### EAGLE NICE (INTERNATIONAL) HOLDINGS LIMITED

#### SHAREHOLDERS COMMUNICATION POLICY

# **Purpose**

1. The purpose of this Policy is to set out the provisions to ensure all shareholders and investors have equal and timely access to the information of Eagle Nice (International) Holdings Limited (the "Company") including financial reports, announcements and other disclosures and information required under the Rules Governing the Listing of Securities (the "Listing Rules") of The Stock Exchange of Hong Kong Limited (the "Stock Exchange") and statutory requirements in order to enable shareholders to exercise their rights in an informed manner.

### **General Policy**

- 2. The board of directors (the "Board") of the Company shall maintain continuous dialogue with shareholders and the investors, and review the Policy on a regular basis to ensure its effectiveness.
- 3. Information shall be communicated to shareholders and investors through the publication of the Company's financial reports (interim and annual reports), price-sensitive announcements and other disclosures and information required under the Listing Rules and statutory requirements on the Company's website, annual general meetings and other general meetings that may be convened.
- 4. Effective and timely dissemination of information to shareholders and investors shall be ensured at all times. Any question regarding this Policy shall be directed to the Company Secretary or Head of Investors Relations.

### Shareholders' Enquiries

- 5. Shareholders should direct their enquiries about their shareholdings, such as transfer of shares, change of address and loss of share certificates etc to the Company's Branch Share Registrar.
- 6. Shareholders and the investors may at any time make a request for the Company's information to the extent such information is publicly available.
- 7. The Company's designated contacts, email addresses and enquiry lines shall be provided for enquiries from individual shareholder, investors and media in respect of the Company.

# **Corporate Communications**

- 8. Corporate communications such as interim and annual reports, circular and annual mountements will be provided to Shareholders in plain language and in both English and Chinese versions to facilitate shareholders' understanding.
- 9. Corporate communications are available online at the Company's website.

### **Company Website**

- 10. A dedicated Investor Relations section is available on the Company's website. Information on the Company's website is updated on a regular basis.
- 11. Information includes financial statements, results announcements, circulars and notices of general meetings and associated explanatory documents etc released by the Company to the Stock Exchange is also posted on the Company's website immediately thereafter.
- 12. Press release and newsletters etc about the Company will be made available on the Company's website.

# **Shareholders' Meetings**

- 13. 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.
- 14. The process of the Company's general meetings will be monitored and reviewed on a regular basis to ensure needs of the shareholders are best served.
- 15. Board members, chairmen of Board committees or their duly appointed delegates, management and external auditors will attend annual general meetings to respond to questions raised by shareholders.
- 16. Shareholders are encouraged to discuss matters with management of the Company after the general meeting in order to enhance better communication.

### **Communications with institutional investors**

17. Interviews with institutional investors, analysts and media will be conducted on a regular basis in order to facilitate communication between the Company and investors.

- 18. In line with market practice, more detailed information may be provided to analysts or professional investors during group meetings or on a one-on-one basis, as long as this information is not material or price-sensitive information or considered to be inside information in terms of the definition in the relevant laws and the Stock Exchange's regulations applicable to the Company. Any dialogues with investors, analysts or media are required to comply with the disclosure obligations under the Listing Rules.
- 19. To ensure consistency and to avoid unintentional disclosure of material information all enquiries from shareholders and the investment community must be directed to the head of Investor Relations or the Company Secretary. Any communication will be made in compliance with the group's communication policy and the relevant statutory and Stock Exchange requirements.

# **Closed and Quiet Periods**

- 20. During the period from one month after the end of a reporting period (i.e. 31 October or 30 April) to the release of results (the "Closed Period"), general investors' communication will be limited to discussions on strategy and/or historic and publicly available information.
- 21. For the avoidance of perception of unintentional selective disclosures prior to the publication of results announcements, a "quiet" period of 30 days prior to the date of publication of results announcement (the "Quiet Period") is strictly observed. During the Quiet Period, the Company will not take part in any phone conversations or meetings with analysts, shareholders or investors notwithstanding the contents of conversations are not in relation to current operations or results of the Company.

### **Shareholder Privacy**

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

Adopted on 31 March 2012