

Hysan Development Company Limited Supplier Code of Conduct

[(Approved and adopted in February 2024)]

1. Objectives

At Hysan, we are committed to conducting business ethically, sustainably, and with respect for human rights. We expect our service providers (“suppliers” and/ or “contractors”) to share this commitment and to adhere to this Supplier Code of Conduct (the “Code”).

2. Scope of Application

This Supplier Code of Conduct applies to all business units who are responsible for engaging with service providers. Business units must communicate this Supplier Code of Conduct to our service providers. The Code is in addition to, and not in lieu of, the provisions of any legal agreement or contract between a service provider and Hysan. Hysan will make the Code available to its service providers and provide education where necessary.

3. Commitment

Legal and Regulatory Compliance

- Service providers must comply with all applicable laws and regulations, including those related to corporate governance, anti-corruption practices, labour standards, environmental protection, health & safety, and data privacy.
- Service providers shall maintain transparent, accurate and up-to-date books and records to demonstrate their compliance with these laws and regulations.

Ethics

- Service providers must conduct their business with integrity, honesty, and transparency.
- Service providers must comply with all applicable laws and regulations, including those related to bribery and corruption.
- Service providers must respect intellectual property rights and maintain the confidentiality of confidential information.

Business Practices

- Service providers must conduct their business in compliance with all applicable laws and regulations, including those related to fair competition, antitrust, and consumer protection.

- Service providers must provide products and services that meet the highest quality and safety standards and have appropriate measures in place to ensure product safety and quality control.
- Service providers will have policies, code of conduct and procedures in place to avoid all forms of bribery, corruption and fraud and ensure they are enforced.
- Service providers shall not, directly or indirectly, offer, promise, give or demand a bribe or other undue advantage to obtain or retain business or other improper advantage.
- Service providers must not engage in any illegal anti-competitive conduct or deceptive trade practices for any reason whatsoever. Specifically, service providers must never rig bids, fix prices, or provide or exchange sensitive information (including but not limited to price, cost, and technical data) with Hysan's competitors or competitors of service providers.

Labour Matters

- Service providers must provide a safe and healthy work environment for their employees.
- Service providers must not use child labor, forced or involuntary labor, whether in the form of prison labour, indentures labour, bonded labour or otherwise.
- Service providers must ensure paying their employees at least the local minimum wage and ensure that their working hours follow the applicable laws and regulations in the countries where they operate. This includes providing employees with breaks and rest periods as required in accordance with industry standards and best practices.
- Service providers must adhere to [Hysan's Human Rights Policy](#) and ensure their operations align with the standards and guidelines outlined in the policy.
- Service providers must ensure the following according to applicable laws and regulations:
 - pay their employees on time and the benefits to which they are entitled in accordance with relevant laws and contractual agreements.
 - their employees' overtime work is within legal limits, and they are compensated.
 - provide their employees with annual leave, public holidays, sick leave, and other necessary time off from work in compliance with local laws and regulations. Such entitlements should be no less than the minimum requirements specified by the applicable laws.
- Service providers must respect the right of their employees to join a union and bargain collectively, where applicable, and without fear of reprisal, intimidation, or harassment.

- Service providers shall have communication mechanisms and grievance procedures allowing employees to raise concerns and complaints with management.
- Service providers must not discriminate based on race, ethnicity, gender, sexual orientation, religion, disability, or any other protected characteristic(s).

Environmental Responsibility

- Service providers must comply with all applicable environmental laws and regulations.
- Service providers must adhere to Hysan's [Sustainability Policy](#) and [Environmental Policy](#) and ensure their operations align with the standards and guidelines outlined in these policies.
- Service providers must minimize their environmental impact by reducing waste, conserving energy, and using sustainable materials where practicable.
- Service providers must promote sustainable practices throughout their supply chain.

Health & Safety

- Service providers are required to comply with all applicable Health & Safety requirements in the local jurisdiction to ensure the safety of their operations.
- Service providers must adhere to [Hysan's Health & Safety Policy](#) and ensure their operations align with the standards and guidelines outlined in the policy.
- Service providers must provide a safe and healthy work environment for their employees.
- Service providers shall ensure relevant employees shall have the required safety knowledge for the roles and take additional steps to prevent potential accidents and injury to their employees.

Data Privacy and Security

- Service providers must protect the privacy and security of all data and information provided by Hysan, including personal information of employees and customers.

Supply Chain Management

- Service providers must ensure that their own service providers and subcontractors also comply with this code of conduct and must take steps to identify and address any potential violations.
- Service providers are expected to extend these principles to their own supply chain, promoting responsible sourcing practices and ensuring that their own suppliers adhere to similar standards.
- Service providers are expected to reference Hysan's [Sustainable Procurement Policy](#) and make every effort to meet its requirements to the fullest extent possible.

We expect our service providers to adhere to these principles and to work with us to ensure that our supply chain is ethical, sustainable, and respectful of human rights. We reserve the right to evaluate our service providers' compliance with this code of conduct and to take appropriate action if necessary.

4. Monitoring and Reporting

We are committed to transparency and accountability. We monitor regularly and annually report our sustainability performance, which is publicly disclosed in our Sustainability Report, demonstrating the effectiveness of this policy.

5. Review of Policy

This policy has been approved by the Sustainability Committee. Review of this policy shall be conducted regularly to ensure its continued effectiveness. Where there are any discrepancies or differences of interpretation in this policy between English text and Chinese translation, the English version shall prevail.

6. Reference

- [Human Rights Policy](#)
- [Sustainability Policy](#)
- [Environmental Policy](#)
- [Health & Safety Policy](#)
- [Sustainable Procurement Policy](#)

If there are any questions about the contents or application of this policy, please email Sustainability Department at sustainability@hysan.com.hk.

Definitions:

“Hysan” or “Company” shall mean Hysan Development Company Limited.

“Sustainability Committee” shall mean the Sustainability Committee of the Company.

“Service providers” refers to external entities or individuals engaged by the organization to provide a range of services, such as consulting, marketing, accounting, legal services, IT support, logistics etc. as well as specialist suppliers and proprietary suppliers.
