



MILLENNIUM

HOTELS AND RESORTS

More than Meets the Eye

Policy & Procedure

CORPORATE COMMUNICATIONS

HUMAN RESOURCES POLICY – CORPORATE COMMUNICATIONS

Owner: Company Secretary	Issued: June 2016	Supersedes:
Review date: June 2017		Page 1 of 7

Introduction

This document explains the Board's policy regarding corporate communication with the media and employees' responsibilities in this area.

Positive communication with the media is important to the success of Millennium & Copthorne Hotels plc ("M&C" or the "Company").

Good communication plays a critical role in building stakeholder trust in M&C's brand, while poor communication exposes the Company to potential damage to its business, together with the risk of severe legal penalties against the Group, its Directors, Officers and associated individuals.

For these reasons, all staff that may have responsibility for making public statements about M&C, giving press interviews on behalf of M&C and other Group companies must understand and comply with this policy. Please note the interview guidelines set out in Appendix 2.

Only those individuals explicitly authorised to speak to the press on company business are allowed to do so. The correct response to press enquiries made to unauthorised individuals is to give the journalist the contact details of the appropriate authorised person.

In an age increasingly dominated by electronic communications, all staff (not just those authorised to speak to the press) must be made aware that e-mail and other forms of electronic communication, including social media, are on permanent record and may be used as evidence in a court of law. All electronic communication by employees must be polite, clear and factual when discussing company business and must not compromise the Company in any way.

The Company's Secretariat at the Corporate Office ("Group Secretariat") is responsible for maintenance of records regarding actions taken in respect of any regulatory announcement or other announcement deemed to be inside information which has been referred to Corporate Headquarters. Generally, this will not include marketing and day to day press releases.

As set out below, corporate communications generally fall within four categories; Regulatory, Marketing, News and Crisis, and Financial.

1. Regulatory Communications

As a company with its shares traded on the London Stock Exchange, M&C, together with its Directors and officers, have specific responsibilities under the United Kingdom's Listing Rules, certain provisions of the Financial Services and Markets Act 2000 ('FSMA'), the EU Market Abuse Regulation ('MAR') and Disclosure and Transparency Rules ('DTRs'). Increasingly in the UK, listed companies and their directors are at risk of being held accountable for failures in communication procedures.

The regulations arising from the FSMA, MAR and DTRs enable the UK Financial Conduct Authority ('FCA') to levy fines (unlimited in some cases), publicly censure and make compensation orders against a company, directors, and other parties involved, for unacceptable market conduct and abusive practices.

Material developments in the Company that may influence M&C's share price must be disclosed to the whole market - normally through the regulatory news service. This is commonly referred to as "**Inside Information**". Disclosure must be prompt, accurate and non-selective. Failure to achieve the required standards of communication may constitute unacceptable market conduct and abusive practice.

HUMAN RESOURCES POLICY – CORPORATE COMMUNICATIONS		
Owner: Company Secretary	Issued: June 2016	Supersedes:
Review date: June 2017		Page 2 of 7

As a global business, M&C's employees and associates must understand that the FCA's authority to impose penalties for non-compliant disclosure of Inside Information extends to activities within and outside the UK.

2. Marketing Communications

M&C employs marketing professionals and agents throughout the world to promote our hotels to customers. The Company encourages this activity and requires that all marketing communications comply with local laws and regulations, together with M&C's global commitment to being honest and fair to our stakeholders, including customers, employees and shareholders.

A significant part of marketing communications activity will put certain authorised employees in contact with relevant media. At a local hotel level, the focus of such communication may include F&B events, charity events, awards, special offers and local staff appointments.

This activity will for the most part constitute "business as usual" and is unlikely to be subject to financial regulatory restrictions or to have an impact on brand beyond the location in question. However employees and their managers must always be mindful of any broader impact on the Company arising from such activity.

In judging the likelihood of a wider financial impact, local managers must be especially mindful of the "closed period", which lasts approximately one month preceding the issue of quarterly and annual results (See Financial Communications below).

In any case, such activities should never involve the disclosure of any financial information concerning M&C without prior permission and agreement from the Group Secretariat.

Management of local marketing communication is the responsibility of the regional operational heads, the hotel General Managers and their designated team members, in conjunction with Global Branding and Marketing.

At the regional and global levels, the focus of marketing communication is likely to be more significant to the global brand, and may include new hotel openings, refurbishments, development of country/regional strategies, loyalty programmes and new branded products.

Executives responsible for such communications must be mindful of their broader impact on M&C's brand and reputation. In all cases, such activities should never involve discussing or disclosing financial information concerning M&C, without prior permission and agreement from the Group Secretariat. Should the impact be deemed material then the following would apply.

