

COUNTRY GARDEN SERVICES HOLDINGS COMPANY LIMITED

碧桂園服務控股有限公司

(Incorporated in the Cayman Islands with limited liability)

(Stock Code: 6098.HK)

Human Rights Policy

1. General Principles

Country Garden Services Holdings Company Limited ((hereinafter referred to as "Country Garden Services" or the "Company") has always upheld the core philosophy of "Employees First" and of respecting and protecting human rights. This philosophy runs through the Company's corporate values and business operations. The Company firmly believes that everyone is entitled to equal dignity and rights, and that respecting human rights is not only a moral duty but also the cornerstone of sustainable development and long-term commercial success

1.1 Management Philosophy

The Group consistently adheres to the core operating principle of respecting, protecting, and promoting human rights across its entire value chain. It strictly complies with domestic and international laws, regulations, and international human rights standards, including the Labour Law of the People's Republic of China, the Labour Contract Law of the People's Republic of China, the ILO Core Labour Standards, the Ten Principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the International Bill of Human Rights, and integrates human rights protection into the entire process of strategic decision-making, daily operations, supply chain management, and employee management.

1.2 Commitments

The Group fully recognises and implements universally recognised human rights standards, safeguards the legitimate basic rights of employees, vulnerable groups, and community residents, treats all stakeholders equally, and prohibits all forms of human rights violations, including human trafficking, forced labour, child labour, discrimination and harassment, unfair remuneration, restrictions on freedom of association, and infringements on physical and mental health. The Group proactively assumes responsibility for human rights management throughout the industrial chain.

1.3 Special Control Requirements for Core Human Rights Risks

(I) Prohibition of Child Labour

1.Identity verification is carried out at all recruitment and onboarding stages, with dual verification through the HR system, and the employment of any child labour is strictly prohibited.

2.Regular self-audits on employee age are conducted. If any illegal employment is identified, the employment relationship is terminated immediately and remedial measures are implemented. The Company is committed to zero child-labour-related violations.

(II) Prohibition of Forced Labour and Human Trafficking

1.All employment relationships are based on entirely voluntary participation. Forced labour by means of coercion, penalty-bond constraints, fraud, threats of violence, or other means is strictly prohibited. Employees' identity cards, passports, and work permits shall not be withheld.

2.Overtime work is on a voluntary basis, and any overtime hours worked must be fully compensated in accordance with the law.

3.Human-trafficking-related activities are strictly prohibited. The Company does not cooperate with labour agencies or suppliers involved in human trafficking or forced labour.

4.Employees have the right to resign freely. No unreasonable barriers shall be set in the resignation process, and assistance and counselling shall be provided to employees who resign due to family emergencies or financial difficulties.

(III) Freedom of Association and Collective Bargaining Rights

1.To the extent permitted by laws and regulations, the Company respects employees' right to voluntarily join trade unions and employee representative organisations, and does not discriminate against union members or suppress employees' legitimate claims.

2.Regular communication channels are established to support employees in negotiating remuneration, working conditions, labour protection, and other matters through collective bargaining. Trade unions and workers' congresses have been established in many locations to encourage employee participation in communications on business matters.

3.Where local laws and regulations impose restrictions on freedom of association, alternative mechanisms such as employee forums and workers' congresses are used to ensure that employees' concerns are effectively conveyed.

(IV) Anti-Discrimination, Anti-Harassment, and Diversity, Equality and Inclusion

1.The Company has zero tolerance for all forms of discrimination. In recruitment, appraisal, promotion, training, remuneration, and benefit distribution, there shall be no differentiation based on colour, nationality, gender, age, ethnicity, sexual orientation, marital or parental status, religious belief, household registration, disability, veteran status, or trade union membership.

2.A comprehensive diversified talent system is established, actively recruiting persons with disabilities, veterans, low-income groups, and migrant workers, and providing them with suitable positions and supportive working environments. The Group continuously optimises the gender diversity structure of management and increases the proportion of women in management positions.

3.Workplace intimidation, violence, verbal harassment, and physical harassment are strictly prohibited. Employee conduct management and disciplinary accountability systems have been promulgated, clearly defining harassment and its prohibitions.

