

DECLARATION OF STEVEN P. ALLEN
GROUP SENIOR LEGAL COUNSEL, HUTCHISON WHAMPOA LTD.
FEBRUARY 6, 2003

1. My name is Steven P. Allen. I am Group Senior Legal Counsel of Hutchison Whampoa Ltd. ("HWL"). I understand that the Federal Communications Commission (the "FCC" or "Commission") has requested Global Crossing Ltd. (Debtor-in-Possession) and GC Acquisition Ltd. (together, "Applicants") to provide certain information about HWL, Cheung Kong (Holdings) Ltd. ("CKHL"), and certain of the various family trusts and companies affiliated with the family of Mr. Li Ka-shing (the "Li Family Trusts").¹ I have prepared this declaration in response to the Commission's request for information.²

HWL And CKHL Shareholders

2. The Commission has requested "ownership details" for each of HWL and CKHL.³ On behalf of HWL, I have made diligent efforts to obtain such information about HWL and its 49.97% owner, CKHL.

3. Share Registers. HWL and CKHL have only limited information about the individuals and entities that hold direct ownership interests in their respective shares. The ownership information is recorded on each company's share register and includes the following: shareholder name, shareholder address, and number of shares held. As used in paragraphs 4 and 5 below, my conclusion as to where a shareholder is "from" is based on the shareholder's address, as recorded on the relevant share register.⁴

4. I have analyzed HWL's share register, dated as at January 23, 2003. The table appended hereto as Exhibit I summarizes my findings, which include the following:

(a) Practically all of HWL's shareholders (99.84%) are from Hong Kong.

¹ See Letter from James L. Ball, Int'l Bur., FCC, to Andrew D. Lipman, Counsel for Applicants, dated Jan. 23, 2003 ("FCC Request").

² I obtained the information presented herein concerning CKHL and the Li Family Trusts from public sources and through discussions with representatives of CKHL.

³ See FCC Request at 2.

⁴ For one entity with respect to HWL and one entity with respect to CKHL, I treated the entity as being from Hong Kong even though it has a non-Hong Kong address because I know that its respective ultimate parent is headquartered in and operating from Hong Kong based on disclosures by that ultimate parent to HWL.

(b) 0.159% of HWL's shares are held by persons (entities and individuals) that are from WTO member nations ("WTO Members") other than Hong Kong.

(c) Only 0.001% of HWL's shares are held by persons from non-WTO Members.

5. I also have analyzed CKHL's share register, dated as at January 24, 2003. The table appended hereto as Exhibit II summarizes my findings, which include the following:

(a) Practically all of CKHL's shareholders (99.922%) are from Hong Kong.

(b) 0.074% of CKHL's shares are held by persons that are from WTO Members other than Hong Kong.

(c) Only 0.004% of CKHL's shares are held by persons from non-WTO Members.

6. Inquiries To Nominees. Approximately 74.53% of HWL's shares are held directly by two nominees, which hold those shares on behalf of beneficial interest holders or other nominees.⁵ The two nominees are HKSCC Nominees Limited ("HKSCC") and HSBC Nominees (Hong Kong) Limited ("HSBC"), both of which are Hong Kong companies that serve as shareholders of record, holding shares as nominees for others, including other nominees and beneficial owners of the shares. Additionally, HKSCC and HSBC directly hold as nominees approximately 71.38% of CKHL's shares.

7. The Commission indicated that its review "would [be] assist[ed] . . . if HWL and CKHL could make further inquiries with the nominees holding their shares."⁶ Pursuant to this Commission suggestion, HWL and CKHL each sent letters to each of HKSCC and HSBC, requesting information about the persons for whom each holds HWL and/or CKHL shares as nominees. HKSCC and HSBC were asked to provide as much information as possible, even if they could not provide all of the information requested. Copies of the letters sent by HWL and CKHL to the nominees, and the letter responses received by HWL and CKHL from the nominees, are appended hereto as Exhibit III.

8. I have analyzed the information provided by HKSCC and HSBC with respect to persons for whom they hold shares in HWL and CKHL ("Participants"). As used in paragraphs 9 and 10 below, my conclusion as to where a Participant is "from" is based on the Participant's address, as represented to me by the relevant nominee.

⁵ This percentage is updated from information previously provided to the Commission by Applicants.

⁶ FCC Request at 2.

9. The results of my analysis for HWL are presented in the table appended hereto as Exhibit IV. The results show the following:

(a) 59.84% of HWL's shares are held by the nominees for persons from Hong Kong.

(b) 14.69% of HWL's shares are held by the nominees for persons from WTO Members other than Hong Kong. (This includes both U.S. and non-U.S. persons.)

(c) Only 0.004% of HWL's shares are held by the nominees for persons from non-WTO Members.

