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)

CODE OF BUSINESS ETHICS

1. Purpose

Country Garden Services Holdings Company Limited (hereinafter referred to as the "Company") has established this Code to define the fundamental standards of conduct and ethical boundaries for the Company and all its employees, directors, and senior management in business activities. It sets forth the core principles and institutional requirements in key areas such as anti-corruption, anti-bribery, conflict of interest management, information confidentiality, anti-monopoly, anti-money laundering and insider trading prevention, and whistleblowing mechanisms. The aim is to foster a corporate governance culture of integrity, compliance, fairness, and responsibility, and to safeguard the legitimate rights and interests of shareholders and other stakeholders.

2. Scope of Application

This Code applies to all employees of Country Garden Services Holdings Company Limited and all its subsidiaries and branches (including regional offices, equity-based companies, entities in which the Company holds a controlling or dominant position, and associates). Associates shall, in principle, comply with this Code by reference or formulate their own implementation rules accordingly.

3. Management Structure

The Audit Committee under the Board of Directors regularly assesses the compliance risks facing the Company and the adequacy of existing prevention and control measures, ensuring the effectiveness of the Company's business ethics management system. The Company's Risk Control, Audit and Supervision Department and the Listing Secretary's Office are the day-to-day coordination and supervisory bodies for the implementation of this Code. They are responsible for organizing compliance training, providing compliance consultations, receiving and coordinating the handling of alleged violation leads, and conducting investigations into suspected violations of this Code. All employees and managers shall fully understand and strictly abide by the provisions of this Code.

4. Business Ethics Management Measures

4.1 Integrity, Self-Discipline and Professional Ethics

The Company adopts a "zero-tolerance" policy towards corruption and bribery, expressly prohibiting any employee, manager, or third party acting on behalf of the Company from directly or indirectly offering, promising, soliciting, or accepting undue benefits from any institution or individual. The Company has formulated and issued supporting policies such as the Regulations on the Management of Job-Related Conduct, which clearly define the boundaries of lawful and compliant conduct.

The Company requires all employees to sign integrity commitments, provides anti-bribery and anti-corruption training to personnel in key positions, and enhances company-wide compliance awareness through case studies. The Company has established internal reporting and investigation procedures for misconduct. Verified violations will be subject to corrective or disciplinary actions under the Company's disciplinary regulations, including criticism, demerit recording, salary reduction, demotion, termination of employment, etc. Where suspected criminal offences are involved, the matter will be referred to judicial authorities in accordance with the law.

In external interactions, employees shall not solicit or accept cash, negotiable securities, valuable gifts, or other undue benefits that may affect impartial decision-making. Gifts that cannot be declined due to business courtesy or normal social exchanges must be truthfully reported through the Company's OA system in accordance with the established Measures for the Registration and Reporting of Gifts and Cash Gifts. After verification by the relevant unit and the Risk Control, Audit and Supervision Department, such items shall be returned or disposed of uniformly according to Company rules. Failure to report as required or private acceptance of such items, once verified, will be seriously dealt with in accordance with Company policies.

Unit heads and above, in addition to performing their regular duties, shall also undertake the following professional ethical obligations:

1) Obligation to coordinate resources: have the duty to coordinate and organize all departments within the unit to fully cooperate with entry/exit audits and supervisory investigations.

2) Obligation to proactively disclose: must proactively report to the Risk Control, Audit and Supervision Department any internal control deficiencies, risk matters, and leads on violations of laws or discipline discovered within their unit.

3) Responsibility for applying results: must ensure that audit results are materially implemented in performance management, appraisal applications, and appointment/removal decisions.

All employees must strictly observe the following prohibitions. Violators will be seriously dealt with under the Group's Measures for Accountability:

a. It is strictly prohibited to secretly collect or withhold property management fees, parking fees, or diversified business income.
b. Any form of establishing off-book "small treasuries" or accounts is strictly prohibited.
c. It is strictly prohibited to collude, fabricate false information, or repeatedly change statements during investigations/audits.
d. It is strictly prohibited to instruct others or personally alter, destroy, or conceal any electronic or paper evidentiary materials required for audits/investigations.
e. Any form of obstruction, suppression, or interference with the normal conduct of audit projects or supervisory work is strictly prohibited.

4.2 Conflicts of Interest

The Company requires all employees and managers to proactively identify, disclose, and recuse themselves from any situation where their personal interests may conflict with the Company's business interests and affect their objective performance of duties, including but not limited to external part-time employment, related-party transactions with the Company, using official positions for personal opportunities, and holding material interests in entities that have business dealings with the Company.

