

Sanbase Corporation Limited

莊皇集團公司

(the “Company”)

(Incorporated in the Cayman Islands with limited liability)

(Stock Code: 8501)

Shareholders’ Communication Policy

Adopted by the Board on December 8, 2017

1. Purpose

- 1.1 This Policy aims to set out the provisions which ensure that the Company’s shareholders (the “**Shareholders**”) and in appropriate circumstances, the investment community at large (which include the Company’s potential investors as well as analysts who report and analyze the Company’s performance), are timely provided with information about the Company (including its financial performance, strategic goals and plans, material developments and corporate governance), in order to enable Shareholders to exercise their rights in an informed manner, and to enhance the communication between the Shareholders, the investment community and the Company.
- 1.2 The board of directors of the Company (the “**Board**”) shall maintain an on-going dialogue with Shareholders and the investment community, and will regularly review this Policy to ensure its effectiveness. Any question regarding this Policy shall be directed to either the Company’s Investor Relations Department or the Company Secretary by telephone or by email.

2. Means of Communication

Shareholders’ Enquiries

- 2.1 Shareholders shall direct their questions about their shareholdings to the Company’s Hong Kong share registrar, Tricor Investor Services Limited (“**Tricor**”).
- 2.2 Shareholders and the investment community may at any time contact either the Company’s Investor Relations Department or the Company Secretary to enquire about the information published by the Company.

Corporate Communication

- 2.3 Corporate communication (as defined in the Listing Rules) shall be provided to Shareholders in plain language and in both English and Chinese versions to facilitate Shareholders’ understanding.

- 2.4 Shareholders have the right to choose the languages (either English and/or Chinese) or means of receipt of the corporate communication (in hard copy or through electronic means).
- 2.5 Shareholders are encouraged to provide, among other things, in particular, their email addresses to the Company through Tricor in order to ensure the receipt of the information published by the Company in a timely manner.

Relevant Websites

- 2.6 Disclosures made by the Company pursuant to the Rules Governing the Listing of Securities on the Growth Enterprise Market of The Stock Exchange of Hong Kong Limited (the “**Listing Rules**”) are available on the website of The Stock Exchange of Hong Kong Limited (www.hkexnews.hk) (“**HKEx News Website**”);
- 2.7 A dedicated “Investor Relations” section is available on the Company’s website (<http://www.irasia.com/listco/hk/sanbase/index.htm>). Information on the Company’s website is updated on a regular basis.
- 2.8 Information uploaded by the Company to the HKEx News Website is also posted on the Company’s website immediately thereafter. Such information includes announcements, circulars and notices of general meetings and other documents.

Shareholders’ General Meetings

- 2.9 Shareholders are encouraged to participate in general meetings (including annual general meetings) or to appoint proxies to attend and vote at such meetings for and on their behalf if they are unable to attend such meetings.
- 2.10 Appropriate arrangements for the annual general meetings will be in place to encourage Shareholders’ participation.
- 2.11 The process of the Company’s general meeting shall be monitored and reviewed on a regular basis, and, if necessary, changes be made to ensure that Shareholders’ needs are best served.
- 2.12 Board members, in particular, the chairman of the Board, the chairmen of Board committees or their delegates, appropriate management executives and external auditors will attend annual general meetings to answer Shareholders’ questions.
- 2.13 Shareholders are encouraged to attend Shareholders’ activities organized by the Company, where information about the Company, including its latest strategic plan, products, services and etc. will be communicated.

Investment Market Communications

2.14 The Company, depending on its need, will arrange, without limitation, investor/analysts briefings and group/one-on-one meetings, roadshows (both domestic and international) and media interviews, and participate in marketing activities and forums for specialists and etc. on a regular basis in order to facilitate communication between the Company, Shareholders and the investment community.

3. Shareholder Privacy

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

Hong Kong, January 4, 2018