- The Group Secretariat must be informed in a timely manner - at least 48 hours before any announcement - that enables the likelihood of such an impact to be considered.
- Announcements will be issued at a time agreed with the Company Secretariat after they have been approved/amended. Disclosure Committee approval will be required for any announcement that falls within its remit.
- The Group Secretariat will approve/amend such communications with the Chairman and Chief Executive Officer of the Company and gain Disclosure Committee approval as necessary should these communications be deemed likely to have a significant impact on M&C's brand. If the proposed communication pertains to significant corporate or financial information, the Group Secretariat will consult the Company's brokers and/or financial public relations advisers before release is authorised.

If in doubt, executives should contact the Group Secretariat for guidance.

3. News and Crisis Communications

News and Crisis Communication is distinct from Marketing Communication in that it is unlikely to be planned by the Company.

HUMAN RESOURCES POLICY – CORPORATE COMMUNICATIONS		
Owner: Company Secretary	Issued: June 2016	Supersedes:
Review date: June 2017		Page 3 of 7

Examples of negative news communication events may include accidents, natural disasters, major fires, terrorist activities, political demonstrations or criminal activities by unrelated parties taking place at or near Company premises.

Our policy in such events is to promote communications that address and mitigate any immediate risks to our customers and employees, whilst containing any longer-term risk to the reputation of the Company and its brand.

The regional heads, with support from the company secretarial and risk functions, are responsible for maintaining the Company's disaster manuals and procedures and monitoring adherence to these procedures in respect of any communications made. Such procedures should establish internal communications processes, including call trees, which can be activated immediately following any such event.

Where the event is at all likely to have a material impact on the Company's brand or financial position, the Group Secretariat should be informed immediately as Inside Information may arise, see Financial Communication below.

Media communications procedures will vary according to the nature of the incident, but in general such communication should be brief and factual, following the interview guidelines below.

Examples of positive news communication events may include a Company hotel receiving a prestigious award or being well placed in a customer survey. Marketing departments will keep a record of such developments for future promotional use by the Company.

4. Financial Communications

Financial Communication is defined as any communications activity, written and oral, that may affect the perception of M&C by shareholders, investment analysts and financial commentators, and that may, as a result, influence M&C's share price. Examples include announcements of senior management and board appointments, quarterly and annual results, acquisition/disposals and any other Inside Information disclosures. Such announcements will be issued by the Group Secretariat through the regulatory news service (RNS) of the London Stock Exchange.

Financial communication is the explicit responsibility of the Chairman, the Group Chief Executive Officer and their designated team members within the Company and can be subject to review by the Group's Disclosure Committee.

The Company will also seek advice, where appropriate, from its corporate brokers and financial public relations consultants.

The Company, its Directors, officers and associated individuals are prohibited by law from any public discussion of Inside Information announcement until after it has been published on RNS.

The month prior to release of a quarterly results announcement is designated as a "quiet period", when the Company will seek to avoid general contact with financial media, investors and analysts, except in situations where new Inside Information has to be released.

Related Companies

M&C has several significant corporate relationships, including with City Developments Limited, the Hong Leong Group, Millennium & Copthorne New Zealand Limited, CDL Hospitality Trusts and First Sponsor Group Limited.

The Group Secretariat and relevant departments in the related companies undertake to advise each other of such announcements where relevant and in a timely manner.

When a material announcement is to be made by M&C or its related companies that gives rise to other related companies having to make a similar announcement, all efforts will be made to ensure that such announcements are consistent with each other and released simultaneously.

HUMAN RESOURCES POLICY – CORPORATE COMMUNICATIONS		
Owner: Company Secretary	Issued: June 2016	Supersedes:
Review date: June 2017		Page 4 of 7

APPENDIX 1 - Contact Details (including Emergency/ Weekend)

