



HUTCHISON PORT HOLDINGS TRUST

Corporate Communications Policy

1. In order to protect the Trust Group's public image, it is necessary to ensure that all communication with the media at HPH Trust, TM and BUs are properly organised and coordinated, and that any information and messages communicated remain consistent.
2. Please ensure that this Policy is understood and adhered to by all managers and employees concerned, including consultants and contractors.
3. This Policy should be read in conjunction with HPH Trust Code of Conduct and HPH Trust policy on Donations, Contributions and Sponsorship or their subsequent updates.

Trust Group Information

4. Please check with the CFO first, who will undertake to obtain the approval of the CEO and the Executive Director of TM, before you do the following:
 - (a) provide information to the media by phone, email, fax or other means;
 - (b) arrange and/or accept interviews from the media;
 - (c) issue press releases and statements to the public.

Press Releases

5. To issue press releases concerning investments, acquisitions, business development (includes expansion projects) or new ventures, a BU must submit a draft of the proposed release well in advance to the CFO for approval by the CEO and the Executive Director of TM. Once approved, the release may be issued through the CFO Office, or the relevant BU, or a public relations firm, depending on the circumstances. In any event, no release shall be issued without prior approval.
6. Marketing or public relations oriented press releases, covering topics such as new service launches, promotions or community sponsorships, may be issued without the CEO or CFO approval. Nonetheless, a copy should be sent to the CFO at least two business days prior to media release for the purposes of record keeping. Feature-type article contributions to media must be submitted at least five working days in advance to the CFO, also for record keeping purposes.

Press Conferences

7. Any proposed press conferences should be cleared well in advance with the CFO, who will obtain the approval of the CEO and the Executive Director of TM. Announcements and drafts of speeches to be released for the conference should be submitted to the CFO for approval at least five working days before the event. The same rule applies to press briefings and any organised press events.

Interviews / Telephone Enquiries

8. All media enquiries about the Trust Group should be referred to the CFO.

9. Telephone enquiries and interviews related to a BU may be handled by the designated Spokesperson of BU (please refer to paragraphs 14 to 17), if the subject matter is not expected to be controversial. The Spokesperson of BU should inform the CFO of such enquiries and interviews. Should you expect the interview to cover controversial or sensitive subjects, please consult the CEO and the Executive Director of TM on an agreed party line before taking the interview (Please also see "Issue Management" in paragraph 18).

Press Visits

10. Occasionally, BUs may wish to promote their ports by accepting media requests to visit their port and terminal facilities. Approval should be obtained from the HBU. The Spokesperson of BU should notify the CFO prior to the visit.
11. BUs should obtain prior agreement from the media that there should be no interviews during such visits, which are conducted to generally familiarise media with BU operations only. Managers and employees accompanying the visits should confine their comments to standard tour presentation and/or operational information and strictly refrain from discussing or disclosing any information that has not been published before. This also applies to the visits of TV crews and photo-journalists, although the BU should additionally ensure that their employees and facilities are fully prepared and presentable in such cases.
12. Should there be a need for interviews during such visits, BUs should follow the procedure for "Interviews/Telephone Enquiries" and obtain the required approvals before accepting such requests.
13. If the press turns up at a BU without prior notification, treat the media with courtesy but do not entertain their requests prior to receiving instruction from the Spokesperson of BU.

Media Engagement and Spokesperson

14. Only the Executive Director of TM, CEO and CFO or the designated executives may speak on behalf of the Trust Group to the public which includes the community, investors, shareholders, regulators and the media and act as spokespersons for the Trust Group ("Spokesperson"). No other person is permitted to be a Spokesperson for the Trust Group either off the record or on the record, and to provide the media with any company information, data or comment without the CEO and the Executive Director of TM's prior approval.
15. The HBU is the Primary BU Spokesperson regarding information and matters strictly related to that BU. For contingency purposes, the Primary Spokesperson should appoint a suitable senior executive of the BU as the Secondary Spokesperson, whose name(s) should be submitted to the CFO, who will obtain approval from the CEO and the Executive Director of TM and maintain a record of all BU Spokespersons within the Trust Group.
16. Alternatively, the Primary Spokesperson may delegate a senior Technical, Engineering, Operations or Information Technology executive to be interviewed on relevant subjects of his or her specialty only. Such interviews should be carried out in the presence of the Primary or Secondary Spokesperson, unless express agreement has been made beforehand that any other aspects of the business will not be covered during the particular interview.
17. It is the responsibility of each Spokesperson of BU to keep himself or herself fully aware of the issues and party lines of the BU and Trust Group, and maintain close contact with the CFO on media communication matters.

Issue Management

18. Should an issue or the potential for an issue that would attract media interest arise, an issue statement should be developed by the respective BU and cleared with the CFO before final approval by the CEO and the Executive Director of TM. Upon approval, the statement will serve

as the party line for responding to related media enquiries. It is the responsibility of each BU to develop and update their respective Issue Statements.

Market Rumours

- (a) It is a policy of the Trust Group not to comment on market rumours or speculation, unless the Trust Group or the BU is required to do so by public authorities or when such a situation would cause disruption or damage to business.

