

CODE OF CONDUCT

1. Our Commitment

This Code of Conduct (“Code”) outlines the values and the commitment of the directors and employees of Hutchison Telecommunications (Australia) Limited (“HTAL”) to implementing the core principles and standards of ethical business practice within the business operated by HTAL.

This Code applies to all employees, directors, officers, consultants, contractors, agents and other representatives engaged by HTAL.

The principles set out in this Code describe how all staff are expected to behave. All directors and employees are required to meet these expectations, and to encourage our suppliers, business associates and fellow employees to follow this Code. Additionally it is our responsibility to report anything we observe or know that might breach these principles to our direct manager or Human Resources.

We take a breach of this Code very seriously. It is important that you read this Code carefully and ask questions about anything you do not understand. Each of us must understand and accept personal responsibility in preserving, protecting and enhancing HTAL's reputation for integrity and good standing within the community and with key stakeholders. Your commitment to doing the right thing is essential to this.

If you have a query or suggestion in relation to this Code, please speak to your manager or Human Resources.

The directors, officers and senior executives of HTAL are committed to the principles and standards set out in this Code applying to how we do business and how we treat our key stakeholders.

For the purposes of this Code, references to management and executive positions may, depending on the circumstances, refer to management of HTAL or persons nominated to fulfil that role from time-to-time.

2. Our Values and Responsibilities

Our purpose

The primary objective of HTAL is in alignment with the strategic goal of the CK Hutchison group of companies to enhance long-term total return for

shareholders. To achieve this objective, HTAL's strategy is to place equal emphasis on achieving sustainable recurring earnings growth and maintaining HTAL's strong financial profile.

Our values

We aspire to operate openly, fairly, lawfully, ethically and responsibly with honesty and integrity.

Our success and differentiation will not be measured by 'what' we do, but rather 'how' we do it. We strive to:

- Make everything we do simple and relevant;
- Always look for ways to make our way of doing business better;
- Be courageous and bold in our thinking;
- Think of others in everything we do;
- Deliver on our promises;
- Listen, understand and treat others as an individual;
- Be honest and open, have real conversations;
- Make conscious commitments – keep your word;
- Celebrate success; and
- Listen to and learn from each other.

Our responsibilities to shareholders and the general financial community

We are committed to delivering long term sustainable value to our shareholders and are focused on ensuring compliance with the spirit as well as the letter of all laws and regulations that govern shareholders' rights.

We have processes in place designed to ensure the transparent, truthful and accurate presentation of our financial reporting in line with the accounting and financial reporting standards that represent the generally accepted guidelines, principles, standards, laws and regulations of Australia.

Our responsibilities to employees

We are honest, open and fair in all dealings with customers, business partners, investors, suppliers and communities ("business associates").

Our employees who are in a position to make or influence our commitments to suppliers of goods and services must not use their positions to solicit funds or goods for charitable or any other purposes not related to their employment. It is imperative that the following principles are adhered to:

- If you are in a position to make or influence commitments to goods and services suppliers, you must make all decisions on the basis of quality, service and price;
- Do not enter into any agreement with a competitor to adhere to certain prices;
- Do not enter into any agreement to refrain from bidding, or to bid at a certain price, or to submit a bid that is less favourable than a competitor's, for the sole purpose of increasing the competitor's likelihood of being awarded the bid;

- Do not enter into any agreement with a competitor that results in a division, assignment, or apportionment of customers or territories to be served or a limitation on any product sold or services rendered; and
- Otherwise comply with all applicable fair trading legislation.

We aspire to provide goods that are safe for our customers. Additionally, we aspire to provide an exceptional level of service to our customers that is reinforced by our focus of seeing the world through our customer's eyes.

We maintain a zero tolerance stance on all forms of behaviour that treats another person detrimentally as well as behaviour that is against the law. Employees must not discriminate, harass, bully or victimise work colleagues or business associates. Conduct that results in the breach of this responsibility will have serious consequences including termination of employment. More information can be obtained in relation to this subject from our Equal Employment Opportunity Policies.

Our approach to the community and environment

We are committed to behaving ethically and contributing to economic development while improving the quality of life of our employees as well as those of the wider community.

We encourage all staff to play an active role in the community through community volunteering, transfer of skills and fundraising.

We also drive a commitment to the environment through participation in industry environmentally focussed initiatives. We also have active recycling programs in our company environments.

We are very aware that our activities impact our environment and we remain focussed and committed to ensuring we minimise or eliminate this impact where possible.

Our responsibilities to the individual

We are committed to keeping private information collected during the course of our activities, confidential and protected from uses other than those for which it was provided.

All employees are responsible to ensure that the confidentiality of all confidential information disclosed during employment is maintained. Your obligations of confidentiality in relation to confidential information are outlined in your employment contract. We may also require you from time to time to sign additional non-disclosure documents relating to confidentiality.

This commitment to privacy and confidentiality supports our obligations to our customers and suppliers and protects us against the competitive disadvantage of confidential information being disclosed to people external to our business.

