SWIRE PACIFIC

Human Rights Policy

We recognise that respecting human rights and dignity is essential to safeguarding the wellbeing of our employees, those in our supply chains and the communities in which we operate. We conduct our business in a manner that seeks to respect and promote internationally recognised human rights across all our activities.

This Policy applies to Swire Pacific Limited and its subsidiaries in a way that is relevant to their respective businesses. Associated and joint venture companies and those with whom we do business are encouraged to comply with it. Implementation of this Policy is the responsibility of the Management team of each group of operating companies.

In this Policy, we aim to:

- comply with applicable human rights laws and regulations in the jurisdictions where we operate;
- respect internationally recognised human rights standards, including those outlined in The United Nations Global Compact Principles and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, unless otherwise conflicted with applicable local laws and regulations;
- foster inclusive, respectful and supportive working environment, free from discrimination, harassment, violence or intimidation;
- base employment decisions on merit and eliminate bias in all its forms;
- prohibit child labour, forced labour and human trafficking in our operations;
- ensure that all employment is voluntary and conducted under safe, healthy and dignified conditions;
- continuously improve our health and safety management systems with the aim of achieving zero harm;
- respect the rights of employees to freedom of association and collective bargaining in accordance with local laws and regulations; and
- encourage our suppliers, contractors and other business partners to adhere to the principles set out in this Policy. Our Supplier Code of Conduct sets out the minimum standards we expect of all our suppliers. For details, please refer to our *Supplier Code of Conduct*.

PUBLIC DISCLOSURE

Appropriate disclosure on matters relating to this Policy will be included in our sustainability reports.

REPORTING

Concerns about suspected or actual improprieties relating to this Code may be raised. Confidential reports can be submitted to the following channels:

- GIAD: group.audit@jsshk.com
- EthicsPoint: swire.ethicspoint.com

REVIEW

We will review this Policy as appropriate and, in any event, once every three years.

Approved by the Board on 13th November 2025.