

# Code of Longfor Business Conduct

## 1. Overview

Relevant content of the *Code of Longfor Business Conduct* (hereinafter referred to as the Code) is derived from the core values of the Company.

This Code applies to all employees of Longfor Group Holdings Limited (HK960) and its majority-owned subsidiaries (excluding outsourced personnel and including but not limited to, employees who have signed labor contracts with the above companies, employees involved in labor dispatch arrangements, interns, consultants, and reemployed retirees who have signed other employment agreements or contracts with the above companies). Other employees engaged by Longfor Group to work in non-majority-owned subsidiaries should comply with this Code as well.

### ***Overall Requirements for All Employees***

- Each employee must strictly comply with the provisions of national laws and regulations, along with this Code.
- Employees should operate on the principles of honesty and integrity while engaging in business activities and fulfilling their duties to build an image of trustworthiness for Longfor.
- Employees have the right and duty to dissuade and stop any act in violation of this Code, or to notify their superiors, general managers (GM) of business units, and heads of human resources (HR) of business units in ways specified in “Channels to Report Potential Violations” under “Overview.”
- Employees should be fully cooperative in an honest manner in the course of the investigation into any suspected violation of this Code. No one is allowed to alter or destroy evidence or stop or obstruct an investigation.

### ***Requirements for the Management***

Heads of all centers of the Group and those above, GMs of companies in charge of different regions, and heads of different functions and projects should:

- Deliver training on the contents of the Code to their subordinates; and
- Actively take measures to prevent any violation of the law and the Code.

## ***Measures for Violations of the Code***

Any of the circumstances below should be deemed as a serious violation of the rules and regulations of the Company on the part of an employee. The Company has the right to terminate the labor contract with the employee concerned and reserves the right to hold him/her criminally liable and pursue a civil compensation claim.

- Where the employee concerned violates the principles of the code of business conduct as prescribed in this Code, and commits any act mentioned in “Don’ts”;
- Where he/she violates relevant provisions of laws and regulations;
- Where he/she intentionally withholds information or covers for others; stops or obstructs investigation; or alters or destroys evidence;
- Where he/she threatens or retaliates against the employee(s) who report(s) suspected violations of laws and regulations of this Code by other employees.

## ***Channels to Report Potential Violations***

- Immediate supervisors or the ones on the next higher level;
- Personnel in charge of the reporting channels for affairs related to honesty and integrity under the Investigation Center of the Group;
- Heads of the centers under the HR and Administration Department of the Group, or the HR heads of their respective business units;
- Heads of the corresponding administrative departments of the Group; and/or
- Members of the Management Committee of the Company.
- Tip-offs Hotline: 400-604-0988
- E-mail for Reporting Honesty-related Affairs: LJJ@longfor.com

## ***Definitions***

Unless otherwise stated explicitly, the definitions of the following terms in this Code are as follows:

- Actual benefits: Actual interests include but are not limited to cash, securities, equities, futures, material objects, virtual items, digital currencies, and free services or services that are significantly below the market

price.

- Relatives: Relatives include but are not limited to parents (parents-in-law), spouses, children, grandparents, and siblings.
- Stakeholders: Stakeholders include but are not limited to classmates, friends, former colleagues, and business partners.

## ***Review, Amendment and Interpretation of the Code***

In general, this Code should be interpreted by the HR and Administration Department and the Department of Internal Audit of the Group. The Department of Internal Audit and the HR and Administration Department of the Group are responsible for initiating these activities, and relevant departments engage in the consultation and amendment to the Code, which is subject to the examination and approval of the CEO and President.

## **2. Employee Judgment Calls**

If an employee encounters a questionable matter, he/she may make a judgment call based on the following questions:

- Could my behavior be widely exposed to the media, or made public on the internal social platform?
- Will my behavior help maintain the reputation of my company as one that “values business ethics?”

## **3. General Principles of Compliance with Legal Provisions**

### **Code of Business Conduct of the Company (What am I Expected to Do or to Refrain From?)**

Every employee should:

- Observe laws and regulations;
- Seek advice from the personnel in charge of legal affairs and external legal advisors of the Company if there is any doubt about his/her work; and
- Report or deal with any identified violations promptly.