Operational Contingency Plan

- (b) Each BU is expected to prepare a prototype press response that has been pre-approved by the CFO to cover any incident which might result in loss of life, disruption of terminal operations or damage to property to the extent where it would attract media attention. This business contingency plan should include a media communication section, and copies of this section should be forwarded to the CFO for the purposes of record keeping.

Stockbroking, Financial and Fund Management Companies

- 19. On requests for courtesy visits or tours, the Trust Group has no specific guidelines and will allow BUs to decide on whether or not they will accept. Requests for interviews often come under the guise of such tours or visits. When accepting such visits, it should be made very clear to the visitors, preferably in writing, that the visit will include no interviews or management discussions. The general rule is that, should a BU accept such request, tours will be conducted in the absence of senior management to avoid discussion of commercially sensitive information.

Public and Social Media Engagement

- 20. Endorsement of the HBU, and subsequently the approval of the CEO and the Executive Director of TM via the CFO should be obtained before accepting any public speaking opportunities as a Trust Group employee. Speeches or presentations made by HBU, must be cleared in advance by the CEO and the Executive Director of TM.
- 21. For effective coordination of all corporate presentations, BU must also notify the CFO of such engagements as soon as possible, and provide other information such as dates, venues, proposed topics and content. In addition, the speaker must submit the copy of his or her speech as well as any accompanying visuals (slides, overhead transparencies, hand-outs, etc.) to the CFO at least eight working days before any release to the organiser or actual delivery, whichever is earlier.
- 22. The CFO should be notified if an employee is approached by public bodies, Non-Government Organizations, political parties/associations or similar entities for assistance or participation in a business or community event, function or campaign as a speaker or panelist in the capacity of a Trust Group employee. No assistance should be given before approval is obtained from the CEO and the Executive Director of TM via the CFO.

Suppliers and Contractors, Product Endorsement

- 23. In general, the Trust Group does not participate in any product or company endorsement, unless the endorsement is justifiably beneficial to the corporate image of the Trust Group or BU. Any press announcements or publicity to be generated by suppliers or contractors of Trust Group should be cleared by the CFO for approval by the CEO and the Executive Director of TM. At the BU level, approval must be obtained from the HBU, and CFO be notified. Please take measures to ensure that our managers or employees are not depicted or quoted in such materials in ways that overtly endorse the product.

Advertising

- 24. BUs should notify the CFO of all advertising activities, including complimentary or charitable advertising, before committing to any placement. The CFO will evaluate the nature of advertising

and seek the CEO and the Executive Director of TM's approval. Advance notification will help avoid any duplication of efforts or resources, particularly in regional or international media. It is essential that the application of all components of the Company's Corporate Identity strictly adheres to the guidelines set out in the "HPH Trust Corporate Identity Manual". Should advertising involve media interviews, please refer to paragraphs 8 and 9 of this Policy.

25. Special care and tact should be taken at all times when dealing with the media and they should be treated with courtesy and respect by all Trust Group employees.

Company Logo

26. The guidelines for using the Trust Group's brands and logos are laid down in the "HPH Trust Corporate Identity Manual". Please consult the CFO if clarifications are needed.

Social Media

27. The Trust Group operates container terminal facilities in different locations. Each location features a different combination of languages, cultures, communication practices and available technologies. Social media may provide valuable options for local or regional communication with a range of internal and external stakeholders.
28. As effective social media strategies must be tailored to local markets, it is not practical for HPH Trust to dictate a single approach. Instead, BUs that wish to take advantage of social media must abide by a few general principles in order to ensure brand consistency and responsible reputation management.
 - (a) As social media are designed to be interactive and depend on audience development, platform maintenance must be diligent and independent of manpower adjustments. All interested BUs must submit to the TM Corporate Affairs a social media management proposal that describes a plan for consistent, regular and uninterrupted platform management;
 - (b) BUs must designate administrators for all accounts;
 - (c) As public communication channels, social media profiles must be treated as any other company media channels, with contents approved by management;
 - (d) All BUs that utilise social media must develop a plan for responding to comments and inquiries through the accounts under their control;
 - (e) All social media activities must be consistent with HPH Trust's and local BUs' branding guidelines;
 - (f) All social media activities must abide by the relevant local and international laws, especially those covering privacy and the usage of personal data;
 - (g) BUs that utilise social media must develop contingency plans for use in the case of disruption by activists, interest groups or hackers;
 - (h) BUs in culturally and linguistically similar localities are strongly encouraged to explore regional platform management and audience development in order to reduce duplication of resources, ensure consistent brand management, and raise cost efficiency. Multiple profiles from linguistically and culturally similar locations will be discouraged;
 - (i) Do not post materials on personal web pages, social media platforms or social networking sites that may compromise the image and competitive edge of the Trust Group. The Trust Group's Code of Conduct and confidentiality obligations are applicable to all social media and networking sites;

- (j) Do not use any social media tools in a way that may compromise the Trust Group's image, or otherwise bring the Trust Group into disrepute or interfere with the privacy of colleagues or those with whom the Trust Group has business dealings.