4.An inclusive working environment is fostered, ensuring equal development opportunities for pregnant and breastfeeding women, employees with disabilities, migrant workers, and older employees.

(V) Equal Pay for Equal Work and Remuneration Guarantees

1.A fair remuneration system is implemented, with equal pay for equal work. Under the same workload and job standards, pay gaps based on gender, region, or identity are eliminated.

2.Remuneration levels are not lower than the local statutory minimum wage and are adjusted in line with the cost of living. Wages are paid in full and on time each month, accompanied by detailed pay slips clearly showing salary, deductions, and overtime allowances.

3.Overtime pay calculation rules are standardised. The HR system automatically calculates working hours and overtime pay to ensure compliance in wage disbursement.

(VI) Employee Health, Rest, and Protection of Resignation Rights

1.A compliant overtime management system is established: working hours and leave policies are publicly disclosed, and employees are proactively encouraged to take paid annual leave. Pay and benefits during annual leave are maintained.

2.A safe working environment is created, with regular occupational health and safety risk inspections to eliminate hazards and protect employees' physical and mental health. Employees' privacy and lawful freedom of expression are respected.

3.The entire redundancy and resignation process is standardised: for mass layoffs, the statutory notice period is strictly observed, written notification is provided to employees, statutory economic compensation is paid, and re-employment guidance is offered. Voluntary retention efforts are made, and support is provided to employees who resign due to sudden family difficulties or financial pressures.

1.4 Comprehensive Implementation Practices for Human Rights Across All Dimensions

(I) Full-Cycle Human Rights Management for Internal Employees

1.Recruitment and hiring: the entire process is open and transparent, with qualification checks on labour service providers; age and identity are fully verified to eliminate child labour, forced labour, and employment discrimination.

2.Occupational health and safety: safety assessments are conducted in office and operational areas, labour protection facilities are provided, and regular safety and human rights training is carried out.

3.Remuneration and benefits: equal pay for equal work, full and timely wage payments, overtime pay, paid annual leave, and statutory social security benefits are implemented, with regular reviews of pay equity.

4.Labour relations communication: multiple communication channels, including trade unions, employee representatives, and regular meetings, are used to resolve labour-management disputes through consultation.

5.Career development: training and promotion pathways are provided without discrimination; dedicated recruitment channels for persons with disabilities and veterans are established to support the career transition of disadvantaged groups.

6.Leave management: an automated system monitors working hours, overtime is voluntary, and employees are guided to take leave to balance work and life.

7.Resignation and redundancy protection: retention assistance, compliant redundancy compensation, and re-employment support are provided to safeguard employees' basic rights after leaving the Company.

(II) Human Rights Controls in the Group's Direct Business Operations

1.All investments (including mergers, acquisitions, joint ventures, etc.), project expansions, and business operations are preceded by human rights impact assessments to avoid harm to the human rights of surrounding communities, residents, and vulnerable groups.

2.Business operations also take into account environmental sustainability, reduce negative impacts on communities and the ecological environment, and carry out public welfare activities in collaboration with communities.

3.All business conduct strictly complies with local human rights and labour laws and regulations, and infringements on third-party human rights through non-compliant operations are prohibited.

(III) Human Rights Management in Products and Services

1.A full-chain quality inspection and control system is established to ensure product safety and prevent the market release of products that could harm consumers' health.

2.Products take into account the needs of diverse groups, optimising usability and accessibility, including for special groups such as the elderly and persons with disabilities.

3.Sales and after-sales processes are fair and transparent, and false advertising and consumer discrimination are prohibited, protecting consumers' legitimate rights and interests.

(IV) Human Rights Management Requirements for Supply Chain and Partners

1.Access and auditing: a human rights compliance agreement is mandatory in all cooperation contracts, explicitly setting out hard requirements such as the prohibition of child labour, forced labour, human trafficking, discrimination. The Group has the right to conduct on-site human rights audits upon prior notice.

2.Joint liability requirement: suppliers are required to impose the same human rights standards on their downstream subcontractors and second-tier suppliers, cascading human rights management responsibilities.

