

# Second-party Opinion on Wheelock and Company Limited's Sustainable Finance Framework

by Hong Kong Quality Assurance Agency (HKQAA)

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This Second-party Opinion service assesses Wheelock and Company Limited's Sustainable Finance Framework against the market standards as stated in this Second-party Opinion report without considering the related debt instruments. The opinion on the relevance, materiality, and core nature of the KPI selection, as well as the ambitious and relevancy of the SPT set, reflects the Group's provided core sustainability and business strategy, and relevant ESG challenges of the industry sector and market status as of the date of the assessment from a comprehensiveness perspective. The views of individual lenders may vary due to their own policies and requirements in relation to sustainable lending, which are based on their risk tolerance and sustainability goals.

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## Introduction

As announced in November 2020, the Chinese Communist Party released the 14th Five-Year Plan, spelling out China's long term development goal. Besides economic indicators, the 14th Five-year Plan also placed emphasis on the importance of promoting green and sustainable development.

Looking forward to 2035, China envisions its carbon emission will have peaked and declined steadily. To achieve this goal, the Chinese government has been pushing for a systematic transition to clean, efficient and low-carbon renewable energy in the industrial, construction and transportation sector. Furthermore, the Plan is committed to deepening the fight against pollution and adhered to prevention-first principle. Consequently, considerable amount of investment in renewable energy and advanced pollution prevention technology is foreseeable.

Wheelock and Company Limited ("WAC" or, together with its subsidiaries and associates, the "Group") is a property group headquartered in Hong Kong. Building on a commercial heritage that dates back to 1857, the Group is committed to investing in the long-term.

The Group is committed to sustainable development and its endeavour is recognised. WAC has developed the Sustainable Finance Framework (the "Framework"), under which it intends to engage in green finance activities, e.g., green bonds and green loans to finance and/or refinance, of their business processes and planned use of proceeds ("UOPs"), as well as management of proceeds and reporting aspects of the Group's sustainable finance. HKQAA also reviewed relevant public documents and non-public information, in whole or in part, existing and future projects that will contribute to China's sustainable development targets. The Framework defines eligible criteria in Green Buildings, Energy Efficiency, Renewable Energy, Clean Transportation, Pollution Prevention and Control, Sustainable Water and Wastewater Management, Climate Change Adaption, Assess to Essential Services, Socioeconomic Advancement and Empowerment, Affordable Basic Infrastructure and Affordable Housing.

The Group may also enter into sustainability linked loan or bond to support implementation of the vision and mission for its sustainability. Accordingly, the Framework specifies the Key Performance Indicators ("KPIs") and Sustainability Performance Targets ("SPTs") that lead to a positive stride on sustainability.

The Group has engaged HKQAA to review the Framework, dated December 2025, and provided a Second Party Opinion ("SPO") on the Framework's environmental credentials and its alignment with the Green Bond Principles 2025 ("GBP"), Green Loan Principles 2025 ("GLP"), Social Bond Principles 2025 ("SBP"), Social Loan Principles 2025 ("SLP"), Sustainability Bond Guideline 2021 ("SBG"), Sustainability Linked Bond Principles 2024 ("SLBP") and Sustainability Linked Loan Principles 2025 ("SLLP"). The SPO shall also determine if the KPIs selected by the Group as specified in the Framework are core, relevant and material to its business model and the associated SPTs are ambitious.

## Overview of Wheelock and Company Limited

WAC holds three key companies, namely they are:

The Wharf (Holdings) Limited (“WHL”) (HKSE: 00004), 69%-owned by WAC, is a listed company with principal businesses in properties, hotels and logistics infrastructure in Hong Kong and Chinese Mainland.

Wharf Real Estate Investment Company Limited (“Wharf REIC”) (HKSE: 01997), 48% -owned by WAC, is a listed company which owns and operates premium quality investment properties in prime locations in Hong Kong and Singapore, as well as certain Chinese Mainland property interest.

Wheelock Properties Limited (“WPL”), 50%-owned by WAC, spearheads the Group's property development business in Hong Kong.

## Framework Overview and Comment

### Use of Proceed

WAC shall use the proceeds raised under the Framework to finance or refinance, new or existing Eligible Green or Social Projects that meets one or more of the below eligible criteria:

#### **Green Buildings:**

- Acquisition, investment in, construction or renovation of existing and new buildings (including commercial and residential) certified in accordance with any one of the following certification standards:
  - Chinese Green Building Label: 2 Stars or above
  - Hong Kong BEAM Plus: Gold or above
  - US Leadership in Energy and Environmental Design (“LEED”): Gold or above
  - Singapore BCA Green Mark Rating: Gold or above
  - BREEAM: Excellent or above
  - Any other green building certification that is equivalent standard or above

#### **Energy Efficiency:**

- Investments and expenditure relating to the upgrade or modification of existing facilities, equipment (e.g. lighting or chillers), systems, professional services and technology such that improvement in energy efficiency or reduction in energy intensity could be yield of the Group (of the entity post upgrade or modification).

#### **Renewable Energy:**

- Projects aimed at developing the production and use of renewable energy. Such as investment and expenditure relating to the design, construction, installation

and operation of systems allowing generation of energy from renewable sources such as solar, wind and hydroelectric power, as well as biomass energy and hydrogen.

***Clean Transportation:***

- Investment in, purchase, repair and maintenance of electric or hydrogen-powered vehicles and related infrastructure.
- Investment in bicycle parking systems to encourage clean transportation usage.

***Pollution Prevention and Control:***

- Installation of recycling, trash sorting / separation, waste management facilities in buildings/our operations such as food waste decomposer.
- Expenditures relating to reduction of waste to landfill through recycling, for example active recycling of construction materials and installation of refuse classification system.

***Sustainable Water and Wastewater Management:***

- Investments and expenditures relating to projects that reduce water consumption and optimize wastewater management. For example, the adoption of rainwater recovery system and steam condensation recovery system.

***Climate Change Adaption:***

- Projects for the design, construction, maintenance, and upgrades of building / assets, and drainage systems for adapting to more frequent and severe extreme weather events due to climate change. For example, projects for the upgrade of flood defense or storm water management systems.

***Access to Essential Services:***

- Projects that support expansion of access to education and skill development, including but not limited to education initiatives regardless of ability to pay. Target population includes vulnerable and underprivileged youth and other underserved population.

***Socioeconomic Advancement and Empowerment:***

- Investment, expenditure and financing in projects that seek to employ vulnerable and underprivileged individuals. Target population includes vulnerable population groups such as aging population as defined by the local authority

***Affordable Basic Infrastructure:***

- Investment, expenditure and financing in projects for refurbishment, maintenance, and enhancement of access to basic and essential infrastructure. Target population includes Individuals with disabilities or aging population as

defined by the local authority, as well as general public for public waterfront promenade

***Affordable Housing:***

- Investment and expenditure in projects that provide affordable housing for the general public and vulnerable groups as defined by local authority. Target population includes population that is eligible for affordable housing as defined by the local authority

Additionally, exclusionary criteria are established to ensure that the proceeds of Eligible Green or Social Projects will not go towards financing or re-financing activities related to the below:

1. Fossil fuel and clean coal
2. Nuclear related assets
3. Armament
4. Mining
5. Gaming

**Project Evaluation and Selection Process**

The Group has established processes and procedures to evaluate and assess projects' compliance with this Framework. A working group, with representatives from project team, finance team and sustainability team, and other departments if deemed necessary, will review and identify potentially eligible projects. Shortlisted projects will be proposed to the Group's Finance Committee for approval. Each project will be evaluated and assessed based on the eligibility criteria outlined in Section 4, the potential risks and impacts associated with the projects.