## **Don'ts (Examples)**

No employee should:

- Compromise the legitimacy of the Company's business or prejudice the interests of the Company by violating mandatory rules of laws and regulations;
- Forge seals, official documents, or certificates of the Company or any other institution;
- Sign relevant documents without authorization, including but not limited to agreements, commitments, project verification forms, and settlement certificates;
- Deliberately deceive clients, suppliers, or government agencies; or
- Cause major losses to the Company or casualties through practices in violation of national laws and regulations on production safety.

## **4. Accuracy of Company's Accounts and Records**

### **Code of Business Conduct of the Company (What am I Expected to Do or to**

#### **Refrain From?)**

- The Company requests that the information contained in accounts and records (including but not limited to financial accounts, personnel information filled out by employees, sheets of employee's benefits, and other business information) be accurate, up-to-the-minute and complete.
- The Company does not allow any employee to deliberately forge accounts or records regarding financial statements and financial management.
- Employees should provide effective, valid, accurate and complete data and information promptly while conducting business activities.

## **Don'ts (Examples)**

No employee should:

- Destroy or hide documents and vouchers which should have been archived according to the mandatory norms and guidelines of the Company;

- Forge false business documents and vouchers or tamper with financial management and accounting statements;
- Intentionally withhold the costs (e.g., engineering change) and expenditures that have already been incurred;
- Put expenditures on reserve by means of reimbursement beforehand;
- Use the budget, not for the corresponding items;
- Conceal actual construction progress or submit false certificates and licenses, confirm false schedules, and make overpayments to a project;
- Enter delivery information into the system in advance for the purpose of achieving income indicators when a building is not yet ready for delivery according to the law;
- Sign a real estate purchase contract with a client in order to reach sales targets when the client has not produced a complete set of buyer qualifications;
- Sign a subscription agreement, purchase contract and other written contract or agreement with a client, supplier, or other associated units or individuals without the prior permission of the Company;
- Pay on other's behalf or pay the rent for a store or apartment, or ask others to do so on his/her behalf first, in order to meet performance indicators, including rental rates;
- Obtain money illicitly via false contracts, thereby putting the Company at risk;
- Provide false personal documents and certificates or other relevant documents to the Company;
- Split procurement targets, tendering phases, and contractual contents in procedures that determine suppliers, such as procurement and invitations to bid, and deliberately circumvent the systems of the Company, thereby lowering the Company ratings and reputation; or
- Refuse to cooperate in an investigation carried out by the Company, or make false statements or present false evidence in the course of an investigation.

## **5. Information Communication and Disclosure**

### **Code of Business Conduct of the Company (What am I Expected to Do or to**

### **Refrain From?)**

- All parts of the Company are responsible for the management of their respective information disclosure.
- On the occasion of high-risk circumstances and events involving sensitive information, employees and relevant personnel in charge must, according to the requirements and standards of the Group, report such events immediately and notify the emergency notification response teams of relevant regions and the Group

based on the particular situations of such events. The *Standards on the Response to the Notification of Risk Events and Events Involving Sensitive Information of the Group* should prevail based on particular events.

- All employees are prohibited from disclosing the trade secrets of the Company (strategic business planning, new project plans, documents of the Board of Directors, designs of projects not yet carried out, economic models of projects, the price floor of biddings, and lists of important clients and resources), or doing so without authorization.
- If the information to be released is time-sensitive information of share prices, such information must be made public immediately by the personnel authorized by the Company after the Board of Directors has made a decision. Such information includes but is not limited to: periodical financial performance and stock dividends; special matters (e.g., acquisitions and sales involving related parties); the signing of important contracts and major joint venture agreements; fundraising activities; comments on the prospects of profits or stock dividends; and expected earnings of the Company.
- The Company does not permit any employee to release illegal information or express views that violate social morals and values and, as a result, potentially harm the reputation of the Company.

