Poly Property Group Co., Limited

保 利 置 業 集 團 有 限 公 司

(Incorporated in Hong Kong with limited liability)

(Stock Code: 00119)

ANTI-CORRUPTION POLICY

I. Purpose

1. Poly Property Group Co., Limited (the "**Company**") and its subsidiaries (collectively, the "**Group**") maintain a zero-tolerance approach to all forms of corruption. This Policy aims to promote business conduct founded on integrity and transparency, ensure that all employees of the Group and external parties with whom the Group conducts business comply with applicable laws and regulations, and mitigate corruption risks through a whistleblowing mechanism, thereby safeguarding the Group's reputation and the interests of its stakeholders.

2. This Policy, together with the Group's other internal policies and procedures (see Part VIII, "Related Policies"), forms the foundation of the Group's anti-corruption compliance framework for preventing, detecting and addressing any suspected corruption or other misconduct. In the event of any inconsistency between this Policy and other internal policies and procedures, the provision that is more detailed or stringent shall prevail.

II. Culture and Commitment

1. The Board of Directors of the Group is committed to fully promoting a culture of integrity and probity and to ensuring strict compliance with applicable anti-corruption laws and regulations in Mainland China, Hong Kong and overseas, including the Anti-

Money Laundering Law of the People's Republic of China, the Anti-Unfair Competition Law of the People's Republic of China, the Prevention of Bribery Ordinance (Cap. 201) and the Anti-Money Laundering and Counter-Terrorist Financing Ordinance (Cap. 615) of the Hong Kong Special Administrative Region. The Group integrates integrity and compliance considerations into its daily operations and decision-making processes.

2. The Group encourages employees and third parties who have business dealings with the Group to raise concerns through established whistleblowing channels regarding actual or suspected misconduct or non-compliance. The Group undertakes to handle such reports confidentially and, where reasonably practicable, anonymously, and strictly prohibits any form of retaliation against any person who makes a report in good faith or cooperates with an investigation.

III. Scope of Application

1. This Policy applies to the Group and its directors, senior management, employees, suppliers, contractors, agents and other third parties who have dealings with the Group.

2. The Company encourages its joint ventures and associated companies to establish anti-corruption policies similar to this Policy.

IV. Code of Conduct

1. All directors, senior management, employees and external business partners shall comply with the Group's internal policies and procedures when conducting business, including procurement management, supplier assessment, codes of professional conduct and integrity cooperation agreements.

2. Personnel involved in supplier management, tendering and procurement, and related oversight functions shall, in addition to complying with this Policy, comply with the *Supplier Management Policy of Poly Property Group* and other relevant internal policies and procedures. Any breach of the integrity requirements under the aforesaid policies and procedures, including the prohibition against accepting financial or other

benefits from or in connection with suppliers, shall be deemed a breach of this Policy and shall be dealt with seriously in accordance with the Group's relevant policies and procedures.

3. It is strictly prohibited to circumvent this Policy through intermediary arrangements, nominee holdings, arrangements involving relatives, or other non-transparent transaction structures. The Group will not conduct business with any entity or individual known or suspected to be involved in corrupt practices, and will endeavour to communicate the integrity requirements set out in this Policy to all business partners.

4. For the purposes of this Policy, "bribery" means the offering, promising, giving, soliciting or accepting of any form of improper benefit or advantage in order to obtain an improper business benefit or competitive advantage, or to influence another person to act improperly. Such benefits include, without limitation, money, gifts, cash gifts, loans, fee waivers, price concessions, contract awards, services, preferential treatment and entertainment, such as tickets to performances or sporting events, hotel accommodation, or other forms of benefit. No industry practice or local custom shall constitute a justification for offering or accepting a bribe.

5. "Corrupt practices" include, without limitation, bribery, embezzlement, misappropriation of funds, improper transfer of benefits, extortion, fraud, bid rigging (including bid suppression and collusive bidding), abuse of authority, tax evasion and money laundering. Any person who assists, condones, facilitates or conceals any of the foregoing conduct shall be deemed to have participated in corrupt practices and shall be held accountable accordingly.