The list of eligible projects will be reviewed on annual basis. Project which is no longer eligible will be removed and replaced as soon as practicable.

**Management of Proceeds**

The proceeds from each green / social / sustainability bond or green / social loan will be deposited in the general funding account, be earmarked to eligible projects and managed by the Group's treasury and accounts teams. The Group will maintain record to keep track of the use of proceeds and ensure there is no double counting of projects in allocation reporting, including information as follows:

1. Funding Transaction:
  - Information of the issuer / borrower entity;
  - Transaction date;

- Principal amount;
  - Repayment or amortization schedule;
  - Maturity date;
  - Interest or coupon; and
  - The ISIN number (in the case of bonds)
2. Allocation of the use of proceeds of UOPs:
- Name and description of eligible projects to which the proceeds of the UOP have been allocated in accordance with this Framework;
  - Finance Committee's endorsement on the allocation to an eligible project;
  - Amount of UOP's proceeds allocated to each eligible project;
  - The remaining balance of unallocated proceeds; and
  - Other relevant information such as information of temporary investment for unallocated proceeds

The Group commits to allocating proceeds to eligible projects on a timely basis. Net proceeds from UOPs pending allocation will be held in accordance with the Group's treasury and liquidity policy, including but not limited to temporary repayment of existing borrowings of the Group.

## Reporting

The Group commits to reporting on the allocation of the net proceeds of its UOPs under this Framework on its respective sustainability report or corporate website until full allocation, or in case of any material development.

The UOP's allocation reporting will include at least the following information:

- A list of approved eligible projects funded through the Group's UOPs, and amount allocated;
- Remaining balance of unallocated proceeds; and

By including this information in the Group's respective annual sustainability report, the allocation of net proceeds receives external review by an independent third party.

Wherever feasible, the Group will report on the environmental or social impacts resulting from the eligible projects. Subject to the project nature, relevant qualitative and quantitative ESG performance indicators will be disclosed per project, or in an aggregated manner. Key performance indicators ("KPIs") will include, but not limited to, the following indicators:

Environmental Project Type	KPIs
Green Building	<ul style="list-style-type: none"> <li>List of eligible buildings that received green building certification (scheme and rating)</li> </ul>
Energy Efficiency	<ul style="list-style-type: none"> <li>Energy consumption reduced (kWh or GJ)</li> <li>Energy intensity (kWh/m<sup>2</sup> or GJ/m<sup>2</sup>)</li> </ul>
Renewable Energy	<ul style="list-style-type: none"> <li>Number of solar lights / panels installed</li> <li>Amount of renewable energy generated (kWh or GJ)</li> </ul>
Clean Transportation	<ul style="list-style-type: none"> <li>Number of EV charging stations installed</li> <li>Percentage of EVs / Hydrogen-powered vehicles in the fleet</li> </ul>
Pollution Prevention and Control	<ul style="list-style-type: none"> <li>Amount of waste recycled (tonne)</li> <li>Amount of waste diverted from landfills (tonne)</li> </ul>
Sustainable Water and Wastewater Management	<ul style="list-style-type: none"> <li>Water consumption reduced (m<sup>3</sup>)</li> <li>Amount of potable water saved / recycled (m<sup>3</sup>)</li> </ul>
Climate Change Adaption	<ul style="list-style-type: none"> <li>Number and type of climate adaption / resilience / mitigation measures implemented</li> </ul>

Social Project Type	KPIs
Access to Essential Services	<ul style="list-style-type: none"> <li>Types and number of beneficiaries</li> </ul>
Socioeconomic Advancement and Empowerment	<ul style="list-style-type: none"> <li>Number and type of disadvantaged community benefitted</li> </ul>
Affordable Basic Infrastructure	<ul style="list-style-type: none"> <li>Number and type of target population benefitted</li> <li>Number of barrier-free facilities installed</li> </ul>
Affordable Housing	<ul style="list-style-type: none"> <li>Number and type of target population benefitted</li> </ul>

## KPI Setting Overview and Comment

### 1. Selection of KPIs

#### 1.1 WAC's core sustainability and business strategy

To meet the increasing demands of corporate responsibility and create long-term values for stakeholders in a post-pandemic era, WAC strives to be at the forefront of sustainable development, proactively embracing evolving international trends and industry initiatives. The Group has incorporated the United Nations Sustainable Development Goals ("UNSDGs") into its strategy. Also, the Group's effort is widely recognised by the capital market.

Along with the incorporation of climate-related risks into the Group's existing risk management system and the formulation and implementation of Climate Change Policy Statement at WHL and Wharf REIC, the Group also explores strategic measures to control and mitigate climate-related risks that may have adverse effects on its business and pursues climate-linked opportunities, thus enhancing resilience and capacity to adapt to climate change. Additionally, WAC continuously enhanced its disclosure in climate

change management referencing the Task Force on Climate-Related Financial Disclosures (TCFD) recommendations.

The Group has been paying effort to reduce emissions and manage energy use. WAC remains committed to supporting low-carbon transition with targets, policies and initiatives, as well as ESG-linked financing.

In line with its Business-in-Community philosophy, the Group has been actively supporting youth development, helping those in need, and promoting arts and culture in the community. The Group is dedicated to supporting underprivileged secondary school students through Project *WeCan* (“*WeCan*”) with donations, volunteer support and a wide range of activities.

Sustainable financing plays a key role in building a resilient society. With the announcement of Hong Kong’s Climate Action Plan 2050, the Group has been establishing a roadmap to support carbon neutrality, and sustainable financing is one of the key measures. The Group has adopted sustainable financing to support its commitment to sustainability.

## **1.2 ESG challenges**

The Group places significant importance on stakeholder engagement through various channels, including soliciting feedback from guests, actively engaging with colleagues and representatives of the local communities, meeting with investors and responding to their enquiries, among others. A comprehensive materiality assessment was conducted using a combination of qualitative methods, such as interviews, and quantitative methods, such as surveys, with various internal and external stakeholder groups. The Group ensured that the selected topics are in line with key ESG issues of the industry sector and aligned with its performance management.

