

PCCW LIMITED

(INCORPORATED IN HONG KONG WITH LIMITED LIABILITY)
(STOCK CODE: 0008)

CORPORATE RESPONSIBILITY POLICY

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PCCW is committed to maintaining a safe, secure and respectful workplace delivering a high level of service, integrity, quality, and performance.

This policy comprises a set of rules adopted by the PCCW Board of Directors which applies throughout the PCCW Group to all employees, directors and officers.

These rules set the standards for the way we go about our business and may be supplemented from time to time by policy statements.

This policy is intended to be a clear and simple guide to the behaviour and to the Corporate Responsibilities of directors, officers, including principal officers, and employees of PCCW Limited ("**PCCW**"), its subsidiaries, affiliates and associated companies, in Hong Kong and internationally (the "**PCCW Group**"). Much of this document may seem obvious but it is helpful to have guidelines on record for new employees, and even for those of us who have been following them intuitively for some time.

As employees of the PCCW Group, we are all identified not only by the PCCW Group's brands but by the way we act. The PCCW brand is more than just a name and a logo; it represents a high standard of behaviour that we should all follow.

We are very proud of the culture that everyone has built to make PCCW a leading technology based organisation holding itself to a high level of standards of behaviour in modern commercial life that go beyond minimum legal standards. Each of us is responsible for respecting and adhering to this high standard of corporate responsibility.

To have such standards - and to live up to them - is something that includes all of us, from the most junior employee in the most distant part of the PCCW Group up to all Senior Executives. These standards are the criteria by which we are judged - both by our colleagues and by our other stakeholders. Customers, shareholders, employees, vendors, and the public, all expect our reputation to continue to be protected and enhanced, consistent with ethical responsibility guidelines which form an integrated part of the PCCW Group.

In our day-to-day business dealings, each of us relies on our good judgement and experience to ensure we make the right decisions. Naturally, all of us must abide by the laws of the countries in which we do business and it is our responsibility to act with high degree of honesty and integrity in every situation. The PCCW Group will not tolerate practices which are illegal, unethical or which may damage our reputation.

We give you our assurance that, should you raise a possible breach of these rules, it will be investigated responsibly. No one will be reprimanded in any way for having raised a matter in good faith and your identity will not be disclosed without your permission, unless disclosure is unavoidable during an investigation. The procedure for raising possible breaches is laid out at the back of this document.

The PCCW Corporate Responsibility Policy sets out standards on how we should behave with all of our stakeholders – customers, our people, communities, investors and regulators. We all have a duty to uphold these standards and to act at all times with integrity and honesty.

Do take the time to read this document carefully. We are sure you will find it helpful.

Authorised and approved by the PCCW Board of Directors for distribution and use throughout the PCCW Group.

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AUTHORITY

This Corporate Responsibility Policy has been adopted by and is issued under the authority of the Board of Directors of PCCW Limited.

This policy reflects and expresses the PCCW director's individual and collective commitment to the continual observance of high standards of social responsibility, ethics, integrity and compliance with all applicable laws in the pursuance of the affairs of the businesses they are charged with directing and supervising.

Under the authority of and as directed by the Board of Directors of PCCW Limited, this Corporate Responsibility Policy shall at all times apply to and be complied with by all directors, officers, including principal officers, and employees of the PCCW Group.

This Corporate Responsibility Policy shall also apply, where applicable, to any other party, including but not limited to contractors, agents, and suppliers, when acting for or on behalf of the PCCW Group.

Each of the HKT Trust and HKT Limited ("**HKT**"), its subsidiary, associated and affiliated companies worldwide ("**HKT Group**"), and Pacific Century Premium Developments Limited ("**PCPD**"), its subsidiary, associated and affiliated companies worldwide ("**PCPD Group**"), have separate Corporate Responsibility Policies which are, in all material respects, the same as this policy.

INTERACTION & INTERPRETATION OF POLICIES

Throughout this policy, the term “**Company**” means the PCCW Group company on whose behalf you are employed and/or acting for.

Where your duties, responsibilities, authority, or knowledge overlaps or includes those of an affiliated company in addition to your employing Company then, in the absence of any conflict, you are also required to comply with any policies more specific to that affiliated company.

For the avoidance of doubt, the hierarchy of policy in the order of precedence as they apply to you is (i) all Company specific policies, (ii) thereafter all relevant PCCW Group policies, and finally, (iii) any relevant affiliated company policies.

Where a reference or obligation is stated herein to any PCCW Group property, both tangible and intangible, then such should be interpreted as including, as applicable, a reference to any affiliated companies tangible or intangible property.

Similarly, where a reference or obligation is stated herein to any PCCW Group employees, customers, partners, suppliers, business dealings, business opportunities, intellectual property, or similar, then such should be interpreted as including, as applicable, a reference to the equivalent within any affiliated company.

OVERVIEW – WHAT ARE YOUR RESPONSIBILITIES

ACT IN COMPLIANCE WITH LAWS, REGULATIONS AND PCCW GROUP POLICIES

- (1) You must observe high standards of ethics and integrity, and ensure your affairs are conducted in accordance with applicable laws, regulations, and PCCW Group policies in all aspects of our business.

OPERATE IN A CONSIDERATE AND CIVIC RESPONSIBLE MANNER

- (2) You must use all of your communications in a considerate and responsible manner.
- (3) You must give your full support in coping with emergencies and in supporting the community.
- (4) You must not acquire other company trade secrets or proprietary information by improper means.