10. The results of my analysis for CKHL are presented in the table appended hereto as Exhibit V. The results show the following:

(a) 45.67% of CKHL's shares are held by the nominees for persons from Hong Kong.

(b) 25.7% of CKHL's shares are held by the nominees for persons from WTO Members other than Hong Kong. (This includes both U.S. and non-U.S. persons.)

(c) Only 0.009% of HWL's shares are held by the nominees for persons from non-WTO Members.

Control Questions

11. Li Family. The Commission has asked "whether the Li family, or any member of the Li family, has the power to control, or does in fact exercise control over, CKHL."⁷ Neither the Li family, nor any member of the Li family, has the power to control, or in fact exercises control over, CKHL. The aggregate CKHL shareholding attributable to the Li family is approximately 37.05%,⁸ which represents a minority of

⁷ FCC Request at 3. For the purpose of responding to this request, I have assumed that the Li family is comprised of the following individuals: Mr. Li Ka-shing, Mr. Li Tzar Kuoi, Victor, Mr. Victor Li's wife and daughters, and Mr. Li Tzar Kai, Richard.

⁸ The percentage reported in this paragraph is updated from information previously provided to the Commission by Applicants. Li Ka-Shing Unity Trustee Company Limited ("TUT"), as trustee of The Li Ka-Shing Unity Trust (the "LKS Unity Trust"), and companies controlled by TUT as trustee of the LKS Unity Trust beneficially hold a combined 33.32% interest in CKHL. The remaining 3.73% which is attributable to the Li family is directly or indirectly individually held by Mr. Li Ka-shing, Mr. Victor Li, or Mr. Victor Li's wife, and is therefore not attributable to TUT or the LKS Unity Trust.

CKHL's shares. Only two members of the Li family (Mr. Li Ka-shing and Mr. Victor Li) are on CKHL's board of directors, which is comprised of 19 individuals. Each of CKHL's directors has a single vote, and no director has a veto right, on matters before the board. There are no veto powers held by the Li family with respect to votes at shareholder meetings. All of the shares of CKHL are voted on the basis of one vote per share.

12. CKHL. The Commission has asked whether CKHL has "the power to control, or does . . . in fact exercise control over, HWL."⁹ CKHL does not have the power to control, and does not in fact exercise control over, HWL. CKHL holds a minority 49.97% interest in HWL. Of the 15 directors on HWL's board, a minority of 7 also sit on CKHL's board. Each of HWL's directors has a single vote, and no director has a veto right, on matters before the board. There are no veto powers held by CKHL with respect to votes at shareholder meetings. All of the shares of HWL are voted on the basis of one vote per share.

Li Family Trusts

13. The Commission has asked the Applicants to provide the citizenship of the trustee of The Li Ka-Shing Unity Trust ("LKS Unity Trust"). The Commission also has asked: "[w]ith respect to any company controlled by the trustee as trustee of the trust, provide the identity, citizenship, and, as applicable, amount of ownership in CKHL."¹⁰

14. The Li Ka-Shing Unity Trustee Company Limited ("TUT") is the trustee of LKS Unity Trust. TUT's principal place of business is either Hong Kong or the Cayman Islands:¹¹

(a) TUT is organized under the laws of the Cayman Islands.

(b) TUT's directors are citizens of Canada, Hong Kong, and the United Kingdom; TUT is a wholly-owned subsidiary of Li Ka-Shing Unity Holdings Ltd.,¹² which in turn is wholly-owned by Mr. Li Ka-shing, a citizen of Hong Kong.

⁹ FCC Request at 3.

¹⁰ *Id.*

¹¹ I understand from my discussions with HWL's legal counsel that the Commission has previously treated the Cayman Islands as a WTO Member, even though Cayman Islands is not in fact a WTO Member.

¹² Li Ka-Shing Unity Holdings Ltd. is a Cayman Islands company with its headquarters in Cayman Islands; its directors are citizens of Canada, Hong Kong, and the United Kingdom; the majority of its assets are located in Cayman Islands; and the majority of its revenues are derived from Cayman Islands.

- (c) TUT's world headquarters is located in the Cayman Islands.
- (d) The majority of TUT's assets are located in Hong Kong.
- (e) The majority of TUT's revenues are derived from Hong Kong.

15. TUT holds the overwhelming majority of its shares in CKHL directly (92.7%). It holds the remaining shares through the following four wholly-owned subsidiaries, each of which has its principal place of business in Hong Kong: Cotomy Ltd. (4.3%); Haverhill Company Ltd. (0.003%); Wabura Company Ltd. (2.4%); and King's Road Development Company Ltd. (0.59%). Each of these four entities has the following characteristics:

- (a) It is organized under the laws of Hong Kong.
- (b) Its directors are citizens of Hong Kong.
- (c) Its world headquarters is located in Hong Kong.
- (d) The majority of its assets are located in Hong Kong.
- (e) The majority of its revenues are derived from Hong Kong.

