

**HENDERSON SUNLIGHT ASSET
MANAGEMENT LIMITED**

Whistleblowing Policy

Version 9, effective on 11 March 2026

1. Objective and Scope

As the manager of Sunlight Real Estate Investment Trust (“Sunlight REIT”), Henderson Sunlight Asset Management Limited (“Manager”) and its delegate - Henderson Sunlight Property Management Limited (collectively the “Companies”) are committed to maintaining good corporate governance, a high level of integrity, openness, probity and accountability, based on which this Whistleblowing Policy (the “Policy”) is being established.

This Policy is designed to detect and deter acts that may constitute impropriety, misconduct, malpractice and irregularity, and to encourage the prompt reporting of any actual or suspected behaviour or performance in relation thereto. This Policy applies to all board members, all staff (including full-time and part-time employees), as well as business partners (including tenants, consultants, suppliers, contractors and outside agencies) who deal with Sunlight REIT or the Companies.

This Policy is primarily concerned with situations where the interests of Sunlight REIT and/or the Companies are at risk; it does not apply to staff grievances and complaints to any particular staff, of which they should be brought to the attention of Corporate Services Department (Human Resources Team) or the senior management of relevant departments.

This Policy has been approved by the Board of Directors of the Manager of Sunlight REIT (the “Board”).

2. Principles of Ethics

It is not possible to give an exhaustive list of the activities that constitute impropriety, misconduct, malpractice or irregularity covered by this Policy. The Companies expect all board members and all staff to observe and apply principles of ethics in conducting the business of Sunlight REIT. Behaviour or performance that is not in line with the principles of ethics (which may constitute impropriety, misconduct, malpractice or irregularity) should be reported.

The principles of ethics include but not limited to the following:

- Absence of fraudulent or corrupt conduct;

- Compliance with the Companies' policies and procedures;
- Compliance with laws, rules and regulations;
- Compliance with financial reporting requirements;
- Compliance with health, safety and environment requirements;
- Protection of information, records and assets; and
- Prompt response to incidents and obligation to report.

Board members and staff who have doubts in observing and applying the principles of ethics are encouraged to seek advice from the senior management of the Companies. Concealment of any violation of the principles of ethics is strictly prohibited.

3. Protection and Confidentiality

Persons reporting genuinely and appropriately under this Policy are assured of fair treatment. The Companies reserve the right to take appropriate actions against anyone who initiates or threatens to initiate retaliation against those who have raised concerns under this Policy. Harassment or victimization of a genuine reporting person will be liable to disciplinary action(s) up to and including summary dismissal. The Companies encourage all staff to raise concerns without fear of reprisals.

The Companies will make every effort, within its capacity, to keep the identity of the reporting person confidential. However, there may be circumstances whereby, due to the nature of the investigation, disclosure of the reporting person's identity may be necessary, but this will always be subject to obtaining his/her prior consent. In order not to jeopardize the investigation, the reporting person should also use his/her reasonable endeavours to keep the matter strictly confidential, including (but not limited to) the nature of concern, reporting details and the identities of those involved.

Should an investigation lead to a criminal prosecution, it may become necessary for the reporting person to provide evidence or be interviewed by the relevant regulators or authorities. The Companies will advise the reporting person in advance if his or her identity is required to be disclosed.

4. Reporting

4.1 The Content of the Allegation

To assist the Companies in response to the allegation, the allegation should be factual rather than speculative, and contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of the matter. The allegation should, to the extent possible, contain the following information:

- The alleged event, matter or issue which is the subject of the allegation;
- The name of each person and organization involved;
- If the allegation involves a specific event or events, the approximate date and location of each event; and
- Any additional information, documentation or other evidence available to support the allegation.

4.2 Reporting Channels

If any board member, staff or business partner has any concerns about impropriety, misconduct, malpractice or irregularity, he/she can report to the Internal Audit Department verbally through a dedicated hotline or in writing by post or email.

4.2.1 Dedicated Hotline

Hotline number: 3669 2834

The hotline has embedded a voice mail system which is available twenty-four hours a day, seven days a week. To the extent possible, the designated staff of the Internal Audit Department will answer the call during office hours. After office hours, calls are transferred to the voice mailbox for processing on the following business day.

4.2.2 Post or Email

The report can also be made to the Internal Auditor of the Manager in writing:

- i) by post in a sealed envelope clearly marked "To be opened by addressee only" at:

**Internal Auditor
Henderson Sunlight Asset Management Limited
30/F, Dah Sing Financial Centre,**

**248 Queen's Road East,
Wan Chai, Hong Kong**

ii) by email to:

reportcase@hendersonsunlight.com

All written reports can be made in the standard form attached in Appendix 1.

The Internal Audit Department will acknowledge the receipt of reported case of voicemail or mail or email to the person who reported a case on the following business day the latest if the report made is not anonymous.

