

Code of Business Conduct

Seazen Holdings Co., Ltd. (hereinafter referred to as the "Group", "we", "our" or "us") regards integrity as our foundation for sustainable development. Grounded in the present, we practice the corporate spirit of "Be honest and pragmatic", and comprehensively enhance our enterprise management level and comprehensive strength. To better collaborate with stakeholders in fulfilling social responsibilities, we have established the Code of Business Conduct (hereinafter referred to as the "Code"), which defines the behavioral standards that must be adhered to in the Group's business activities, aiming to promote the Company's high-quality and sustainable development through steady and pragmatic actions.

This policy is formulated with reference to relevant national laws and regulations and industry practices and is applicable to Seazen Holdings headquarters, two major business units (the Real Estate Development Business Department and the Business Management Business Department), diverse businesses, and its regional, city, and project companies. The Code is applicable to the Group's board of directors, board of supervisors, management, full-time employees, and part-time employees. We encourage business partners to adhere to the Code. We are committed to:

Building a Diverse and Inclusive Environment

1. Promoting democratic, diverse, and inclusive development across the Group, upholding equal employment, increase workforce diversity at the board and management levels, and opposing all forms of discrimination based on gender, age, geography, educational background, religious belief, nationality, ethnicity, sexual orientation, disability, or any other distinguishing characteristics.
2. Cultivating outstanding talent, provide employees with comprehensive and diverse compensation and benefits systems and occupational health protection plans, safeguarding employee rights, and are committed to creating a safe, healthy, and humane working environment.

Anti-Fraud, Anti-Bribery and Anti-Corruption

3. Strictly abiding by national laws and regulations and align with certification requirements such as the ISO37001 Anti-Bribery Management System to establish an internal integrated management system. We clearly define the management responsibilities of the board of directors, audit committee, management, and various departments, establish employee code of conduct and a comprehensive risk management system, conduct annual comprehensive internal audits, integrate integrity culture building with anti-corruption efforts, and foster a positive atmosphere of fair competition, integrity, and probity.
4. Maintaining a "zero tolerance" approach towards fraudulent activities. Every three years, we conduct an occupational ethics audit, prohibiting employees from engaging in, participating in, supporting, or condoning any actions that may harm the interests

of the Group (such as embezzlement, fraud, bribery, disclosure of customer and consumer privacy, etc.). Violations shall be subject to accountability and disciplinary action based on the severity of the offense.

5. Signing Integrity Cooperation Commitment with suppliers, business partners, and other collaborators to ensure that no acts of bribery, improper benefit transfers, or fraudulent practices occur during contract performance, thereby establishing cooperative relationships based on honesty, trustworthiness, integrity, and self-discipline.

6. Strictly abiding by domestic and international anti-money laundering laws and regulations. Any suspicious transactions or suspected money laundering activities identified must be reported promptly. Anti-money laundering training is provided to relevant personnel to ensure everyone understands their roles and responsibilities, actively carry out anti-money laundering activities, and prohibiting any money-laundering related behaviors.

Complaint and Whistleblowing Management

7. Adhering to the working principles of confidentiality, objectivity, fairness, and equality, we have established a reporting management system, with multiple channels available to receive and handle reports from stakeholders regarding any dishonest behavior by employees/departments within the Group, and to promptly address them.

8. Protecting the privacy of whistleblowers in accordance with the law, strictly prohibit disseminating whistleblower-related information to relevant parties without authorization, and ensure the information security of whistleblowers and all participants in anti-fraud investigations.

9. No individual or organization may obstruct or suppress whistleblowing by whistleblowers and retaliate against whistleblowers under any pretext. Once retaliation is verified, severe disciplinary action shall be taken in accordance with company regulations. Where such act constitutes a crime, it shall be transferred to judicial organs for handling. No organization or individual shall retaliate against investigators from the audit and supervision department or disclose reporting information. Once verified, severe disciplinary action shall be taken according to company regulations.

Suppliers and Partners

10. Encouraging suppliers and other partners to establish and improve their own codes of business conduct.

11. Giving priority to suppliers and partners who comply with the Code and include clauses in agreements to incentivize their compliance.

For details, please refer to the Supplier Code of Conduct.

The Code is effective as of its release date and will be reviewed and updated by the Group periodically.