3. Our Employment Practices

Equal Employment Opportunity

We are committed to providing a work environment in which employees feel valued; they are treated fairly, and are given recognition for their contribution to HTAL's success. We also aim to provide an environment that fosters good working relationships. We are committed to ensuring all employees enjoy equal employment opportunity.

This means that employees are treated fairly and equally when employment decisions are made, unlawful discrimination does not take place and each employee enjoys a harassment-free work environment.

For more information please refer to our Equal Employment Opportunity policy.

Harassment and Discrimination

Any form of behaviour that discriminates, harasses, bullies or victimises another individual will not be tolerated. There will be serious consequences for any breach of this responsibility.

Occupational Health and Safety

We will provide and maintain a safe working environment for the health, safety and welfare of our employees, contractors, visitors and members of the public who may be affected by our work. For additional information please refer to our Occupational Health and Safety Policy.

Training and Further Education

We provide opportunities for employee training and education both through the provision of training and the support of employees pursuing further education.

Workplace behaviour

It is expected that all employees will ensure their personal behaviour is aligned with 'Doing the right thing' at all times. Therefore employees will not engage in conduct or behaviour that includes but is not limited to the following:

- Use disruptive threatening behaviour either physically or verbally;
- Swear or use inappropriate language;
- Attend work under the influence of illegal drugs or alcohol;
- Offer to another, or deal in, illegal drugs in the workplace;
- Misrepresent HTAL in any way;
- Use the internet to access or send sexually explicit or offensive material;
- Use HTAL work time for personal gain;
- Falsify reports;
- Breach copyright laws; or
- Place yourself or fellow employees in risk of injury.

Drugs and Alcohol

In the interest of health and safety we reserve the right to further investigate or may request testing if we believe an employee is under the influence of illegal drugs or alcohol at work. If you are found to be affected by drugs or alcohol, disciplinary action will be taken, including suspension from work or formal warning. If we establish an employee has an addiction, we may require participation in a rehabilitation program.

Political activities

We do not discourage employees from appropriate involvement in the political process that reflects individual beliefs and commitments. However, any political activity must take place in your own time. Our resources and reputation cannot be used for any political activities unless specifically permitted by law and approved by the Company Secretary.

No company assets may be used directly or indirectly for political purposes, including the support of any candidate or party. Do not allow your status as an employee to be used in support of a particular candidate or issue. An employee cannot act as a representative of HTAL or any of its businesses regarding political issues. Employees must not pressure, either directly or indirectly, other employees to make political contributions or to participate in support of a political party, issue or candidate.

Employee Security Dealing

We are committed to the prevention of the incidence of insider trading in HTAL shares by directors, officers, senior managers and certain other categories of employees and person associated with any of them. Please see our Share Dealing Policy.

Record keeping

Almost every employee is required to report some form of accounting, sales, or operations data. Each employee must ensure that the reporting is done on a timely basis, accurately, and in sufficient detail to ensure the integrity of corporate information and records.

As an employee, you must not:

- establish or maintain an unrecorded fund or asset on behalf of HTAL;
- make a false, artificial, or misleading entry in the books, records and documents of HTAL for any reason;
- engage in any arrangement that results in such prohibited acts; or
- initiate a transaction or make a payment on behalf of HTAL with the intention or understanding that the transaction or payment is other than what is described in its documentation.

4. Our approach to gifts

Accepting Gifts

Employees may accept gifts of a nominal value, including advertising novelties provided in accepting these gifts there is nothing expected in return. Other gifts or gratuities of more than a nominal value, or excessive entertainment, may not be accepted at any time. At no time is it acceptable to receive goods of a nominal value or otherwise when in accepting these gifts there is an expectation of something in return. All gifts, gratuities and entertainment received or offered, of any value, should be reported to your direct manager.

5. Company property

Our policy is that no company property may be removed from company premises or designated storage places without the permission of a nominated supervisor or manager. For example all books, records and computer software are HTAL's property and cannot be removed from the company's premises. This includes manuals, lists and other information used by employees in their daily work. Employees must:

- Respect the company's ownership of all company funds, equipment, supplies, books, records and property;
- Not make any unauthorised statements to the media about the company's business (requests for media statements should be referred to your direct manager or the Director Communications and Corporate Affairs); and
- Observe all requirements in relation to the use and protection of the company's intellectual property.

On leaving HTAL all employees must return company property and all documents containing confidential information. This property must be returned as part of the Leaving Policy outlined on our company intranet.

No director or employee may use any property or information of HTAL or its customers for personal gain or to cause detriment to HTAL or its customers.

6. Compliance with legislation

Employees are expected to conduct daily activities in compliance with all company policies, legal and contractual obligations. This includes, but is not limited to complying with:

- company policies, procedures, rules, regulations and contracts with its business associates;
- applicable legislation;
- contracts of employment;

- health and safety procedures and rules set out in the Occupational Health & Safety Policy; and
- the company's prohibition on sexual or other unlawful harassment or discrimination in the workplace as set out in the Harassment and Equal Employment Opportunities Policies.