BE RESPECTFUL OF THE WORKPLACE

- (5) You must observe all safety and environmental policies, procedures and regulations.
- (6) You must not discriminate against anyone on grounds of gender, disability, pregnancy, family status, race, colour, religion, age, sexual orientation, national origin, trade union membership or other condition recognised in law.
- (7) You must not participate in any form of harassment or inappropriate conduct.
- (8) You must not gamble on PCCW Group premises, or lend money to, or borrow money from, other employees.
- (9) You are expected to dress appropriately and to carry your Company pass card while on duty.

AVOID CONFLICTS OF INTEREST AND BE FAIR IN BUSINESS DEALINGS

- (10) You must not do anything which conflicts with the interests of, first and foremost, the Company and thereafter the PCCW Group or anything that could be construed as possibly being in conflict.
- (11) You must not have any personal business dealings which detract from, or conflict with the interests of the PCCW Group.
- (12) You must not take for yourself business opportunities that arise through the use of PCCW Group property, information or position.
- (13) You must not directly or indirectly engage in any other business or occupation for reward, nor receive any commission or fee, unless the Company provides prior written approval.

DO NOT MISUSE INSIDE INFORMATION

- (14) You must not use or provide to another individual Inside Information as the basis for purchasing, or selling, shares, warrants or other securities in any Listed PCCW Group Company, or any other company with which the PCCW Group has dealings.
- (15) You must not disclose Inside Information to any person without the relevant and appropriate authorisation, nor are you to knowingly, recklessly or negligently present or provide Inside Information, in a manner which may be false or misleading through the inclusion or omission of material facts.

- (16) You must ensure that any information which may be relevant to an assessment of the Company's disclosure obligations is reported to the senior management of the PCCW Group.

SAFEGUARD YOUR COMMUNICATIONS

- (17) You must ensure Company information and property are only used, accessed and disclosed for authorised business purposes in support of the operations of the PCCW Group and in accordance with appropriate statutory, legal and other governmental/regulatory requirements.
- (18) You must ensure any public disclosure is of a high quality.
- (19) You must ensure correct approval procedures are followed when communicating with external parties.

MANAGE PROPERTY AND RECORDS WITH HIGH INTEGRITY

- (20) You must ensure all PCCW Group property is looked after and properly protected.
- (21) You must ensure all records are accurate, complete and of high integrity.
- (22) You must ensure the proper expenditure of PCCW Group funds including expenses.
- (23) You must ensure all intellectual property is protected and only used for authorised purposes.

ENSURE PRIVACY AND INFORMATION PROTECTION

- (24) You must ensure all personal customer and employment related data is protected.
- (25) You must ensure the protection of all corporate information and trade secrets.

AVOID BEING COMPROMISED BY BRIBERY, GIFTS AND ENTERTAINMENT

- (26) You must act in compliance with the PCCW corporate "Bribery, Gifts and Entertainment Policy" and not be a party to, or knowingly permit to happen, any act of actual or suspected bribery or corruption in connection with the activities of the Company.
- (27) You must ensure your acceptance or giving of gifts and / or entertainment is in compliance with the PCCW corporate "Bribery, Gifts and Entertainment Policy".

SPEAK UP ON UNETHICAL CONDUCT – NOTIFICATION PROCEDURES

- (28) You must be alert and sensitive to situations that could result in actions by yourself, or others, which might violate the PCCW Corporate Responsibility Policy.

BE AWARE OF COMPLIANCE, WAIVERS AND AMENDMENTS

- (29) You must be aware of your obligation as an employee to comply with the Corporate Responsibility Policy and all other PCCW policies, procedures and guidelines.
- (30) You must be aware that no waiver of any provision as set out herein shall be made for an executive officer or director of the PCCW Group unless such waiver is made by the Board of Directors.
- (31) You must be aware that this Corporate Responsibility Policy will be regularly assessed and updated to ensure it always meets the highest standards of conduct.

ACT IN COMPLIANCE WITH LAWS, REGULATIONS AND PCCW GROUP POLICIES

Why is this important?

As employees, we are representatives of PCCW. Therefore it is everyone's responsibility to ensure compliance with all laws, regulations, and PCCW Group policies in the markets in which PCCW Group operates.

What must you do?

You must observe high standards of ethics and integrity, and ensure your affairs are conducted in accordance with applicable laws, regulations, and PCCW Group policies in all aspects of our business.

The PCCW Group is strongly committed to high standards of ethics and integrity, which generally extends beyond strict interpretation of the law, in all aspects of our business as well as ensuring our affairs are always conducted in accordance with applicable laws and regulations. In carrying out your duties, you should act impartially and responsibly, and not give preferential treatment to any organisations or individuals. Each employee of the PCCW Group is expected to adhere to this high standard whenever he or she is acting on behalf of the PCCW Group, whether in dealings with other employees, customers, vendors, government regulators or the general public.

Everyone should be aware of the basic legal requirements that apply to his or her job responsibilities, which increasingly may also include compliance with laws in additional countries to those in which you are operating, especially as the PCCW Group continues to extend its global footprint. A Group Compliance Manual has been prepared to ensure that business unit managers are aware of their responsibilities in complying with all applicable laws and regulations.