It is highly encouraged that reports are not being made anonymously in order to facilitate further investigation and follow-up. Under the organizational structure of Sunlight REIT, the Internal Audit Department has open, regular and unrestricted access to the Audit Committee and the Chief Executive Officer ("CEO"), such independence can assure the information provided is treated in strict confidence.

If the complaint is lodged against the Internal Auditor, the report should be made by post either to the CEO (who will report to the Chairman of the Audit Committee) or directly to the Chairman of the Audit Committee, in both cases to the same address as stated above.

Where the staff makes a report to his/ her immediate superior or head of department and/or Corporate Service Department, the report of allegations received under this Policy shall redirect to the Internal Auditor.

5. Investigations

Once a report has been received, Internal Auditor will examine the concerns and assess the actions to be taken. This may involve any internal enquiry or a more formal investigation. If necessary, external specialists, such as forensic experts or legal experts, may be engaged to assist with an investigation. For cases of suspected corruption or other criminal offences, Internal Auditor will notify the CEO and the Chairman of the Audit Committee prior to seeking legal advice and reporting to the

Independent Commission Against Corruption (“ICAC”) or other relevant authorities. Once the matter is referred to the authorities, the Companies will not be able to take further action on the matter.

If the case falls more properly within the grievance procedure, the reporting matter will be transferred to the Corporate Services Department (Human Resources Team) or the senior management of relevant departments, and will keep the reporting person informed.

The results of any investigation will be submitted to the CEO or the Chairman of the Audit Committee to determine the appropriate corrective actions. The corrective actions may include disciplinary actions, termination of employment, and/or other appropriate actions.

Refer to Appendix 2 for detailed investigation procedures and Appendix 3 for communication procedures of investigation result with reporting person.

6. Untrue Allegation

In lodging a case, the reporting person should exercise due care to ensure the accuracy of the information. The Companies reserve the right to take appropriate action against any relevant person to recover any loss or damage for any untrue allegations made maliciously, with an ulterior motive, or for personal gain. In particular, the relevant person will face disciplinary action up to and including summary dismissal.

7. Retention of Records

Full records will be kept for all reported cases for a period not exceeding seven years (or whatever other period may be specified by any relevant legislation), and be classified as “confidential” and stored securely to avoid unauthorized access. In the event a reported case leads to an investigation, the party responsible will ensure that all relevant information relating to the case is retained, including details of corrective actions taken.

8. Summary of Reported Cases

The Internal Auditor will summarize all reported cases with respective

follow-up actions and report to the Audit Committee on a quarterly basis.

9. Communication and Training

The Companies will make this Policy available to all board members and all staff; it is posted on the website of Sunlight REIT and is saved on the server to be accessed by all staff of the Companies under: O:\Policy and Guidelines\Anti-fraud Policy & Whistleblowing Policy. Any material changes to the Policy shall be approved by the Board and be communicated to all board members and all staff. The Companies shall offer training for new staff, as well as to all staff at regular intervals.

10. Implementation, Monitoring and Review of the Policy

The Audit Committee has the overall responsibility for implementation and monitoring of this Policy. The Internal Audit Department has been delegated with the daily responsibilities for administration, periodic review and update of this Policy. Any material changes to this Policy are subject to the approval of the Board.

Appendix 1

Whistleblowing Report Form

The Companies are committed to maintaining good corporate governance, emphasizing accountability and high degree of transparency which enable our stakeholders to have trust and faith in Sunlight REIT and the Companies to take care of their needs and to fulfill their social responsibility.

