



Hutchison Telecom
Hong Kong Holdings

Hutchison Telecommunications Hong Kong Holdings Limited

和記電訊香港控股有限公司

(Incorporated in the Cayman Islands with limited liability)

(Stock Code: 215)

POLICY ON APPOINTMENT OF THIRD PARTY REPRESENTATIVES

I. Policy Statement

Hutchison Telecommunications Hong Kong Holdings Limited (“**HTHKH**”, together with its subsidiaries and controlled affiliates, the “**Group**”) recognises that Business Units (“**BUs**”) engage Third Party Representatives (such as advisers, agents, consultants, introducers and finders, and political lobbyists) for their business purposes from time to time.

The Group is committed to exercising proper controls in hiring Third Party Representatives. These include any arrangements entered into with an individual or a legal entity for the provision of any consultancy or advisory services, whether on a stated term, or on a project basis.

This Policy sets out minimum standards. BUs may implement stricter standards where appropriate. This Policy should be read in conjunction with the Anti-Fraud and Anti-Bribery Policy of the Group.

Questions in relation to this Policy should be directed to the Chief Financial Officer.

II. General Principles

- 2.1 Third Party Representatives are normally hired for providing specialist advices or services due to their qualification, background or expertise.
- 2.2 The use of Third Party Representatives should be specific to a project or for a specified period of time.
- 2.3 A Third Party Representative is not an employee of the Group and is not entitled to any staff benefits provided by the Group.

III. Procedures for Approval

- 3.1 Any BUs seeking to retain Third Party Representatives must obtain pre-clearance prior to any binding commitment being made by:
 - a) completing the Third Party Representative Requisition Form (“**Form**”, available from the Business Assurance and Compliance team);

- b) signing the completed Form and having the Department Head approved and signed the Form; and
 - c) submitting the signed Form to the Chief Executive Officer and the Chief Financial Officer for approval. Approval will be based on the nature and need of the services, availability of resources and concurrence with the strategy of the Group.
- 3.2 All BUs are required to exercise due care and diligence in selecting Third Party Representatives and in monitoring their activities. Agreements reached with Third Party Representatives must be recorded in writing. The contract with the Third Party Representative must normally include, (i) services to be provided by the Third Party Representative, (ii) fees to be paid to the Third Party Representative, (iii) where appropriate, anti-bribery representations and warranties, including confirmation that the Third Party Representative understands and agrees to abide by all relevant provisions in the Anti-Fraud and Anti-Bribery Policy of the Group, (iv) where appropriate, representations and warranties related to taxation, financial crime and sanctions compliance, including confirmation that the Third Party Representative will maintain reasonable procedures designed to prevent employees, agents and other persons who perform services for them or on their behalf from undertaking any activities which would facilitate or otherwise result in a breach of the laws related to taxation, financial crime and/or sanctions compliance, and (v) right of the engaging entity to terminate the contract in the event of breach of such representations and warranties. A sample representative agreement is available from the Legal & Regulatory Affairs Department). All such engagements must be approved by the Chief Executive Officer.
- 3.3 All subsequent amendment of terms or extension of service period must be approved by the Chief Executive Officer by using the Form.
- 3.4 Each Department Head/designated senior management of the BU is responsible for ensuring the effective implementation of this Policy, including overseeing the ongoing compliance of the Third Party Representative with the Anti-Fraud and Anti-Bribery Policy and the Group policy of zero tolerance of any facilitation of domestic or foreign tax evasion by its employees or others acting on its behalf (agents and other persons who perform services for or on behalf of the Group), ensuring that due diligence information concerning the Third Party Representative is updated at the time of renewal of any engagement, and reviewing the relationship with the Third Party Representative whenever necessary.

IV. Exceptions

The engagement of the following services, consultants, agencies or staff are not subject to this Policy:

- 4.1 Audit, audit-related and taxation advisory services which are approved by the Head Office on a regular or on an as needed basis.
- 4.2 Legal services which are approved by the Head Group General Counsel on an as needed basis.
- 4.3 All technical and other consultants engaged with respect to approved IT system implementation, telecommunications cell site and switch centre construction and restoration.

- 4.4 All advisers, agencies and consultant engaged with respect to the provision of advices and services on advertising, brand management and marketing activities in the ordinary course of business of the relevant BUs and in each case allowed under the current year approved budget.
- 4.5 All recruitment agencies.
- 4.6 All temporary staff hired for existing vacancies or special events (e.g. promotion activities).

(November 2021)