CORPORATE OFFICE EMERGENCY CONTACT LIST			
NAME	TITLE/COMPANY	OFFICE	MOBILE/HOME
Alzaabi, Ali	President/CEO, Middle East	+971 (0) 4 309 9002 (T) +971 2 627 5501 (T)	-
Chiu, Boo Keng	Managing Director, New Zealand	+64 9 353 5001 (o)	+64 27519 0888 (m)
Chong, Kok-Kee	Group Chief Financial Officer	+65 6664 8740 (o)	+65 9247 6801
De Silva, Gerry	Head of Group Corporate Affairs Hong Leong Group Singapore	0065 6438 3110 (o)/ 0065 6428 9308 (o)	0065 9731 7122 (m)
Grech, Jonathon	Group General Counsel and Company Secretary	020 7872 2476 (o)	07989 478 271 (m)
Harrington, Clive	Chief Operating Officer, Europe	020 7872 2488 (o)	07947 496187 (m) 020 8893 9470 (h)
James, Paul	Senior Vice President, Global Marketing & Branding	020 7872 2417 (o)	0044 7464 673113 (m)
Krijgsman, Peter	Financial Communications	-	07969 612609 (m) 01984 623 354 (h)
Lee, Aloysius	Group Chief Executive Officer	020 7872 2425 (London office)	07721 260984 (m)
Ong, Angela	SVP – Finance	020 7872 458 (o)	07971 787635 (m)
Sekercioglu, Cetin	President – Asia	+65 6664 8800 (o)	+65 9023 6181 (m)
Tracey, Shaun	President – US	+1 (212) 789 7585	+1 (646) 276 3768
Yip, Lawrence	Country Head – China	+852 2514 8933	+852 9188 1216 (HK) +86 139 1012 7933 (C)
[TBA]	Group Risk Manager	020 7872 2444	
CORPORATE BROKERS			
Hannaford, John	Credit Suisse	020 7888 6235 (o)	07795 614609 (m)
Green, James	Credit Suisse	020 7883 8591 (o)	07876 392642 (m)
CORPORATE COUNSEL			
Uftland, Richard	Hogan Lovells	020 7296 5712 (o)	07801 559787 (m)

HUMAN RESOURCES POLICY – CORPORATE COMMUNICATIONS

Owner: Company Secretary	Issued: June 2016	Supersedes:
Review date: June 2017		Page 5 of 7

APPENDIX 2 - Press Interview Guidelines

Types of Interviews

Press Interviews fall into the following categories:-

Pre-Arranged Interviews: Interviews arranged beforehand with the journalist. Examples of these would be a mutually-agreed meeting that has been set up, a scheduled phone conversation, etc.

Impromptu Interviews: Interviews where the interviewee is not prepared or caught off guard. Examples of these would be when a journalist simply telephones an individual, approaches him/her at a convention or trade show, etc.

When approached for an interview, always follow these key points:

- ✓ Get the journalist's name, name of publication, readership, distribution and ask for the deadline
- ✓ Ask the journalist for a list of questions
- ✓ Try to gather some time to think through what will be said. If possible, and if the journalist's deadlines allow, try to arrange to phone the journalist back.
- ✓ Remember to always get back to the journalist even if only to confirm that you have no comment to make. In no case should a journalist be left waiting. Give them a time indication of when you will respond.

Rules and Recommendations for Press Interviews

Press interviews should never be conducted lightly. Authorisation of contact with the press is necessary because of the damage that can be done as a result of an ill-prepared interview. The following rules and recommendation are not exhaustive, but form the basis of how to conduct a successful interview with a journalist.

Always observe Company policies.

Try to establish and be clear on the context in which the questions are being asked. If it is not obvious, ask journalist why h/she is asking.

Q&As can be useful, but they can also be confusing and difficult to use. In addition to Q&As, have the three or four most important facts clear in your mind in a form that can be repeated throughout the interview. Don't be afraid of sounding repetitive.

If a question is very complicated, repeat it back to the journalist. This will give you time to think and will clarify the point at issue.

Always remember that "off the record" is never a reliable protection against being quoted. Assume that everything you say is on the record.

Never attempt to answer a question without adequate preparation.

Be honest. If you cannot reply because it will breach Company policies or you don't know the answer, say that you are not in a position to comment.

If it is reasonable for you not to know the answer, say that you don't have the exact facts but that you will find out and let him/her know in a fixed period of time. You and our advisors can then all give the answer in the best possible light, after due consideration.

Do not volunteer negative points.

Do not comment on competitors, even if you have knowledge of a competitor through, for example, previous employment. Tell the journalist that h/she should ask them directly.

HUMAN RESOURCES POLICY – CORPORATE COMMUNICATIONS		
Owner: Company Secretary	Issued: June 2016	Supersedes:
Review date: June 2017		Page 6 of 7

Don't be provoked. Remain positive, firm and calm if a journalist is aggressive. Never lose your temper or use offensive words.

Be aware of weasel words and questions: "Don't you think that? Would you agree that? Etc" If you say yes, the journalist may quote you as saying that "Mr X agrees that etc", even if you have only just said the word "yes" or "maybe".

If you feel a journalist is lost, do not be afraid to question whether he/she has understood and, if not, repeat the answer, elaborating on the most difficult aspects

Do not exaggerate.

Volunteer information if you think a journalist has missed a vital point, but avoid filling silences with anything other than the key positive facts that you wish to get across.

HUMAN RESOURCES POLICY – CORPORATE COMMUNICATIONS		
Owner: Company Secretary	Issued: June 2016	Supersedes:
Review date: June 2017		Page 7 of 7