7. Conflicts of interest

A conflict of interest arises when you are in a position or situation that could:

- benefit you, or someone with whom you are associated, and that benefit is at the expense of HTAL, or results in lost opportunity for HTAL; or
- interfere with your objectivity in performing your company duties and responsibilities.

When conducting any business on behalf of HTAL, you must always act in the best interests of HTAL and must avoid situations which could reasonably give the appearance of being under obligation to, or being influenced by, any business associate (actual or potential) or any advisers such as banks, contractors, law firms, consultants and government agencies.

Directors, officers and members of the executive must not take advantage of company property or information, their position or opportunities arising from their position for personal gain or to the detriment of HTAL.

We require that all employees disclose to their manager any financial interest that might influence an employee's decisions or actions on the job, including interests in any of our business associates and competitors.

To reduce the possibility of conflicts of interest arising, directors, officers and employees are not permitted, while working for HTAL, to accept additional outside employment with another organisation that is a business associate or competitor of HTAL, or any other employment that is in conflict with the employee's position at HTAL.

You must not use information or authority derived from employment with the company for personal gain. For example you may not engage in any transaction with a customer other than at 'arms length'. Pseudo transactions entered into for the purpose of gaining bonus sales and commission will be regarded as fraud.

8. Non-compliance reporting: "Whistleblowing"

In line with our culture of trust and cooperation, employees are encouraged to raise with their direct manager or Human Resources information they may have with regard to a practice, event, or a financial transaction that may not be in compliance with this policy.

Our Open Door Approach ensures that multiple avenues are available for individuals ("Whistleblowers") to escalate their concerns, including an

opportunity to anonymously provide us with information. Whistleblowers play an important role in the identification of wrongdoing and for this reason, they are key players in a company's governance framework, particularly in the area of risk management

HTAL encourages a culture of reporting actual or suspected conduct which is illegal, unacceptable or undesirable and any person who reports conduct as a whistleblower who is acting honestly, reasonably and with a genuine believe about the conduct will be supported and protected.

HTAL has adopted a Whistleblower Policy which sets out our approach to receiving, handling and investigating whistleblower disclosures.

Directors and executives must take an active role in the promotion of ethical behaviour, by training or otherwise, ensuring that teams within the business are aware of their requirements to comply with this Code and the law in general.

9. Anti-bribery and Corruption

At the core of our values, HTAL aspires to operate openly, fairly, lawfully, ethically and responsibly with honesty and integrity and we have zero-tolerance to bribery and corruption. We are also committed to implementing and enforcing robust and effective systems to prevent bribery.

Bribery is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. For example, staff receiving payments or gifts from vendors in return for preferential treatment of that vendor's products or services.

Corruption is the misuse of private power in relation to business outside the realm of government or the misuse of public office or power for private gain. For example, payments made to individuals in government agencies to ensure that approval is granted for infrastructure such as base stations.

Bribery and corruption is a criminal offence in most countries in which HTAL operates and penalties can be severe. Additionally, HTAL may suffer reputational damage if it is involved in bribery or corruption activities.

Prohibited activity

Directors, officers and employees of HTAL must not make an illegal or improper payment on behalf of HTAL to any government agency, person or entity. You must not offer, promise, authorise, approve, or condone the use of corporate funds or property for any of the following activities:

- The payment of money or the giving of anything of value to any:
 - government official(s) in order to influence them to act or fail to act in any official capacity;
 - political party, any official of a political party, or any candidate for political office in order to influence them to act or to fail to act in any official capacity; or

- person who will apply the payment or gift (in whole or in part) directly or indirectly to these activities
- The payment of a kickback to obtain business.
Offering, promising or paying a bribe of any kind.
- Requesting, agreeing to receive or accepting a bribe of any kind.
- Making a payment of secret commissions to those acting in an agency or fiduciary capacity.

Training

As appropriate, HTAL will provide training to managers and others who are likely to be exposed to bribery or corruption about how to recognise and deal with it.

We prohibit the activities set out in this section even if they are permitted by the laws, standards, or customs of any country where we do business, and regardless of any requests or pressures received from any government or the competitive consequences of refusing to comply with such requests or pressures.

10. Compliance with this Code

All directors, officers, managers and employees are committed to implementing the ethical business practices and principles as set out in this Code. Therefore, it is up to each individual to comply with this Code of Conduct and they will be accountable for such compliance.

A breach of this Code will be regarded seriously. Management will ensure that the Board or the Audit & Risk Committee will be informed of any material breaches of this Code or any material incidents reported under this Code. It may constitute a breach of the law and it may lead to disciplinary action being taken against the employees, including dismissal in serious cases.

11. Review of this Code

This Code shall be reviewed periodically to ensure that it is operating effectively and to consider whether any changes are required.

Approved by the Board of HTAL on 9 December 2019.