You are expected to give your best service at all times to promote the business and interests first and foremost of the Company and thereafter the PCCW Group, to comply with and act under the general orders and directives of management or any person to whom the requisite authority may be delegated by management. Tasks assigned to you should be performed in a responsible and reliable manner - you must be sure you meet the standards of work laid down for you. Do not cut corners, ignore defects, or use inferior materials to those specified.

You must use your time at work efficiently - you must not waste PCCW Group time and resources by using phones, photocopiers, faxes, voice mail or computers for unauthorised personal reasons nor take part in unauthorised ventures such as trading, gambling, use illegal substances (e.g. drugs) or political activities on PCCW Group premises.

You must refrain from communicating any information (especially information of a proprietary or confidential nature) that may create a damaging, embarrassing or negative impression of the PCCW Group, its management, employees, contractors, business partners or customers, which is likely to compromise the regulatory or legislative requirements of the PCCW Group, or is in contravention of Company or PCCW Group policies, or is likely to compromise the confidentiality or sensitivity of PCCW Group information (including customer information) or information held by the PCCW Group on behalf of an external party. Please refer to the "*Electronic Communication Policy*" which can be found on the Corporate Intranet for further guidance.

Group Legal Office or any appropriate supervisor should be consulted as to questions of whether a particular action is lawful.

OPERATE IN A CONSIDERATE AND CIVIC RESPONSIBLE MANNER

Why is this important?

As a critical infrastructure provider, PCCW Group is committed to supporting, and is looked upon by, the community regardless of the prevailing circumstances. PCCW Group is represented and seen by the community through its employees who each must act in a considerate and civically responsible manner.

What must you do?

Considerate Responsibility

You must use all of your communications in a considerate and responsible manner.

You shall at all times provide the highest levels of electronic, verbal and body language communications in accordance with the *"Electronic Communications Policy"*. You shall not participate in communications or acts that may result in the sending and/or accessing of material that may be considered as pornographic, offensive, libellous, sexually, racially, or religiously prejudicial to or from PCCW Group premises and/or communications systems.

Civic Responsibility

You must give your full support in coping with emergencies and in supporting the community.

As a provider of essential telecommunications services and other services to the public and our clients, you must provide your best efforts to be available to support PCCW in providing services in the event of social disorder, natural disasters, and other emergencies. Community involvement is an important obligation and PCCW is fully supportive of community activities and encourages the participation of all employees in community affairs and community functions.

Fair Competition

You must not acquire other company trade secrets or proprietary information by improper means.

While healthy rivalry with our competitors is good, you must also be honest in your dealings with them - both directly and indirectly. This includes their existing business relationships with our potential customers. In many countries there are laws governing the protection and promotion of competition, including laws protecting our competitors' proprietary and other sensitive information.

You must not knowingly participate in, promote or conceal knowledge of any anti-competitive conduct, or conduct which may be interpreted as intending to unfairly manipulate a market, in relation to any of the PCCW Group's businesses.

There are laws in most countries governing co-operation between companies operating in the same field. You should seek advice from the Group Legal Office whenever anti-competition and related questions arise. This can be a complex and sensitive area. In some parts of the world PCCW Group can be competitors with one branch of another company, and partners with them in other places.

Generally speaking, you should not agree to discuss, in writing or orally, formally or informally, prices, discounts, allocations of territory, customers, or sales with representatives of other companies.

You must not make false or deceptive statements about PCCW Group products and services or make false and deceptive comparisons of other companies' products and services. You should not agree to any request to join in any bans, boycotts, or other restrictive trade practices.

BE RESPECTFUL OF THE WORKPLACE

Why is this important?

As we all spend a large amount of time within the workplace it is very important that this work area provides us all with an environment in which we can feel healthy, safe, secure and comfortable.

What must you do?

Health & Safety

You must observe all safety and environmental policies, procedures and regulations.

You are obliged to carry out your work in a safe manner so as not to cause harm either to yourself or to others - and to report any potentially unsafe or unhealthy situations. Safety and environmental regulations vary, so always find out the rules, follow them; and try to observe the best practice.

Equal Opportunities

You must not discriminate against anyone on grounds of gender, disability, pregnancy, family status, race, colour, religion, age, sexual orientation, national origin, trade union membership or other condition recognised in law.

The PCCW Group is committed to providing equal opportunities in relation to all human resources matters. You have the right to make a complaint directly to the respective line manager, or alternatively to Human Resources. All complaints will be resolved in a speedy and fair manner and handled in strict confidence. Further guidance can be obtained from Group Human Resources.

Harassment and Inappropriate Conduct

You must not participate in any form of harassment or inappropriate conduct.

You must treat each individual with respect and dignity and be accountable for the appropriateness of your behaviour. Sexual/disability/racial harassment is unlawful and unacceptable, and will not be tolerated. PCCW is committed to a working atmosphere free from demeaning or harassing behaviour. Anyone found to have committed an act of harassment may be subject to disciplinary action, including dismissal, and may be personally liable for legal proceedings resulting from the discriminatory acts. PCCW will thoroughly investigate all reported harassment incidents and will not tolerate any form of retaliation against anyone who, in good faith, reports an incident or participates as a witness in the investigation.

Gambling, Lending and Borrowing of Money

You must not gamble on PCCW Group premises, or lend money to, or borrow money from, other employees.