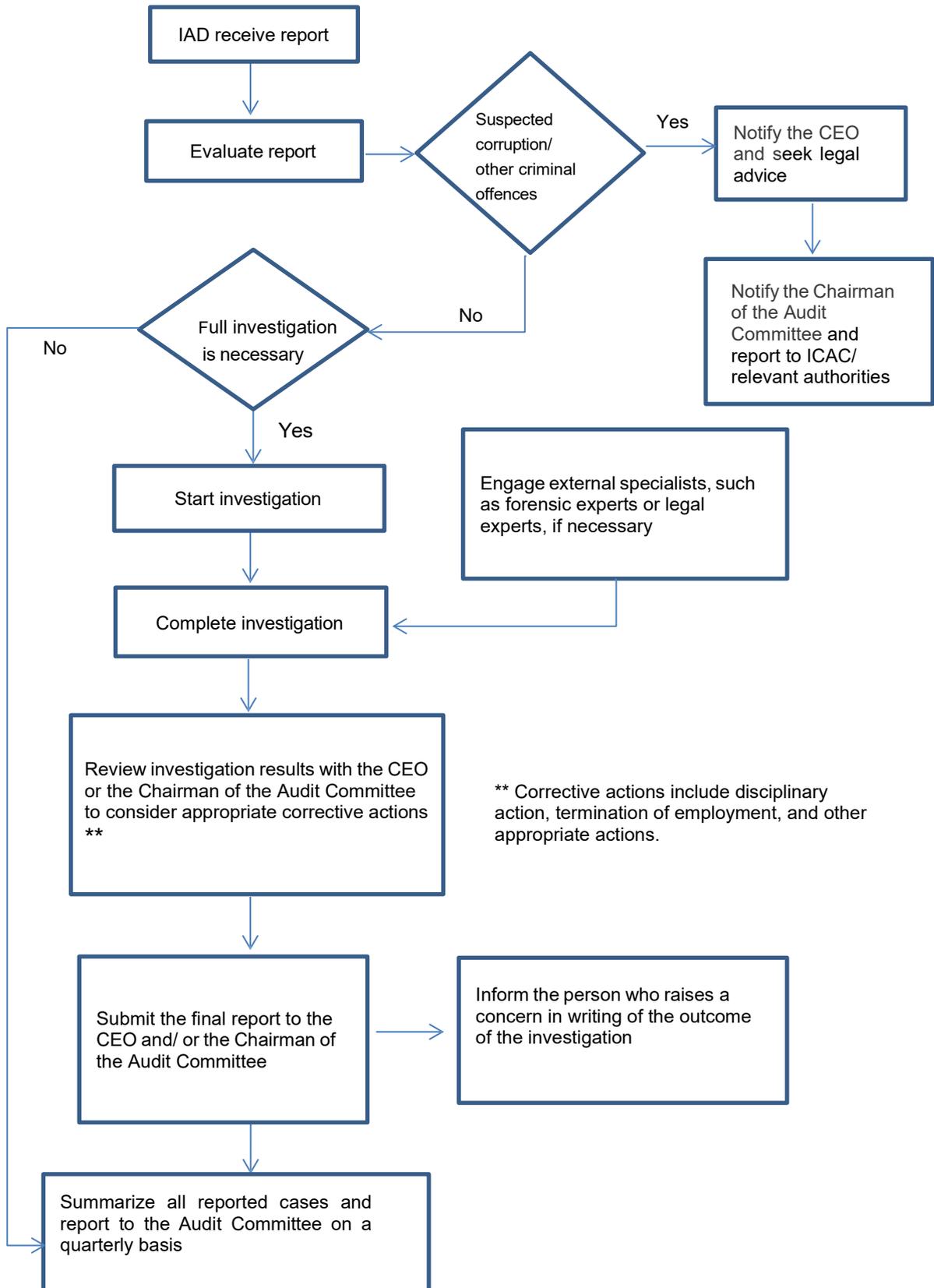
The Whistleblowing Policy has been established to encourage and assist the board members, staff (including full-time and part-time employees) and business partners (e.g., tenants, consultants, suppliers, contractors, outside agencies, etc.) who deal with the Companies to report information relevant to impropriety, misconduct, malpractice or irregularity through a confidential reporting channel (to the extent possible). The Companies will handle this report with care and will treat the concerns raised fairly and properly.

If you wish to make a written report, please use the report form below. You may send the report, in a sealed envelope clearly marked "To be opened by addressee only" and addressed to the Internal Auditor of the Manager, by post to the relevant address below or by email to reportcase@hendersonsunlight.com

To: Internal Auditor	
Henderson Sunlight Asset Management Limited 30/F, Dah Sing Financial Centre, 248 Queen's Road East, Wan Chai, Hong Kong (If the complaint is lodged against the Internal Auditor, the report should be made by post either to the CEO (who will report to the Chairman of the Audit Committee) or directly to the Chairman of the Audit Committee, in both cases to the same address as stated above.)	
Your Name / Contact Telephone Number and Email We encourage you to provide your name with this report form. Concerns expressed anonymously are much less effective to follow up.	Name: _____ Board member <input type="checkbox"/> Staff <input type="checkbox"/> Business Partner <input type="checkbox"/> (please specify: __) Address: _____ _____ Tel No.: _____ Email: _____ Date: _____
Details of concerns: Please provide full details, such as name, date and place and reason for the concerns (continue on separate sheet if necessary) together with any supporting evidence / documents.	
Personal Information Collection Statement All personal data collected will only be used for purposes which are directly related to the case you reported. It is strongly recommended that the report should not be made anonymously. The personal data submitted will be held and kept confidential. If necessary, the information provided may be disclosed to law enforcement authorities or other concerned units. Where relevant, under the Personal Data (Privacy) Ordinance of Hong Kong, you shall have the right to request access to and correction of your personal data. If you wish to exercise these rights, requests should be made in writing to the Internal Auditor at address shown in this form. Your personal data will not be kept longer than is necessary for the fulfillment of the investigation purposes, unless the retention is otherwise permitted or required by law.	

Appendix 2

Investigation Procedures



Appendix 3

Communication Procedures of Investigation Result with Reporting Person

