

China Merchants Port Holdings Company Limited

Human Rights Policy Commitment

Chapter I General Provisions

Section 1 Statement of Acceptance

Article 1. China Merchants Port Holdings Company Limited (the "Company") and its subsidiaries (the "Group") firmly believes that the protection of human rights is fundamental to the sustainable development of an enterprise. The Group conduct business in accordance with all applicable laws, regulations, international conventions, company rules and regulations and the highest ethical standards, undertakes to conduct its business with professionalism, honesty and integrity in all business transactions and relationships, and to prohibit any activity that may adversely affect the integrity and reputation of the Group.

Section 2 Purpose of compilation

Article 2. *Human Rights Policy Commitment* of the Company (the "Commitment") is formulated for the purpose of strengthening the Group's protection of the human rights of its employees and relevant stakeholders, preventing violations and violations of human rights, and ensuring reasonable and dignified treatment of Group's employees.

Section 3 Scope of Application

Article 3. The Commitment applies to the Group, non-controlling companies entrusted and managed by the Group and companies consigned its management right to the Group. The Commitment actively promotes the implementation of relevant contractors, suppliers and permanent and temporary employees who provide services to the Group. For non-controlling investing entities, the Company will use its shareholder rights to maximize the consistency of its policies and practices with the requirements of this code, so that its policies and practices are in line with the principles advocated by this policy.

Section 4 Basis for compilation

Article 4. The Commitment is prepared in accordance with laws and regulations, rules and regulations of the Company, international conventions and international practices.

Article 5. Laws and regulations based on the Commitment include but are not limited to:

*Constitution of the People's Republic of
China Civil Code of the People's Republic of
China*

*The Company Law of the People's Republic of China
Trade Union Law of the People's Republic of China*

Law of the People's Republic of China on the Protection of Minors

Law of the People's Republic of China on the Protection of Women's Rights and Interests

Law of the People's Republic of China on the Protection of Persons with Disabilities

Labor Law of the People's Republic of China

Employment Promotion Law of the People's Republic of China

Provisions against the Use of Child Labour

Hong Kong Bill of Rights Ordinance

Article 6. the Company's rules and regulations based on the Commitment include but are not limited to:

Regulations on Labor and Employment Management of China Merchants Group

Regulations on Staff Management of China Merchants Port Holdings Company Limited

Human Resource Management System of China Merchants Port Holdings Company Limited

Recruitment Management Regulations of China Merchants Port Holdings Company Limited

Regulations on Staff Attendance and Leave Management of China Merchants Port Holdings Company Limited

Administrative Measures for Salary and Welfare of Employees of China Merchants Port Holdings Company Limited

Administrative Measures for Salary and Welfare of Employees of China Merchants Port Holdings Company Limited

Article 7. The international conventions and practices on which the Commitment is based include but are not limited to:

United Nations Universal Declaration of Human Rights

United Nations Convention on the Elimination of All Forms of Discrimination against Women

United Nations International Convention on the Elimination of All Forms of Racial Discrimination

United Nations Convention on the Rights of the Child

United Nations Convention on the Rights of Persons with

ILO International Labor Conventions

ILO Declaration on Fundamental Principles and Rights at Work

Article 8. If the human rights protection policies and measures in the Commitment are in conflict with the relevant laws, regulations and cultural background of the place where the overseas subsidiary operates, the human rights protection of the overseas subsidiary shall be carried out in accordance with local laws and regulations and local cultural background.

Article 9. If relevant laws and regulations, rules and regulations, international conventions and international practices are updated, the company's human rights protection shall be carried out in accordance with the latest valid versions of laws and regulations, rules and regulations of the Group, international conventions and international practices.

Section 5 Management mechanism

Article 10. The leading administrative body of the human rights policies and measures in the Commitment letter is the Human Resources Department of the Company which is responsible for the full implementation of the human rights protection policies and measures in this commitment in the Group. The leadership of the Company is responsible for supervising the implementation of various human rights protection policies and measures.

Chapter II Policies and measures to protect human rights in enterprises

Section 1 Workplace Equality and Diversity

Article 11. The Group undertakes to abide by the *Constitution of the People's Republic of China*, the *Civil Code of the People's Republic of China*, the *Labor Law of the People's Republic of China*, the *Employment Promotion Law of the People's Republic of China*, the *Law of the People's Republic of China on the Protection of the Rights and Interests of Women*, the *Law of the People's Republic of China on the Protection of Persons with Disabilities*, the *Universal Declaration of Human Rights* of the United Nations, the *Convention on the Elimination of All Forms of Discrimination against Women*, the *International Convention on the Elimination of All Forms of Racial Discrimination*, the *Convention on the Rights of Persons with Disabilities*, the *International Labour Convention* of the International Labour Organization, the *Declaration on Fundamental Principles and Rights at Work*, *Hong Kong Bill of Rights Ordinance*, and other workplace equality and diversity requirements that are set out in laws, regulations and international conventions/practices.

Article 12. The Group provides an open and challenging working environment for its employees. All employees, regardless of their nationality, race, religion, gender, or age, shall have equal opportunities in recruitment, training, promotion, transfer, salary and welfare, working conditions, organization and participation in labor unions, retirement, dismissal, and business activities. No one shall be excluded or treated unfairly due to any of the aforementioned legally protected characteristics. The Company

will measure employees' performance based on established reasonable criteria (including qualifications, professional competence, and achievements) to ensure that those performing well are commended and rewarded appropriately. The Group has zero tolerance for any form of discrimination, harassment, bullying, or intimidation. It has established and published relevant policies to address violations of laws and regulations, including acts of discrimination, sexual harassment, and other infringements on human rights, ensuring workplace equality and diversity. Regular training on these topics is provided to eliminate all forms of discrimination and bias, fostering an inclusive and equitable work environment.