You must not engage in or permit gambling on PCCW Group premises. You must not borrow money from other employees or seek your line manager to act as a guarantor for a loan. Borrowing could be an indication of potential financial problems requiring financial counseling.

Dress Code and Identification Card

You are expected to dress appropriately and to carry your Company pass card while on duty.

Office staff can be in a "smart casual" look, with personal discretion to be used when meeting clients. Sandals, shorts, sports wear or other clothes of this type are discouraged. If you are required to wear a Company uniform, you should keep it in neat and tidy condition.

AVOID CONFLICT OF INTEREST & BE FAIR IN BUSINESS DEALINGS

Why is this important?

Conflicts of interest, or even the perception thereof, can expose your personal judgement and that of PCCW Group to criticism which could result in damage to both PCCW Group and your own personal standing.

What must you do?

Conflict of Interest

You must not do anything which conflicts with the interests of, first and foremost, the Company and thereafter the PCCW Group or anything that could be construed as possibly being in conflict.

If you have any concerns about conflict of interest, please contact your line manager for clarification. Where a potential conflict of interest arises, you must complete the form "Declaration of Conflict of Interest", which is available on the Intranet under the Human Resources Homepage.

Recusal

Where a transaction is otherwise legal or proper but for your material involvement, you are required to inform your supervisor and recuse yourself from any further participation in the transaction.

If you have a personal conflict of interest in handling a particular matter, such as a material financial interest in the entity with whom you are negotiating a contract on behalf of the Company, or are legally precluded (e.g. a "U.S. Person" cannot be materially involved in a matter involving a U.S. embargoed entity), you must not be involved in the transaction, and others in the Company who work on it should not involve or consult you.

You shall not be subject to any disciplinary or other adverse consequences for exercising your obligation to recuse yourself under this policy.

Business Dealings

You must not have any personal business dealings which detract from, or conflict with the interests of the PCCW Group.

You must not hold any position or have any interest in or dealings with any of our competitors, suppliers or customers — or anyone else with whom you are engaged in a business relationship on behalf of the PCCW Group — which might, or might appear to, create a conflict of interest, or impair the judgements you make in the course of your employment with the PCCW Group. Prohibited transactions would include, for instance, any dealings conducted on behalf of the PCCW Group with businesses or persons that were connected to you personally or through immediate family relationships.

Corporate Opportunities

You must not take for yourself business opportunities that arise through the use of PCCW Group property, information or position.

No employee, officer or director may use corporate property, information or position for personal gain, and no employee, officer or director may compete with the PCCW Group. Competing with the PCCW Group may involve engaging in the same line of business as a PCCW Group Company, or any situation where the employee, officer or director takes away from the PCCW Group opportunities for sales or purchases of property, products, services or interests.

Outside Employment

You must not directly or indirectly engage in any other business or occupation for reward, nor receive any commission or fee, unless the Company provides prior written approval.

If you would like to apply for approval of any outside employment, you should fill in the form “Application for Permission to Engage in Outside Business / Employment” available on the Intranet under the Human Resources Homepage. The general criteria for granting such permission are whether the outside business or employment is in conflict with the PCCW Group's interests, and whether the outside business or employment interferes with or impairs your job performance.

DO NOT MISUSE INSIDE INFORMATION

Definitions

“**Listed PCCW Group Company**” means: collectively and each individually as the context determines, PCCW Limited, HKT Limited, and Pacific Century Premium Developments Limited.

“**Inside Information**” means: specific information that may have a material effect on the trading price and / or volume of any shares or other securities and which has not been made generally available to persons or entities that are likely to deal in such shares or other securities. It may include information in relation to any PCCW Group company, including HKT Group companies and PCPD Group companies, or other companies which may be a party to or subject of a potential or actual material transaction in which you are involved on behalf of the Company or any other PCCW Group company

Why is this important?

Misuse of Inside Information is illegal in many countries in which the PCCW Group operates and is prohibited under your terms and conditions of engagement with the PCCW Group.

Prohibited use of Inside Information

You must not use or provide to another individual Inside Information as the basis for purchasing, or selling, shares, warrants or other securities in any Listed PCCW Group Company, or any other company with which the PCCW Group has, or may be contemplating having dealings.

You must not use Inside Information as the basis for purchasing, or selling, shares, warrants or other securities of a Listed PCCW Group Company, or any other company with which the PCCW Group has, or may be contemplating having dealings, nor may you provide any such Inside Information to other persons as the basis for those persons to deal, or refrain from dealing, in securities.

Insider dealing is a criminal offence in many countries and is unethical everywhere. PCCW Group companies and their directors, officers and employees are subject to Stock Exchange rules and/or other laws and regulations relating to insider dealing in Hong Kong, and may be subject to similar laws in other jurisdictions. Breach of these laws and regulations can have very serious consequences, including civil or criminal liability.

It is perfectly acceptable for you to deal in securities of a Listed PCCW Group Company as long as you check before making any transactions to assure yourself that all information you have is public or prior approval is given. If you are in doubt as to whether or not you should deal you should consult the Company Secretary.

Certain individuals are subject to the more stringent rules relating to dealings in a Listed PCCW Group Company's securities as set out in the ***PCCW Code of Conduct for Securities Transactions by Directors, Senior Management, and Nominated Persons (the “PCCW Code”)***. These persons are:

- (a) all directors of PCCW Group;
- (b) all first line reports to a Director of PCCW Group; and
- (c) any employee nominated by a Director of PCCW Group or a first line report to a Director of PCCW Group.

