

# Responsible Marketing Policy

## Purpose

This policy aims to ensure that Seazen Group Holdings Co., Ltd. (新城集团控股有限公司) (hereinafter referred to as “Seazen Group”, the “Group”, “we”, “our” or “us”) complies with relevant laws and regulations and business ethics when communicating with stakeholders, and promoting and marketing its products and services. It seeks to enhance the Group's sustainable operations and development while reflecting the Group's values of social responsibility.

## Scope of application

This policy is applicable to full-time and part-time employees, as well as temporary employees of the Group and its subsidiaries.

## Compliance with industry laws and regulations

Seazen Group complies with all laws and regulations related to marketing practices and industry norms applicable to the countries or regions where our business is conducted, including but not limited to the *Advertising Law of the People's Republic of China* (《中华人民共和国广告法》), *Urban Real Estate Administration Law of the People's Republic of China* (《中华人民共和国城市房地产管理法》), *Administrative Measures for the Sale of Commodity Buildings* (《商品房销售管理办法》) and *Provisions on the Release of Real Estate Advertisements* (《房地产广告发布规定》).

## Compliance with internal responsible marketing, advertising, and sales systems

Seazen Group has established internal policies and systems related to marketing, advertising, and sales activities. We have passed internal systems such as the *Measures for the Marketing Operations Management and Risk Management of the Real Estate Development Division (2024 Edition)*(《地产开发事业部营销业务管理与风险管理办法(2024版)》) and *Measures for the Management of Project Marketing Teams of the Real Estate Development Division (2024 Edition)*(《地产开发事业部项目营销团队管理办法(2024版)》) to regulate marketing behaviors, marketing contents and marketing methods within marketing activities. Furthermore, false or misleading content is strictly prohibited in the Group's marketing scripts, and there shall be no exaggeration or misleading practices in consumer interactions during marketing activities.

## Commitment to Responsible Marketing

- There shall be no false statements on products, services or prices;
- There shall be no false or misleading statements on the Group's products, services, performance, or performance record, nor false or misleading statements on competitors' products, services, performance, or performance record;
- When comparing the Group's products or services with those of competitors,

unless substantiated by substantial research and investigation, there shall be no comparative advertising, whether in written form or others;

- All marketing materials shall be kept properly for evaluation or review when needed;
- All advertising and marketing campaign materials shall be approved by authorized management to ensure accuracy and compliance;
- Marketing and sales activities shall be reviewed on a regular basis to ensure that sales and marketing practices related to products and services are legal and compliant;
- The privacy and data of customers/consumers shall be fully respected and protected;
- We proactively organize consumer education activities to improve their ability to evaluate and compare products and services, and guide them to make rational and responsible purchases.

### **Responsible Marketing Audit**

The Group regularly conducts special audits on responsible marketing, where self-inspection and rectification on non-compliant marketing issues shall be carried out, and results of special audits on responsible marketing shall be disclosed. Through various measures such as standardized management, negative criticism, and online and offline reviews in multiple forms, we make every effort to ensure that marketing information complies with legal norms.

### **Employee Training**

All employees shall receive relevant training on responsible marketing and training on this policy. We require the sales teams of each subsidiary to regularly organize responsible marketing training related to business.

### **Violation Reporting Channels**

Employees of the Group shall have an obligation to report any violations of this policy through relevant channels as required by the *Employee Code of Conduct of Seazen Holdings (2024 Edition)*( 《新城控股员工职务行为准则（2024版）》 ). All reports of improper conduct shall be investigated in accordance with the *Employee Code of Conduct of Seazen Holdings (2024 Edition)* of the Group, and serious measures shall be taken when necessary.

### **Revision and Review**

The Group shall review this policy on a regular basis and revise it when necessary.