

**SANROC INTERNATIONAL HOLDINGS LIMITED**

善樂國際控股有限公司

*(Incorporated in Cayman Islands with limited liability)*

(the “**Company**”)

**SHAREHOLDERS’ COMMUNICATION POLICY (THE “POLICY”)**

**1. Purpose**

- 1.1 This Policy aims to set out the provisions with the objective of ensuring that shareholders of the Company, both individual and corporate (collectively, “**Shareholders**”), and, in appropriate circumstances, the investment community at large, are provided with ready, equal and timely access to balanced and understandable information about the Company (including its financial performance, strategic goals and plans, material developments and governance), in order to enable Shareholders to exercise their rights in an informed manner, and to allow Shareholders and the investment community to engage actively with the Company.
- 1.2 For the purpose of this Policy, references to the investment community are intended to include the Company’s potential investors as well as analysts reporting and analyzing the Company’s performance.

**2. General Policy**

- 2.1 The board (the “**Board**”) of directors of the Company shall maintain an ongoing dialogue with Shareholders and the investment community, and will regularly review this Policy to ensure its effectiveness.
- 2.2 Information shall be communicated to Shareholders and the investment community mainly through the Company’s financial reports (interim and annual reports), annual general meetings and other general meetings that may be convened, as well as by making available all the disclosures submitted to The Stock Exchange of Hong Kong Limited (“**Stock Exchange**”) and its corporate communications on the Company’s website.
- 2.3 Effective and timely dissemination of information to Shareholders and the investment community shall be ensured at all times. Any question regarding this Policy shall be directed to the executive directors of the Company.

**3. Communication Channels**

**Shareholders’ or Investors’ Enquiries**

- 3.1 Shareholders should direct their questions about their shareholdings to the Company or the Company’s share registrar.
- 3.2 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.

- 3.3 Shareholders and the investment community shall be provided with designated contacts, correspondence addresses, email addresses and enquiry lines in order to enable them to make any query in respect of the Company.

### **Corporate Communication**

- 3.4 “Corporate communication” refers to any document issued or to be issued by the Company for the information or action of holders of any of its securities, including, but not limited to, annual reports, the interim reports, notices of meeting, circulars and proxy forms. They will be provided to Shareholders in plain language and in both English and Chinese versions to facilitate Shareholders’ understanding.

### **Corporate Website**

- 3.5 A dedicated investor relations section is available on the Company’s website at [www.sanrochk.com](http://www.sanrochk.com). Information on the Company’s website is updated on a regular basis.
- 3.6 Information released by the Company to the Stock Exchange is also posted on the Company’s website simultaneously or immediately thereafter. Such information includes financial statements, results announcements, circulars and notices of general meetings and associated explanatory documents.
- 3.7 All press releases issued by the Company will be made available on the Company’s website.

### **Shareholders’ Meetings**

- 3.8 Shareholders are encouraged to participate in general meetings or to appoint proxies to attend and vote at meetings for and on their behalf if they are unable to attend the meetings.
- 3.9 Appropriate arrangements for the general meetings shall be in place to encourage Shareholders’ participation.
- 3.10 The process of the Company’s general meetings will be monitored and reviewed on a regular basis, and, if necessary, changes will be made to ensure that Shareholders’ needs are best served.
- 3.11 Board members, in particular, the chairmen of Board committees or their delegates, appropriate management executives and external auditors will use all reasonable efforts to attend annual general meetings to answer Shareholders’ questions.

## **Investment Market Communications**

- 3.12 Investors'/analysts' briefings and one-on-one meetings, media interviews, etc. will be available on a regular basis in order to facilitate communication between the Company, Shareholders and the investment community.
- 3.13 The Company's directors and employees who have contacts or dialogues with investors, analysts, media or other interested outside parties are required to comply with the disclosure obligations and requirements under the Company's corporate disclosure policy.

## **4. Shareholder Privacy**

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

***Note: If there is any inconsistency between the English and Chinese versions of this document, the English version shall prevail.***

9 February 2017  
Hong Kong