

KE Holdings Inc.

Anti-Harassment Policy

KE Holdings Inc. (together with its subsidiaries and consolidated affiliated entities, the “Company”) is committed to the prevention of harassment across the Company’s business operations. The objective of this Anti-Harassment Policy (the “Policy”) is to establish internal guidelines and controls to ensure the Company’s adherence to anti-harassment laws or policies, to safeguard its employees’ wellbeing, and to protect the Company from potential legal liability and reputational harm. The standards in this Policy represent the minimal standards upon which any other anti-harassment compliance-related policies and procedures adopted by the Company must be based. This Policy does not in any way restrict the Company from adopting additional policies, procedures, or standards based on local applicable law in the jurisdictions in which the Company operates. It also does not relieve employees of their obligations, at all times in connection with their employment, to hold themselves to the highest ethical and professional standards and to treat everyone with whom they interact in the scope of their employment with dignity and respect.

1. All Harassment Prohibited

The Company adheres to a zero-tolerance policy against harassment by its employees within the scope of their employment, irrespective of whether the harassing behavior is directed toward fellow employees or non-employees, such as the Company’s agents, suppliers, vendors, business partners, and customers (“Covered Persons”) because of race, religion, creed, national origin, ancestry, sex (including pregnancy), gender (including gender nonconformity and status as a transgender or transsexual individual), age, physical or mental disability, citizenship, genetic information or any other characteristic protected under applicable laws (“Protected Traits”).

The Company also does not tolerate the harassment of its employees based on the Protected Traits by fellow employees, or non-employees, such as the Company’s agents, suppliers, vendors, business partners, and customers. The Company reserves all rights to take necessary and appropriate action to protect itself and its employees.

A. Sexual Harassment

All Company employees are prohibited from harassing other employees and Covered Persons based on sex or gender (including pregnancy and status as a transgender or transsexual individual) and regardless of the harasser’s sex or gender.

Sexual harassment means any harassment based on someone’s sex or gender. It includes any unwelcome sexual advances or requests for sexual favors or any other conduct of a sexual nature, when any one of the following is true:

- Submission to the advance, request or conduct is made either explicitly or implicitly a term or condition of employment;
- Submission to or rejection of the advance, request or conduct is used as a basis for employment decisions;
- Submission to or rejection of the advance, request or conduct is used as a basis, explicit or implicit, for business decisions made on behalf of the Company, including, but not limited to, awarding business or contracts to vendors or suppliers; or
- Such advances, requests or conduct have the purpose or effect of substantially or unreasonably interfering with an employee's work performance (or, in the case of Covered Persons, their work, or opportunities to work, with or for the Company) by creating an intimidating, hostile or offensive work or business environment.

The Company will not tolerate any form of sexual harassment in any form. Harassment is prohibited both at the workplace and at Company-sponsored events, including, but not limited to, team building events, holiday parties, and company outings.

B. Other Types of Harassment

The Company's Anti-Harassment Policy applies equally to harassment based on an employee's or a Covered Person's race, religion, creed, national origin, ancestry, age, physical or mental disability, citizenship, genetic information, or any other characteristic protected under applicable laws.

The Company will not tolerate such harassment in any form, including at the workplace and at Company-sponsored events, including, but not limited to, team building events, holiday parties, and company outings.

2. Compliance Procedure

A copy of this Policy will be furnished to all current and newly hired employees via suitable means (online or offline) at the Company's discretion for employees to read, understand, and acknowledge their compliance therewith.

3. Complaint Procedure by Company Employees

If you are subjected to any conduct that you believe violates this Policy or witness any such conduct, you should promptly speak to, write or otherwise contact your direct supervisor or, if the conduct involves your direct supervisor, the next level above your direct supervisor. If you have not received a satisfactory response within a reasonable period of time after reporting any incident of what you perceive to be harassment, please immediately contact the Professional Ethics Promotion Center or the Group Compliance Center. These departments will ensure that a prompt investigation is conducted.

Any manager or supervisor who receives a complaint or who observes harassing conduct MUST report the conduct to the Professional Ethics Promotion Center or the Group Compliance Center so that an investigation can be made and corrective action taken, if appropriate.

This Policy is intended both to set certain minimal behavioral standards to which all Company employees must adhere and to protect the Company's employees from harassment. Hence, even if the alleged or suspected harasser is a non-employee but is someone with whom the Company does business, you should still report any incident through the means set forth above. Similarly, Company employees are prohibited from engaging in any behavior inconsistent with this Policy toward any non-employees with whom they interact within the scope of their employment.

Finally, the Company has established an email address jubao@ke.com to receive questions or reports of potential policy violations on a confidential basis. All submitted questions and reports will be accessed only by the Professional Ethics Promotion Center personnel on a need-to-know basis, and will be shared with others only insofar as required by law or as necessary to evaluate and respond to the questions or reports received. Company policy strictly prohibits retaliation against any employee who reports a potential compliance issue in good faith.

The Company is committed to enforcing this Policy. The effectiveness of our efforts, however, depends largely on employees telling us about inappropriate workplace conduct. If employees feel that they or someone else may have been subjected to conduct that violates this Policy, they should report it immediately. If employees do not report harassing conduct, the Company may not become aware of a possible violation of this Policy and may not be able to take appropriate corrective action.

4. Violations of This Policy

For any violation of this Policy by Company employees, the Company may impose discipline as it deems appropriate, including, but not limited to, a letter of censure, suspension, termination of employment, or termination of contract. Where necessary or appropriate, the Company may report complaints to the relevant regulatory and law enforcement authorities. Details of disciplines are set forth in Article 13, 30 and other relevant clauses of the Company's Code of Business Conduct and Ethics (职业道德行为守则). Please contact the Professional Ethics Promotion Center for details.

Where a Company employee believes himself or herself to have been the victim of harassment by non-Company personnel in the course of employment, such as by the Company's customer or service providers, the employee is also encouraged to report such harassment by following the procedures set forth in Section 3 of this Policy. The Company reserves the right to take necessary and appropriate action, including, but not limited to, terminating its relationship with violators, reporting misconduct to the violators' employers and, where a crime may have been committed, to the law enforcement authorities.

5. Administration of This Policy

The Group Legal Center, Professional Ethics Promotion Center and the Group Compliance Center are responsible for the administration, interpretation and amendment of this Policy. If you have any questions regarding this Policy or other questions that are not addressed in this Policy, please contact us at jubao@ke.com.