



## Whistleblowing Policy

1. Hutchison Ports, its subsidiaries and controlled affiliates (collectively, the "Group") is committed to achieving and maintaining the highest standards of openness, probity and accountability. In line with this commitment, the Group expects and encourages independent third parties who deal with the Group (e.g. customers, suppliers, creditors and debtors) to report to CK Hutchison Holdings Limited ("CKHH") any suspected impropriety, misconduct or malpractice within the Group.
2. Activities that constitute impropriety, misconduct or malpractice include but not limited to:
  - (a) criminal offences,
  - (b) breach of legal or regulatory requirements,
  - (c) miscarriage of justice,
  - (d) malpractice, impropriety or fraud in financial reporting, internal control or other financial matters of the Group,
  - (e) breach of rules, policies or internal controls of the Group,
  - (f) endangerment of the health and safety of an individual,
  - (g) discrimination or harassment,
  - (h) damage caused to the environment,
  - (i) professional, ethical or other malpractices or wrongdoings,
  - (j) improper conduct or unethical behaviour likely to prejudice the standing of the Group, and
  - (k) deliberate concealment of any of the above.
3. In making a report, the reporting person or entity (the "Reporter") should exercise due care to ensure the accuracy of the information.
4. The Reporter making appropriate reports under this Policy is assured of protection against unfair dismissal, victimization or unwarranted disciplinary action, even if the reports are subsequently proved to be incorrect or unsubstantiated. Harassment or victimization of a genuine Reporter is treated as gross misconduct, which if proven, may result in dismissal.
5. Each report will be treated as confidential. The identity of the Reporter will not be divulged save with such Reporter's consent or where:
  - in the opinion of the Audit Committee of CKHH (the "Audit Committee"), it is material to the investigation or in the interest of CKHH to disclose the identity;
  - the report is frivolous or is lodged in bad faith with malicious or mischievous intent or in abuse of this Policy;
  - it is required to be disclosed in compliance with any applicable law or regulation, by any relevant regulatory authority including The Stock Exchange of Hong Kong Limited or by the order or directive of any court having jurisdiction over CKHH; and
  - the report and the identity of the Reporter are already public knowledge.



## 6. Procedure

- Every report shall be made in writing either by email to [Report@ckh.com.hk](mailto:Report@ckh.com.hk) or by post to "**General Manager Group Management Services, CK Hutchison Holdings Limited**" at **48/F, Cheung Kong Center, 2 Queen's Road Central, Hong Kong** who shall report to the Chairman of the Audit Committee. The Chairman of the Audit Committee shall then determine the course of action to pursue, with power to delegate, with respect to the report;
- All written reports by post shall be sent in a sealed envelope clearly marked "Strictly Private and Confidential - To be Opened by Addressee" to ensure confidentiality;
- Each Reporter is required to provide details of improprieties (including relevant incident(s), behaviour, activity or activities, name(s), date(s), place(s) and any other relevant information) on the report; and
- Details of the Reporter (including name, department/business unit, company, contact number, address or email address) are not required but are encouraged to be provided so as to facilitate the investigation and such details will be kept in the strictest confidence.
- The General Manager – Group Management Services of the Chairman of the Audit Committee where warranted will respond to the Reporter, if contactable, as soon as practicable upon receipt of the report:
  - (i) acknowledging receipt of the report;
  - (ii) advising the Reporter as to whether or not the matter will be investigated further and, as appropriate, the actions taken or being taken or the reasons for no investigation being made;
  - (iii) where applicable, giving an estimate of the timeline for the investigation and final response.