

### **Carbon Offsetting Policy**

Swire Pacific is committed to achieving deep, science aligned decarbonisation as the foundation of our SD 2050 net zero climate strategy, and adopting carbon offsetting as a supplementary measure to hard-to-abate emissions.

This Policy applies to Swire Pacific Limited and its subsidiaries in a way that is relevant to their respective businesses. Associated and joint venture companies and those with whom we do business are encouraged to comply with it. Implementation of this Policy is the responsibility of the Management team of each group of operating companies.

#### **POLICY**

We expect all parties who are required and encouraged to follow this policy to meet or exceed all applicable regulations related to climate change.

- We shall ensure a clearly articulated decarbonisation roadmap to achieve decarbonisation target(s) is in place, and reductions in scope 1, 2 and 3 carbon emissions have been made to the greatest extent possible, before purchasing carbon offsets at scale;
- We shall offset business air travel;
- We shall conduct due diligence when sourcing carbon offsets;
- We shall give preference to carbon offsets that remove carbon from the atmosphere and permanently store it within or beyond the value chain;
- We shall avoid making claims about being net zero until emissions are reduced to the greatest extent possible, and residual emissions are offset;
- We should give preference, as far as practicable, to quality, cost effective carbon offsets associated with projects in our locations of operation.

**PUBLIC DISCLOSURE**

Appropriate disclosure on matters relating to this Policy will be included in our sustainability reports.

**COMPLIANCE**

Compliance with this policy is essential in maintaining Swire Pacific's commitment and aspirations to be a leader in sustainability. Should you, at any time, have any questions or concerns related to this Policy, please contact the Swire Pacific Sustainable Development function at [sd@swirepacific.com](mailto:sd@swirepacific.com). Confidential reports of perceived breaches of this policy, can be made to the Group Internal Audit Department (GIAD) of John Swire & Sons (H.K.) Limited via email ([group.audit@jsshk.com](mailto:group.audit@jsshk.com)) or through [EthicsPoint](#), a third-party service provider.

**REVIEW**

We will review this policy as appropriate and, in any event, once every 3 years.

Approved by the Swire Group Sustainability Committee on 11th February 2026.