In addition, any person in possession of Inside Information which is not publicly available, whether or not they are included in the list of persons above, is also subject to the same stringent rules set out in the PCCW Code.

These individuals are prohibited from dealing in the securities of any Listed PCCW Group Company without complying with the notification requirements set out in the PCCW Code. During certain periods as stated in the PCCW Code, dealings in securities of a Listed PCCW Group Company by those subject to

the PCCW Code are prohibited. During these periods those not subject to the PCCW Code should, before dealing, also consider very carefully whether they are in possession of Inside Information.

The PCCW Code also provides guidance on the principles applicable to directors, officers, and other persons with respect to dealing in Listed PCCW Group Company securities. If you are in any doubt about how it affects you, or if you would like a copy of the PCCW Code, please contact the Group Legal Office or Corporate Secretariat.

Confidentiality of Inside Information

You must not disclose Inside Information without appropriate authority to do so, and, if you know or suspect that any Inside Information may have been disclosed without such authority, you must immediately inform an appropriate person.

You must take all reasonable precautions to prevent the accidental or deliberate unauthorized disclosure of Inside Information. Failure to safeguard the Inside Information may result in, amongst other things, significant damage to the PCCW Group's reputation and / or market position, as well as prosecution of PCCW and / or any person or persons involved in the unauthorized disclosure.

You are also reminded that, as an employee of the PCCW Group, you are bound to protect the confidentiality of all PCCW Group confidential information, including Inside Information, even if you have not signed a separate non-disclosure or confidentiality agreement.

In the event that you become aware of or have valid reason to suspect that Inside Information may have been accidentally or deliberately disclosed without appropriate authorization, you should immediately inform appropriate senior officers of the PCCW Group and / or the PCCW Board of Directors.

Disclosure of Inside Information

You must not withhold from appropriate senior officers of the PCCW Group, in whole or in part, any Inside Information or knowledge that the confidentiality of Inside Information may have been compromised.

The PCCW Group has a legal and an ethical obligation to ensure that Inside Information is fully and accurately disclosed in a controlled and timely manner. Such disclosures must only be made under the authority of appropriate senior officers of the PCCW Group and / or the PCCW Board of Directors.

You must not withhold any material facts, or provide any false or misleading information in relation to Inside Information from appropriate senior officers of the PCCW Group and / or the PCCW Board of Directors.

To the extent that you are responsible, and have the requisite authority, for any required disclosure of Inside Information, you must ensure such disclosure is made in a manner which will provide equal, timely and effective access by the public. Such disclosure shall, at a minimum, include publication through an electronic publication system operated by a recognized exchange company, such as the Stock Exchange of Hong Kong Limited.

SAFEGUARD YOUR COMMUNICATIONS

Why is this important?

All employees should be aware that the press, financial community, regulators, and the community at large take a close interest in the activities of the PCCW Group. These audiences and their views and understanding of the PCCW Group have a direct impact on the PCCW Group's reputation and our market value. It is therefore imperative that all formal and informal statements made to the press or any other external parties are handled in a clear and consistent manner.

What must you do?

Safeguarding Principles

You must ensure Company information and property are only used, accessed and disclosed for authorised business purposes in support of the operations of the PCCW Group and in accordance with appropriate statutory, legal and other governmental/regulatory requirements.

You must not knowingly, with intent to defraud, transmit by telecommunication any message for which the charge has not been paid. Any breach of the above may result in a liability to prosecution. Messages must remain strictly confidential and unauthorised persons must not be permitted access to any communication transmitted over the PCCW Group's infrastructure nor may unauthorised devices be connected.

Quality of Public Disclosures

You must ensure any public disclosure is of a high quality.

PCCW Group has a responsibility to provide full and accurate information in our public disclosures, in all material respects, about the PCCW Group's financial condition and results of operations. Our reports and documents filed with or submitted to the securities regulators in Hong Kong and other jurisdictions, and all our other public communications shall include full, fair, accurate, timely and understandable disclosure.

In certain circumstances, it is an offence under law for PCCW, or any officer of the PCCW Group to knowingly, recklessly, or negligently make a public disclosure which contains false or misleading material facts, or is false or misleading through the failure to disclose material facts. It is therefore essential that you be aware of, and comply with, all relevant PCCW Group policies, processes, and procedures, governing the use and / or disclosure of PCCW Group information as may be amended from time to time.

Communications with Media, Financial Community and Other Outside Parties

You must ensure correct approval procedures are followed when communicating with external parties.

To ensure this, all draft press releases, materials intended to be forwarded to the media, or any interviews to be conducted with the media, must be submitted to, and receive prior approval from, the Head of Group Communications in conjunction with a relevant senior executive. It is essential that all marketing information released by the PCCW Group is accurate and approved by the General Manager or above in the relevant business unit before release.

PCCW Group's confidential information must be handled with special care. Every one of us has the responsibility to maintain strict confidentiality with respect to PCCW Group business dealings and only make public comments consistent with our legal and regulatory obligations, any PCCW Group confidentiality agreements with its business partners, and in accordance with PCCW Group policies.