16. The Commission also requested "the identity, citizenship, and amount of ownership in" the LKS Unity Trust held by each of the beneficiaries. The LKS Unity Trust is a discretionary trust. The discretionary beneficiaries of the LKS Unity Trust, and their respective citizenships, are as follows: Mr. Li Ka-shing (Hong Kong), Mr. Li Tzar Kuoi, Victor (Canada and Hong Kong), Mr. Victor Li's wife and two daughters (Hong Kong), Mr. Li Tzar Kai, Richard (Canada), and the Li Ka-Shing Foundation Ltd. (the "Li Foundation"). The status of these persons as discretionary beneficiaries does not confer upon them any ownership interest in LKS Unity Trust. Over 90% of the issued units in the LKS Unity Trust are indirectly owned by Mr. Li Ka-shing.

17. The Li Foundation is a charitable foundation that was established for the purpose of promoting the development of education and healthcare. The Li Foundation's principal place of business is Hong Kong:

- (a) It is organized under the laws of Hong Kong.
- (b) Its directors are all citizens of Hong Kong.
- (c) Its world headquarters is in Hong Kong.
- (d) It has no substantial assets because its purpose is solely to distribute assets that it receives from the LKS Unity Trust.

(e) It has no substantial revenues other than the revenues that it receives from the LKS Unity Trust and other sources for the purpose of making charitable contributions.

Hong Kong Government

18. As previously reported to the Commission, the Government of Hong Kong is believed to hold a small beneficial interest in HWL.¹³ This interest, which was acquired through open market transactions, is held through investment funds, and, in turn, nominees. Based on a recent analysis of publicly available data, HWL's financial advisors have estimated that beneficial interest to be approximately 2.4% of HWL's shares.¹⁴ The Government of Hong Kong's indirect beneficial interest in HWL does not entitle it to any rights beyond those afforded to HWL's other beneficial shareholders. I am not aware of any other foreign government that beneficially owns HWL's shares.

* * *

¹³ See Application for Consent to Transfer Control and Petition for Declaratory Ruling, filed by Applicants on August 22, 2002, at 11 n.20.

¹⁴ HWL's financial advisors have informed me that approximately 1.6% of HWL's shares and 1.6% of CKHL's shares are indirectly held by the Government of Hong Kong. Thus, the Government of Hong Kong's aggregate beneficial interest in HWL is approximately 2.4%.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

SE. P. AM

Executed on February 6, 2003.

**DECLARATION OF STEVEN P. ALLEN
FEBRUARY 6, 2003**

EXHIBIT I

EXHIBIT I

HWL — SUMMARY OF SHARE REGISTER

(As of January 27, 2003)

| | <u>Number of Shareholders</u> | <u>Number of Shares</u> | <u>% Interest in HWL</u> |
|---|-------------------------------|-------------------------|--------------------------|
| Shareholders From Hong Kong: | | | |
| <i>Individual Shareholders</i> | 15,463 | 146,459,661 | 3.43% |
| <i>Entity Shareholders</i> * | 372 | 4,112,647,285 | 96.41% |
| Shareholders From WTO Members Other Than Hong Kong** | | | |
| <i>Individual Shareholders</i> | 686 | 6,169,905 | 0.15% |
| <i>Entity Shareholders</i> | 57 | 369,969 | 0.009% |
| Shareholders From Non-WTO Members | | | |
| <i>Individual Shareholders</i> | 9 | 38,269 | 0.001% |
| <i>Entity Shareholders</i> | 0 | 0 | 0% |
| TOTAL | 16,587 | 4,265,685,089*** | Appx. 100% |

* This includes HSBC and HKSCC.

** The represented WTO Members are as follows: Austria, Australia, Bermuda, Canada, Cayman Islands, Fiji, France, India, Ireland, Japan, Malaysia, Macau, Malta, Nigeria, New Zealand, Panama, People's Republic of China, Panama, Philippines, Portugal, Singapore, South Korea, Spain, Sri Lanka, Sweden, Switzerland, Thailand, United Arab Emirates, United States of America, United Kingdom.

*** The information provided to me for this exhibit by HWL's registrar overstates the total number of shares by approximately 2 million shares. The "% Interest in HWL" was determined using this slightly overstated share total.