3. Violation handling mechanism: if serious human rights violations are found in a partner, the Company may, depending on the severity, restrict new business cooperation, impose a rectification deadline, or directly terminate the cooperation agreement if rectification fails.

1.5 Human Rights Due Diligence, Assessment, and Mitigation Mechanisms

(I) Scope of Human Rights Risk Identification

1. List of risk matters: forced labour, human trafficking, child labour, pay discrimination, gender discrimination, excessive overtime, workplace harassment, occupational safety hazards, infringement on the rights of outsourced accommodation, leakage of property owners' privacy, supply chain labour rights infringements, restrictions on freedom of association, infringement on the right to collective bargaining, and non-compliant redundancy compensation.

2. Key groups: front-line employees, older front-line workers, migrant workers, female employees, minor workers, employees with disabilities, rural migrant workers, indigenous residents, elderly living alone in communities, and minor property owners.

(II) Human Rights Risk Response and Mitigation Measures

1. Internal division of responsibilities: Human Resources is the primary coordinator for human rights work in each unit, working with Legal, Operations, and the President's Office to form a human rights management team responsible for daily risk monitoring, early warning, and rectification implementation.

2. Preventive measures:

1) Recruitment: standardised identity verification and voluntary onboarding acknowledgment letters to avoid risks of forced labour and child labour.

2) Training: regular human rights compliance, anti-harassment, and labour rights training for all employees to raise human rights awareness.

3) Systems: complete internal management systems covering overtime, leave, anti-discrimination, resignation, and complaints.

3. External collaborative mitigation: establishing long-term communication mechanisms with communities and industry associations to jointly carry out human rights protection and vulnerable-group assistance projects.

4. Dynamic monitoring and adjustment: relying on employee satisfaction surveys, complaints, and audit reports to monitor human risks in real time, periodically reviewing the risk mapping of potential issues, and dynamically adjusting mitigation plans according to changes in local laws, regulations, and business conditions.

(III) Human Rights Complaint, Reporting, and Remediation Mechanisms

1. Multiple anonymous complaint channels: complaint hotlines and reporting email addresses are established and publicly posted in office areas, on the Group's website, and in supplier cooperation documents.

2. Strict anonymity and confidentiality systems are enforced, complainant information is properly safeguarded, and retaliation against complainants or reporters is strictly prohibited; any leakage of report information will be seriously pursued.

3. Standardised complaint handling process: all human-rights-related complaints are centrally collected by the human rights management team, which launches a fair and complete investigation within a defined timeframe and keeps complete investigation records.

4. Upon completion of the investigation, a written conclusion is issued and the outcome is communicated to the complainant. Multiple remedial measures are implemented for infringements: apologies to the injured party, financial compensation, psychological counselling, and job adjustments. Disciplinary actions against violators include warnings, demotion, termination of employment contracts, or termination of cooperation. Simultaneously, company-wide special training is conducted to prevent recurrence of similar issues.

5. Through internal audits, third-party verification, employee and community feedback, and updates to domestic and international laws and regulations, the Company periodically assesses systemic weaknesses and identifies optimisation directions through data analysis and case studies.

1.6 Scope of Application

This Policy applies to all employment relationships within Country Garden Services. At the same time, this Policy explicitly extends to the Company's suppliers, contractors, partners, and other relevant stakeholders, requiring them to jointly comply with human rights requirements.

2. Decision-Making Bodies and Responsibilities

The highest decision-making body for this Policy is the Board of Directors. The Company's ESG Committee and ESG Working Group serve as the lead departments, and all business centres and functional departments are responsible for comprehensively promoting the implementation of the Policy.

3. Supplementary Provisions

3.1 Conflicts and Supremacy: Where other documents contain similar provisions to this Policy and there is a conflict, the requirements of this Policy shall prevail.

3.2 Review and Amendment: The Company will review and update this Policy in a timely manner in accordance with changes in national laws and regulations, the Company's operational realities, and performance appraisal results.

3.3 Effective Date: This Policy takes effect as of the date of issuance.