## **Don'ts (Examples)**

- Postponed or failed reporting of high-risk events and sensitive information; also, reporting falsely or hiding high-risk events and sensitive information on purpose, thereby causing losses or exerting significant impacts on the Company;
- Failure of board directors or senior management of the Company to make sensitive events or decisions on sensitive events public immediately after being informed of aforesaid events;
- No employee should, without the authorization of the Company, accept any interview with the media, release news, participate in public campaigns, or engage in awards competitions of the industry or beyond in the name of the Company; furthermore, no employee is allowed to participate in any of the aforesaid activities as an individual, if he/she is actually considered as a representative of the Company by the media and the audience;
- No employee should, on occasions such as external meetings, without the authorization of the Company, publicly deliver speeches or comments on the Company's strategic planning, business operations, expertise and experience, and core capabilities;
- When considered as a representative of the Company by the media or audience, no employee should express views that violate national laws and regulations; that attack the State, the Government or the people; that conform to good customs and traditions; that contain descriptions degrading the dignity of others or discriminatory remarks or violate family moral values; in addition, employees should not express views that speculate, fabricate or spread comments on the Company's adjustments of strategies, personnel changes, and

political struggles or make negative comments on regulators, rivals, suppliers or other stakeholders;

- No employee should employ the Company network to disseminate anti-Party and anti-social remarks.

## **6. On Offering, Demanding or Accepting Illicit Business for Commercial Benefit**

### **Code of Business Conduct of the Company (What am I Expected to Do or to Refrain From?)**

- Every employee should comply with the general codes of business conduct as stated in both the national laws and regulations and industrial rules while conducting operations management activities.
- No employee should offer any actual benefits to any associated unit or individual in any form, in order to obtain illicit commercial benefits, unless out of courtesy.
- No employee should demand or accept any form of actual benefits from any business associated unit.
- No employee should accept commissions or kickbacks during external interactions, apart from the above circumstances.

### **Don'ts (Examples)**

No employee should:

- Offer any form of actual benefits to functionaries, clients, commercial tenants, or suppliers (including their representatives) of the Company, in order to obtain illicit commercial benefits, unless out of courtesy;
- No employee or his/her relatives, or stakeholders should demand or accept “kickbacks” and other actual benefits from rivals, suppliers, clients, or commercial tenants in the course of contract awarding, article procurement, land purchase, on-site project verification, project briefing, introduction to shortlisted institutions, property transactions, and housing sales and rentals;
- Engage, without the authorization of his/her superior, in interactions unnecessary for maintaining normal business ties with the Company's suppliers, rivals, clients, or commercial tenants in the course of communication with them. This includes excessively frequent or extravagant banquets and entertainment activities (with a cost of more than RMB500 for each person every time, including the cost of drinks), or participation in activities indicating the explicit purpose of seeking illegitimate benefits from the Company;
- Participate in gambling with the intent of winning money or material goods organized by suppliers, rivals,

clients, or commercial tenants (including but not limited to mahjong, poker, sports competition, and e-sports);

- No employee or his/her relatives should, without the approval of his immediate superior and the one on the next higher level at the least, accept free trips and vacations offered by suppliers, rivals, clients, or commercial tenants of the Company; or
- Accept lending, loans, or personal securities (except for transactions made with banks or other financial institutions under the principle of fair trade) offered by rivals, suppliers, clients, or commercial tenants of the Company.
- *Note: If a modest gift or cash (valued under RMB500 and considered as a gift given out of courtesy) is given, and it would be inappropriate to decline the offer, an employee may accept the gift in public, but, after returning to the Company, he/she must hand it over to the HR and Administration Department for management.*

## **7. Improper Exploitation and Misappropriation of Company's Assets**

### **Code of Business Conduct of the Company (What am I Expected to Do or to**

#### **Refrain From?)**

- All employees should use the assets and resources of the Company to serve the business purposes of the Company.
- No employee is allowed to take advantage of his/her position to misappropriate the assets and resources of the Company for personal gains.
- No employee is allowed to take advantage of his/her position to seek illicit gains (e.g., enjoying discounts on houses and renting a shop at a price lower than the reasonable level).