6. Employees shall uphold the principles of openness, fairness and impartiality in business activities and comply with the Group's internal requirements on business entertainment, gift management and travel expenses. It is strictly prohibited to offer, solicit or accept any form of bribe or kickback. Employees shall not offer facilitation payments or grease payments in any form to government authorities, public officials or personnel of public institutions. In entertainment activities in connection with business negotiations, external receptions or other official engagements, employees shall comply with the

Group's internal requirements relating to gift management and entertainment expenses. Gifts shall generally not be accepted in routine official dealings. Where gifts are involved in connection with business cooperation or external receptions, employees shall not accept them unless necessary and shall handle them in accordance with the Group's internal requirements. Any gift, payment or other form of personal benefit that may influence, or may reasonably be perceived as influencing, an employee's impartial performance of duties shall not be accepted. Such gifts or benefits include any benefit obtained by an employee, his or her relatives or connected persons by virtue of the employee's position. The Group strictly prohibits any form of political donation, as well as the provision of funds or gifts in kind to political organisations or individual politicians, in all jurisdictions in which it operates, including Mainland China, Hong Kong and overseas.

7. Subject to compliance with this Policy and the Group's requirements relating to benefits associated with the performance of duties and the management of business expenditure, business meals or other business entertainment activities that are directly related to business activities and reasonable in terms of cost and frequency may generally be regarded as acceptable business entertainment arrangements. However, where such arrangements may reasonably be regarded as affecting objective and impartial decision-making, or do not comply with the Group's business entertainment standards, employees shall decline them or report them for handling in accordance with internal requirements.

8. The Group implements a declaration and recusal mechanism for conflicts of interest. Employees shall not use their authority to influence business or personnel decisions involving their relatives or connected persons. Where an employee or his or her relative holds an equity interest in, exercises actual control over, or holds a management position with a business partner, the employee shall proactively declare the interest and refrain from participating in the relevant decision-making.

9. Before renewing or establishing a new contractual relationship with a customer, business partner or other potential counterparty, the Group shall, in accordance with its

relevant internal policies and procedures, take appropriate measures to identify and verify the counterparty's identity and, where necessary, conduct a risk assessment of the counterparty's potential involvement in money laundering or illegal fund-raising activities.

10. The Group will provide regular training for directors, management, employees and external business partners on integrity management and anti-corruption, including training on compliance requirements, case studies and induction training for new employees, with a view to enhancing overall compliance awareness and integrity standards.

V. Monitoring, Handling and Whistleblowing

1. Employees who breach this Policy shall be subject to disciplinary action as appropriate, including, without limitation, warnings, suspension or termination of employment. Where a breach involves a violation of laws or regulatory requirements, the matter shall be referred to the relevant law enforcement authorities, and the person concerned shall bear the corresponding legal liability.

2. The Group has established a whistleblowing mechanism and accepts reports submitted in person, by post or by email. All information contained in reports will, where reasonably practicable, be kept confidential and handled in accordance with the Group's *Whistleblowing Policy*. The Group strictly prohibits any form of retaliation against whistleblowers who make reports in good faith or persons who assist in an investigation.

3. The procedures for using the whistleblowing channels, receiving and handling reports, and retaining relevant records and preserving their confidentiality are set out in the Group's *Whistleblowing Policy*.

VI. Contact Details

All whistleblowing complaints must be submitted in writing. Whistleblowers can personally deliver, mail, or email the relevant written reports and supplementary information to the General Manager of the Company's Internal Audit Department at the following contact details:

General Manager of the Internal Audit Department

Poly Property Group Co., Limited

Room 2503, 25/F, Tower 1, Admiralty Centre, 18 Harcourt Road, Hong Kong

Email: whistleblowing@polyhongkong.com.hk

VII. Policy Review

The Board shall review this Policy regularly and update it where appropriate to ensure that it remains aligned with applicable laws, regulatory requirements and the Group's operational needs.

VIII. Related Policies

In complying with this Policy, employees should also refer to the Group's other relevant internal policies and procedures, including, without limitation:

Code of Conduct for Cost Contracting Staff of Poly Property Group

Regulations on Gift Management for Events of Poly Property Group

Measures for the Management of Benefits Associated with the Performance of Duties and Business Expenditure of Headquarters Personnel of Poly Property Group

Measures for the Management of Benefits Associated with the Performance of Duties and Business Expenditure of Persons-in-Charge of Principal Subsidiaries of Poly Property Group

Supplier Code of Conduct of Poly Property Group

Supplier Management Policy of Poly Property Group

Whistleblowing Policy