
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 Group's shops, stores or offices 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 / 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 / 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 Group’s image and competitive edge. The Group’s Code of Conduct and confidentiality agreement are applicable to personal blogs / websites / social media and networking sites etc.

4. Donation & Sponsorship

4.1 Definition

“Donations” (cash or in-kind) are charitable in nature and benefit the targeted organisation or cause.

“Sponsorships” (cash or in-kind) have company exposure through sponsored event or programme advertisement recognition or publicity.

“Charitable organisations” include 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” include 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 Group’s targeted prospective beneficiaries.

To ensure Group resources are deployed effectively, all such contributions should obtain the CEO and Group Director(s) approvals before commitment of



any charitable monetary donation or sponsorship on behalf of the Group and / or Group companies. It is common for appeals / solicitation / requests from the same charitable organisations or government and related organisations to be sent to multiple Group companies and subsidiaries. In Hong Kong, where many of the Group’s businesses have connections with similar local NGOs, trade bodies, etc., charitable requests are to be coordinated by GCCIR prior to obtaining Group Director(s) approval, unless otherwise noted.

(i) Charitable Donations

Requests that fall outside of marketing sponsorships (as defined in 4.2(ii)) should first be screened by the recipient Division. Should a Division identify appropriate projects it would like to donate to or sponsor monetarily outside of their previously approved marketing budget, the Head of Division should approve and submit such request to the Executive Director of the Company, copying the GCCIR, for further approval.

Donations of products and services (“in-kind”) do not require Group Executive Director approval. Such donations, however, must still be approved by each Division’s operation head. Any donation, monetarily or in-kind, should be notified to the GCCIR timely for record purposes, some of which may be included in the Annual and Sustainability Reports.

(ii) Marketing Sponsorships

Group companies with marketing budgets may have budgeted sponsorship and other community / charitable projects with non-profits / non-governmental organisations or local government and related organisations / statutory bodies / entities, in line with their business objectives. Even though these sponsorships or programmes have obtained prior Group management approval via the budgeting process, companies are required to inform the GCCIR when such projects are executed so they are properly recorded on a Group basis.

All Divisions and Group companies around the world are expected to follow this Policy.

4.3 Contribution to Politicians / Political Associations

It is the Group’s general policy 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 via 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 Group company / Division 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's 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 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. 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.

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