**DECLARATION OF STEVEN P. ALLEN
FEBRUARY 6, 2003**

EXHIBIT II

EXHIBIT II

CKHL — SUMMARY OF SHARE REGISTER

(As of January 27, 2003)

| | <u>Number of Shareholders</u> | <u>Number of Shares</u> | <u>% Interest in CKHL</u> |
|---|-------------------------------|-------------------------|---------------------------|
| Shareholders From Hong Kong: | | | |
| <i>Individual Shareholders</i> | 7,751 | 67,875,473 | 2.931% |
| <i>Entity Shareholders</i> [*] | 249 | 2,246,485,320 | 96.991% |
| Shareholders From WTO Members Other Than Hong Kong ^{**} | | | |
| <i>Individual Shareholders</i> | 179 | 1,629,377 | 0.070% |
| <i>Entity Shareholders</i> | 11 | 83,368 | 0.004% |
| Shareholders From Non-WTO Members | | | |
| <i>Individual Shareholders</i> | 2 | 90,800 | 0.004% |
| <i>Entity Shareholders</i> | 0 | 0 | 0% |
| TOTAL | 8,192 | 2,316,164,338 | Appx. 100% |

* This includes HSBC and HKSCC.

** The represented WTO Members are as follows: Australia, Canada, Cayman Islands, France, Guyana, Liechtenstein, Macau, Malaysia, New Zealand, People's Republic of China, Philippines, Singapore, Thailand, United States of America, United Kingdom.

**DECLARATION OF STEVEN P. ALLEN
FEBRUARY 6, 2003**

EXHIBIT III

Hutchison Whampoa Limited



27 January 2003

HKSCC Nominees Limited
7 Floor, Vicwood Plaza
199 Des Voeux Road
Central, Hong Kong

Fax: 2581-2657

Attn: Ms. Grace Tong

Dear Sirs,

Request for Information

Based on the share register of Hutchison Whampoa Limited ("HWL"), we believe that you are a current shareholder of HWL.

Pursuant to Section 18(1) of the Securities (Disclosure of Interests) Ordinance (Cap. 396 of the laws of Hong Kong), we ask that you provide us with the following information concerning your ownership of HWL shares ("Shares").

1. Please confirm whether or not you are, as at the date of this letter, a shareholder of HWL and, if so, the number of Shares held by you as at 24 January 2003.
2. If you hold Shares, please provide the following particulars:
 - 2.1 Are you the beneficial owner of any of the Shares? If yes, please state:
 - (a) the number of Shares that you beneficially own;
 - (b) your place of incorporation;
 - (c) the name and address of each entity that owns 10% or more of you, and a contact person for each such entity;
 - (d) the citizenships of your directors;
 - (e) the country in which your world headquarters is located;
 - (f) the country or countries in which the majority of your tangible assets is located; and
 - (g) the country or countries from which you derive the greatest sales and revenues from operations.

- 2.2 Do you hold any of the Shares as nominee for another person (whether an individual or corporation or other entity)? If yes:
- (a) for each such person who is an individual, please state as much of the following information as possible:
 - (i) the name of the individual;
 - (ii) the given address of the individual;
 - (iii) the citizenship of the individual; and
 - (iv) the number of Shares you hold as nominee for the individual;

 - (b) for each such person who is not an individual, please state as much of the following information as possible:
 - (i) the name of the entity;
 - (ii) the number of Shares that the entity owns;
 - (iii) the entity's place of incorporation and the entity's type (e.g., corporation, limited liability partnership, etc.);
 - (iv) the name and address of any person that owns 10% or more of the entity, and a contact person for each such person;
 - (v) the citizenships of the entity's directors;
 - (vi) the country in which the entity's world headquarters is located;
 - (vii) the country or countries in which the majority of the entity's tangible property is located;
 - (viii) the country or countries from which the entity derives the greatest sales and revenues from operations;
 - (ix) the given address of the entity; and
 - (x) the name of a contact person for the entity.

This information is required for disclosure to the FCC on or before Thursday, 6 February 2003. Accordingly, we ask that you provide the requested information to the Company Secretary, Hutchison Whampoa Limited, fax: 2118 1778 no later than the close of business of **Tuesday, 28 January 2003**.

Yours sincerely,
HUTCHISON WHAMPOA LIMITED



Director



香港交易所

Hong Kong Securities Clearing Company Limited

(A wholly-owned subsidiary of Hong Kong Exchanges and Clearing Limited)

28 January 2003

BY FAX : 2128 1778

Hutchison Whampoa Limited
22/F Hutchison House
10 Harcourt Road
Hong Kong

Attn. The Company Secretary

Dear Sirs,

Request for information

We refer to your letter dated 27 January 2003 to our subsidiary, HKSCC Nominees Limited ("HKSCCNL").

We confirm that, as at 24 January 2003, HKSCCNL holds 1,448,548,413 shares of Hutchison Whampoa Limited ("Shares") and HKSCCNL is not the beneficial owner of the Shares. HKSCCNL holds the Shares as nominee for our participants. The names of those participants and the number of Shares held on behalf of each such participant as contained in the Participant Shareholding Report dated 24 January 2003 had already been provided to you. Regarding your request for the address of each such participant (as notified to us) and contact person and contact details for each such participant, we will only be able to provide such information around mid-February 2003. If you still need such information, please let us know and we would make the necessary arrangement for you upon receipt of your written notice.

