

WHISTLEBLOWER POLICY

1. Introduction

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. Hutchison Telecommunications (Australia) Limited ("HTAL") and its subsidiaries and controlled entities recognise that individuals who are considering reporting wrongdoing may fear that their identity will be disclosed and that they will suffer retribution or other detriment by reason of having reported wrongdoing. 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 belief about the conduct will be supported and protected.

The Australian Corporations Act 2001 (Cth) and Taxation Administration Act 1953 (Cth) provide protection for certain individuals who make a qualifying disclosure ("Whistleblower Laws").

A qualifying disclosure is protected under Whistleblower Laws where:

- the disclosure is made by an eligible whistleblower (set out at part 5 below);
- the disclosure is made directly to an eligible recipient (set out at part 5 below);
- the eligible whistleblower has reasonable grounds to suspect the information they report concerns improper conduct (set out at part 3 below); and
- there is a connection between the eligible whistleblower or the conduct reported and Australia.

A qualifying disclosure also includes:

- disclosures made to specific regulators (set out at part 5 below);
- disclosures made to a legal practitioner for the purpose of obtaining legal advice or legal representation about the operation of the Whistleblower Laws (and do not have to relate to improper conduct); and
- a Public Interest Disclosure or Emergency Disclosure (described at part 5 below).

This Whistleblower Policy ("Policy") outlines how you can make a disclosure to HTAL, how you can be protected under the Whistleblower Laws, how HTAL will investigate and deal with disclosures of improper conduct, and how HTAL will support and protect you throughout this process.

For the purposes of this Policy 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. Purpose

The purpose of this Policy is to:

- support the Group's values and Code of Conduct;
- ensure that individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported by HTAL;
- ensure that whistleblower disclosures are dealt with appropriately and on a timely basis;
- provide transparency regarding HTAL's processes for receiving, handling and investigating whistleblower disclosures;
- encourage employees and business partners of HTAL to have the confidence to speak up and report wrongdoing; and
- help deter wrongdoing.

3. Reporting improper conduct

For the purposes of this Policy, "improper conduct" is the conduct of anyone connected with HTAL or a related body corporate which in your reasonable view may amount to misconduct, wrongdoing or an improper state of affairs. This includes any conduct that involves:

- breach of legal or regulatory requirements;
- material breach of rules, policies or internal controls of HTAL;
- dishonest or unethical behaviour;
- fraudulent activity;
- illegal, corrupt, inappropriate or irregular practices or activities;
- any behaviour which creates an unsafe work-practice (e.g. which poses a serious risk to the health/safety of anyone in our workplace);
- serious or systemic instances of harassment, discrimination or bullying;
- unauthorised disclosure of confidential information;
- serious risk to public health, public safety or the environment;
- any activity which may significantly damage HTAL's reputation;
- any other conduct which may cause significant loss (whether financial or non-financial) to HTAL; and
- any attempt to conceal any of the above.

A disclosure that is not about improper conduct will not qualify for legal protection.

4. What reports or disclosures are not covered

Personal work-related grievances

This Policy and protections under the Whistleblower Laws do not apply to any personal work-related grievances. A "personal work-related grievance" is a grievance about any matter in relation to your employment or former employment having (or tending to have) implications for you personally, which may include:

- an interpersonal conflict between you and another employee;
- a decision relating to your engagement, transfer or promotion;
- a decision relating to the terms and conditions of your engagement; and
- a decision to discipline you or to suspend or terminate your engagement due to the way you performed your role.

If you believe that this describes your situation and would like internal assistance to resolve that grievance, then such concerns should be directed to your line manager or Human Resources.

A personal work-related grievance will still qualify for protection if:

- it includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (mixed disclosure);
- HTAL has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond your personal circumstances;
- you suffer from or are threatened with detriment for making a disclosure; or
- you seek legal advice or legal representation about the operation of the whistleblower protections under the Corporations Act.

