



**CTF Services Limited**  
**周大福創建有限公司**  
*(incorporated in Bermuda with limited liability)*

**Human Rights Policy**

<b>Current Version</b>	3.0
<b>Effective Date</b>	February 2025
<b>Approved By</b>	The Board of Directors

## **Introduction**

CTF Services Limited (“CTFS”) 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 CTFS’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**

This Policy applies to CTFS 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, the Group Human Resources and Corporate Services Department or the Human Resources team of respective subsidiaries, or report to [whistleblower@ctfs.com.hk](mailto:whistleblower@ctfs.com.hk) if it relates to reportable concerns as described in the Whistleblowing Policy. 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.

### **Privacy and Data Protection**

We respect individuals' privacy rights and comply with the Personal Data (Privacy) Ordinance (Cap. 486) of Hong Kong. Personal information will be handled responsibly and securely in accordance with relevant data protection laws.

### 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.

### Governance & Review

This Policy has been approved by the Board as recommended by the ESG Committee and its review shall be conducted at least every two years and whenever deemed necessary. Any amendments or updates should be subject to the Board’s approval.

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 Group Human Resources and Corporate Services Department at [ctfshr@ctfs.com.hk](mailto:ctfshr@ctfs.com.hk).

### References

- CTFS Group’s Environmental, Social and Governance Policy (“ESG Policy”)
- CTFS Group’s Whistleblowing Policy
- The Ten Principles of the UN Global Compact

### Version Control

Version	Date	Description of Change
1.0	2020 Jun	Initial release of the document.
2.0	2021 Dec	Updated the commitments
2.1	2024 Jun	Updated the department name & format and the referencing policy
3.0	2025 Feb	Updated the company name and contact information and added the section on privacy and data protection