

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. Scope

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 behavior likely to prejudice the standing of the Group, and
- k. deliberate concealment of any of the above.

3. Protection

- a. In making a report, the reporting person or entity (the "Reporter") should exercise due care to ensure the accuracy of the information.
- b. The Reporter making genuine and 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. The topic of harassment stipulated in the CK Hutchison "Code of Conduct" and the corresponding glossary, and Hutchison Ports Policy Circular "34. Employment and Work Place Policy" or their subsequent updates shall be observed."

4. Confidentiality

Each report will be treated as confidential. The identity of the Reporter will not be divulged save with such Reporter's consent or where:

- a. 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;
- b. the report is frivolous or is lodged in bad faith with malicious or mischievous intent or in abuse of this Policy;
- c. 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
- d. the report and the identity of the Reporter are already public knowledge.

In order not to jeopardise the investigation and any follow-up actions, the Reporter is also required to keep confidential all information about and relating to the report, including the fact that he or she has filed a report, the nature of concerns, the identities of the parties involved and any other information that the Group has shared with the Reporter in the course of handling the report."

5. Procedures

Making a Report

- a. Every report shall be made in writing either by email to **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;

- b. 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;
- c. "If the General Manager - Group Management Services ("GMS") is being complained against or where a conflict of interest arises, perceived or otherwise, the report should be made in person or by post addressed to the Chairman of the Audit Committee at the same address;" and paras thereafter are renumbered.
- d. Each Reporter is required to provide details of improprieties (including relevant incident(s), behavior, activity or activities, name(s), date(s), place(s) and any other relevant information) on the report; and
- e. 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.
- f. Reporters may also make their reports through the Group's other whistleblowing channels, and the management concerned should report to the General Manager of GMS according to the CK Hutchison Code of Conduct and CK Hutchison AntiFraud and Anti-Bribery Policy.

6. Investigation Procedure

- a. The format and length of an investigation will vary depending on the nature and particular circumstances of each report made. Where appropriate, the reports raised may:
 - i. be investigated internally by the Audit Committee or if delegated by the Audit Committee, the Company Secretary, the internal audit department, the human resources department or other departments of CKHH;
 - ii. be referred to the external auditor as instructed by the Audit Committee;
 - iii. be referred to the relevant public bodies or regulatory /law enforcement authorities as instructed by the Audit Committee; and/or
 - iv. form the subject of any other actions as the Audit Committee may determine in the best interest of the Group.

If it is deemed appropriate and necessary to conduct internal enquiry/investigation into the relevant matter, efforts will be made to ensure it will not jeopardise any possible enquiry/investigation on the same matter by other relevant law enforcement authorities.
- b. The General Manager - GMS or 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; where practicable, giving an estimate of the timeline for the investigation and final response; and
 - iii. indicating if any remedial or legal action is or is to be taken.

7. False Reports

If a Reporter makes a false report maliciously, fraudulently, with an ulterior motive, or for personal gains, the Group reserves the right to decline to investigate or discontinue an investigation, and take appropriate actions against such Reporter (employees or third parties) to recover any cost, loss or damage as a result of such false report. Employees may also face disciplinary action, including dismissal where appropriate.