False disclosures

This Policy will only apply to genuine claims and disclosures (even if the disclosure turns out to be incorrect). HTAL takes deliberately or maliciously false disclosures very seriously and disciplinary action may follow.

5. Reporting improper conduct

Who can report improper conduct?

You may report improper conduct under this Policy if you currently are, or have been, any of the following with respect to HTAL and its related entities:

- an employee (whether permanent, fixed term or casual);
- a director;
- an officer;
- an individual supplier of goods or services (whether paid or unpaid) including HTAL's dealers;
- an employee of a supplier;
- an individual consultant; and
- a relative, dependent, spouse (including a dependent of a spouse) of any of the above.
(together, the "eligible whistleblowers")

Under this Policy, HTAL will also act on disclosures from the following people but they will not be protected under the Whistleblower Laws (unless they also fall into one of the categories set out above):

- a customer; or
- a creditor or a debtor.

Disclosures may be made anonymously, confidentially, securely and outside of business hours.

Making a report or disclosure

You are encouraged to make a disclosure in person or in writing either by email to htalreport@company matters.com.au or by post to "Company Secretary, Hutchison Telecommunications (Australia) Limited" at Level 1, 177 Pacific Highway, North Sydney, NSW 2060, Australia.

The Company Secretary will ask for your consent to share your identity and shall report to the Chairman of the Audit & Risk Committee. If consent is not provided, the Company Secretary will not share your identity with the Chairman and will redact your identity and information likely to identify you from any written disclosure provided, before forwarding it to the Chairman.

The Chairman of the Audit & Risk Committee shall then determine the course of action to pursue, with power to delegate, with respect to the disclosure.

If you are posting a disclosure, you should use a sealed envelope clearly marked "Strictly Private and Confidential - To be Opened by Addressee" to ensure confidentiality.

If the Company Secretary is being complained against, the disclosure should be made in person or by post addressed to the Chairman of the Audit & Risk Committee at Level 1, 177 Pacific Highway, North Sydney, NSW 2060, Australia.

To ensure the matter can be considered and investigated thoroughly, you should provide details of the improper conduct (including relevant incident(s), behaviour, activity or activities, name(s), date(s), place(s) and any other relevant information) in the disclosure.

Eligible recipients

Disclosures may also qualify for protection under the Whistleblower Laws when made to an eligible recipient, which is someone who receives disclosures that qualify for protection. You can make a disclosure to one of the following eligible recipients at HTAL or a related body corporate:

- officers (including the Chairman of the Audit & Risk Committee);
- senior managers;
- an internal or external auditor or member of an audit team conducting an audit; or
- an actuary.

Disclosures to eligible recipients can be made in writing, in person, by email or by phone.

Regulators

Disclosures made to the following regulators may also qualify for protection under the Whistleblower Laws:

- Australian Securities and Investments Commission ("ASIC");
- Australian Prudential Regulatory Authority ("APRA");
- A Commonwealth authority prescribed by regulation; and
- (For tax-related disclosures) Commissioner of Taxation.

Anonymous reporting

You may advise that you wish to remain anonymous or place restrictions on who knows your identity when making a disclosure, over the course of investigation and after an investigation is finalised. Disclosures can be made anonymously and still receive legal protection. HTAL will comply with these requests and will still make best endeavours to investigate an anonymous disclosure. However, there may be limitations in investigating a disclosure where you do not consent to disclosure of your identity.

HTAL encourages you to share your identity wherever possible as this will make it easier for HTAL to fully investigate the disclosure and to provide you with the support and protections described in this Policy. In some instances, HTAL will not be able to investigate unless it can contact you.

If you do wish to remain anonymous, you are encouraged to remain in contact with HTAL so that follow-up questions can be asked and we can provide feedback. You can refuse to answer any questions (during the investigation or afterwards) that you feel could reveal your identity.

Public interest and emergency disclosures

In limited circumstances, the Corporations Act permits a person to make a disclosure about improper conduct to a member of the Federal Parliament or a State Parliament or to a journalist and for that disclosure to qualify as improper conduct.