Please also note that according to our records, all CCASS participants have a Hong Kong address for correspondence purpose.

HKSCCNL has not been provided with and is therefore unable to provide to you any information regarding:

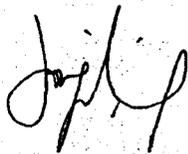
- (a) in respect of participants who are individuals, the citizenship of the participant;
- (b) in respect of participants who are corporations or other legal entities,
 - (i) the place of incorporation or organization of the participant;
 - (ii) the name or other particulars of any entity owning a legal or beneficial interest shares in the participant;
 - (iii) the directors of the participant, including the number, name and citizenship of such directors;

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Hutchison Whampoa Limited
Attn: The Company Secretary

- (iv) the country in which the world headquarters of the participant is located;
- (v) the country where the majority of the tangible assets are located; or
- (vi) the country where the participant derives the greatest sales and revenues.

Yours faithfully,
For and on behalf of
Hong Kong Securities Clearing Company Limited



Grace Tong
Senior Manager
Cash Clearing

Hutchison Whampoa Limited



27 January 2003

HSBC Nominees (Hong Kong) Limited
35/F., Sun Hung Kai Center
Wanchai
Hong Kong

By fax: 2845-5802

Attn: Mr. Herman Lee

Dear Sirs,

Request for Information

Based on the share register of Hutchison Whampoa Limited ("HWL"), we believe that you are a current shareholder of HWL.

Pursuant to Section 18(1) of the Securities (Disclosure of Interests) Ordinance (Cap. 396 of the laws of Hong Kong), we ask that you provide us with the following information concerning your ownership of HWL shares ("Shares").

1. Please confirm whether or not you are, as at the date of this letter, a shareholder of HWL and, if so, the number of Shares held by you as at 24 January 2003.
2. If you hold Shares, please provide the following particulars:
 - 2.1 Are you the beneficial owner of any of the Shares? If yes, please state:
 - (a) the number of Shares that you beneficially own;
 - (b) your place of incorporation;
 - (c) the name and address of each entity that owns 10% or more of you, and a contact person for each such entity;
 - (d) the citizenships of your directors;
 - (e) the country in which your world headquarters is located;
 - (f) the country or countries in which the majority of your tangible assets is located; and
 - (g) the country or countries from which you derive the greatest sales and revenues from operations.

- 2.2 Do you hold any of the Shares as nominee for another person (whether an individual or corporation of other entity)? If yes:
- (a) for each such person who is an individual, please state as much of the following information as possible:
 - (i) the name of the individual;
 - (ii) the given address of the individual;
 - (iii) the citizenship of the individual; and
 - (iv) the number of Shares you hold as nominee for the individual;

 - (b) for each such person who is not an individual, please state as much of the following information as possible:
 - (i) the name of the entity;
 - (ii) the number of Shares that the entity owns;
 - (iii) the entity's place of incorporation and the entity's type (e.g., corporation, limited liability partnership, etc.);
 - (iv) the name and address of any person that owns 10% or more of the entity, and a contact person for each such person;
 - (v) the citizenships of the entity's directors;
 - (vi) the country in which the entity's world headquarters is located;
 - (vii) the country or countries in which the majority of the entity's tangible property is located;
 - (viii) the country or countries from which the entity derives the greatest sales and revenues from operations;
 - (ix) the given address of the entity; and
 - (x) the name of a contact person for the entity.

This information is required for disclosure to the FCC on or before Thursday, 6 February 2003. Accordingly, we ask that you provide the requested information to the Company Secretary, Hutchison Whampoa Limited, fax: 2128 1778 no later than the close of business of Tuesday, 28 January 2003.

Yours sincerely,
HUTCHISON WHAMPOA LIMITED



Director



Ref: CNC/RSA/LI

PRIVATE & CONFIDENTIAL
The Company Secretary
Hutchison Whampoa Limited
22nd Floor, Hutchison House
10 Harcourt Road, Hong Kong
Fax no. 21281770

29 January 2003

Dear Madam,

Securities (Disclosure of Interests) Ordinance Section 18 Chapter 396: Interests in
Hutchison Whampoa Limited ("Company")

We refer to your letter dated 27 January 2003 and subsequent telephone conversation with Ms Wong.
We are pleased to enclose a report detailing the name, address of the shareholders and their
respective holdings in the Company as at 28 January 2003.

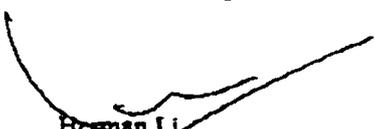
The shares are held by HSBC in our capacity as nominees for our customers. As at 28 January 2003,
the total number of shares held by us was 1,728,766,616 shares.

To the best of our knowledge and belief, we are not aware of any agreement or arrangement relating
to the exercise of any rights conferred by the holding of such shares.