#### **Don'ts (Examples)**

No employee should:

- Unauthorized asset disposal of the Company; give the capital, vehicles, equipment, property, raw materials, or products to other companies, institutions, or individuals as a gift; or transfer, lease, or lend the above items to any of the aforesaid entities; or use them as collateral;

- Occupy and use the assets of the Company, such as vehicles and computers, above the access granted to him/her;
- Without the authorization of the Company, carry out an investigation, negotiation or contract signing in the name of the Company, or provide financial and loan guarantees in the name of the Company;
- Without authorization, purchase various membership cards of clubs with the public funds of the Company, or spend such funds on other personal consumption;
- All employees or their relatives and stakeholders should sign lease or sales contracts in a timely manner when renting shops or products under the apartment leasing brand Guanyu, including purchasing houses; no such entities should, without valid authorization, reduce or exempt rent or penalty for breach of contract or surcharges for rent overdue, or resign real estate contracts or alter the ownership of the houses on the contracts;
- In violation of normal rental and sales procedures, reserve houses to lease or sell them to himself/herself, his/her relatives, or stakeholders;
- Deliberately set a low price for a house, or use discount inappropriately, and lease or sell such a house to himself/herself, his/her relatives, or stakeholders;
- After purchasing a house, exploit the resources of the Company to add more floors, redesign or modify configuration standards of the house in excess of the general standards for common owners;
- Make up an intermediary service to gain intermediary fees or sales commissions illicitly from the Company, or collude with others to make profits from intermediary services;
- Collude with suppliers to swindle the Company out of project fee by signing false contracts, or fabricating false engineering change orders (ECO) or workloads of projects, or collude with contractors to claim compensation for malicious purposes; or
- Engage in other acts to seek personal gains or help others reap benefits illicitly, such as embezzling public funds; applying for false reimbursement of travel expenses, reception costs and other expenditures; establishing off-books accounts; or failing to enter money collected in accounts or using cash earnings for cash payments by circumventing the financial management system of the Company; or engaging in other acts that exploit false contracts, false contractual items, or excessively high amount for illicit gains.

## **Inappropriate Acts**

- It is ill-advised to hold banquets and entertainment activities within the Company with public funds (except for celebrations or ceremonial events approved by the immediate superiors and the ones on the next higher level, and budgeted team-building activities as approved by the immediate superiors).
- Except for assets and equipment that can be used for both public and private or private purposes according to the rules of the Company upon the approval of the Company, the assets purchased or provided by the

Company should not be used for private purposes without prior reporting and permission of the superiors.

- Other circumstances where the assets of the Company are used inappropriately include the payment for a house that has not been made in full, but the house is handed over to the buyer prior to examination and approval.

## 8. Conflicts of Interest

### *Code of Business Conduct of the Company (What am I Expected to Do or to Refrain From?)*

- Any personal relationship, financial interest, or other interests that could potentially hinder the Company's maximize interests are potential conflicts of interest for the Company. The Company requests that employees disclose all potential conflicts of interests, and deal with such conflicts of interests in conformity with the guidance of the Company. Some matters involved in potential conflicts of interest are prohibited by the Company.
- In the case of any form of potential conflicts of interest, an employee should select the procedure appropriate to his/her position to declare the potential conflict of interests concerned through the module "Conflict of Interests" in the OA User Center. The Company will respond to the declaration by specifying the principle of disposal based on the particulars of the potential conflict of interests concerned. The principles include but are not limited to withdrawing from the conflict of interest, avoiding conducting business, and addressing risk alerts to management.
- Every employee must disclose fully and in a timely manner any situation that may trigger conflicts of interest. If an employee fails to faithfully and timely disclose such a situation, once confirmed, the strict investigation into the case will be carried out according to relevant systems of the Company; under serious circumstances, the Company may terminate labor contracts with the employee concerned.
- If an employee notices any potential conflict of interests between other employees, members of the Board of Directors, or the senior management, he/she should report the information to the Company.
- All employees should sign a declaration form of conflicts of interest when they join the Company, and the forms should be archived by the department in charge of HR. In the event of any new conflict of interest, the employees concerned should make a timely declaration in accordance with the principles specified under this system.
- Heads of all centers of the Group and those above, GMs of companies in charge of different regions, heads of

different functions and projects, and key personnel (the list of this personnel determined by the HR and Administration Department should prevail) should issue statements on the aforementioned or other conflicts of interests on a yearly basis. The HR and Administration Department of the Company should collect such statements and notify the Board of Directors and the personnel executing the business of the conflicts of interests that may expose the Company to risks.