### 1.3 Key Performance Indicators for WHL and Wharf REIC

KPI 1	ESG performance rating as in Hang Seng Index’s website
KPI’s definition and unit	Rating Results
Measurement methodology	Announcement and assessment report of Hang Seng Sustainability Index (HSSI)
Measurement scope	WHL and Wharf REIC’s Performance
Assessor’s comment	
<p>WHL and Wharf REIC has been maintained as one of the eligible companies for Hang Seng Corporate Sustainability Index assessment. The final rating score of WHL and Wharf REIC is assessed and confirmed by an independent assessment agency. The rating ranged from “AAA” (the highest) to “D” (the lowest) where Plus “+” or minus “-” grade is also assigned to indicate respective performance level within the rating categories. The rating “AA” represents the top tier sustainability performance. During the 2024 assessment results, less than 2% of all assessed companies achieved “AA” or above ranking. To attain such rating that requires strong commitment on sustainability and resources deployment in addressing the issues of environmental conservation, social responsibility, and corporate governance.</p> <p>WHL and Wharf REIC aim to achieve the “AA” rating in the Hang Seng Sustainability Index to demonstrate their commitment to uphold its sustainability performance efforts. “AA” rating represents the company has achieved a “Sustainable” level of ESG performance, meaning the company has developed a mature and systematic management mechanism to address ESG issues with sustained results, as well as putting genuine efforts in achieving positive impacts to the society.</p> <p>The Assessment team consider that the KPI is consistent and materially link to WHL and Wharf REIC’s sustainability strategy and commitment. The KPI selection is appropriate. Also, the KPI is verifiable by measurement on the results of performance rating.</p>	
KPI 2	Absolute or intensity of scope 1 and/or scope 2 Greenhouse Gas (“GHG”) emissions reduction
KPI’s definition and unit	% based on adjusted GHG emission (scope 1 and 2) in FY2019 and FY2022
Measurement methodology	Collection of activity data and calculation based on GHG Protocol
Measurement scope	<ul style="list-style-type: none"> <li>a. Investment Properties from Chinese Mainland (“MLIPs”) and owned hotels in Chinese Mainland under WHL, Modern Terminals (“MTL”), Hong Kong Investment Properties (“HKIPs”) and Leisure and Hospitality under Wharf REIC for FY2019 adjusted baseline</li> <li>b. WHL and Wharf REIC for FY2022 adjusted baseline</li> </ul>
Assessor’s comment	

WHL's and Wharf REIC's strategic focus on reducing properties' carbon emissions is pertinent. In the context of Hong Kong's Climate Action Plan 2050, which attributes over 60% of carbon emissions to building electricity generation, targeting Scope 2 emissions is directly material to both WHL's and Wharf REICs' core business operations. Their established practice of diligently monitoring and analyzing energy consumption trends further demonstrates that this KPI is central to their decarbonization strategy and overall business management.

The framework uses a well-defined and different baseline approach for its absolute GHG reduction across the measurement scope.

For the GHG emission reduction of MLIPs and owned hotels for WHL, MTL, HKIPs and Leisure and Hospitality for Wharf REIC, the selection of a 2019 adjusted baseline is considered robust and methodologically sound due to the significant impact of the COVID-19 pandemic on the Group's investment properties and hotels. The pre-pandemic year serves as the most suitable and representative benchmark for the assets. This ensures the targets are measured against the business-as-usual state. Furthermore, one of the assets, Niccolo Suzhou started operation in April 2021, thus the selected baseline is adjusted to simulate the normal operation of it in 2019.

Conversely, the selection of a 2022 adjusted baseline for WHL and Wharf REIC's reduction target is considered an appropriate selection. This decision was made specifically to align with WHL and Wharf REIC's near-term emissions reduction targets recently validated by the SBTi. This approach adds significant credibility and ambition as it uses a starting point that has already been approved by a globally recognized standard. The assessment team considers the KPI is directly linked to WHL and Wharf REIC's sustainability strategy. It is verifiable through the direct measurement of GHG emissions from their respective properties and hotels specified in the measurement scope. We consider the KPI to be material and the baseline selection to be appropriate.

KPI 3	Absolute electricity consumption reduction
KPI's definition and unit	GJ
Measurement methodology	Percentage reduction based on the electricity consumption data in FY2019
Measurement scope	Purchased Electricity from MLIPs and owned hotels in Chinese Mainland under WHL, HKIPs and Leisure and Hospitality under Wharf REIC

**Assessor's comment**

Reducing the absolute electricity consumption is a relevant and material KPI, given that energy use is a significant operational issue for the hospitality and real estate sectors. Industry benchmarks, such as the GRESB Real Estate Assessment<sup>1</sup>, categorize commercial properties as assets with substantial energy consumption. Correspondingly, publications from bodies like the UN Environment Programme<sup>2</sup> suggest that monitoring resource efficiency enables organizations in the property industry to better manage associated economic and environmental risks.

The KPI is applied across the Group's key segments, including MLIPs, HKIPs, owned hotels as well as Leisure and Hospitality. The selection of this metric corresponds with the Group's identification of "Energy Management" as a material ESG topic, according to its 2024 Materiality Assessment update.

<sup>1</sup> GRESB, *2024 Real Estate Assessment Results*, <https://www.gresb.com/2024-real-estate-assessment-results/#net-zero-progress>

<sup>2</sup> UN Environment Programme (2021). *A Manual to Measuring and Monitoring Resource Efficiency and Greenhouse Gas Emissions in the Hotel and Conference Sector*. Paris.

Therefore, the KPI is considered relevant, core, and material to the Group’s business and its current and future operations. It is measurable against a 2019 adjusted baseline on a consistent basis and can be benchmarked. Its selection also relates to key ESG issues, such as Carbon Emissions, identified for the real estate industry on internationally recognised frameworks like the MSCI ESG Industry Materiality Map.	
KPI 4	Absolute municipal water consumption reduction
KPI’s definition and unit	m3
Measurement methodology	Percentage reduction based on the municipal water consumption data in FY2019
Measurement scope	Consumption from MLIPs and owned hotels in Chinese Mainland under WHL, MTL, HKIPs and Leisure and Hospitality under Wharf REIC
Assessor’s comment	
<p>The responsible management of water resources has become an increasingly significant issue for businesses globally, driven by factors including shifting weather patterns, growing urban populations, and tightened regulatory focus on resource preservation. The Group's assets, including large-scale investment properties and hotels in both Hong Kong and Chinese Mainland, have considerable water footprints associated with cooling systems, sanitation, landscaping, and extensive hospitality services. Unmanaged consumption can lead to increased operational expenditures and exposure to physical and reputational risks in regions that may face water stress.</p> <p>The selection of absolute municipal water consumption reduction as KPI is considered appropriate and relevant to the Group's operational business. The scope of this KPI is comprehensive as it encompasses the Group’s investment properties across the portfolio.</p> <p>This KPI provides a direct measure of the Group’s progress in managing its water impact. The methodology, based on a percentage reduction from a 2019 adjusted baseline, is straightforward and allows for consistent tracking over time. The selection of this metric also corresponds with its identification as a key ESG issue, such as Water Stress, for the real estate and hotel industries on established frameworks like the MSCI ESG Industry Materiality Map, confirming its relevance to external stakeholders.</p>	
KPI 5	Increase in percentage of employees trained by gender
KPI’s definition and unit	Percentage of employees received training in each gender group
Measurement methodology	$(\text{Number of male employee trained of the year} / \text{Total male employees of the year}) * 100$ and $(\text{Number of female employee trained of the year} / \text{Total female employees of the year}) * 100$
Measurement scope	Employees of WHL, MTL and Wharf REIC
Assessor’s comment	
WHL and Wharf REIC recognise the importance of employees and their contributions to the success of the Group and to society. The Group is committed to providing fair and equal opportunities and benefits to all employees, regardless of age, disability, ethnicity, gender, family background, nationality, religion, or sexual orientation. To remain competitive in the market and maintain a healthy employee retention rate, WHL and Wharf REIC focuses not only on competitive remuneration	

packages but also on offering meaningful career development opportunities. A wide range of talent development programmes is provided to employees across all levels of the organisation.

