

## **Responsible Marketing Policy**

Sun Hung Kai Properties Limited (“SHKP”) is committed to adopting responsible marketing, advertising, and sales practices to foster trust with our customers while aligning with our ethical values and regulatory compliance. This Policy serves as a fundamental principal for cultivating strong customer relationships and ensuring sustainable business growth.

This Policy is applicable to SHKP and its subsidiaries (collectively: the Group). Business units of the Group are expected to abide by this Policy. Where applicable, they will establish, review and update their own policy in accordance with their business nature. This Policy covers the following areas:

### **Legal Compliance and Commitment**

- The responsible marketing guidelines, practices and systems regarding marketing, advertising and sales are set out to comply strictly with all applicable legal requirements in the respective jurisdictions of our operations, including, but not limited to, Residential Properties (First-hand Sales) Ordinance in Hong Kong.

### **Approach**

- Implement comprehensive internal controls, guidelines and policies focused on responsible marketing, advertising and sales.
- Establish a systematic and regular audit system for marketing and communication materials to ensure compliance and quality.
- Marketing and communication materials, including sales brochures, are regularly reviewed by external professionals and internal expert committee to ensure compliance with relevant regulations and industry guidelines.

### **Communication**

- Ensure employees understand this Policy and procedures and to enforce throughout the Group’s sales and leasing operations.
- Provide trainings on responsible marketing, advertising and sales to employees through internal meetings and on-the-job training on regular basis, covering a wide range of topics, such as consumer rights, legal protections and applicable laws and regulations.
- Conduct seminars to allow employees to stay abreast of emerging market trends, including competition law, intellectual property rights, copyrights and trademark usage.

### **Monitoring and Reporting**

- This Policy is reviewed by the Sales and Marketing Department periodically for adequacy and effectiveness, as appropriate.
- All reports of misconduct will be investigated in accordance with applicable laws in the respective jurisdictions. Non-compliant marketing behaviors shall be rectified in a timely manner.

If there is any inconsistency or ambiguity between the English version and the Chinese version, the English version shall prevail.