

## Business Ethics Policy Statement

Shui On is firmly committed to conducting all business and employee relations in the spirit of integrity, objectivity and fair play. We believe that it is these principles and the business ethics that all our employees uphold which form the important business assets of the Company today, and on which our good reputation is based.

We conduct our business in full accordance with all laws and relevant regulations. Our employees are prohibited from soliciting, accepting or offering any advantage in conducting the Company's business or affairs within and outside Hong Kong. Adhering to our firm beliefs and practices in good faith, professionalism and impartiality, we strive to treat all our business partners, including consultants, main contractors, subcontractors and suppliers in an appropriate manner.

Based on the above beliefs and with strict compliance with laws and regulations, we require all employees to uphold the following professional and business ethics:

- Deal with all business and affairs with integrity and fairness
- Obtain and approve works / contracts by legal means
- Treat all consultants, main contractors, subcontractors and suppliers equally
- Handle all confidential information provided by clients, employees and business partners in strict confidence
- Report to the Company whether it is a real or potential conflict of interest
- Perform various duties with professionalism and impartiality, in order to provide quality products and services that meet professional standards
- Respect intellectual property rights and strictly prohibit the unauthorised use of any patented products, technologies and concepts

This Policy Statement states that it is the fundamental accountability of each Shui On employee to act in full compliance with the business ethics principles. We have established the Code of Conduct to guide our employees in achieving the highest standard of integrity, conduct and professionalism, and we require all our business partners to understand and share the same value and commitment in building a clean and honest business environment.

To ensure our employees fully understand the Company's Business Ethics Policy and comply with the "Code of Conduct on Business Ethics for Employee", all new employees are required to attend a business ethics seminar organised by the Human Resources Department once onboard. In addition, seminars related to business ethics are arranged regularly for our employees and business partners to keep them abreast of the latest best practices.

We will review and strengthen the Business Ethics Policies and Codes, as well as the relevant management systems and procedures from time to time, to continuously improving the standards of business ethics.



Freddy Lee  
Chief Executive Officer