As the business operations of WHL and Wharf REIC are people-intensive and require high-quality standards to sustain a competitive advantage, training and education are critical to the Group's long-term success. This social KPI has been adopted to achieve a balanced enhancement of both environmental and social performance. WHL and Wharf REIC aspires to progressively increase the proportion of employees receiving training to foster a strong learning culture across its businesses. Training opportunities are provided without discrimination, with the aim of achieving an equitable level of training participation between genders. By offering comprehensive training, the Group seeks to support employees' career progression and capability development, while strengthening the foundation of its ESG practices to better serve society.

The assessment team considers this KPI to be relevant to the Group's people-centric business model, is aligned with its stated material priorities, and incorporates a methodology that reinforces its social governance objectives. Its selection is therefore considered appropriate.

#### 1.4 Key Performance Indicators for WPL

KPI 1	ESG performance rating as in HKQAA CSR Index Plus
KPI's definition and unit	Rating Results
Measurement methodology	Announcement and assessment report of CSR Index Plus
Measurement scope	WPL's Performance
Assessor's comment	
<p>The selection of WPL's overall ESG performance rating, as measured by the Hong Kong Quality Assurance Agency (HKQAA) CSR Index Plus, is an appropriate Key Performance Indicator (KPI). This approach links the financing framework directly to the company's holistic sustainability performance as assessed by a credible, independent third party. The index provides a structured assessment covering a spectrum of ESG criteria, based on the company's public disclosures and identified risk factors.</p> <p>The KPI's design requires the company to manage a wide range of material issues concurrently to achieve a better score. Consequently, setting a progressive improvement target on this composite score necessitates continuous enhancement across multiple sustainability areas, rather than allowing for focus on a single, isolated metric. This structure demonstrates a commitment to broad-based ESG advancement.</p> <p>The KPI is verifiable through the assessment report and score published by HKQAA, which provides a transparent and quantifiable basis for performance tracking. The associated time-bound targets for the score create a clear pathway for accountability.</p> <p>In summary, the KPI is relevant as it reflects WPL's overall sustainability journey. Its reliance on a structured, third-party assessment ensures verifiability and transparency, making its selection appropriate for this sustainability-linked framework.</p>	
KPI 2	New development with BEAM Plus Gold rating or above

KPI's definition and unit	Percentage of new development receiving the target rating
Measurement methodology	No. of new development receiving the target rating / No. of total new development
Measurement scope	WPL's new development
Assessor's comment	
<p>The selection of KPI 2 based on achieving a BEAM Plus Gold rating or higher for new developments is appropriate for WPL's business. The use of the BEAM Plus green building certification provides a credible and independently verifiable framework for the KPI. As an established assessment system in Hong Kong, it evaluates building performance across key environmental categories, including energy efficiency and water conservation.</p> <p>By setting a target for a BEAM Plus Gold rating or above, WPL integrates measurable sustainability criteria directly into its development process. This KPI incentivizes the adoption of sustainable design principles, efficient building systems, and innovative technologies from the project outset. The ambition of achieving the Gold rating involves a holistic approach to design and operational factors. It also necessitates effective collaboration with contractors and suppliers to ensure sustainability objectives are met throughout the construction phase.</p> <p>In summary, the KPI is relevant to WPL's core business as a property developer, and its reliance on a recognized, third-party standard ensures verifiability and transparency. The selection is considered appropriate for the framework.</p>	
KPI 3	Carparks are cable enabled with electric vehicle charging
KPI's definition and unit	Percentage of new development equipped with the facilities
Measurement methodology	No. of new development equipped with cable enabled electric vehicle charging / No. of total new development
Measurement scope	WPL's new development
Assessor's comment	
<p>The KPI directly supports the transition to low-carbon transportation by enabling the adoption of electric vehicles, which contribute to the reduction of greenhouse gas emissions and local air pollutants. By ensuring carparks are cable enabled, the Group demonstrates forward-looking planning, thereby supporting long-term decarbonisation pathways.</p> <p>In terms of SLLP alignment, the KPI meets the principle of relevance and materiality, as climate change mitigation and energy transition are widely recognised material topics for real estate and infrastructure-related businesses. The KPI is also clearly defined and quantifiable. This allows for transparent tracking of performance over time, consistent with the SLLP requirement for measurable SPTs.</p> <p>Overall, this KPI is credible, verifiable, and strategically aligned with sustainability objectives, making it well suited for inclusion under the Group's sustainable Finance Framework.</p>	
KPI 4	Waste recycling rate at WPL's construction sites
KPI's definition and unit	Percentage of waste recycling among all construction sites

Measurement methodology	Amount of waste recycled / The average amount waste recycled from the past 5 years
Measurement scope	WPL's construction sites
Assessor's comment	
<p>The selection of KPI 4 focused on waste recycling at WPL's construction sites is admissible, as it addresses a material environmental impact for the Group, and aligning with the SLLP's emphasis on relevance. This KPI allows WPL to quantify its commitment to resource management within its core business operations.</p> <p>The KPI's measurement methodology focuses on the absolute volume of materials recycled and the target is calculated in percentage reduction. By benchmarking the annual amount of recycled waste against a five-year historical average, the KPI provides a consistent baseline to track progress and demonstrate year-over-year changes in the scale of WPL's recycling activities. This approach offers a direct measure of the Group's effort and the tangible outcomes of its waste management initiatives.</p> <p>The KPI is verifiable through data from waste management records from construction sites and is directly linked to WPL's operational sustainability strategy. This provides a quantifiable measure of the Group's effort in resource circularity. Therefore, its selection and methodology are considered appropriate.</p>	

## 2. Calibration of SPTs

### 2.1 Sustainability Performance Targets for WHL and Wharf REIC

SPT 1	Achieve “AA” or above for ESG performance rating as in Hang Seng Index’s website
Historical performance	The historical performance supplied by the Group is reviewed and will be provided to relevant parties if appropriate.
Benchmark or external reference	N.A.
Timeline for the target achievement	Target observation date(s)/period(s): Align with the Group’s Sustainable Finance Framework Trigger event(s): Nil Frequency of review of the SPTs: Annual (12-month period ending 31 December)
Baseline or reference point selected for improvement of KPIs (if relevant)	Rationale for that baseline or reference point to be used (including date/period): Align with the Group’s Sustainable Finance Framework
Assessor’s comment	
<p>It is considered that the SPTs are meaningful to WHL, Wharf REIC and the society. During the 2024 assessment cycle, less than 2% of all assessed companies achieved “AA” or above ranking. The rating model is evolving, and the bar is lifting year-on-year by incorporating the emerging ESG issues in the rating regime. Therefore, maintaining the target to achieve “AA” ranking in the Hang Seng Corporate Sustainability Rating is highly challenging. It requires strong management commitment, resources deployment and actions on continuous improvement.</p> <p>There are almost 1,800 companies in the universe of the HSSI selected for the annual assessment. Historically, only less than 30 companies achieved “AA” or above rating, which is less than 2 % with an outstanding ESG performance. The performance criteria of the index are tightened year by year with introduction of the new and emerging sustainability issues. The rating model is dynamic and upgraded to address the local and global ESG highlights. Therefore, continuously maintaining as the top 2% outstanding ESG performers in the index would require momentum in improvement with ceaseless commitment, stewardship, and ambition. For this reason, HKQAA considers that WHL and Wharf REIC will not be achieving the AA rating simply by taking the “business as usual” approach. It demands ambitiousness and extra efforts, so that the Group can be recognized as the 2% top ESG performers in the index with sustained success.</p> <p>The Assessment Team considered that the level of SPT has been set in good faith, relevant to WHL and Wharf REIC’s sustainability strategies and ambitious.</p>	
SPT 2	<p>a. Reduce GHG emissions (Scope 1 and 2) of 9 Investment Properties and 4 Owned Hotels in Chinese Mainland for WHL, HKIPs and Leisure and Hospitality for Wharf REIC from FY2019 adjusted baseline</p> <p>b. Reduce GHG emissions (Scope 1 and 2) of WHL and Wharf REIC from FY2022 adjusted baseline</p>

