HKR INTERNATIONAL LIMITED

香港興業國際集團有限公司*

(the "Company")

COMPANY CULTURE POLICY

1. Purpose

The Board of Directors of HKR International Limited (the "Company") (the "Board") is conscious of doing its jobs diligently, challenge management to pursue benchmark performance, give frank advice, heed red flags and demand accountability. The Board being aware of its responsibilities and duties, discharges its functions with deep sense of commitment to its stakeholders. Therefore, it is pertinent that the Board expects a culture of accountability with high standards from the Company and executives. An accountable board and company would take its responsibility seriously, as accountability is the cornerstone upon which all the rest of governance is built. For the Company, the role model is the Board.

Company culture is rooted in an organisation's goals, strategies, vision, mission, values and approaches to customers, investors, stakeholders and the community at large. A strong company culture attracts better talent and, more importantly, retains that talent. When people feel like they belong to an organisation, they are more likely to stick around for the long term with better performance and productivity. Therefore, the Board hereby puts in place the Company culture and the Company is expected adhere to with highest level dedication. Company culture plays a big role in how a company behaves and interacts with the world around.

2. Policy

The Board believes that a culture of accountability for the Company would be characterised by the following observable, mutually reinforcing behaviours such as commitment, connected and belonging, caring, trusting, respectful, diligence and honest and ethical conduct.

2.1 Commitment

Accountability and commitment go hand in hand. Every employee, no matter what their roles are must be fully committed to the Company and to its mission, vision and values; and work as a cohesive team helping the Company to stay true to its commitment of making a difference to its customers which in turn would lead to win-win situation for Board, the Company, employees, customers and stakeholders.

2.2 Connected and Belonging

The Company is engaged to make every employee feels accepted, valued, and has a sense of belonging. Employees at connected companies are able to share ideas quickly and work together easily. Companies with a connected culture have engaged employees that share common goals.

Employees of the Company should have a sense of belongingness, and feel proud of working with the Company and should never forget that the Company belongs not to the Board or management but to the owners i.e. its shareholders. It should act in ways that embody independence and accountability.

2.3 Caring

If employees believe the Company care about them, they care more about their jobs. This affects everything from recruiting new employees to retaining them — and that saves money in the end. In addition, the more the employees feel appreciated and valued, the harder they work to succeed, and thus help the company succeed. If they are passionate about the Company's mission, vision, values and product, they are more invested in the Company and helping it improve and achieve the goals.

2.4 Trusting

The importance of trust within a company is truly immeasurable. A culture of trust not only promotes a positive work environment, but it can also impact the organisation in more concrete ways. For example, a trusting workplace environment tends to breed more motivated employees, which as every good employer is aware, usually results in increased productivity and creativity. Trusting employees are much more likely to harbour a sense of loyalty for the Company. Trust is the glue that unities the many voices into a cohesive team. The Board and management need to trust that everyone in the Company is working in good faith towards a common earned. One thing management can do to merit the Borad's trust is to support the Board with information that is accurate, timely and complete. In the same vein, to earn the trust of the management, the Board with its competent members, should appreciate the complex issues facing the Company, understand the difference between governance and management, and know how to offer constructive criticism.

2.5 Respectful

With a respectful workplace, employees are encouraged to express opinions and ideas without interruption—and their coworkers are expected to be courteous when they do just that which create an environment which benefit to development of innovative idea.

2.6 Diligence

Employees of the Company are expected to do their work meticulously, take advantage of training opportunities and use them to upgrade and update their knowledge. They should also articulate views/suggestions in the interest of the organisation.

2.7 Honest and Ethical Conduct

The Board expects that the employees act in accordance with the highest standards of personal and professional integrity, honesty and ethnical conduct, while working on the Company's premises and at locations where the Company's business is being conducted, at Company sponsored business and events, or at any other place where employees are representing the Company. Honest conduct means conduct that is free from fraud or deception. Similarly, ethical conduct to be conducted in conformance with accepted professional standards of conduct and compliance with all applicable laws. Ethical conduct includes the ethical handling of actual or apparent conflict of interest between

personal and professional relationships. This is, decisions and actions in the course of one's employment with the Company should be based on the best interests of the Company, and not based on personal relationships or benefits.

3. Measurement

The Corporate Governance Committee and/or Audit Committee will discuss and review company culture on a regular basis with focus on the key quantitative and qualitative indicators used to measure the Company culture.

Examples of quantitative and qualitative indicators that can be used to assess and monitor culture include:

- Whistleblowing disclosures from employees and other stakeholders (e.g. customers and suppliers, etc);
- Material code of conduct and regulatory breaches identified;
- Fraud-related / high-risk complaints breaches identified; and
- Employee turnover ratio.

These indicators should be reviewed regularly by the Corporate Governance Committee and/or Audit Committee to ensure the continued applicability and relevance.

4. Review

The Corporate Governance Committee has been delegated by the Board to review this Policy at least on an annual basis and make appropriate recommendations, as and when required, for the approval of the Board to ensure the Company's culture continuously align with its purpose, values, mission and strategy.

Adopted on 16 March 2022

^{*}Registered under the predecessor ordinance of the Companies Ordinance, Chapter 622 of the laws of Hong Kong