You may have legal protection when making a disclosure through these channels if:

- you have previously reported the improper conduct to ASIC or APRA and certain time periods have passed since the previous disclosure was made;
- you have given the regulator written notice of your intention to make such a disclosure; and
- the disclosure constitutes a “public interest disclosure” or an “emergency disclosure” within the meaning of the Corporations Act and the information in your disclosure is strictly limited to the information necessary to make the relevant type of disclosure.

HTAL recommends a person considering making such a disclosure obtain independent legal advice to ensure that they understand these conditions if they are considering making a public interest disclosure or emergency disclosure.

6. Investigations

How reported matters will be handled

All disclosures received will be assessed to determine if they qualify for protection under this Policy and whether further investigation is warranted.

Where appropriate, disclosures made under this Policy may:

- be investigated internally by the Audit & Risk Committee or if delegated by the Audit & Risk Committee, the Company Secretary, the internal audit department, the human resources department or other departments of HTAL;

- be referred to the external auditor as instructed by the Audit & Risk Committee;
- be referred to the relevant public or regulatory bodies as instructed by the Audit & Risk Committee; and/or
- form the subject of any other actions as the Audit & Risk Committee may determine in the best interest of HTAL.

The Company Secretary or the Chairman of the Audit & Risk Committee where warranted will respond to you, if contactable, as soon as practicable upon receipt of your disclosure:

- acknowledging receipt of the disclosure;
- requesting consent in relation to use of your identity (if known);
- advising you 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
- indicating if any remedial or legal action is or is to be taken.

Fair treatment

Where an investigation is undertaken, it will incorporate the following principles of procedural fairness:

- Prompt action and transparent communication in relation to the investigation and subsequent decisions.
- Support for the accused should they choose to respond to the allegations in person.
- Investigator and ultimate decision maker shall have no direct involvement in the alleged incident.
- Confidential information regarding the investigation should only be communicated on a need-to-know basis and all efforts should be made to ensure such details remain confidential.
- Records will be maintained of meetings and interviews, including details of those who attended and the agreed outcomes.
- All relevant evidence will be lawfully obtained and carefully considered.
- Investigation findings and recommendations may be documented in a written report.

Fair treatment of respondents

Each named individual implicated in a disclosure will be given the opportunity to be part of the investigation and to respond to any allegations made against them, prior to any decisions being made internally.

Investigation findings

The format and length of an investigation report will vary depending upon the nature and particular circumstances of each disclosure made.

The investigation may conclude with a report from the Company Secretary or another investigator. The report will include findings on the allegations and a summary of reviewed evidence. If permitted by law, the Company Secretary may inform the individual(s) against whom allegations have been made of the findings. All reports and meeting records will remain the property of HTAL and will not be shared with you or any person against whom allegations have been made.

7. Protections

Detrimental conduct

HTAL strictly prohibits detrimental conduct. Detrimental conduct occurs when a person causes or threatens to cause detriment to you or someone else because the person believes or suspects that you (or someone else) made, may have made, proposes to make, or could make a disclosure under this Policy, and the belief or suspicion is the reason, or part of the reason, for the detriment.

Detriment includes, but is not limited to:

- dismissal, suspension or demotion;
- any form of harassment or victimisation, including being threatened; and
- discrimination.

Any employee or contractor found to have engaged in such activities will be in breach of this Policy and will be subject to disciplinary action, which may include termination of employment.

You can also seek independent legal advice or contact a regulatory body such as ASIC, APRA or the Australian Taxation Office if you believe you have suffered detriment.

HTAL will support whistleblowers and protect them from detriment by:

- assessing the risk of detriment against you and other persons which will commence as soon as possible after receiving a disclosure;
- providing access to support services (including counselling or other professional or legal services);
- investigating claims of detriment; and
- protecting you if detriment has already occurred - for example, HTAL may investigate and address the detrimental conduct, such as by taking disciplinary action.

The following actions are not detrimental conduct:

- administrative action that is reasonable for the purpose of protecting you from detriment (e.g. moving you to another office); and
- managing unsatisfactory work performance.