	c. Reduce total GHG emission intensity of MTL
Historical performance	The historical performance supplied by the Group is reviewed and will be provided to relevant parties if appropriate.
Benchmark or external reference	Peer benchmarking is not practicable as the scope is not the same and property characteristics are different, therefore, information from industrial peers is limited for comparison. The investment properties held by local peers are less aged or even mostly are newly built, therefore comparison with those portfolios would not be eloquent.
Timeline for the target achievement	Target observation date(s)/period(s): Align with the Group's Sustainable Finance Framework Trigger event(s): Nil Frequency of review of the SPTs: Annual (12-month period ending 31 December)
Baseline or reference point selected for improvement of KPIs (if relevant)	Rationale for that baseline or reference point to be used (including date/period): Align with the Group's Sustainable Finance Framework
Assessor's comment	
<p>SPT 2 presents a robust and credible decarbonization target, with its ambition anchored by the validation of WHL and Wharf REIC's near-term science-based targets by the SBTi. This third-party validation provides a strong, independent verification that WHL and Wharf REIC's climate goals are aligned with the level of decarbonization required to meet the goals of the Paris Agreement, lending significant credibility to the overall framework.</p> <p>SPT2.a and SPT2.b which demonstrate a significant acceleration in emission cuts from FY2028 onwards, is both meaningful and appropriate. This structure reflects the Group's stated strategy to align with its SBTi pathway. The final magnitude of a 42% absolute reduction by 2030 is substantial and consistent with science-based methodologies.</p> <p>For SPT2.c designated for Modern Terminals, the use of an intensity metric is suitable for a business with variable throughput. The targets are acceptable given that significant decarbonization has already been achieved through the electrification of its gantry cranes.</p> <p>Collectively, the targets of SPT 2 are appropriate, representing a well-considered strategy that combines absolute and intensity metrics tailored to different business units. The magnitude is deemed acceptable.</p>	
SPT 3	Reduce purchased electricity of 9 Investment Properties and 4 Owned Hotels in Chinese Mainland for WHL, HKIPs and Leisure and Hospitality for Wharf REIC from FY2019 adjusted baseline (in %)
Historical performance	The historical performance supplied by the Group is reviewed and will be provided to relevant parties if appropriate.
Benchmark or external reference	Peer benchmarking is not practicable as the scope is not the same and property characteristics are different, therefore, information from industrial peers is limited for comparison. The investment properties held by local

	peers are less aged or even mostly are newly built, therefore comparison with those portfolios would not be eloquent.
Timeline for the target achievement	Target observation date(s)/period(s): Align with the Group's Sustainable Finance Framework Trigger event(s): Nil Frequency of review of the SPTs: Annual (12-month period ending 31 December)
Baseline or reference point selected for improvement of KPIs (if relevant)	Rationale for that baseline or reference point to be used (including date/period): Align with the Group's Sustainable Finance Framework
Assessor's comment	
<p>Electricity consumption is a major source of indirect greenhouse gas emissions for property and hospitality portfolios, particularly in Chinese Mainland where grid emission factors remain relatively carbon intensive. Reducing purchased electricity directly supports climate change mitigation, energy efficiency improvement, and operational cost optimisation, all of which are key sustainability priorities for the Group. The SPT directly links to the Group's core business activities and material ESG risks and opportunities, aligning the SLLP requirement for materiality.</p> <p>Moreover, the SPT is measurable, quantifiable, and benchmarked against a credible baseline. Using a 2019 adjusted baseline is appropriate as it reflects business-as-usual operations prior to COVID-19-related disruptions, ensuring that performance improvements are not overstated due to abnormal operating conditions. Expressing the target as a percentage reduction allows for transparent tracking over time and accommodates changes in absolute consumption due to operational fluctuations.</p> <p>Third, the SPT demonstrates ambition and continuous improvement. Achieving electricity reductions across multiple properties and hotels requires systematic energy management, investments in efficiency measures, and behavioural change, going beyond a passive or business-as-usual trajectory. Hence, the SPT demonstrates ambition and strives for continuous improvement as stipulated in the SLLP.</p> <p>Overall, the SPT is relevant, measurable, ambitious, and verifiable, and is therefore considered aligned with the latest SLLP.</p>	
SPT 4	Reduce municipal water consumption of 9 Investment Properties and 4 Owned Hotels in Chinese Mainland for WHL, MTL, and HKIPs and Leisure and Hospitality for Wharf REIC from FY2019 adjusted baseline (in %)
Historical performance	The historical performance supplied by the Group is reviewed and will be provided to relevant parties if appropriate.
Benchmark or external reference	N.A.
Timeline for the target achievement	Target observation date(s)/period(s): Align with the Group's Sustainable Finance Framework Trigger event(s): Nil Frequency of review of the SPTs: Annual (12-month period ending 31 December)

Baseline or reference point selected for improvement of KPIs (if relevant)	Rationale for that baseline or reference point to be used (including date/period): Align with the Group's Sustainable Finance Framework
Assessor's comment	
<p>The selection of absolute municipal water consumption as a KPI is appropriate, directly addressing a material operational issue for the Group's property and hospitality portfolio. The meaningfulness and ambition of this SPT is also well defined.</p> <p>The rationale identifies the consumption is highly correlated with hotel occupancy and property footfall. The Group commits to an absolute reduction during a period where a post-pandemic recovery and projected "travel boom" are expected to create significant upward pressure on resource use.</p> <p>Therefore, the target magnitude of an 19%, 9.5% and 18% reduction by FY30 for WHL, MTL and Wharf REIC respectively, is considered both acceptable and ambitious. Achieving any net reduction under these conditions demands continuous and proactive management, from implementing water-saving technologies to enhancing operational practices, which goes beyond a "business-as-usual" trajectory.</p>	
SPT 5	Increase the percentage of employees received training by gender of WHL, MTL and Wharf REIC
Historical performance	The historical performance supplied by the Group is reviewed and will be provided to relevant parties if appropriate.
Benchmark or external reference	N.A.
Timeline for the target achievement	<p>Target observation date(s)/period(s): Align with the Group's Sustainable Finance Framework</p> <p>Trigger event(s): Nil</p> <p>Frequency of review of the SPTs: Annual (12-month period ending 31 December)</p>
Baseline or reference point selected for improvement of KPIs (if relevant)	Rationale for that baseline or reference point to be used (including date/period): Align with the Group's Sustainable Finance Framework
Assessor's comment	
<p>Employee training and development is a core social issue for people-intensive businesses such as property management, hospitality, and logistics. The SPT directly supports human capital development, talent retention, and operational resilience, which are critical to the long-term sustainability of WHL and Wharf REIC. By tracking training participation by gender, the SPT also promotes fairness and equal access, aligning with broader social inclusion and diversity objectives. This meets the SLLP requirement that SPTs should be relevant and material to the Group's business and sustainability strategy.</p> <p>The SPTs are clearly defined, measurable, and time-bound, with a predefined trajectory for each entity. The gradual increase in the percentage reflects continuous improvement rather than one-off actions, consistent with the SLLP expectation that SPTs should be ambitious and represent a meaningful improvement beyond a business-as-usual trajectory.</p>	

