

Respect in the Workplace Policy

1. Background

We are committed to creating an inclusive and supportive working environment for all our people regardless of their age, gender, gender identity, sexual orientation, relationship, family status, disability, race, ethnicity, nationality or religious or political beliefs. We believe in creating an environment where people feel comfortable at work and able to realise their full potential. A workplace free from harassment and bullying is an important element of creating such an environment.

2. Policy statement

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 is designed to ensure that all our people understand what will be regarded as harassment and bullying, what they should do about it and how it will be dealt with. 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.

3. 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. Harassment is different from bullying in that it is a form of discrimination. A single incident can amount to harassment. A person may be harassed even if the person was not the intended target. Harassment includes treating a person less favourably because the person has submitted or refused to submit to such behaviour in the past.

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.

Sexual harassment includes:

- unwelcome sexual advances – e.g. leering and lewd gestures and touching, grabbing or deliberately brushing up against another person;
- unwelcome requests for sexual favours – e.g. suggestions that sexual cooperation or the toleration of sexual advances may further a person's career;
- unwelcome verbal, non-verbal, physical or non-physical behaviour of a sexual nature – e.g. sexually offensive emails, text messages or social media content, sexually derogatory or stereotypical remarks and persistent questioning about a person's sex life; and
- behaviour of a sexual nature that creates a hostile or intimidating work environment – e.g. sexual or obscene jokes and comments and displaying offensive material.

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. Racial harassment includes:

- verbal comments about an individual or a group that are racial in nature;
- name calling related to a person's race, or racist abuse, insults, taunts or jokes, including references to a person's physical features, accent, dialect or manner or pattern of speech;
- physical assaults, attacks or threatening behaviour related to a person's race,
- display or circulation of racially offensive posters, pictures or threats; and
- unwanted jokes or banter about a person's race or mocking, mimicking or belittling a person because of the person's race.

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. Disability harassment includes:

- insulting comments and remarks related to a person's disability;
- name calling relating to, and making derogatory references to, a person's disability;
- offensive jokes related to a person's disability; and
- gestures mimicking a person's disability.

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. It can be by text message, email or social media. Workplace bullying includes:

- physical or psychological threats;
- overbearing or intimidating levels of supervision;
- derogatory remarks about a person or their performance;
- shouting or using an intimidating tone or patronising words;
- picking on a person in front of others or in private;
- spreading rumours about or insulting a person;
- blocking a person's promotion or training opportunities;
- ignoring or excluding a person from work activities or work-related social events;
- setting a person up to fail by overloading the person with work or setting impossible deadlines; and
- regularly making a person the butt of jokes.

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.

4. 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.

5. Guidelines

Those who believe that they or others are being harassed or bullied should take action as soon as possible.

Informal approach. You may raise the matter informally with the other person, at the time or later. You should describe the offensive behaviour and explain that it is unwelcome or makes you uncomfortable. You should record in writing the name of the other person, what happened, when and where it happened, who (if anybody) witnessed it and how you responded. If you feel uncomfortable about raising the matter directly with the other person, you can make an informal approach to your line or human resources manager, to the head of your department or to the diversity and inclusion department of John Swire & Sons (H.K.) Limited (JSSHKDID). They can advise you confidentially about how to resolve the matter, informally or formally.

Formal Approach. You may make a formal complaint about the matter to the human resources manager of your business unit. You should provide full details of the behaviour, including the name of the other person, what happened, when and where it happened, who (if anybody) witnessed it and how you responded. You should also provide any documentary evidence. You may also make a formal complaint to EthicsPoint (a third party service provider) at swire.ethicspoint.com, to the Group Internal Audit Department (GIAD), to the John Swire & Sons (H.K.) Limited Staff Department (JSSHKSD) or to JSSHKDID. Reports to GIAD, JSSHKSD or JSSHKDID can be made in writing or, by prior appointment, in person. Contact details are as follows:

GIAD email: group.audit@jsshk.com

JSSHKSD email: staff.voice@jsshk.com

JSSHKDID email: swire.dni@JSSHK.com

6. Investigations

- When a formal complaint is made, a preliminary inquiry will be conducted by the relevant business unit's human resources manager to determine whether there are grounds for an investigation. If the human resources manager determines that there are no such grounds, the investigation will not proceed. If the human resources manager determines that there are such grounds, the business unit's human resources director will form an investigation team to determine whether harassment or bullying has taken place. The investigation team may interview the complainant, the person against whom the complaint has been made and witnesses proposed by either of them. If the complaint is found by the investigation team to be valid, the person making the complaint will be notified and will be told what action is proposed. However, action taken against the person against whom the complaint is made may remain confidential as between that person and the employer of that person. If the complaint is found by the investigation team to be invalid, the investigation will be closed.
- If an investigation does not proceed because the business unit's human resources manager determines that there are no grounds for an investigation or an investigation is closed because the complaint is found by the investigation team to be invalid, nothing will be placed on the file of the person against whom the complaint is made.

- Everyone involved in an investigation must keep the names of the persons involved, the details of the complaint and the existence of the investigation confidential. This is 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.
- If a person makes a complaint which is found to be capricious, malicious or knowingly false, any investigation will cease and disciplinary or other appropriate action may be taken against the person making the complaint. No such action will be taken if the complaint is made in good faith.

7. 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.

8. Review

We will review this policy from time to time as appropriate.