict of Interest) Appendix 2b Declaration Form-Part-time Employment	HD Employees	Approve	-	Approve
	HPML Employees	Approve	-	Approve
(9. Avoiding Conflict of Interest) Appendix 2c Form - Application for Offering Services to External Institution	HD Employees	Approve	-	Approve
	HPML Employees	Approve	-	Approve

(11. Moderation in Gifts and Entertainment)

Limit of Financial Approval Authority	Actual / Estimated Value	Self-declaration with Supervisor	Form submitted to HR with approval of *Remarks			
			Supervisor	Unit/Dept Head	HR	Chairman
Gift	< \$500	✓				
	\$500 - \$10,000		✓	✓	✓	
	> \$10,000		✓	✓	✓	✓
Red Packet	HD Employees: < \$500	✓				
	HD Employees: ≥ \$500		✓	✓	✓	✓
	HPML Employees		✓	✓	✓	
Business Entertainment			✓	✓	✓	✓