As regards to item 2.2 in your letter, please note that we are not in the position to provide details of
the citizenship of any individual, or any of the entity's directors, world headquarters, place of
incorporation, shareholders, assets or revenues.

We shall be grateful if you would forward us a cheque in favour of The Hongkong and Shanghai
Banking Corporation Limited for HKD300.00 being reimbursement of our administration fees for the
above information.

Yours faithfully


Herman Li
OIC Reconciliation/Stock/Audit

The Hongkong and Shanghai Banking Corporation Limited
Custody and Clearing, Hong Kong Office:
35/F and 36/F, Sun Hung Kai Centre, 30 Harbour Road, Wan Chai, Hong Kong
Tel: 2500 3333 Fax: (852) 2845 5802 Telex: 73205 HSBCHK Telegrams: Hongbank Hongkong

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27 January 2003

By fax: 2581-2657

HKSCC Nominees Limited
7th Floor, Vicwood Plaza
199 Des Voeux Road
Central, Hong Kong

Attn: Ms. Grace Tong

Dear Sirs,

Request for Information

Based on the share register of Cheung Kong (Holdings) Limited ("CKH"), we believe that you are a current shareholder of CKH.

Pursuant to Section 18(1) of the Securities (Disclosure of Interests) Ordinance (Cap. 396 of the laws of Hong Kong), we ask that you provide us with the following information concerning your ownership of CKH shares ("Shares").

1. Please confirm whether or not you are, as at the date of this letter, a shareholder of CKH and, if so, the number of Shares held by you as at 24 January 2003.
2. If you hold Shares, please provide the following particulars:
 - 2.1 Are you the beneficial owner of any of the Shares? If yes, please state:
 - (a) the number of Shares that you beneficially own;
 - (b) your place of incorporation;
 - (c) the name and address of each entity that owns 10% or more of you, and a contact person for each such entity;
 - (d) the citizenships of your directors;
 - (e) the country in which your world headquarters is located;
 - (f) the country or countries in which the majority of your tangible assets is located; and
 - (g) the country or countries from which you derive the greatest sales and revenues from operations.

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- 2 -

- 2.2 Do you hold any of the Shares as nominee for another person (whether an individual or corporation of other entity)? If yes:
- (a) for each such person who is an individual, please state as much of the following information as possible:
 - (i) the name of the individual;
 - (ii) the given address of the individual;
 - (iii) the citizenship of the individual; and
 - (iv) the number of Shares you hold as nominee for the individual;

 - (b) for each such person who is not an individual, please state as much of the following information as possible:
 - (i) the name of the entity;
 - (ii) the number of Shares that the entity owns;
 - (iii) the entity's place of incorporation and the entity's type (e.g., corporation, limited liability partnership, etc.);
 - (iv) the name and address of any person that owns 10% or more of the entity, and a contact person for each such person;
 - (v) the citizenships of the entity's directors;
 - (vi) the country in which the entity's world headquarters is located;
 - (vii) the country or countries in which the majority of the entity's tangible property is located;
 - (viii) the country or countries from which the entity derives the greatest sales and revenues from operations;
 - (ix) the given address of the entity; and
 - (x) the name of a contact person for the entity.

This information is required for disclosure to the FCC on or before Thursday, 6 February 2003. Accordingly, we ask that you provide the requested information to the Company Secretary, Cheung Kong (Holdings) Limited, fax: 2128 8001 no later than the close of business of Tuesday, 28 January 2003.

Yours sincerely,
For and on behalf of
Cheung Kong (Holdings) Limited



Company Secretary



HKE

香港交易所

Hong Kong Securities Clearing Company Limited
(A wholly-owned subsidiary of Hong Kong Exchanges and Clearing Limited)

28 January 2003

BY FAX : 2128 8001

Cheung Kong (Holdings) Limited
7-12/F, Cheung Kong Center
2 Queen's Road Central
Hong Kong

Attn: The Company Secretary

Dear Sirs,

Request for information

We refer to your letter dated 27 January 2003 to our subsidiary, HKSCC Nominees Limited ("HKSCCNL").

We confirm that, as at 24 January 2003, HKSCCNL holds 991,028,780 shares of Cheung Kong (Holdings) Limited ("Shares") and HKSCCNL is not the beneficial owner of the Shares. HKSCCNL holds the Shares as nominee for our participants. The names of those participants and the number of Shares held for each of them are contained in the Participant Shareholding Report dated 24 January 2003. If you wish to have a copy of the report, please let us know by sending us a written request with a payment of HK\$500.00 per copy. The address of each such participant (as notified to us) and contact person and contact details for each such participant can be available around mid-February 2003. If you still need such information, please let us know and we would make the necessary arrangement for you upon receipt of your written notice.

Please also note that according to our records, all CCASS participants have a Hong Kong address for correspondence purpose.