Any employee approached by the media for any reason (particularly if the media are asking for a comment), the journalist must be referred immediately to Group Communications. In accordance with the "Media Enquiries and Media Release Procedures" (COM-PRO-01), only PCCW Group authorised spokespeople may address the media and financial community on Company issues. If you are in any doubt about how to handle any enquiry from or release to the media or external community, please refer them directly to Group Communications.

MANAGE PROPERTY AND RECORDS WITH HIGH INTEGRITY

Why is this important?

The property and records held by the PCCW Group represent the lifeblood of the organisation. The loss or compromise of PCCW Group assets would severely impair the organisation's ability to operate effectively and deliver the highest levels of products and services expected by all customers and stakeholders.

What must you do?

PCCW Group Property

You must ensure all PCCW Group property is looked after and properly protected.

You are responsible for all physical property entrusted to you by the PCCW Group, customers and others. You should treat such property as you would your own, and not damage it, deface it or remove it for personal use unless authorised to do so. Just as you must not misuse or misappropriate property internally, so you must not, for example, dispose of any PCCW Group property in an unauthorised manner such as by selling, loaning or giving it away without proper permission. In the case of damage to or loss of PCCW Group property by you, you must report such damage or loss in accordance with applicable procedures and you may be required to make repayment to the Company. Falsifying documents or furnishing false accounting records are offences under the Theft Ordinance and other laws and are strictly prohibited.

Records

You must ensure all records are accurate, complete and of high integrity.

The integrity of the PCCW Group depends on the honesty, completeness, and accuracy of our records. You must prepare the PCCW Group's records and reports diligently to assure the accuracy and completeness of all data, records and reports and expenditure connected with the PCCW Group. You must keep copies of test reports, financial records, installation data, customer records, and estimates (both for customers and from suppliers) – in a safe place. Certain important documents must be retained for specific time periods in order to protect the PCCW Group's legal or financial rights or for compliance purposes in accordance with the *"Document Retention Policy"*. You must ensure arrangements are in place for vital records to be securely stored in compliance with the *"Information Classification Policy"*.

Company Funds

You must ensure the proper expenditure of PCCW Group funds including expenses.

No secret fund of Company cash or other unrecorded assets shall be set up for any purpose whatsoever. When spending or committing PCCW Group funds, you should be sure that you have the appropriate authority, the transaction is properly authorised and properly documented, and that the PCCW Group receives appropriate value in return.

Intellectual Property

You must ensure all intellectual property is protected and only used for authorised purposes.

You will only use intellectual property (including, designs, copyright material, trademarks, registered designs, patents and domain names) in accordance with the *"Intellectual Property Rights Policy"*. Additionally you need to ensure that the electronic storage of intellectual property is protected in accordance with the *"Malicious Code (Virus) Security Policy"*. In accordance with the *"Software Copyright Protection Procedures"* all patents, copyrights, registered and unregistered designs, trademarks and any other intellectual property rights invented, developed or created by you in the course of your employment with the PCCW Group shall be the absolute property of the PCCW Group.

ENSURE PRIVACY AND INFORMATION PROTECTION

Why is this important?

PCCW Group customers, job applicants and employees are legally entitled to have their personal identifiable information ("PII") protected and not disclosed in an unauthorised manner. It is a serious breach to use or reveal PII in a manner not intended. Breaches may lead to legal penalties against the PCCW Group company and the employee.

What must you do?

Protect the Privacy of Customer and Employment Related Personal Identifiable Information

You must ensure all personal customer and employment related data is protected.

Each company within the PCCW Group is committed to the policy of respecting and safeguarding the data privacy of our respective customers, job applicants and employees by collecting, holding, using and processing their personal data in a lawful and prudent manner. The Personal Privacy Policy in conjunction with other procedures and guidance available on the PCCW Policies and Procedures Intranet must at all times be followed. At any time, should you have any questions, concerns, or comments in respect of either Customer or employment related personal data, you are encouraged to contact the Privacy Compliance Officer.

Protect Corporate Information and Trade Secrets

You must ensure the protection of all corporate information and trade secrets.

In the performance of your duties, you may receive or have access to or be entrusted with certain commercially valuable proprietary and confidential information which includes trade business activities, operations, financial details, dealings, business methods, business strategies, market plans, manpower plans, customer and supplier lists or details, trade secrets, intellectual property rights, technology, systems, programming, products and services relating to the companies within the PCCW Group (collectively "**Confidential Information**"). As such you are reminded to observe the related policy for the protection of Confidential Information, which is summarised below:

You must not give away, sell, or discuss any such information - however trivial it may seem to you - to any person, either an employee or an outsider (including family and friends, no matter how much you believe they can be trusted) unless they have a need to know and are authorised to know such information. If anyone offers you money for copies of letters, memos, plans, drawings, records, or any other PCCW Group property or for Confidential Information provided to any member of the PCCW Group in confidence by any third party, such as a customer, supplier, or a partner, you should report the matter immediately to your manager.

Many outsiders would like access to proprietary information about PCCW or companies within the PCCW Group. If an outsider approaches you, ALWAYS check with your line manager before you agree to talk to him or her. In some cases, it may be necessary to have someone from Group Communications or the Group Legal Office with you.

The general guidelines for handling inquiries are as follows:

- (a) you must never disclose to outsiders, or even colleagues within the PCCW Group, who are not entitled to know about any Inside Information, transactions or legal proceedings in which the PCCW Group is or may be involved. You should refer any such inquiry to the Group Legal Office;
- (b) journalists should always be referred to Group Communications; and
- (c) investment analysts, brokers etc., should always be referred to Group Investor Relations.

