



NWS Holdings Limited
新創建集團有限公司*
(incorporated in Bermuda with limited liability)

Human Rights Policy

** For identification purposes only*

Introduction

NWS Holdings Limited (“NWS”) considers good corporate governance to be vital to the long-term success of a corporation. This Human Rights Policy (“Policy”) forms part of the guidelines and instructions on best management practices and personal integrity. Compliance with this Policy can prevent misconduct or misbehaviour and reduce management risk. This Policy outlines NWS’s commitment to human rights by ensuring our employees are treated with dignity and respect in a manner consistent with the principles of United Nations Global Compact (“UNGC”).

Scope of Application

This Policy applies to NWS and its subsidiaries, collectively referred to as the “Group”.

Commitments

The Group is committed to treating our stakeholders with dignity, fairness and respect. Every staff member is expected to do his or her utmost to promote a respectful workplace culture that is free of harassment, intimidation, bias and discrimination of any kind.

Equal Opportunity, Diversity and Inclusion

The Group is committed to maintaining an equitable and supportive workplace, and is committed to complying with all applicable anti-discrimination legislations, regulations and codes in force from time to time in Hong Kong and all other jurisdictions where we operate our business. In Hong Kong, applicable anti-discrimination legislations include Sex Discrimination Ordinance (Cap. 480, Laws of Hong Kong), Disability Discrimination Ordinance (Cap. 487, Laws of Hong Kong), Family Status Discrimination Ordinance (Cap. 527, Laws of Hong Kong) and Race Discrimination Ordinance (Cap. 602, Laws of Hong Kong). The aforementioned legislations prohibit discrimination, sexual and non-sexual harassment, intimidation or violence on the bases of race, colour, nationality, religion, gender, age, marital status, family status, disability, medical condition or any other characteristics protected by law. Staff members are expected to treat each other with respect and courtesy. As an equal opportunity employer who inspires employees to stay and grow within the Group, we operate our business by ensuring meritocratic employee recruitment, training, compensation and promotion processes, and other working conditions.

In accordance with the aforementioned anti-discrimination legislations in Hong Kong, any harassment in relation to sex, disability, family status or race is unlawful and unacceptable, and will not be tolerated in the workplace. Any staff member found to have committed an act of harassment against another staff member could (or "may") be subject to disciplinary action, which may include dismissal, and may be personally liable for any legal proceedings resulting from the discriminatory acts committed.

The Group recognizes employees' choices to breastfeed, and respects the decision of employees returning to work after delivery to continue breastfeeding. In Hong Kong, the Group takes the Guide to Establishing Breastfeeding Friendly Premises issued by the Department of Health as reference, aims to provide an appropriate and friendly environment for, and appropriate assistance to, breastfeeding employees so that breastfeeding is compatible with work. Coworkers should accept and support the choices of colleagues returning to work after delivery to continue breastfeeding.

Staff members have the right to make a complaint directly to the respective line managers, or alternatively to the Group Human Resources Department. All complaints will be resolved in a speedy and fair manner and handled in strict confidence.

In addition, the Group creates opportunities for staff development and advancement, promotion and transfer within the Group. Where such opportunities arise, the Group will assess all possible candidates and use best efforts to ensure that staff members with potential are not overlooked.

Work Hours, Remuneration and Benefits

The Group operates in full compliance with statutory requirements on work hours, holidays, remuneration and benefits in accordance with the Employment Ordinance (Cap. 57, Laws of Hong Kong) and other applicable legislations, regulations and codes in force from time to time in Hong Kong and all other jurisdictions where we operate our business.

Illegal Labour and Human Trafficking

The Group fully complies with all applicable legislations, regulations and codes in relation to illegal labour and human trafficking in force from time to time in Hong Kong and all other jurisdictions where we operate our business. In Hong Kong, applicable legislations include Employment Ordinance (Cap. 57, Laws of Hong Kong), Immigration Ordinance (Cap. 115, Laws of Hong Kong) and Crimes Ordinance (Cap. 200, Laws of Hong Kong). The aforementioned legislations forbids employment of all forms of illegal and forced labour (including child labour, illegal immigrants, etc.), and any form of human trafficking.

Employees shall also strictly comply with applicable legislations, regulations and codes in our own operations and contracted business activities, the violation of which can lead to serious consequences and legal liability.

Freedom of Association and Collective Bargaining

We respect each staff member's right to form, join or not join associations and/or labour unions. In cases where employees are represented by associations and/or labour unions, the Group is committed to bargaining in good faith with their representatives.

Monitoring and Reporting

We are committed to transparency and accountability. We benchmark and report on our sustainability performance in line with global reporting frameworks as well as local listing rules requirements on Environment, Social and Governance disclosure. Stakeholders are regularly engaged to assess our sustainability performance and the effectiveness of this Policy.

Review of the Policy

This Policy will be regularly assessed to ensure that it always meets the highest standards of conduct. Any comments or suggestions staff members may have are always welcome. Amendments to the Policy must be approved by the ESG Committee.

Where there are any discrepancies or differences of interpretation in the Policy between English text and Chinese translation, the English version shall prevail. If there are any questions about the contents or application of this Policy, please email to nwshr@nws.com.hk.

Version Control

Effective Date	Description	Approved by
23 June 2020	Revision 0	The Board
9 December 2021	Revision 1 Updated contents under Commitments	The Board
7 June 2024	Revision 2 Updated the name of the committees	The Board

References

1. Corporate Policy on Staff Responsibility – NWS
2. ESG Policy – NWS
3. [Whistleblowing Policy](#) – NWS
4. [The Ten Principles of the UN Global Compact](#) – UNGC