HKSCCNL has not been provided with and is therefore unable to provide to you any information regarding:

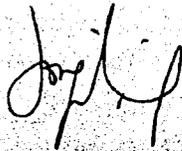
- (a) in respect of participants who are individuals, the citizenship of the participant;
- (b) in respect of participants who are corporations or other legal entities:
 - (i) the place of incorporation or organization of the participant;
 - (ii) the name or other particulars of any entity owning a legal or beneficial interest shares in the participant;
 - (iii) the directors of the participant, including the number, name and citizenship of such directors;

Cont'd/ 2

Cheung Kong (Holdings) Limited
Attn: The Company Secretary

- (iv) the country in which the world headquarters of the participant is located;
- (v) the country where the majority of the tangible assets are located; or
- (vi) the country where the participant derives the greatest sales and revenues.

Yours faithfully,
For and on behalf of
Hong Kong Securities Clearing Company Limited



Grace Tong
Senior Manager
Cash Clearing

DATE: 27/1/03

 CHEUNG KONG (HOLDINGS) LIMITED 長江實業(集團)有限公司

27 January 2003

By fax: 2845-5802

HSBC Nominees (Hong Kong) Limited
35/F., Sun Hung Kai Center
Wanchai
Hong Kong

Attn: Mr. Herman Lee

Dear Sirs,

Request for Information

Based on the share register of Cheung Kong (Holdings) Limited ("CKH"), we believe that you are a current shareholder of CKH.

Pursuant to Section 18(1) of the Securities (Disclosure of Interests) Ordinance (Cap. 396 of the laws of Hong Kong), we ask that you provide us with the following information concerning your ownership of CKH shares ("Shares").

1. Please confirm whether or not you are, as at the date of this letter, a shareholder of CKH and, if so, the number of Shares held by you as at 24 January 2003.
2. If you hold Shares, please provide the following particulars:
 - 2.1 Are you the beneficial owner of any of the Shares? If yes, please state:
 - (a) the number of Shares that you beneficially own;
 - (b) your place of incorporation;
 - (c) the name and address of each entity that owns 10% or more of you, and a contact person for each such entity;
 - (d) the citizenships of your directors;
 - (e) the country in which your world headquarters is located;
 - (f) the country or countries in which the majority of your tangible assets is located; and
 - (g) the country or countries from which you derive the greatest sales and revenues from operations.

..../2

- 2 -

- 2.2 Do you hold any of the Shares as nominee for another person (whether an individual or corporation of other entity)? If yes:
- (a) for each such person who is an individual, please state as much of the following information as possible:
 - (i) the name of the individual;
 - (ii) the given address of the individual;
 - (iii) the citizenship of the individual; and
 - (iv) the number of Shares you hold as nominee for the individual;
 - (b) for each such person who is not an individual, please state as much of the following information as possible:
 - (i) the name of the entity;
 - (ii) the number of Shares that the entity owns;
 - (iii) the entity's place of incorporation and the entity's type (e.g., corporation, limited liability partnership, etc.);
 - (iv) the name and address of any person that owns 10% or more of the entity, and a contact person for each such person;
 - (v) the citizenships of the entity's directors;
 - (vi) the country in which the entity's world headquarters is located;
 - (vii) the country or countries in which the majority of the entity's tangible property is located;
 - (viii) the country or countries from which the entity derives the greatest sales and revenues from operations;
 - (ix) the given address of the entity; and
 - (x) the name of a contact person for the entity.

This information is required for disclosure to the FCC on or before Thursday, 6 February 2003. Accordingly, we ask that you provide the requested information to the Company Secretary, Cheung Kong (Holdings) Limited, fax: 2128 8001 no later than the close of business of Tuesday, 28 January 2003.

Yours sincerely,
For and on behalf of
Cheung Kong (Holdings) Limited



Company Secretary



Ref: CNC/RSALI

PRIVATE & CONFIDENTIAL
The Company Secretary
Cheung Kong (Holdings) Limited
7-12/F Cheung Kong Centre
2 Queen's Road, Central
Hong Kong
Fax no. 21281770

29 January 2003

Dear Madam,

Securities (Disclosure of Interests) Ordinance Section 18 Chapter 396: Interests in
Cheung Kong (Holdings) Limited ("Company")

We refer to your letter dated 27 January 2003 and subsequent telephone conversation with Ms Wong. We are pleased to enclose a report detailing the name, address of the shareholders and their respective holdings in the Company as at 28 January 2003.

The shares are held by HSBC in our capacity as nominees for our customers. As at 28 January 2003, the total number of shares held by us was 662,308,499 shares.

To the best of our knowledge and belief, we are not aware of any agreement or arrangement relating to the exercise of any rights conferred by the holding of such shares.

As regards to item 2.2 in your letter, please note that we are not in the position to provide details of the citizenship of any individual, or any of the entity's directors, world headquarters, place of incorporation, shareholders, assets or revenues.

