

Guideline for the Responsible Use of Artificial Intelligence

1. Background

- 1.1. As Swire Properties Limited (the “**Company**”) adopts AI technologies within our business processes and procures solutions that utilise them as underlying components, we are committed to the responsible, ethical, and compliant use of AI across the organisation in accordance with applicable laws and regulations, supported by a formal guideline governing its use.
- 1.2. This guideline (“**Guideline**”) sets out actionable principles and commitments that enable informed decision-making for the use, development, and procurement of AI across the organisation, covering everyday use by staff, AI model deployment, and third-party AI solutions. It is designed to address risks spanning regulatory, compliance, operational, and model dimensions, including but not limited to data privacy, cybersecurity, bias, intellectual property, and environmental impact, in a manner proportionate to the nature and scale of each AI application.
- 1.3. This Guideline applies to the Company and its subsidiaries (the “**Swire Properties Group**”). Associated and joint venture companies are encouraged to adopt the same guidelines.

2. Principles for the Responsible Use of AI

- 2.1. The Company is committed to the following principles in the development, procurement and use of AI solutions:
 - (a) Human Centric: The Company shall design and deploy AI to work in service of people, empowering them to make better decisions and drive faster results. Appropriate human oversight shall be maintained. Decisions with material impact on individuals or business outcomes should involve a level of human oversight proportionate to the significance of the decision.
 - (b) Privacy and Security: The Company shall protect the integrity, confidentiality, and security of data used within AI systems, in compliance with the Company’s Information Security Policy, Generative AI Usage Guidelines and applicable data

protection requirements. This commitment applies across the lifecycle of AI systems.

- (c) **Transparency and Explainability:** The Company shall provide appropriate clarity on the use of AI and the decision-making process, supporting understanding and responsible use. The Company also supports appropriate disclosure of the use, capabilities, and known limitations of AI systems to enable informed use.
- (d) **Responsible and Fair:** The Company shall foster the responsible design and use of AI, supporting fair and unbiased outcomes. Consideration shall be given to mitigating unintended bias, including periodic reviews of AI outputs where appropriate. Designated ownership, guardrails, and usage boundaries for AI systems shall be established under the governance framework set out under section 3 of this guideline.
- (e) **Testing and Training:** The Company shall test AI models with realistic and imperfect data, ensuring the models perform appropriately across both “perfect day” and “rainy day” scenarios.
- (f) **Environmental Responsibility:** Aligned with the Company’s Sustainable Procurement Policy, we encourage our suppliers to adopt a “best practice approach” on sustainability. Where feasible, we incorporate relevant sustainability considerations into our AI-related supplier selection and contract renewal evaluation processes. When making our procurement decisions, we endeavour to, where appropriate, take into consideration a supplier’s commitment and performance in the following:
 - assessing environmental impact across their entire service lifecycle;
 - tracking and reporting their Scope 1 and Scope 2 greenhouse gas emissions;
 - setting decarbonisation targets or commitment to the Science Based Targets initiative;
 - reducing carbon emissions and energy consumption through adopting energy efficient infrastructure and renewable energy; and
 - evaluating and reducing water consumption and other impacts on nature and biodiversity and degradation of the environment.

The Swire Properties Group has a strong preference for suppliers whose goods and services demonstrate better ESG performance.

3. AI Governance

3.1. All AI initiatives within the Company are subject to a structured assessment and approval process prior to deployment. This process ensures that each use case is evaluated against relevant risk dimensions and that cross-functional oversight - involving appropriate governance, technology, legal, and business stakeholders - is applied, proportionate to the risk profile and scope of each initiative.

3.2. The development and adoption of AI solutions should adhere to the principles set out in the Company's Guidelines for the Appropriate Use of AI and is subject to completion of the AI Use Case Assessment and Digital Project Governance Assessment.

4. Guideline Endorsement

4.1. Digital and IT Department oversees the endorsement and implementation of this Guideline. This Guideline has been reviewed and endorsed by the Board.

5. Review and Updates

5.1. The Company will review this Guideline from time to time as appropriate, and in any event, once every two years.

Adopted by The Board: 04 August 2026