
TOM Group Limited
Corporate Communications Policy

(If there is any inconsistency or conflict between the English and the Chinese versions, the English version shall prevail.)

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1. Policy Statement

TOM Group Limited (“Company”, together with its subsidiaries and controlled affiliates, “Group”) highly values its reputation in the communities and countries where it operates.

To ensure the market receives timely and accurate information about the Group, the Group Corporate Communications & Investor Relations Department (“GCCIR”) assist the management to provide clear, consistent and congruent messages for the businesses of the Group through the media in a speedy, professional and well-coordinated manner.

This Policy also establishes a framework for handling incoming requests for corporate donation and sponsorship activities. A common and coherent approach among all Group companies is important to ensure that Group resources are deployed effectively and contribute to the development of communities the Group serves.

This Policy applies to all employees across the Group. If an employee has questions regarding the contents of this Policy, the GCCIR should be contacted.

2. Media Engagement

Only the Chief Executive Officer of the Company (“CEO”) or his/her designated executives may act as spokespersons. No one can speak to the media on behalf of the Group either off the record or on the record unless authorised.

All enquiries and requests from the media should be directed to the PR/Media personnel of the relevant division. No one should respond to media enquiries unless authorised.

If any representative of the media turns up at the shops, stores or offices of the Group without prior notification, the PR/Media personnel of the relevant division should be notified immediately to handle the media requests. No one can provide the media with any company information, data or comment without prior approval.

3. Public and Social Media Engagement

Prior to accepting any public speaking opportunity as a Group representative, approval from the CEO should be obtained and the GCCIR should be notified.



Whenever being approached by public bodies, non-governmental organisations (“NGOs”), political parties / associations or similar entities for assistance or participation in a business or community event, function or campaign as a speaker or panelist in the capacity as a Group employee, prior approval from the CEO should be obtained and the GCCIR should be notified.

Nothing should be posted on personal web pages, social media platforms or social networking sites that may compromise the image and competitive edge of the Group. TOM Group Code of Conduct and confidentiality obligations are applicable to personal blogs, websites, social media and networking sites etc.

4. Donation and Sponsorship

4.1 Definitions

“donation(s)” refers to any donation (in cash or in kind) that is charitable in nature and benefits the targeted organisation or cause.

“sponsorship(s)” refers to any sponsorship (in cash or in kind) that has company exposure through sponsored event or programme advertisement recognition or publicity.

“charitable organisations” includes non-profits, non-governmental organisations / NGOs. In addition to community, environmental protection and service organisations, these may also include trade bodies.

“government and related organisations” includes local government departments / agencies, statutory or public bodies.

4.2 Contribution to Charitable Organisations

The Group recognises the diversity of people, culture and social needs. It seeks to make contributions to programmes that have a positive impact on community development and reflect Group values and sustainability objectives with a profound respect of all cultures and the unique social needs of different communities. The Group supports strategic charitable contributions, and encourages and supports programmes to facilitate employee giving.

In addition, charitable contributions are to be executed in a well-coordinated manner within a controlled framework, in consideration of the targeted prospective beneficiaries of the Group.

To ensure Group resources are deployed effectively, approvals from the CEO and a company Director should be obtained before any commitment of charitable monetary donation or sponsorship on behalf of the Group and/or Group companies. Donations of products and services (“in kind”) do not require Group Executive Director approval. Such donations, however, must be approved by the Head of Division or CEO.

Any donation, monetarily or in kind, should be notified to the GCCIR timely for record purposes, which may be included in the Annual Reports and/or Sustainability Reports, as appropriate.

It is common for appeals, solicitation or requests from the same charitable organisations or government and related organisations to be sent to multiple Group companies. In Hong Kong, where many of the businesses of the Group have connections with similar charitable organisations, all charitable requests are to be coordinated by GCCIR prior to obtaining approval from a Company Director, unless otherwise noted.

4.3 Marketing Sponsorships

Group companies with marketing budgets may have budgeted sponsorship and other community or charitable projects with charitable organisations or government and related organisations, in line with their business objectives (“Marketing Sponsorships”). Even though these Marketing Sponsorships or programmes have obtained prior Group management approval as part of the budgeting process, Group companies are required to inform the GCCIR when such sponsorships or programmes are executed so that they are properly recorded on a Group basis.

Requests that fall outside of Marketing Sponsorships should first be screened by the relevant Division. Should a Division identify any appropriate project it would like to donate to or sponsor monetarily outside of its previously approved marketing budget, such donation or sponsorship should first be submitted to the Head of Division for approval and then to Executive Director, copying the GCCIR, for further approval.

4.4 Contribution to Politicians / Political Associations

It is the general policy of the Group not to make any form of donation or sponsorship to political associations or individual politicians.

5. Company Logo

The Group has in place strict Corporate Identification (“CI”) Guidelines as to the usage of the brands and logos of Group companies available through the GCCIR. Consent for the use of the Group (TOM Group) logo must be obtained from the GCCIR. Group companies also have their own CI. In order to maintain brand consistency, please check with the GCCIR for the guidelines as and when the need arises.

6. Company Website(s)

6.1 Company Information

It is the responsibility of each Division and Group company to ensure that all information on their websites are kept up to date.

Media, analysts and investors, customers and other third party person(s) may refer to information on websites as the basis of their reports and decision making. There are potential liabilities for disseminating inaccurate or defunct material as well as for damaging the image and integrity of the Group.

6.2 Designated Webmaster

Each Head of Division must designate a person (“webmaster”) to ensure that the information on the Group company websites is up to date and accurate. The webmaster also serves as the main contact point with the GCCIR. Any change to this webmaster should be reported to the GCCIR on a timely basis.

6.3 References to TOM Group and its Chairman and Directors

The webmaster is responsible for checking with the GCCIR periodically for updates (at least twice a year) on references to the Group, TOM Group Limited and its Chairman and Directors.

6.4 Rights, Policies, Obligations

Each Group company must take responsibility for ensuring that the content and delivery of the information on its website comply with applicable local and international laws. Examples of such laws include those relating to the collection and use of personal data, privacy, copyright, as well as any trade description legislation (or similar legislations). In case of doubt, the relevant legal department of business unit should be consulted for advice.



6.5 Domain Registration

Each Group company is responsible for ensuring that its domain registrations are renewed and maintained by the Group Corporate Systems & IT Department.

December 2024

Last updated in December 2022