We shall be grateful if you would forward us a cheque in favour of The Hongkong and Shanghai Banking Corporation Limited for HKD300.00 being reimbursement of our administration fees for the above information.

Yours faithfully



Herman Li
OIC Reconciliation/Stock/Audit

The Hongkong and Shanghai Banking Corporation Limited
Custody and Clearing, Hong Kong Office:
35/F and 36/F, Sun Hung Kai Centre, 30 Harbour Road, Wan Chai, Hong Kong
Tel: 2500 3333 Fax: (852) 2845 5802 Telex: 73205 HSBC HK Telegrams: Hongbank Hongkong

**DECLARATION OF STEVEN P. ALLEN
FEBRUARY 6, 2003**

EXHIBIT IV

EXHIBIT IV

NOMINEES' LIST OF PARTICIPANTS* — HWL

(As of January 2003)

| | <u>Number of Participants</u> | <u>Number of Shares</u> | <u>% Interest in HWL</u> |
|--|-----------------------------------|-----------------------------|------------------------------|
| Participants From Hong Kong:** | | | |
| <i>HSBC Participants</i> | 10,099 | 1,102,314,418 | 25.86% |
| <i>HKSCC Participants</i> | 2,234 | 1,448,548,413 | 33.977% |
| Participants From WTO Members Other Than Hong Kong*** | | | |
| <i>HSBC Individual Participants</i> | 860 | 5,227,459 | 0.123% |
| <i>HSBC Entity Participants</i> | 589 | 621,023,697 | 14.566% |
| <i>HKSCC Participants</i> | 0 | 0 | 0% |
| Participants From Non-WTO Members | | | |
| <i>HSBC Individual Participants</i> | 24 | 145,042 | 0.003% |
| <i>HSBC Entity Participants</i> | 2 | 56,000 | 0.001% |
| <i>HKSCC Participants</i> | 0 | 0 | 0% |
| TOTAL | 13,808 | 3,177,315,029 | 74.53% |

* These are persons (individuals and entities) who hold shares in HWL indirectly through HSBC and HKSCC.

** HSBC and HKSCC did not provide information sufficient to distinguish readily between individual and entity participants from Hong Kong.

*** The represented WTO Members are as follows: Australia, Bahrain, Belgium, Brazil, Brunei Darussalam, Canada, Costa Rica, Cyprus, Denmark, Fiji, Finland, France, Germany, India, Indonesia, Ireland, Italy, Jamaica, Japan, Luxembourg, Macau, Madagascar, Malaysia, Mauritius, Netherlands, New Zealand, Norway, Oman, Papua New Guinea, Norway, Paraguay, People's Republic of China, Philippines, Portugal, Singapore, South Africa, South Korea, Spain, Sweden, Switzerland, Thailand, Turkey, United States of America, United Kingdom, and United Arab Emirates.

**DECLARATION OF STEVEN P. ALLEN
FEBRUARY 6, 2003**

EXHIBIT V

EXHIBIT V

NOMINEES' LIST OF PARTICIPANTS* — CKHL

(As of January 2003)

| | <u>Number of Participants</u> | <u>Number of Shares</u> | <u>% Interest in CKHL</u> |
|---|-----------------------------------|-----------------------------|-------------------------------|
| Participants From Hong Kong: ** | | | |
| <i>HSBC Participants</i> | 5,149 | 66,803,430 | 2.885% |
| <i>HKSCC Participants</i> | 1,282 | 991,028,780 | 42.787% |
| Participants From WTO Members Other Than Hong Kong *** | | | |
| <i>HSBC Individual Participants</i> | 494 | 2,555,577 | 0.110% |
| <i>HSBC Entity Participants</i> | 437 | 592,743,384 | 25.591% |
| <i>HKSCC Participants</i> | 0 | 0 | 0% |
| Participants From Non-WTO Members | | | |
| <i>HSBC Individual Participants</i> | 17 | 177,108 | 0.008% |
| <i>HSBC Entity Participants</i> | 2 | 29,000 | 0.001% |
| <i>HKSCC Participants</i> | 0 | 0 | 0% |
| TOTAL | 7,381 | 1,653,337,279 | 71.383% |

* These are persons (individuals and entities) who hold shares in CKHL indirectly through HSBC and HKSCC.

** HSBC and HKSCC did not provide information sufficient to distinguish readily between individual and entity participants from Hong Kong.

*** The represented WTO Members are as follows: Australia, Austria, Belgium, Brunei Darussalam, Canada, Denmark, France, Germany, India, Indonesia, Ireland, Italy, Japan, Luxembourg, Macau, Malaysia, Mauritius, Netherlands, New Zealand, Papua New Guinea, Paraguay, People's Republic of China, Philippines, Singapore, South Africa, South Korea, Sweden, Switzerland, Thailand, Turkey, United States of America, and United Kingdom.