Furthermore, the SPTs are supported by concrete actions, including structured training programmes and sponsorship schemes. Overall, the SPT setting is demanding yet achievable, socially meaningful, and aligned with the latest SLLP.

## 2.2 Sustainability Performance Targets for WPL

SPT 1	Achieve ESG performance score of 80 or above in HKQAA CSR Index Plus
Historical performance	The historical performance supplied by the Group is reviewed and will be provided to relevant parties if appropriate.
Benchmark or external reference	N.A.
Timeline for the target achievement	Target observation date(s)/period(s): Align with the Group's Sustainable Finance Framework Trigger event(s): Nil Frequency of review of the SPTs: Annual (12-month period ending 31 December)
Baseline or reference point selected for improvement of KPIs (if relevant)	Rationale for that baseline or reference point to be used (including date/period): Align with the Group's Sustainable Finance Framework
Assessor's comment	
<p>The structure SPT 1, with targets of 80 and 81, should be evaluated in the context of the dynamic nature of the underlying index. The rationale notes that ESG rating model of CSR Index Plus is not static as it evolves annually to incorporate more stringent standards and emerging stakeholder expectations. Consequently, maintaining a consistent score year-on-year requires continuous improvement from the Group to keep pace with the rising bar. A "business-as-usual" approach would likely result in a score decline. This target builds upon the Group's historical ESG performance, where WPL has demonstrated a capacity for progressive improvement.</p> <p>Achieving a score of 80 and then advancing to 81 demands a significant and sustained commitment to enhance performance across a wide range of ESG areas. The Group's robust framework and ESG establishments aims to provide the necessary structure to manage this complex challenge.</p> <p>Given this context, the SPT is considered to represent a continuous and proactive effort. The target is measurable, verifiable and linked to a comprehensive view of the Group's sustainability strategy, making it appropriate and aligned with the principles of the latest SLLP.</p>	
SPT 2	100% new development GFA with BEAM Plus Gold rating or above

Historical performance	The historical performance supplied by the Group is reviewed and will be provided to relevant parties if appropriate.
Benchmark or external reference	N.A.
Timeline for the target achievement	Target observation date(s)/period(s): Align with the Group's Sustainable Finance Framework Trigger event(s): Nil Frequency of review of the SPTs: Annual (12-month period ending 31 December)
Baseline or reference point selected for improvement of KPIs (if relevant)	Rationale for that baseline or reference point to be used (including date/period): Align with the Group's Sustainable Finance Framework
Assessor's comment	
<p>The BEAM Plus rating system is a widely recognized sustainability assessment tool used in Hong Kong. Achieving a Gold rating or above requires meeting stringent criteria in various aspects, such as energy efficiency, water conservation, indoor environmental quality, and materials selection.</p> <p>To achieve this rating for 100% new development means that all new construction projects within a given scope would need to meet the high standards set by BEAM Plus. This represents a significant departure from the business-as-usual approach.</p> <p>The ambition to achieve BEAM Plus Gold rating or above for all new developments signifies a commitment to sustainability and a desire to go beyond minimum regulatory requirements. It demonstrates a willingness to invest in environmentally responsible practices and contribute to long-term societal and environmental goals.</p>	
SPT 3	100% residential carparks are cable enabled with electric vehicle charging
Historical performance	The historical performance supplied by the Group is reviewed and will be provided to relevant parties if appropriate.
Benchmark or external reference	N.A.
Timeline for the target achievement	Target observation date(s)/period(s): Align with the Group's Sustainable Finance Framework Trigger event(s): Nil Frequency of review of the SPTs: Annual (12-month period ending 31 December)

Baseline or reference point selected for improvement of KPIs (if relevant)	Rationale for that baseline or reference point to be used (including date/period): Align with the Group's Sustainable Finance Framework
Assessor's comment	
<p>The SLLP and SLBP emphasize sustainability in the building and construction sector, including measures to mitigate climate change and reduce greenhouse gas emissions. Implementing EV charging infrastructure in 100% of residential car parks is a significant departure from the business-as-usual approach, where the provision of EV charging stations is often limited or non-existent. It requires a proactive effort to integrate charging infrastructure into property developments.</p> <p>Pursing SPT 3 would encourage the adoption of electric vehicles, contribute to reducing greenhouse gas emissions, and support the transition to a low-carbon transportation system. It would also provide convenience and accessibility for residents who own or plan to own electric vehicles.</p> <p>Having a comprehensive EV charging network in residential areas can help alleviate range anxiety, increase the attractiveness of electric vehicles to potential buyers, and foster a culture of sustainability within communities.</p> <p>Given the above, the Assessment Team considered that the level of SPT will lead to material improvement in GHG reduction and beyond both a business-as-usual trajectory and regulatory required targets.</p>	
SPT 4	Achieve 50 % or above waste recycling rate at our construction sites
Historical performance	The historical performance supplied by the Group is reviewed and will be provided to relevant parties if appropriate.
Benchmark or external reference	N.A.
Timeline for the target achievement	<p>Target observation date(s)/period(s): Align with the Group's Sustainable Finance Framework</p> <p>Trigger event(s): Nil</p> <p>Frequency of review of the SPTs: Annual (12-month period ending 31 December)</p>
Baseline or reference point selected for improvement of KPIs (if relevant)	Rationale for that baseline or reference point to be used (including date/period): Align with the Group's Sustainable Finance Framework
Assessor's comment	

The selection of KPI 4 for the waste recycling rate at WPL's construction sites is appropriate, as it addresses a material environmental impact for the Group and aligns with the SLLP's emphasis on relevance. The KPI provides a specific metric to track performance in the key area of construction waste management.

The rationale offers context for the SPT, explaining that the target setting accounts for future operational conditions. It notes that projected project schedules and the nature of work during certain construction phases will influence the overall recycling rate. The target of 50% is also positioned in relation to other benchmarks, including the Group's internal minimum requirement for contractors and the rate referenced within the BEAM Plus framework. The Group has identified operational measures, such as the double chute system, to support its waste management activities.

The KPI is verifiable through project-level data, and its targets are established with consideration for the Group's operational forecast. Given the context provided in the rationale, the SPT setting is considered appropriate.