## **Don'ts (Examples)**

- The Company does not conduct business or have financial associations with companies established by its employees or their relatives, or other companies in which they are shareholders.
- No employee of the Company should engage in business that competes with the Company, including establishing and investing in any enterprise, institution, or organization that is a rival to the Company or assuming any responsibility in aforesaid entities.
- No employee of the Company should hold any post in the firms of the Company's suppliers, regardless of whether he/she is paid for this post.
- While working together with a supplier, no employee of the Company is allowed to take away any business opportunity of the Company by exploiting the resources or information of the Company or his/her position for the sake of personal gains. If any business opportunity is identified in the process, the employee concerned should first and foremost report it to the Company.
- No employee of the Company or his/her relatives should hold the shares or benefit from returns on equity (ROE) of any unlisted supplier or rival to the Company.
- No employee of the Company or his/her relatives should hold more than 1% of the stocks or other equities of any listed supplier or rival to the Company. Otherwise, such equities should be reported to the HR and Administration Department immediately.
- No employee of the Company is allowed to invest in the clients, suppliers, or rivals to the Company (unless through public securities trading), or do so in the name of his/her relatives.
- In principle, the Company does not conduct business with any company which has recruited a former employee who has resigned from the Company within the previous five years (when the employee is a founder, shareholder, or a member of the senior management of the company). If it is indeed necessary to establish a partnership with such a company, the approval of the CEO of the Group must be obtained beforehand.
- No employee of the Company is allowed to take part-time jobs outside of the Company unless it is arranged or approved by the Company.

## Acts to Be Declared (Examples)

- The Company still encourages employees to recommend excellent suppliers. If there is any interest-based relationship between a supplier, client, or commercial tenant of the Company, or a rival enterprise, institution, or organization of the Company, and an employee of the Company, the employee concerned should make a declaration to the HR and Administration Department. Interest-based relationships include but are not limited to the following circumstances:
  - An employee already holds the stocks or relevant equities of a supplier;
  - The relatives of an employee work for the firm of a supplier, or hold shares or benefits from the ROE of the unlisted firm of a supplier, and hold more than 1% of the stocks of the listed supplier; and
  - The stakeholder of an employee is the founder, shareholder or member of the senior management of a potential supplier, or an operator or broker of the business.
- In the course of selecting suppliers for the Company (e.g., qualifications examination and invitations to bid), if any employee, such as an operator or head of relevant functions involved, has any of the aforesaid interest-based relationships with any potential supplier, he/she should make a declaration to the HR and Administration Department.
- Where any employee enjoys equities in the rival to the Company or other stakeholders, he/she should make a declaration to the HR and Administration Department.
- Where the relatives of an employee also work at the Company, the situation should be declared to the HR and Administration Department.

## **9. Duty of Confidentiality**

### Code of Business Conduct of the Company (What am I Expected to Do or to

### Refrain From?)

- In the order of the importance of materials and information, technical levels and the damages of breach of confidence, confidentiality is divided into four levels, namely top secret, secret, internal and public. According to the rules of the Company, no information labeled as top secret should be made available to outsiders in any way; secret and internal materials and information may not be made available to outsiders until examined, approved and authorized. The currently effective *Management System of Data Security of the*

*Group* should prevail in particular events.

- The employee should keep himself/herself away from the situation where he/she may inadvertently leak classified information, such as reading classified information in public or discussing classified information in public spaces.
- No classified information should be disclosed to those who are not explicitly liable to confidentiality (unless, for the sake of the business interests of the Company, an employee of the Company or a third party has a just and necessary justification to access that information upon examination and approval in line with the currently effective *Management System of Data Security of the Group*).
- If an employee is still legally bound to keep the top-secret information of his/her former employer, he/she should not use or disclose such information while working at this Company.
- If an employee resigns from the Company (or is transferred to a different job), he/she should observe professional ethics and not take any classified materials or data of the Company with him. Prior to the resignation (or the internal job transfer), he/she should hand over the information or relevant materials he/she oversees to the successor as designated by his/her superior. If any economic loss and reputational damage are caused to the Company due to the leakage of top secrets by this employee, the Company reserves the right to take him/her to the court.

