

TM

恒安國際集團有限公司

HENGAN INTERNATIONAL GROUP CO., LTD.

(Incorporated in the Cayman Islands with limited liability)
(the “Company”)

Shareholder Communication Policy

1. Purpose

This Policy aims to set out the Company’s strategies for maintaining continuous and open communication with Shareholders and the investment community at large and reinforce the Company’s commitment to promoting investor confidence by keeping the market fully informed at all times of the material information about the Company and that Shareholders and investment community have simultaneous access to the information relating to the Company’s financial performance, strategic goals and plans, material development of its projects, corporate exercises and governance issues.

2. General Policy

2.1 The Board shall maintain an on-going dialogue with Shareholders and the investment community and is aimed at establishing a two-way relationship and communication between the Company and its Shareholders.

2.2 Information shall be communicated to Shareholders and the investment community mainly through the following communication channels:-

- (a) Company’s publications such as financial reports (interim and annual reports), results announcements, corporate announcement and circulars (“Corporate Communications”);
- (b) the Company’s website;
- (c) annual general meetings and other general meetings; and
- (d) investors and analysts meetings.

2.3 Effective, equal and timely dissemination of information to Shareholders and the investment community shall be ensured at all times and the effectiveness of the communication channels will be reviewed regularly.

3. Communication Strategies

Corporate Communications

3.1 Corporate Communications containing regulatory disclosures and notices of the Company will be provided to Shareholders in accordance with the legal and regulatory requirement applicable to the Company for the information or action of holders of its securities. Corporate Communications will be written in plain language and in both English and Chinese versions to facilitate Shareholders' understanding.

3.2 To facilitate timely and effective communications and contribute to environmental protection, the Company has provided options for Shareholders to receive Corporate Communications by electronic means in lieu of receiving printed copies. Shareholders are encouraged to receive electronic form of the Corporate Communications published on the Company's website and provide their email addresses to Tricor Investor Services Limited, Hong Kong branch share registrar and transfer office of the Company (the "Registrar") to receive email notification of the publication of the Corporate Communications. Procedures are in place for Shareholders to change their choice of language and means of receipt of the Corporate Communications.

Corporate Website

3.3 The Company is committed to maintaining a corporate website with general information about the Company and its business. Information on the Company's website will be updated on a regular basis.

3.4 The following will be posted to the Company's website:-

- (a) the Corporate Communications released by the Company to The Stock Exchange of Hong Kong Limited;
- (b) corporate details such as information about the Company's directors and senior management;
- (c) press releases regarding the corporate function, marketing activities and community services provided or carried out by the Group; and
- (d) presentation materials provided in conjunction with the Company's results announcements.

Shareholders' Meetings

3.5 Shareholders are encouraged to participate at general meetings or to appoint proxies to attend and, on poll, vote at meetings for and on their behalf if they are unable to attend the meetings.

3.6 The Chairman will allow reasonable time during the general meetings for questions and comments from Shareholders. Appropriate arrangements shall be in place to encourage Shareholders' participation.

3.7 The process of the Company's general meeting will be monitored and reviewed on a regular basis, and, if necessary, changes will be made to ensure that Shareholders' needs are best served.

3.8 Board members, appropriate management executives and external auditors will attend annual general meetings to answer Shareholders' questions.

Investment Market Communications

3.9 Investor/analysts briefings and one-on-one meetings, roadshows (both domestic and international), media interviews, marketing activities for investors and specialist industry forums etc will be available from time to time in order to facilitate communication between the Company, Shareholders and the investment community.

3.10 The Company's Directors and employees who have contacts or dialogues with investors, analysts, media or other interested outside parties shall only explain information already in the public or discuss in general the markets in which the Company operates, and shall avoid giving answers which may provide unpublished or potential price sensitive information to the receiving party.

Shareholders' Enquiries

3.11 Shareholders should direct their questions about their shareholdings to the Registrar.

3.12 Shareholders and the investment community may at any time make a request for the Company's information to the extent such information is publicly available.

3.13 Shareholders who intend to put forward their enquiries about the Company to the Board should contact the Corporate Affairs Department of the Company. The Company will endeavour to respond to their queries in a timely manner.

4. Shareholder Privacy

4.1 The Company recognizes the importance of Shareholders' privacy and will not disclose Shareholders' information without their consent, unless required by law to do so.

For any enquiry about this Policy, please contact:
Hengan International Group Company Limited
Unit 2101D, 21/F., Admiralty Centre,
Tower 1, 18 Harcourt Road, Hong Kong
Email : ha1044admin@hengan.com.hk

** for identification purposes*