The Company has arranged for all employees to sign conflict of interest commitment letters. Employees shall submit conflict of interest declarations in accordance with regulations and follow the established authorization and approval process, which involves sequential review by the immediate supervisor, the unit's HR officer, and the unit head, who shall confirm the handling plan. Failure to disclose as required or improper interference in conflict-of-interest matters will result in strict accountability.

4.3 Anti-Monopoly and Anti-Competitive Conduct

The Company strictly complies with the anti-monopoly and fair competition laws and regulations in each jurisdiction where it operates. In its interactions with competitors, suppliers, customers, and industry organizations, the Company remains independent and prudent. All competitively sensitive information (such as pricing, costs, sales strategies, capacity arrangements, etc.) is covered by information confidentiality and monitoring measures.

4.4 Anti-Money Laundering and Prevention of Market Misconduct

The Company firmly complies with all applicable anti-money laundering, counter-terrorist financing, and securities regulatory laws and regulations, and adopts a "zero-tolerance" policy towards money laundering, insider trading, and market manipulation. All employees and relevant third parties shall abide by laws, regulations, and internal Company rules and shall not trade on inside information, nor engage in any form of money laundering or market manipulation. In the event of any such violation, the Company will cooperate actively with regulatory authorities and handle the matter in accordance with the law.

5. Reporting (Whistleblowing)

5.1 Training on Reporting Channels

The Company has established and continuously operates an institutionalized and transparent whistleblowing and internal reporting mechanism, clearly defining the dedicated department and personnel responsibilities for handling reports. The Company has set up multiple reporting channels (including a 400 hotline, dedicated reporting email address, online platform, etc.). Information about these channels is published on the Company's homepage and specified in internal policies such as the Notice on Regulating the Management of the Group's Complaint and Reporting Channels and the Measures for the Protection of Whistleblowers of Country Garden Services Group. The Company informs all employees of the reporting channels and their use through new employee onboarding briefings, organized signing, etc., to ensure that all employees fully understand the reporting avenues and precautions. The Company accepts both named and anonymous reports and maintains strict confidentiality over the details of reports.

5.2 Process for investigating reported breaches

The Company's Risk Control, Audit and Supervision Department has designated personnel to centrally receive all types of reporting leads, promptly update the case ledger, and, in accordance with the standards for evaluating supervisory leads, classify and determine appropriate handling measures. The main handling methods include: (1) Supervising the relevant unit for investigation – the Risk Control, Audit and Supervision Department initiates a case tracking process, exercises full tracking and quality control over the investigation, and provides a closing opinion, and the unit implements the decision based on the review opinion; (2) Filing for investigation by the Risk Control Department – before the investigation, an on-site investigation plan is prepared, and at least two investigators are assigned to the site to collect and verify evidence in accordance with laws and regulations, forming a complete and reliable chain of evidence. After the investigation, a formal investigation report is prepared and, upon approval, the relevant unit executes the decision. The investigation results are fed back to the whistleblower as necessary, and the relevant unit is urged to complete rectification within a prescribed time limit, ensuring closed-loop handling of the reported matter.

5.3 Protection of Whistleblowers

The Company strictly prohibits any form of retaliation and adopts a zero-tolerance policy towards retaliatory acts. The core protective measures are as follows:

1)Confidential document management system: Reporting materials must be strictly managed as confidential documents. Access to such information is strictly limited to within the Risk Control, Audit and Supervision Department. Unauthorized personnel are strictly prohibited from accessing, copying, or excerpting reporting materials.

2)Principle of conflict of interest avoidance: Personnel handling a case who have a close familial relationship (including spouses, children, parents of both parties, siblings and their spouses, etc.) or a conflict of interest with the whistleblower or the accused must recuse themselves.

3)Severe punishment for retaliation: Blocking, suppressing, or retaliating against whistleblowers is strictly prohibited. Any verified retaliatory act will result in disciplinary action commensurate with the severity of the case; if a crime is suspected, the matter will be referred to judicial authorities for handling in accordance with the law.

6. Policy Review and Revision

This Code has been reviewed and approved by the Board of Directors of the Company. The applicability and effectiveness of its contents shall be systematically reviewed annually. Based on the review results, updates in laws and regulations, developments in industry practices, and the Company's actual operating conditions, amendments shall be made as needed.