

GUANGDONG INVESTMENT LIMITED

ANTI-CORRUPTION POLICY

Guangdong Investment Limited Anti-Corruption Policy (the “Policy”) has been adopted by Guangdong Investment Limited (hereinafter referred to as “GDI”) together with its subsidiaries (hereinafter referred to as the “Group”, “we” or “us”). The Policy is applicable to all staff of the Group with no exception, including all staff employed by the Group and members of the Board of Directors. The directors and employees must comply with all local laws (including the Prevention of Bribery Ordinance when in Hong Kong SAR) and regulations when conducting the Group’s business, and also those in other jurisdictions when conducting business there where applicable. The Group complies with all applicable anti-corruption laws, regulations and policies, adheres to business ethics, establishes a sound integrity system and various anti-corruption mechanisms, to ensure effective control of major integrity risks and to facilitate corporate development along with the culture of integrity.

We are committed to the followings:

- comply with applicable laws and regulations relating to integrity, and strive to cultivate a corporate culture of integrity, anti-malpractice and anti-fraud;
- Corruption refers to the abuse of power for private gains, which involves activities where individuals abuse their positions or authority to seek personal benefits. Bribery refers to offering benefits to public officials or third parties involved in the Group's affairs as an incentive or a reward to unduly influence their job functions. We prohibit all forms of corruption and bribery, which means employees are strictly prohibited from giving or receiving relevant gifts, rebates, commissions, rewards, allowances, favours or benefits, directly or indirectly, from or to individuals or companies with business dealings, in order to achieve prohibited commercial purposes;
- Conflicts of interest refers to situations where the interests of the company’s board of directors, senior management, and employees conflict with their personal interests when fulfilling their duties, potentially harming the interests of the company and its shareholders. We establish internal control mechanisms, require the implementation of anti-corruption regulations in tendering and procurement management, conduct thorough evaluation of relevant employees to prevent any conflicts of interest, and prohibit our personnel from giving or accepting illegal benefits;
- strictly regulate all aspects of construction works and company operation management, prohibiting irregularities including abuse of power, power for private gain, acceptance of benefits, etc.;
- establish and implement an audit and supervision mechanism, develop annual audit plans, conduct independent supervision of various business activities by internal auditors, and manage and control business ethics behaviour and major business ethics risks, including but not limited to insider trading, fraud, anti-trust activities, and conflicts of interest;

- establish a policy to encourage employees and third parties raising concerns over possible misconduct (in particular corruption and related malpractices), and strive to achieve and maintain a high level of transparency, integrity and accountability;
- set up penal provisions for those units and personnel suspected of corruption and deal with them strictly in accordance with relevant laws and regulations and our internal policies upon discovery;
- strictly prohibit any acceptance or payment of facilitation under any circumstances by our directors, senior management or staff of the Group, which means the prohibition of receiving or giving money or any other benefits at any stage to provide or seek job-related advantages; and
- provide training on business ethics and anti-corruption to Board of directors and employees in accordance with local circumstances.

The Group's Internal Audit Department is responsible for overseeing internal practices in relation to business ethics, reviewing on the use and balance authorities of different positions, regularly reporting the related management performance to the Board of Directors and reviewing on this policy.

**This policy has come into effect since 26 April 2019 and amended with effect from 26 March 2021, 26 October 2023, 28 August 2024 and 9 December 2024.*