

# **SHENZHEN INVESTMENT LIMITED**

(the “Company”)

## **Code of Business Ethics**

### **Business Ethics**

The Company and its subsidiaries (collectively the “Group”) operate in compliance with the laws, prevent and control integrity risks, establish a long-term early warning mechanism for corporate governance of commercial bribery and corruption, and adopt the “Anti-Corruption and Bribery Policy”. Strict adherence to business ethics, compliance with integrity and opposition to fraud are the primary principles pursued by the Group. Violation of business ethics may result in the Group being held liable for breach of contract, loss of business transaction opportunities, or even the cancellation or invalidation of signed contracts by a court. In addition, it may also result in the Group facing administrative penalties imposed by the relevant administrative and regulatory authorities, which may be extremely severe, including substantial fines, revocation of business licenses, inclusion in the list of defaulting enterprises, etc. In serious cases, the responsible companies and individuals may also be held criminally liable.

The Group and all of its directors, executives and employees shall strictly observe, and shall not violate, the following code of business ethics when conducting business activities and interacting with external related parties:

- 1) We shall not provide false or misleading information to external parties in our business cooperation dealings with them.
- 2) Participate in market competition in accordance with the laws and regulations, refrain from colluding with other bidders, engage in activities such as bidding and collusion, refrain from colluding with each other in bidding quotations, and harm the legitimate interests of other bidders and bidding companies.
- 3) When facing investigations conducted by administrative and regulatory authorities, judicial authorities or within the Group, the Group shall disclose the relevant information in a truthful and complete manner and shall not conceal or intentionally provide false information.

- 4) Do not make false or exaggerated representations or promises to customers or consumers in order to obtain trading advantages or trading opportunities, which may cause customers or consumers to make wrong judgments.
- 5) Do not make false or misleading statements or provide false information in financial statements or financial documents (including, but not limited to, financial books, agreements, invoices, and other financial record documents), records related to production and operations, expense reports, and data statistics.

The Group attaches great importance to business ethics training, which covers all employees (including part-time employees). In conjunction with compliance and legal system publicity and education, the Group has strengthened the education and training of all employees of the Group on business ethics knowledge and ability in an institutionalized and regular manner, so as to ensure that employees understand and comply with the requirements, and consciously and proactively maintain a high degree of consistency in their thoughts and actions with the Group's compliance and operation objectives. The Group has formulated the "Measures for the Compliance Management of Business Partner", which sets out various compliance requirements for its business partners. When commencing business cooperation with external business associates, the Group will send "Compliance Proposal to Business Partners" to the partners and require the latter partners to sign a "Letter of Commitment of Business Partners" to undertake to comply with the Company's compliance system.

The Group actively promotes a culture of business ethics and compliance, requiring all employees of the Group to firmly establish the values of safety, quality, integrity, efficiency, compliance with the laws, law-abidingness and honesty, to build up an ideological foundation for compliant operation, and to tighten up the system of governing the enterprise in accordance with the laws.

### **Compliance Risk Whistleblowing**

The Group has established and improved its compliance whistleblowing and investigation accountability mechanism by adopting a "Whistleblowing Policy" to provide whistleblowing channels and guidelines for the Group's employees and those who have business dealings with the Group (such as customers, suppliers, creditors and debtors), and expects and encourages them to report any suspected improprieties, misconduct or malpractices of the Group to the Company, and to eliminate any retaliation.

### **Internal Supervision and Inspection**

Pursuant to the Group's corporate governance functions, the Board reviews and monitors the Group's policies and practices in respect of compliance with laws and regulatory rules as a whole, including the overall monitoring of the Company's business ethics and anti-corruption efforts. In accordance with the Group's internal control procedures, internal audits including relevant systems and business practices are conducted regularly and reported to the Audit Committee and the Board on a regular basis, so as to identify problems in a timely manner and rectify them seriously.

Any person who violates business ethics will be held accountable in accordance with the relevant regulations; and any person suspected of committing a crime will be transferred to the judicial authorities for handling in accordance with the laws.

### **Responsible Product Marketing**

The Group has established internal policy systems relating to marketing, advertising and sales in accordance with the "Advertisement Law of the People's Republic of China", the "Law of the People's Republic of China on Urban Real Estate Management", the "Measures for Regulating the Sale of Commercial Houses", the "Regulations for the Publication of Real Estate Advertisements" and other laws and regulations and industry standards, and has clearly stipulated that the relevant contents and methods of its marketing activities shall be in compliance with the relevant policies of the Company. It aims to ensure compliance and fairness, universality and environmental friendliness in the lifecycle of its various products and services, and ensure that the Company's communication with stakeholders, as well as promotion and marketing of the Company's services are carried out in accordance with the laws, regulations, social norms and ethical standards of its sales and marketing practices. All its business partners, including partners, contractors and suppliers are encouraged to comply with this policy. The Company strictly regulates the marketing displays at its project sites in accordance with the latest requirements of government work and laws and regulations.