Confidentiality

Your identity and information likely to lead to you being identified that we receive from you under this Policy will be treated as confidential. HTAL will not disclose this information without your consent unless it is:

- a disclosure of information likely to lead to your identity that is reasonably necessary for the effective investigation of the matter and all reasonable steps are taken to reduce the risk of your identification;
- disclosed to ASIC, APRA, the Australian Federal Police or a person or body prescribed by regulation or (for tax-related matters) is reported to the Commissioner of Taxation; or
- disclosed to a legal practitioner for the purposes of obtaining legal advice or representation in relation to the Whistleblower Laws.

All reasonable steps will be taken to reduce the risk of identifying you without your permission. Should your identity, or information leading to your identity be disclosed during an investigation, it is expected that it is kept confidential by all parties.

If you have reported improper conduct under this Policy and consider that action has been taken either against you, your colleagues, or your relatives which breaches your confidentiality or results in you or the individual(s) becoming personally disadvantaged, please contact the Company Secretary.

HTAL will protect your confidentiality by:

- redacting all personal information from a disclosure;
- referred to you in a gender-neutral context;
- contacting you to help identify certain aspects of your disclosure that may inadvertently identify you;
- ensuring disclosures are handled and investigated by qualified staff;
- ensuring all paper and electronic documents and other materials relating to disclosures will be stored securely;
- limiting access to all information relating to a disclosure to those directly involved in managing and investigating the disclosure;
- limiting the number of people who are directly involved in handling and investigating a disclosure who will be made aware of your identity (subject to your consent) or information that is likely to lead to the identification of the discloser;
- ensuring that communications and documents relating to the investigation of a disclosure will not to be sent to an email address that can be accessed by other staff; and
- reminding each person who is involved in handling and investigating a disclosure about the confidentiality requirements, including that an unauthorised disclosure of a discloser's identity may be a criminal offence.

Anonymous reporters

If you have made an anonymous disclosure, HTAL will protect your anonymity by allowing you to adopt a pseudonym for the purpose of your disclosure.

Legal protections

As well as the protections stated above, the following legal protections apply where your disclosure qualifies for protection under the Whistleblower Laws. You should seek independent legal advice for more information.

Legal protection	Description
<p>Protection from detrimental conduct</p>	<p>Anyone who is proven to have engaged in detrimental conduct (as described at "Detrimental conduct" above) may be guilty of an offence and may be liable for damages.</p> <p>In that case, you (or any other employee or person) can seek compensation and other remedies through the courts if you suffer loss, damage or injury because of detrimental conduct and if HTAL failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.</p>
<p>Your confidentiality will be protected</p>	<p>A person commits an offence if they obtain your identity or information likely to lead to your identification directly or indirectly because of your disclosure and they disclose that information, unless one of the exceptions apply (see "Confidentiality" above for the relevant exceptions).</p>
<p>You will be protected from some types of liability</p>	<p>For example:</p> <ul style="list-style-type: none"> • any legal action for breach of an employment contract, duty of confidentiality or another contractual obligation for making the disclosure • attempted prosecution for unlawfully releasing information, or other use of the disclosure in a prosecution • disciplinary action for making the disclosure

8. Other

Review of Policy

This Policy and related procedures shall be reviewed periodically to ensure that whistleblower disclosures are being appropriately recorded, investigated and responded to and to consider whether any changes are required to the Policy or procedures.

Training

As appropriate, HTAL will provide training to employees in respect of their rights and obligations under this Policy and will provide training to managers and others who may receive disclosures made under this Policy on how to handle those disclosures.

Access

This Policy will be made available in the Corporate Governance section of HTAL's website. A copy may also be obtained from the Company Secretary.

Further information

If you require further information about this Policy and making a disclosure, please contact the Company Secretary by phone at +61 2 9015 5088 or by email at htalinvestors@company matters.com.au.

Approved by the Board of HTAL on 3 December 2021.