At any time following the termination of your employment with the Company, you are not permitted to use any of the Confidential Information for the purposes of soliciting, enticing or canvassing any person who at any time is or has been a customer or agent of any of the companies within the PCCW Group.

AVOID BEING COMPROMISED BY THE OFFERING, FACILITATING OR RECEIVING OF BRIBERY, GIFTS AND ENTERTAINMENT

Why is this important?

The PCCW Group is committed to doing business in a fair, honest and open manner. Being involved in bribery and corruption is illegal in most countries and would damage PCCW Group business and values and therefore is prohibited. Likewise the acceptance of excessive gifts or entertainment may impact the PCCW Group's commercial relationships and the confidence of PCCW as a reputable organisation.

What must you do?

You must ensure your acceptance or giving of gifts and / or entertainment is in compliance with the corporate "*Bribery, Gifts and Entertainment Policy*".

The PCCW Group prohibits corruptive acts and, in particular, the use of corporate funds for corruptive purposes. As an employee of PCCW Group, you must not engage in any practice or procedure which may, or may appear to, conceal, facilitate or constitute bribes, kickbacks, improper gratuities or other illegal or improper payments or receipts, or may jeopardise important business and contractual relationships.

Soliciting, accepting or offering advantages, including the arranging for or facilitating a third party to do so, with the intent to cause the improper performance (e.g. a breach of good faith, impartiality or trust) of a certain function or activity is strictly prohibited.

The definition of an advantage is very broad including, amongst other things: gifts, loans, fees, rewards, office, employment, contracts, services, and favours, as more fully described in the "*Bribery, Gifts and Entertainment Policy*". In many circumstances, what may be acceptable and even appropriate in one situation, may be inappropriate in other situations.

In general you must:

- (a) not solicit, accept or offer advantages from/to clients, contractors, suppliers, distributors or any person in connection with PCCW Group business in connection with your work without the permission of the Company;
- (b) not engage in gambling with persons having business dealings with the PCCW Group to avoid embarrassment or loss of objectivity when conducting PCCW Group business;
- (c) not offer bribes to any person or company for the purpose of obtaining or retaining business;
- (d) observe PCCW approval guidelines for business gifts, and business entertainment as contained within the "*Bribery, Gifts and Entertainment Policy*";
- (e) ensure that the selection of contractors, sub-contractors, distributors and suppliers is made on the basis of applicable regulations, and on the basis of strictly objective criteria;
- (f) ensure that the provision of goods and/or services free of charge, excluding donations and sponsorships, is prohibited, unless specifically authorised by the Managing Director of the PCCW Group company concerned;
- (g) not allow discounts for goods and services which are not consistent with the discount policy and/or approved by the Managing Director of the PCCW Group company concerned;
- (h) ensure all contracts with customers and partners are fairly arrived at, with no hidden deals or unspoken agreements, and fully recorded in writing;
- (i) not promise, offer or give an advantage to a government official, including political parties or political candidates, in violation of applicable laws and the rules and guidelines set out in the corporate "*Bribery, Gifts and Entertainment Policy*"; and
- (j) ensure that all charitable contributions of PCCW Group funds receive the advanced approval of Group Communications.

SPEAK UP ON UNETHICAL CONDUCT – NOTIFICATION PROCEDURES

Why is this important?

Speaking up, in confidence, is how we all can raise concerns about misconduct, malpractice and any other risks. PCCW fully encourages speaking up by providing employees with multiple channels by which they can communicate their concerns.

What must you do?

You must be alert and sensitive to situations that could result in actions by yourself, or others, which might violate the Corporate Responsibility Policy.

Any suspected or actual occurrence of unauthorised access, attempted theft, loss, falsification, damage or destruction of PCCW Group records and property should be reported immediately to PCCW Corporate Security & Fraud Management Group who will arrange for reporting to the police as necessary.

If you are uncertain about what is proper conduct in a particular situation or if you wish to raise any matter arising in connection with the activities of the PCCW Group or the behaviour of any employee which knowingly or unknowingly may have violated this Policy, it is your obligation to promptly make at least one of the following contacts:

- (a) consult with your immediate manager who may, at his or her discretion, address the situation personally or in consultation with other appropriate personnel, such as the Group Legal Office;
- (b) the Corporate Secretariat will assist you in connection with issues regarding share ownership and dealing of any PCCW Group company;
- (c) consult Group Finance and/or Group Internal Audit with any concerns regarding accounting, internal accounting controls, or auditing matters. The Audit Committee of the Board may be notified as appropriate; and
- (d) consult Human Resources with respect to any personnel matter that is of concern to you.

If your subordinate has committed some behaviour which you believe may violate the Corporate Responsibility Policy, before taking any actions or having any discussion with the staff concerned, you should consult Corporate Security & Fraud Management and Group Human Resources.

If you are concerned that a breach of law may be involved, or, if you wish to raise a matter in confidence, or even on an anonymous “no names” basis, you may consult with a member of Group Internal Audit. You may also contact the PCCW Audit Committee, either through the Head of Group Internal Audit or directly as per the contact details set out at the end of the policy. If you feel it is necessary to raise a matter directly with the Group Managing Director, the Audit Committee, or any other director, he or she will see to it that your concerns are addressed and, if necessary, may involve external authorities.