### **3. Loan / Bond Characteristics**

This SPO service focused solely on WAC's Sustainable Finance Framework, where the loan / bond characteristics, including any incentives and/or penalties, should be detailed in the relevant documents for each Sustainability Linked Transactions ("SLT"). Therefore, this aspect of the SLLP is not covered by this SPO service.

### **4. Reporting**

Reporting obligation will be included in the relevant document of each SLT. Annual reporting of the performance of the SPTs will be available on the Group's website for sustainability-linked bonds, whereas for sustainability-linked loans, annual reporting of the performance of the SPTs will be provided to the relevant parties.

### **5. Verification**

The assessment team of HKQAA considers the Verification description provided by The Group is aligned with the SLLPs. The Group can appoint an external reviewer to verify the performance of the KPIs annually on a best effort basis, and in any case at the trigger event date. This will outline the performance against the SPTs, the related impact and timing of such impact on the financial characteristics of Instruments.

## **Conclusion**

### Use of Proceeds

The assessment team of Hong Kong Quality Assurance Agency has determined that WAC's Sustainable Finance Framework is well-structured and in accordance with the requirements

of Green Bond Principles 2025, Green Loan Principles 2025, Social Bond Principles 2025, Social Loan Principles 2025, Sustainability Bond Guideline 2021. For detail information, please refer to Appendix 3: Independent External Review Form.

#### Sustainability-Linked Loan / Bond's Settings

The assessment team of Hong Kong Quality Assurance Agency has determined that WAC's Sustainability-Linked Loan / Bond's setting by adoption of this Sustainable Finance Framework includes all core components of Sustainability-linked Loan Principles 2025 / Sustainability-linked Bond Principles 2024. KPIs and SPTs are meaningful and ambitious. Thus, the loan / bond's setting is in alignment with the core components of Sustainability-linked Loan Principles 2025 / Sustainability-linked Bond Principles 2024.

## Appendix 1: Documents reviewed or referenced

No.	Author	Title
1	GRESB	<i>2024 Real Estate Assessment Results</i> , <a href="https://www.gresb.com/2024-real-estate-assessment-results/#net-zero-progress">https://www.gresb.com/2024-real-estate-assessment-results/#net-zero-progress</a>
2	UN Environment Programme (2021).	<i>A Manual to Measuring and Monitoring Resource Efficiency and Greenhouse Gas Emissions in the Hotel and Conference Sector</i> . Paris.

## Appendix 2: External Review Form

### Independent External Review Form

#### Section 1. Basic Information

**Issuer / borrower name: Wheelock and Company Limited's**

**Sustainability-Linked Bond ISIN: N.A.**

**Independent External Review provider's name for second party opinion pre-issuance (sections 2 & 3): Hong Kong Quality Assurance Agency (HKQAA)**

**Completion date of second party opinion pre-issuance: N.A**

**Independent External Review provider's name for post-issuance verification (section 4): To be determined**

**Completion date of post issuance verification: N.A.**

**At the launch of the bond/ loan, the structure is:**

Bond:

- |  |  |
|--|--|
| <input type="checkbox"/> a step-up structure     | <input type="checkbox"/> a variable redemption structure |
| <input checked="" type="checkbox"/> others: N.A. |  |

Loan:

- |  |  |
|--|--|
| <input type="checkbox"/> term loan               | <input type="checkbox"/> revolving credit facilities |
| <input checked="" type="checkbox"/> others: N.A. |  |

#### Section 2. Pre-Issuance Review

##### 2-1 SCOPE OF REVIEW

*The following may be used or adapted, where appropriate, to summarise the scope of the review.*

The review:

- assessed all the following elements (complete review)     only some of them (partial review):

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Selection of Key Performance Indicators (KPIs)           | <input checked="" type="checkbox"/> Bond/ Loan characteristics<br><i>(acknowledgment of)</i> |
| <input checked="" type="checkbox"/> Calibration of Sustainability Performance Targets (SPTs) | <input checked="" type="checkbox"/> Reporting  |
| <input checked="" type="checkbox"/> Verification   |  |

- and confirmed their alignment with the SLBP/SLLP.

**2-2 ROLE(S) OF INDEPENDENT EXTERNAL REVIEW PROVIDER**

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Second Party Opinion | <input type="checkbox"/> Certification  |
| <input type="checkbox"/> Verification                    | <input type="checkbox"/> Scoring/Rating |

*Note: In case of multiple reviews / different providers, please provide separate forms for each review.*

**2-3 EXECUTIVE SUMMARY OF REVIEW and/or LINK TO FULL REVIEW (if applicable)**

Please refer to Section 1 to 7 of this SPO report.

**Section 3. Detailed pre-issuance review**

*Reviewers are encouraged to provide the information below to the extent possible and use the comment section to explain the scope of their review.*

**3-1 SELECTION OF KEY PERFORMANCE INDICATORS (KPIs)**

**Overall comment on the section (if applicable): Please refer to Section 1 to 7 of this SPO report.**

**List of selected KPIs: Please refer to Appendix 1**

- ✓ ...
- ✓ ...

**Definition, Scope, and parameters**

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Clear definition of each selected KPIs | <input type="checkbox"/> Clear calculation methodology |
| <input type="checkbox"/> Other (please specify):                           |  |

**Relevance, robustness, and reliability of the selected KPIs**

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Credentials that the selected KPIs are relevant, core and material to the Borrower/ Issuer’s sustainability and business strategy. | <input checked="" type="checkbox"/> Evidence that the KPIs are externally verifiable |
| <input checked="" type="checkbox"/> Credentials that the KPIs are measurable or quantifiable on a consistent methodological basis                                      | <input checked="" type="checkbox"/> Evidence that the KPIs can be benchmarked        |
| <input type="checkbox"/> Other (please specify):   |  |

**3-2 CALIBRATION OF SUSTAINABILITY PERFORMANCE TARGETS (SPTs)**

**Overall comment on the section (if applicable): Please refer to Section 3.2 of this SPO report.**

### Rationale and level of ambition

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Evidence that the SPTs represent a material improvement  | <input checked="" type="checkbox"/> Credentials on the relevance and reliability of selected benchmarks and baselines |
| <input checked="" type="checkbox"/> Evidence that SPTs are consistent with the Borrower/ Issuer's sustainability and business strategy | <input checked="" type="checkbox"/> Credentials that the SPTs are determined on a predefined timeline                 |
|  | <input type="checkbox"/> Other ( <i>please specify</i> ):   |

### Benchmarking approach

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Borrower/ Issuer own performance | <input type="checkbox"/> Borrower/ Issuer's peers         |
| <input type="checkbox"/> reference to the science                    | <input type="checkbox"/> Other ( <i>please specify</i> ): |

### Additional disclosure

- |   |   |
|---|---|
| <input type="checkbox"/> potential recalculations or adjustments description                                  | <input type="checkbox"/> Borrower/ Issuer's strategy to achieve description |
| <input checked="" type="checkbox"/> identification of key factors that may affect the achievement of the SPTs | <input type="checkbox"/> Other ( <i>please specify</i> ):                   |

## 3-3 LOAN/ BOND CHARACTERISTICS

**Overall comment on the section (*if applicable*): Please refer to Section 3.3 of this SPO report.**

#### Financial impact:

- variation of the coupon
- ...
- Other (*please specify*):

#### Structural characteristic (only applicable for bond):

- ...
- ...
- Other (*please specify*):

## 3-4 REPORTING

**Overall comment on the section (*if applicable*): Please refer to Section 3.5 of this SPO report.**

#### Information reported:

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> performance of the selected KPIs | <input checked="" type="checkbox"/> verification assurance report |
|--|---|

- level of ambition of the SPTs  Other (please specify):

**Frequency:**

- Annual  Semi-annual  
 Other (please specify):

**Means of Disclosure**

- Information published in financial report  Information published in sustainability report  
 Information published in ad hoc documents  Other (please specify):  
 Reporting reviewed (if yes, please specify which parts of the reporting are subject to external review):

Where appropriate, please specify name and date of publication in the “useful links” section.

