

CITY DEVELOPMENTS LIMITED
HUMAN RIGHTS POLICY



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City Developments Limited (CDL) believes in upholding fundamental principles of human and workplace rights in places where we operate. We are guided by international human rights principles as described in the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the United Nations Global Compact's principles on Human Rights. CDL supports the Singapore government's policies and national legislation in protecting human rights. We pride ourselves as a responsible organisation and are committed to respecting human rights in all aspects of our operations and value chain. This includes fairness in our employment practices, non-discrimination, fair compensation, as well as workplace health and safety within our developments.

I. Purpose

The policy outlines CDL's responsibility to uphold and protect the human rights of individuals working in CDL and the communities in which we operate. We strive to contribute positively and ensure that human rights are understood, observed and respected as far as is reasonably practicable.

II. Application

This policy applies to all employees within CDL. Where we do not have a controlling interest, we will encourage our stakeholders, including business partners, contractors, suppliers and joint venture partners to observe this policy. For CDL's stance on human rights in our supply chain, please refer to the CDL Supplier Code of Conduct.

III. Human Rights Principles

The following broad principles reflect the values that CDL upholds in our own operations, and we expect our stakeholders to follow the spirit and intent of these principles:

a) Workplace Diversity and Equal Opportunity

- i. We will provide just and favourable work conditions to our employees in a non-discriminating manner, ensuring that there is equal opportunity with respect to employment and occupation within the company.
- ii. The basis for recruitment, placement, training, compensation, and advancement is based on qualifications, performance, skills and experience. No employee shall be discriminated on the above due to nationality, ethnicity, religion, disability, gender, age and sexual orientation.
- iii. We will maintain a workplace that is free from physical, psychological or verbal abuse, the threat of abuse and sexual or other harassments.
- iv. We will embrace diversity and inclusivity at the workplace and appreciate contributions made by all employees.
- v. We are committed to creating local employment in the communities that we operate in.

b) Upholding Workers' Welfare and Well-being Engagement

- i. We strive to work with contractors to protect the rights of foreign workers they hire to work on its sites. We also ensure that workers are employed through fair and ethical sourcing practices and are treated with dignity and respect.
- ii. We will put in place measures (e.g. work with labour rights experts) to ensure that our operations and that of our significant suppliers are not involved in unethical labour practices, such as child labour, trafficked labour or forced labour.
- iii. We will work with contractors to ensure that dormitories and facilities are equipped with basic amenities and all necessary measures to provide safe, clean, healthy and dignified living and working conditions in instances where there are on-site or off-site workers' housing, including commercial purpose-built dormitories and factory converted dormitories.
- iv. We will work with our corporate office and investment properties to incorporate information on remediation and grievance channels through trainings at the workplace.
- v. We will continue to collaborate with our downstream stakeholders (e.g. consultants, sub-contractors) to prevent/mitigate further operational risks/impacts in relation to the policy.

c) Prohibiting Child Labour

We will adhere to minimum age provisions of applicable laws and regulations, remaining consistent with the United Nations Convention on the Rights of the Child and the relevant standards under the International Labour Organization. We are committed to ensuring that no young children are employed directly by CDL or our contractors.

d) Prohibiting Forced Labour

CDL prohibits the use of all forms of forced or bonded labour, slave labour and any form of human trafficking.

e) Stakeholder Rights

- i. Safe and Healthy Workplace

We will provide a secure, safe and healthy workplace in compliance with local workplace safety and health legislations. We will also maintain a productive workplace by minimising the risk of accidents, injury and exposure to health risks. All employees shall receive the necessary health and safety training for their line of work. In accordance with our whistleblowing policy, employees can provide feedback to management through our whistleblowing hotline without fear of reprisal or retaliatory action.

ii. Salary and Benefits

We will compensate employees relative to the industry and local labour market. We will operate in full compliance with applicable government policies on wages, work hours, overtime and benefits laws. We will also offer employees opportunities to develop their skills and capabilities and provide advancement opportunities where possible.

iii. Work Conditions

The working hours of CDL employees shall comply with applicable laws. Recognising the need for employees to balance their working life with other interests and responsibilities, we offer flexible working hours and flexible work arrangements, and discourage excessive working hours, as far as is reasonably practicable within the constraints of effectively running the business.

iv. Freedom of Association and the Right to Collective Bargaining

We respect our employees' right to join or form a labour union without fear of reprisal or harassment. We shall not discriminate against employees' legal bargaining representatives. National and other applicable laws and regulations concerning an individual's freedom of association shall be complied with at all times.

IV. Human Rights Risk and Due Diligence Process

Wherever practicable, our human right due diligence process includes assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed. We

(a) *Identify and assess actual or potential adverse human rights impacts* that the enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships;

(b) *Integrate findings from impact assessments across relevant company processes* and taking appropriate action according to its involvement in the impact;

(c) *Track the effectiveness of measures* and processes to address adverse human rights impacts in order to know if they are working; and

(d) *Communicate on how impacts are being addressed* and showing stakeholders – in particular affected stakeholders – that there are adequate policies and processes in place.

This policy complements CDL's Sustainable Investment Principles in identifying and assessing risks by geographic context, sector and business relationships throughout CDL's HQ and subsidiary activities and its value chain.

V. Human Rights Mitigation & Remediation

The policy aligns itself with remediation and mitigation processes that complement CDL's Whistleblowing policy and grievance processes.

In all contexts, CDL shall comply with all applicable laws and respect internationally recognised human rights, wherever we operate.

Where it is necessary to prioritise actions to address actual and potential adverse human rights impacts, we shall first seek to prevent and mitigate those that are most severe or where delayed response would make them irremediable.

Should we identify areas in which our operations have caused or contributed to adverse impacts, we shall provide for or cooperate in remediation through legitimate processes.

We will work with affected stakeholders or their legitimate representatives in relation to the following labour rights issues: freedom of association and the effective recognition of the right to collective bargaining; forced labour; child labour and non-discrimination in respect of employment and occupation.

VI. Responsibilities

Heads of Divisions / Departments are accountable for compliance with the Policy. They are to establish appropriate responsibilities and procedures within their business units. The Chief Sustainability Officer, Chief Human Resource Officer or Head of Internal Audit are to be informed of any issues or violations arising in places where we operate, which can be done via CDL's whistle-blowing channels.

We expect employees to maintain the highest standards in conformity with these principles. Disciplinary measures shall be enforced against any CDL employee who is in breach of these human rights principles.

If employees have concerns about any instance of malpractice, human rights abuses or discrimination, they have a responsibility to raise them through their reporting manager in accordance with the CDL Grievance Management Policy or CDL Workplace Anti-Harassment and Anti-Bullying Policy. If this is not practical, they may do so via the confidential whistleblowing hotline at the earliest possible opportunity.

This policy has been reviewed by the Board Sustainability Committee and approved by the Board.

Revisions approved by the Board on 3rd May 2023