It is the PCCW Group’s wish to create a safe and ethical environment across the PCCW Group from which all individuals can benefit. The PCCW Group undertakes that if any concerns are raised, arising from this Policy, every reasonable effort will be made to maintain the confidentiality of the person raising the issue or concern. PCCW Group will not tolerate any kind of retaliation for reports or complaints regarding misconduct that were made in good faith. Open communication of issues and concerns by all employees, officers and directors without fear of retribution or retaliation is vital to the successful implementation of this Policy. You are required to cooperate in internal investigations of misconduct and unethical behaviour.

For additional details on roles, responsibilities and procedures which will be followed by relevant parties should you wish to report a case, or suspected case of unethical conduct, please refer to the “Unethical Conduct Notification Procedures Manual” which is available on the Intranet.

BE AWARE OF COMPLIANCE, WAIVERS AND AMENDMENTS

Why is this important?

PCCW is committed to excellence and, to achieve this, enforcement of all PCCW Group policies and standards must be undertaken to ensure good corporate governance and compliance by the PCCW Group and all of its stakeholders, including each of its employees. PCCW understands that not all circumstances are identical and that there may be a requirement for special waivers to be approved and for PCCW Group policies, such as this Corporate Responsibility Policy, to be updated as business, community and regulatory changes occur.

What must you do?

Compliance

You must be aware of your obligation as an employee to comply with the Corporate Responsibility Policy and all other PCCW Group policies, procedures and guidelines.

All employees must adhere to and comply with all PCCW issued policies, procedures and guidelines as these documents provide the standards by which PCCW can consistently achieve acceptable behaviour throughout Hong Kong and internationally. PCCW standards, policies, procedures and guidelines (some of which are referenced throughout this policy) are readily available internally on the corporate Intranet – select **Group Policies and Procedures** from the Intranet home page. Each staff member as part of their annual Performance and Development Review is required to confirm awareness of and compliance with this Corporate Responsibility Policy, which includes an employee's obligation to comply with all PCCW policies, procedures and guidelines.

Employees found to not be in compliance with PCCW Group policies, procedures and guidelines may be summarily dismissed and the Company may withhold all privileges including retirement benefits and bonuses. Except for cases of summary dismissal, you will be warned of the offence committed either verbally or in writing before any disciplinary action. If disciplinary action is imposed, you will have the offence explained and the right to appeal against the disciplinary action within 2 working days to your superior or to Human Resources. The Company may also report the offence to the authorities.

Enforcement of the Corporate Responsibility Policy will at all times be dealt with in a prompt and consistent manner, giving full protection to those persons reporting questionable behaviour. PCCW believes all policies provide clear and objective standards for compliance, and that the Unethical Conduct Notification Procedures Manual sets out a fair process to determine violations.

Waivers

You must be aware that no waiver of any provision as set out herein shall be made for an executive officer or director of the PCCW Group unless such waiver is made by the Board of Directors.

In the event that such a waiver is granted, full details of the waiver, including the reasons for granting the waiver, shall be disclosed to the shareholders in the next Annual Report or as may be determined from time to time by the relevant authorities.

Amendments

You must be aware that this Corporate Responsibility Policy will be regularly assessed and updated to ensure it always meets the highest standards of conduct.

Any comments or suggestions you may have are always welcome and should be addressed to the Risk Management and Compliance. Amendments to this Policy may be approved by the Controls and Compliance Committee, or any other committee so authorised from time to time, for and on behalf of the Board of Directors of PCCW Limited.

CONTACT POINTS FOR CORPORATE RESPONSIBILITY POLICY

<p>Executive Committee Representative BG Srinivas Group Managing Director</p> <p>Tel: (852) 2888 7788 Add: 42/F PCCW Tower TaiKoo Place, Quarry Bay Hong Kong</p>	
<p>Audit Committee Representative Aman Mehta Chairman of the Audit Committee of the Board of Directors</p> <p>Add: C/o. The Head of Group Internal Audit 31/F PCCW Tower TaiKoo Place, Quarry Bay Hong Kong</p>	
<p>Group Internal Audit:</p> <p>Attn.: Head of Group Internal Audit Tel: (852) 2888 3759 * Add: 31/F PCCW Tower TaiKoo Place, Quarry Bay, Hong Kong</p> <p>Group Legal Office & Company Secretariat</p> <p>Attn.: Group General Counsel & Company Secretary Tel: (852) 2888 3601* Add: 39/F PCCW Tower TaiKoo Place, Hong Kong</p>	<p>Group Human Resources</p> <p>Attn.: Head of Group Human Resources, Group Human Resources Tel: (852) 2883-7688 Add: 15/F PCCW Tower TaiKoo Place, Quarry Bay, Hong Kong</p> <p>Group Communications</p> <p>Attn.: Head of Group Communications Tel: (852) 2883 8831 Add: 39/F PCCW Tower TaiKoo Place, Quarry Bay, Hong Kong</p> <p>Corporate Security & Fraud Management</p> <p>Attn: Group Manager, Corporate Security & Fraud Management Tel: (852) 2883 3381 / 2883 5999 Add: 7/F Ngau Tau Kok Engineering Centre 7 Siu Yip Street, Ngau Tau Kok</p>

* Confidential Line (no Caller Number Display) and Voice Mail Facility