## **Don'ts (Examples)**

No employee should:

- Discuss the top trade secrets of the Company at symposiums of the industry;
- Discuss the top secrets of the Company in public, or with his/her relatives or friends;
- Store top-secret documents and materials in places vulnerable to exposure and leakage;
- Pry into, record, or spread top-secret information of the Company for any purpose other than facilitating his/her work;
- Lend top-secret documents of the Company to outsiders without going through examination and approval;
- Pry into or share with others details of his/her remuneration;
- Leak the classified information of the Company (including but not limited to management systems, work procedures, market judgments, marketing strategies, investment strategies, projects of intention, sales quotas, funds, profits and other financial data, technical materials of projects, interactions, remuneration of employees) and personal information of the Company's clients, users, and employees;
- Exploit insider information to prejudice the interests of the Company and seek personal gains;
- Deliberately leak important business information related to procurement targets or phases of invitations to bid, such as the cost of the targets and economic indicators, in the course of procurement or invitations to

bid;

- Without the authorization of the Company, send classified data assets of the Company to domains beyond the control of the Company (namely outside the local-area network and employees' computers used in offices), including sending them to others, sending them to outsiders, and copying them to his/her personal computer or to other storage mediums without authorization. The outgoing transmission channels include but are not limited to sending by e-mail, uploading to the Internet, using instant messaging tools, copying data to a USB drive, using Bluetooth devices, burning a CD, printing, and taking screenshots;
- Without the prior permission of the Company, reinstall computer systems, important software, or disassemble computers of the Company, or, without authorization, connect IT devices such as personal computers to the intranet of the Company;
- Share with others his/her account and password given by the Company, or lend his/her computer used in the office to others, allowing them to access internal information;
- Without the prior permission of the Company, install the Company's application system on a device that is not designated by the Company;
- Access any controlled area or premise, such as machine rooms, data centers, and the President's Office, in excess of his/her access, without authorization;
- Without authorization, use any tool or software that may put the network, devices, systems, and data at risk in the network environment of the Company;
- Insert any backdoor or malicious code into devices and systems, or reserve unreported interfaces or accounts;
- Share with others his/her personal account and password and administrator account and password, or use other people's accounts or an unauthorized account to log into a device for operation; or
- Other prohibited matters are subject to the *Management System of Data Security of the Group*.

## **Inappropriate Actions**

- Employees should not discuss top-secret information on mobile phones in public.
- Employees should not, without the prior consent of their immediate superiors, take home the top-secret information of the Company in writing.
- Employees should ensure that the people surrounding them cannot access top-secret and secret information when they work in public.
- Employees should see that their desktop is locked when they are away from their desks, and should not leave their office computers unattended in a public space.
- Other inappropriate acts are subject to the current *Management System of Data Security of the Group*.

## 10. Fair Trade

### *Code of Business Conduct of the Company (What am I Expected to Do or to*

#### *Refrain From?)*

- An open and transparent price system should be established for clients, and no employee should make false sales commitments.
- Suppliers should be selected in a fair and open manner, with a fair assessment of suppliers, and an open and transparent incentive mechanism.

#### *Don'ts (Examples)*

No employee should:

- Provide excessively high or low quotes to clients, intentionally conceal applicable discount terms, or make sales commitments that violate the rules of a project;
- Place false advertisements in sales or leasing;
- Make unrealistic written or oral commitments to clients, suppliers, or other associated units or individuals;
- Set up targeted conditions and terms or manipulate the results of procurement or target decisions;
- Tacitly allow suppliers to or collude with suppliers to commit collusive bidding or bid rigging with the help of several competitors;
- Tacitly allow contractors to or collude with contractors to downgrade the technical standards on construction projects as set forth in contracts;
- Tacitly allow contractors to or collude with contractors to help the latter circumvent or pass the examination and approval of false qualifications provided by the latter, or change the brands, specifications and grades of materials and equipment as specified in contracts to replace good products with inferior ones, thereby causing significant losses to the Company;
- Tacitly allow contractors to or collude with contractors to help the latter circumvent or pass the examination and approval of false qualifications provided by the latter, or change the brands, specifications and grades of materials and equipment as specified in contracts to replace good products with inferior ones, thereby causing significant losses to the Company;
- Deliver a misleading or deceptive assessment of a subcontractor. For example, when the construction progress, quality and cost control of a construction subcontractor do not meet the requirements of the Company, but the assessment result given by the employee states that the aforesaid conform to the standard

or are above standard.