**Level of Assurance on Reporting**

- limited assurance  reasonable assurance  
 Other (please specify):

**USEFUL LINKS** (e.g. to review provider methodology or credentials, to issuer’s documentation, etc.)

**Section 4. Post-issuance verification**

**Overall comment on the section** (if applicable):

**Information reported:**

- limited assurance  reasonable assurance  
 Other (please specify):

**Frequency:**

- Annual  Semi-annual  
 Other (please specify):

**Material change:**

- Perimeter  KPI methodology  
 SPTs calibration

## Appendix 3: About role(s) of review providers as defined by the ICMA

**1. Second Party Opinion:** An institution with environmental/ social/sustainability expertise that is independent from the issuer may provide a Second Party Opinion (either required or recommended pre-issuance as described in the respective Principles). The institution should be independent from the issuer's adviser for its green, social, sustainability and sustainability-linked bond framework, or appropriate procedures such as information barriers will have been implemented within the institution to ensure the independence of the Second Party Opinion. Any concerns on the institution's independence should be disclosed to investors.

**2. Verification:** An issuer can (or "needs to" in the case of sustainability-linked bonds post issuance) obtain independent verification against a designated set of criteria, typically pertaining to environmental/social/sustainability or KPI performance and sustainability targets for the SLBs.

**3. Certification:** An issuer can have its green, social, sustainability and sustainability-linked bond or associated green, social, sustainability and sustainability-linked bond framework or Use of Proceeds or Key Performance Indicators (KPIs) and Sustainability Performance targets (SPTs) certified against a recognised external green/ social/sustainability standard or label. A standard or label defines specific criteria, and alignment with such criteria is normally tested by qualified, accredited third parties, which may verify consistency with the certification criteria.

**4. Green, Social, Sustainability and Sustainability-Linked Bond Scoring/Rating:** An issuer can have its green, social, sustainability and sustainability-linked bond associated framework or a key feature such as Use of Proceeds, selection of KPIs, calibration of the level of ambitiousness of SPTs, evaluated or assessed by third parties, such as specialised research providers or rating agencies, according to an established scoring/rating methodology.

## Appendix 4: Hong Kong Quality Assurance Agency (HKQAA)

### Local Excellence, Global Perspective

Established by Hong Kong Government in 1989, Hong Kong Quality Assurance Agency (HKQAA) is a non-profit public organisation committed to introducing international management standards, promoting good management practices and sustainability in Greater China for decades. As one of the leading conformity assessment organisations in the region, HKQAA not only provides certification, assessment, registration, training and research services to help organisations enhance management performance and competitiveness, but also develops a wide range of good management practices and related criteria to cope with increasingly diversified market demands and the growing need for sustainable development, fostering a better environment and bringing benefits to the community.

### Ample Experience in Fostering Sustainable Economy

In recent years, sustainability has become one of the key forces driving organisations towards a prolonged success. To support and encourage them to walk the talk, HKQAA has developed diverse services and obtained ample experience in the field of social responsibility, environmental protection, sustainability and responsible investment:

- With the initial support of **The Hongkong and Shanghai Banking Corporation Limited (HSBC)**, HKQAA introduced the **CSR Index** to provide quantitative metrics to measure organisations' maturity level in practicing their social responsibilities in 2008;
- HKQAA was **the only Hong Kong organisation accredited as the Designated Operational Entity (DOE)** by the Executive Board of the Clean Development Mechanism (CDM) under the United Nations Framework Convention on Climate Change (UNFCCC) to deliver CDM validation and verification services since 2011;
- HKQAA has been providing assessment and rating services on companies' sustainability performance for the **Hang Seng Corporate Sustainability Index Series** since 2014;
- Since 2017, our expert has been nominated by the **Innovation and Technology Commission of the HKSAR Government** and the **China National Institute of Standardization** respectively to directly take part in the technical committee of ISO/ TC 207/SC 4 and the working group of **ISO/TC 207/SC 4/ WG 7** to develop **ISO 14030 Green bonds – Environmental performance of nominated projects and assets**;
- Since 2018, HKQAA has been admitted as an **Observer of the Green Bond Principles (GBP) under the International Capital Market Association (ICMA)**;
- Since 2018, HKQAA has become an **approved verifier under the Climate Bonds Standard**.
- Since 2018, the HKQAA expert was nominated by the **Innovation and Technology Commission of the HKSAR Government** to participate in the **ISO Technical Committee, Sustainable Finance (ISO/TC 322)** for the development of sustainable finance related standards.

Contact HKQAA

Website: <http://www.hkqaa.org>

## Appendix 5: Methodologies and Limitation

### Methodology

The process applied in this assessment made reference with ICMA's Guidelines for Green, Social, Sustainability and Sustainability-Linked Bonds External Reviews.

Our assessment procedure performed covered reviewing of relevant documentation, interviewing responsible personnel with accountability for preparing the SLLs setting and verifying the selected representative sample of project, data and information. Supporting evidence of the selected samples might also be examined during the assessment process.

### Independence

Borrower is responsible for the collection and presentation of the information presented in the document describing the SLLs setting (SLL/SLB Document). HKQAA does not involve in calculating, compiling, or in the development of the SLLs setting. Our assessment activities are independent from Borrower.

### Limitation

There are inherent limitations in performing assessment which are set out as follows. The report is issued on the assumption that the documents and information provided to HKQAA are accurate, complete and valid as of the date of this document. The assessment did not provide assurance on information outside the defined reporting boundary and period. Unless explicitly expressed by HKQAA, HKQAA expresses no opinion in relation to any representation or warranty that may contain in any of the data and information provided to HKQAA. HKQAA does not provide any guarantee or endorsement in respect of any business of any parties mentioned in the document. There are additional inherent risks associated with assurance over non-financial information including reporting against which may require information to be assured against source data compiled using definitions and estimation methods that are developed by the Borrower.

Our assessment is limited to the selected information on the document describing the SLLs setting, and did not include statutory financial statements, financial statements and economic performance. Our assessment is given only as to and based on the circumstances and matters of fact existing and known to HKQAA and based on the policies and procedures in place as of 28/01/2026.

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The borrower/ issuer is fully responsible for certifying and ensuring the compliance with its commitments, for their implementation and monitoring.

In case of discrepancies between the English language and translated versions, the English language version shall prevail.