HUMAN RIGHTS AND EQUAL EMPLOYMENT OPPORTUNITY POLICY

Purpose

Henderson Land Development Company Limited (the "Company") and its subsidiaries (collectively the "Group") are committed to respecting and promoting equal opportunity free from harassment and discrimination. This Policy promotes the principles of human rights and provides the framework guiding the Group across the principles of equal opportunity in the workplace, in compliance with relevant statutory requirements.

Equal Opportunity under Employment

In terms of staff recruitment, promotion and retirement, the Group shall adhere to all the statutory requirements relevant to equal opportunity and prohibits the following unlawful discriminatory acts in employment activities. Such acts are unlawful under the anti-discrimination law. The Group will promptly handle any discrimination complaint and where appropriate, take remedial actions. The unlawful acts under the Sex Discrimination Ordinance (Cap. 480), the Disability Discrimination Ordinance (Cap. 487), the Family Status Discrimination Ordinance (Cap. 527) and the Race Discrimination Ordinance (Cap. 602) are:

- (a) Sex discrimination
- (b) Marital status discrimination
- (c) Pregnancy discrimination
- (d) Disability discrimination, harassment and vilification
- (e) Family status discrimination
- (f) Racial discrimination, harassment and vilification

Illegal Labour and Human Trafficking

The Group prohibits the employment of all forms of illegal and forced labour, including child labour, illegal immigrants, indentured labour and any forms of human trafficking in our operations and contracted business activities along our supply chain. The Group fully respects all applicable laws establishing a minimum age for employment in order to support the effective abolition of child labour worldwide.

Risk Monitoring

The Company will monitor its human rights impacts arising from business activities and the relationship with supply chain partners and other stakeholders.

As a bottom-up operational process, each department of the Group is responsible for identifying its own human rights risk factors and designing, implementing and monitoring the relevant risk management and internal control system. The process involves the annual review by the Audit Department of the risk register setting out particulars of material risks, including human rights risk factors, together with the control measures as reported by significant departments of the Group. The Audit Department of the Company reports material risk factors directly to the Audit Committee. The Audit Department must maintain its independence from the Company's daily operations and conduct regular audits on the major activities of the Company.

Handling Complaints

Any complaints made by employees concerning the above matters shall be handled by Human Resources Department under the relevant grievance procedures.

Review of this Policy

The Company will review this Policy from time to time as appropriate, and in any event, once every three years.