



## **FIRST SHANGHAI INVESTMENTS LIMITED**

*(Incorporated in Hong Kong with limited liability)*

**(Stock Code: 227)**

### **SHAREHOLDERS COMMUNICATION POLICY (the “Policy”)**

(adopted on 1 March 2012)

#### **(A) Purpose**

- (1) This Policy is established with the objective of ensuring that the Company’s shareholders (the “Shareholders”), and, in appropriate circumstances, the investment public, are provided according to Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (“SEHK”) (the “Listing Rules”) with equal and timely access to relevant information about the Company (including its financial performance, strategic goals and plans, material developments, governance and risk profile), in order to enable Shareholders to exercise their rights in an informed manner, and to allow Shareholders and the investment public to engage actively with the Company.
- (2) For the purpose of this Policy, references to the investment public would include the Company’s potential investors as well as analysts reporting and analyzing the Company’s performance.

#### **(B) General Policy**

- (1) The Board shall maintain an on-going dialogue with Shareholders and the investment public, and will regularly review this Policy to ensure its effectiveness and compliance with the Listing Rules.
- (2) Information shall be communicated to Shareholders and the investment public mainly through the Company’s published financial reports, annual general meetings and other general meetings that may be convened, as well as by making available all the public disclosures submitted to SEHK and its corporate communications and other corporate publications on the Company’s and SEHK’s website.

- (3) Effective and timely dissemination of relevant information to Shareholders and the investment public shall be ensured at all times. Any question regarding this Policy shall be directed to the Company Secretary of the Company.
- (4) Shareholders should inform the Company's registrar their preference in receiving information from the Company either (i) in printed English and/or Chinese version(s) ("Printed Version") or (ii) by electronic means through the Company's website ("Electronic Version"). For those Shareholders who have elected (or are deemed to have elected) the Electronic Version, the Company will, at about the same time when the Printed Version is mailed, notify the relevant Shareholders of the publication of such information on the Company's website (a) by email (if email address is provided to the Company), or (b) by post (if no email address is provided).

## **(C) Communication Strategies**

### ***Shareholders' enquiries***

- (1) Shareholders should direct their questions about their shareholdings to the Company's registrar.
- (2) Shareholders and the investment public may make a request for the Company's information to the extent such information is publicly available according to relevant rules and legislations.
- (3) Shareholders and the investment public shall be provided with designated contacts, email addresses and enquiry lines of the Company through the Company's website in order to enable them to make any query in respect of the Company's information to the extent such information is disclosable according to the Listing Rules and relevant legislations. Shareholders shall provide, amongst other things, in particular, their name and updated mail/email addresses to the Company in order to facilitate timely and effective communications.

### ***Company Website***

- (4) The Company's website [www.firstshanghai.com.hk](http://www.firstshanghai.com.hk) provides comprehensive and updated information about the Company, including our news, financial results, financial statements, announcements, circulars, Memorandum and Articles of Association, composition of the Company's Board of Director, Audit Committee, Nomination Committee and

Remuneration Committee and the terms of reference of the Company's Audit Committee, Nomination Committee and Remuneration Committee. Information on the Company's website is updated from time to time.

- (5) Public information released by the Company to SEHK is also posted on SEHK's website immediately thereafter according to SEHK's policy. Such information includes financial statements, results announcements, announcements, circulars and notices of general meetings and associated explanatory documents etc.

#### ***Shareholders' Meetings***

- (6) 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.
- (7) Appropriate arrangements for the shareholders' meetings shall be in place to facilitate Shareholders' participation.
- (8) The process of the Company's general meeting will be reviewed from time to time to ensure the compliance with the relevant requirements of the Listing Rules and the relevant legislations.
- (9) Board members, in particular, the chairmen of Board committees or their delegates, and external auditors will attend annual general meetings to answer Shareholders' questions.

#### ***Communications with Investment Public***

- (10) Investor/analysts briefings and one-on-one meetings, media interviews and marketing activities for investors etc will be available where necessary in order to facilitate communication between the Company, Shareholders and the investment public.
- (11) The Company's officers who have contacts or dialogues with investors, analysts, media or other interested outside parties are required to comply with the relevant disclosure obligations and requirements under the Listing Rules.

#### **(D) Shareholder Privacy**

The Company recognises the importance of Shareholders' privacy and will not disclose Shareholders' information without their consent, unless required by relevant rules and legislations to do so.

*The Chinese version of this document is for reference only.  
In case of any discrepancies or inconsistency between the English version and Chinese version, the  
English version prevails.*

END