

Respect in the Workplace Policy

We are committed to providing a workplace free from harassment and bullying. We aim to ensure that all our people are treated, and treat others, with dignity and respect. Behaviour which does not adhere to this policy will not be tolerated and will lead to disciplinary action being taken, up to and including dismissal.

This Policy applies to Swire Pacific Limited and its subsidiaries. Associated and joint venture companies are encouraged to comply with it. Implementation of this policy is the responsibility of the management of individual business units.

What are harassment and workplace bullying?

Harassment is any unwanted conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Sexual harassment is unwelcome sexual behaviour in circumstances where a reasonable person would anticipate that the person subject to the behaviour would be offended, humiliated or intimidated. It may be directed at an individual or a group.

Racial harassment is unwelcome behaviour related to a person's race, colour, descent or national or ethnic origin (or the race, colour, descent or national or ethnic origin of a near relative of the person) in circumstances where a reasonable person would anticipate that the person subject to the behaviour would be offended, humiliated or intimidated or that the behaviour would create a hostile or intimidating working environment for the person subject to the behaviour.

Disability harassment is unwelcome behaviour related to a person's disability (or to the disability of a near relative of the person) in circumstances where a reasonable person would anticipate that the person subject to the behaviour would be offended, humiliated or intimidated.

Workplace bullying is repeated, unreasonable behaviour directed to a person in the workplace which is intimidating, cruel, offensive, humiliating or malicious and is actually or potentially harmful. It may be physical or non-physical, verbal or non-verbal. It need not be face to face.

Fair and reasonable counselling of a person about underperformance is not workplace bullying. Nor are investigating complaints, disciplinary action for misconduct and normal supervision and work directions.

Appropriate behaviour

All our people have a responsibility to behave in a manner which is appropriate and

which respects the rights and sensitivities of others. We expect our people to contribute to an environment of trust and respect and to conduct themselves in a manner which is not offensive or reasonably perceived by others to be offensive and which takes due account of the diversity of others' backgrounds, cultural values and beliefs.

Reporting

Those who believe that they or others are being harassed or bullied should take action as soon as possible. Concerns about suspected or actual improprieties relating to this policy may be raised directly with your People Department or Line Manager/Department Head and/or in accordance with our [whistleblowing process](#) with reports to any of the following:

- GIAD: group.audit@jsshk.com
- Director, People of the People Department: directorpeople@jsshk.com
- EthicsPoint: swire.ethicspoint.com

All information received throughout the process will be kept confidential, subject to any legal disclosure obligations and to the need for the person against whom the complaint is made to know the details of the complaint.

No retaliation or victimisation

Retaliation against or victimisation of a person making a complaint in good faith of harassment or bullying (or providing evidence in good faith of harassment or bullying) will not be tolerated. Nor will such a person suffer any detriment as an employee (for example demotion or an unwanted transfer) by reason of making such a complaint or providing such evidence.

Review

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

Approved by the Board on 13th November 2025