Section 2 Elimination of child labor and forced labor

Article 13. The Group undertakes to abide by the *Labor Law of the People's Republic of China*, *Law of the People's Republic of China on Minors*, *Provisions Prohibiting the Use of Child Labour*, *Universal Declaration of Human Rights* of the United Nations, The UN Convention on the *Rights of the Child*, *International Labour Convention* of the International Labour Organization, the *Declaration on Fundamental Principles and Rights at Work*, *Employment Ordinance* and other laws and regulations and international conventions/practices against the use of child labor, forced labor and human trafficking requirements.

Article 14. The Group will provide equal opportunities for job seekers following the principle of "equality, voluntariness, and consensus" and assess and screen job seekers based on the objective requirements of the positions. The company will comply with applicable laws and adhere to the principle of "equality, voluntariness, and consensus" in employing all employees, and strictly prohibit any form of coercion. It will respect employees' work based on voluntariness, and employees will have the right to autonomously terminate their labor relations with reasonable prior notification. Meanwhile, the Group has established an internal monitoring mechanism to ensure regular inspections and evaluations of labor law compliance, enabling the timely identification and rectification of any instances of forced labor. When hiring employees, the company will pay special attention to the verification of age. It will strictly prohibit the employment of child labors at any operational site, and will take remedial measures if necessary

Section 3 Employee Compensation and welfare Protection

Article 15. The Group undertakes to abide by the *Company Law of the People's Republic of China*, the *Labor Law of the People's Republic of China*, the *Labor Contract Law of the People's Republic of China*, the *Trade Union Law of the People's Republic of China*, the *Universal Declaration of Human Rights of the United Nations*, the *International Labor Convention of the International Labor Organization*, *Employment Ordinance*, *Occupational Safety and Health Ordinance*, *Employees' Right and Benefits of Hong Kong* and other laws and regulations as well as international conventions/practices.

Article 16. The working hours, holidays, remuneration and rights and interests of all

employees of the Group fully meet the statutory requirements, and provide employees with health examination, commercial insurance, enterprise annuity and other benefits; set up the working hour system and management measures in accordance with the regulations according to the requirements of the operation, and give overtime pay or time off as compensation for the overtime work in accordance with the regulations.

Section 4 Respect the political rights of employees

Article 17. The Group undertakes to abide by the *Constitution of the People's Republic of China*, the *Company Law of the People's Republic of China*, the *Labor Law of the People's Republic of China*, the *Trade Union Law of the People's Republic of China*, *Universal Declaration of Human Rights* of the United Nations, *Hong Kong Bill of Rights Ordinance*, and other political rights of employees as required by laws, regulations and international conventions/practices.

Article 18. The Group has developed various communication channels for employees to seek help and feedback on problems. The company respect the rights of employees according to law, including the right to freely form associations, to participate in or not participate in trade unions, to seek representation, to participate in employee congresses, and so on. The Group establishes regular employee communication and feedback mechanisms to proactively understand employee opinions, continuously enhancing management practices and employee satisfaction.

Article 19: The Group maintains zero tolerance for incidents infringing upon employee rights. It has implemented grievance channels and support mechanisms to ensure the independence and confidentiality of these channels. This guarantees that employees can raise concerns or provide feedback without fear of retaliation, threats, or harassment, enabling effective communication with management regarding workplace conditions and management issues.

Section 5 Information Security and Privacy Protection

Article 20. The Group undertakes to comply with the privacy protection requirements of employees stipulated in the *Constitution of the People's Republic of China*, the *Civil Code of the People's Republic of China*, the *Data Security Law of the People's Republic of China*, and the *Personal Information Protection Law of the People's Republic of China* and other laws and regulations.

Article 21. The Group rigorously implements policies and systems for safeguarding the privacy and data security of customers, employees, and partners. Through training programs, the Group enhances employees' awareness of information and privacy protection, ensuring they understand the Group's policies, procedures, and requirements in this regard. This commitment protects the privacy of all stakeholders, including customers, employees, and partners, while safeguarding the Group's information security.

Section 6 Safe and Healthy Working Environment

Article 22. The Group promises to abide by laws and regulations, such as the *Constitution of the People's Republic of China*, the *Labor Law of the People's Republic of China*, the *Trade Union Law of the People's Republic of China*, the *International Labor Convention* of the International Labor Organization, *Occupational Safety and Health Ordinance of Hong Kong* and safe and healthy working environment requirements required by laws, regulations and international conventions/practices.

Article 23. The Group adheres to applicable laws and regulations to establish and continually refine its safety management system. It monitors key health and safety performance indicators, taking timely corrective actions to ensure a safe and hygienic working environment. The Group provides necessary occupational health and safety protections for stakeholders, including employees and contractors, to prevent accidents and mitigate occupational risks. Regular health and safety training sessions are conducted for employees, contractors, and other relevant parties, ensuring their safety and promoting both physical and mental well-being.

Chapter III Supplementary Provisions

Article 24. Authorized by the Company, the Human Resources Department is responsible for the interpretation and revision of this letter of commitment.

Article 25. This commitment applies to China Merchants Port Holdings Company Limited and its subsidiaries under operational control. The Group also actively encourages relevant labor subcontractors, suppliers, and both permanent and temporary employees providing services to implement this commitment.

Article 26. The Commitment shall come into effect on the date of issuance.