## 11. Securities Transactions

### *Code of Business Conduct of the Company (What am I Expected to Do or to*

#### *Refrain From?)*

- The Company prohibits any employee from exploiting or helping others to exploit the internal information of the Company or a third party known to him/her via opportunities arising from his/her job, for the purpose of making profits from the securities market.

#### *Don'ts (Examples)*

- No employee should exploit the important information of the Company or of a third party known to him/her via opportunities arising from his/her job when such information is not announced yet to engage in the trading of the Company's stocks or the stocks, securities and their derivatives of the third party.
- No employee should provide to any third party "hints" of the trading of the Company's stocks, or the stocks, securities and their derivatives of other third parties.
- Board directors and other "relevant personnel" of a listed company should not, during the quiet period as prescribed in listing regulations (two months prior to the release of annual reports and one month prior to semiannual reports), trade stocks, securities and their derivatives of the company. Board directors of a listed company have to obtain the approval of the Chairman of the Board of Directors in order to engage in the trading of the stocks, securities and derivatives of the company. For the definition of "relevant personnel," please see the *Administrative Measures for Securities Transactions and Disclosure of Board Directors and Relevant Personnel of the Group*.
- Sensitive documents on share prices known to an employee via opportunities arising from his/her job must be kept strictly confidential. Before such documents are made public, no employee should engage in the trading of the stocks, securities and their derivatives of the Company, or prompt or stop others from engaging in such transactions.

## 12. Workplace Behavior

### *Code of Business Conduct of the Company (What am I Expected to Do or to*

#### *Refrain From?)*

- Employees should examine their own behaviors while working and interacting with colleagues and should make sure that their behaviors do not prompt others to file a complaint or report.
- Harassment means any disrespectful act that violates a person's dignity when the aggressor, as a person with normal thinking abilities, should have known that his/her acts are not welcomed or discomfort other people. The Company strictly prohibits any harassment targeting other employees, clients, tenants, shops, and suppliers, and encourages all employees, clients, and suppliers, among other entities who think they are being harassed to report such acts to the Company in ways specified in "Channels to Report Potential Violations" under "Overview."

#### *Don'ts (Examples)*

- No employee should express or post inappropriate remarks or information (e.g., pornographic messages or violent information) to others orally or via instant messages or WeChat, among other channels, which may disconcert others and prompt them to file a complaint or lawsuits.
- Leaders should not abuse, insult, or use violence against employees, thereby leading to complaints or lawsuits.
- No employee should exploit the rights of his/her position to ask any colleague to engage in an intimate relationship with him/her, thereby leading to complaints or lawsuits.
- Drugs are prohibited.
- The consumption of alcohol on lunch breaks or during office hours is prohibited (except for business dinners).
- Gambling, browsing or sharing websites involving pornographic or violent content during office hours or at the workplace is prohibited.
- No employee should, without prior permission, attempt to defame other employees of the Company, the Company, or business partners, as an individual or in the name of the Company, thereby causing adverse social impacts.

## **13. Anti-Money Laundering**

### **Code of Business Conduct of the Company (What am I Expected to Do or to**

#### **Refrain From?)**

- The company prohibits employees from engaging in any money laundering that attempts to legalize the illegal gains and the resulting incomes in form by covering up and concealing their source and nature through various means.

#### **Don'ts (Examples)**

- It is prohibited to assist in the transfer of property through illegal means or even through knowing someone's engagement in criminal activities, such as money laundering by forging commercial papers, investing in cash-intensive industries, or purchasing real estate or precious metals.
- It is prohibited to launder money by purchasing property at a price well below the current one in the market.
- It is prohibited to assist in the transfer of property by charging a fee well above the current one in the market, such as money laundering through loan sharks.
- It is prohibited to cover up and conceal the gains out of crime and their source and nature in any number of ways.

**HR and Administration Department of the Group**

**Department of Internal Audit**

**May 2022**