



# E-COMMODITIES HOLDINGS LIMITED

## 易大宗控股有限公司

*(Incorporated in the British Virgin Islands with limited liability)*  
(Stock Code: 1733)

### SHAREHOLDER COMMUNICATION POLICY

#### Chapter I General Policy

**Article 1** E-COMMODITIES HOLDINGS LIMITED (the “**Company**”) has formulated this policy according to the Company Law of the British Virgin Islands, the Securities and Futures Ordinance (Chapter 571 of the Laws of Hong Kong), the Corporate Governance Code and the Corporate Governance Report set out in Appendix 14 to the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the “**Hong Kong Listing Rules**”), the Articles of Association of the Company (the “**Articles of Association**”) and other laws, administrative regulations, rules and regulatory requirements.

**Article 2** The Company adheres to its basic principle of fair disclosure of information to and open communication with its shareholders. This policy aims to set out the provisions with the objective of ensuring that the Company’s shareholders, both individual and institutional (collectively, “**Shareholders**”), and, in appropriate circumstances, the investment community at large, are provided with timely access to comprehensive, equal and understandable information about the Company (including its financial performance, strategic goals and plans, major 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 community to strengthen communication with the Company. For the purpose of this policy, reference to the “investment community” shall include the Company’s prospective investors as well as analysts reporting and analyzing the Company’s performance.

**Article 3** The board of directors of the Company is responsible for maintaining an on-going dialogue with Shareholders and the investment community, and will regularly review the Shareholder Communication Policy to ensure its effectiveness.

**Article 4** The Company maintains its open communication policy and deliver information to Shareholders and the investment community through various channels, which include publication of the Company’s financial reports (including interim and annual reports), information and notices of the annual general meeting and other extraordinary general meeting that may be convened, other disclosures in accordance with the regulatory requirements under the relevant laws and regulations and the Hong Kong Listing Rules, as well as its corporate communications and other corporate publications on the HKEXnews website ([www.hkexnews.hk](http://www.hkexnews.hk)) and/or the Company’s website.

## **Chapter II Communication Channels**

### **Article 5 General meeting**

- (1) Shareholders may participate in the general meetings or to appoint proxies to attend and vote at the meetings for and on their behalf if they are unable to attend the meetings.
- (2) The Company shall make appropriate arrangements for the general meetings to encourage Shareholders' participation.
- (3) The Company shall review the procedure for conducting general meeting from time to time to ensure that it complies with the Articles of Association, the Hong Kong Listing Rules and the applicable laws as well as abiding by the practice of good corporate governance. If necessary, changes will be made to ensure that Shareholders' needs are best served.
- (4) Members of the board of directors of the Company, in particular, either the chairmen of board committees or their delegates, appropriate management executives, external auditors and other parties considered to be appropriate by the directors shall attend the general meetings to answer Shareholders' questions.
- (5) Relevant circulars and meeting materials shall be delivered to the Shareholders in advance as required under the Articles of Association and the Hong Kong Listing Rules.

### **Article 6 Shareholders' enquiries**

- (1) Shareholders should direct their questions about their shareholdings to the Company's share registrar.
- (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) Shareholders may at any time raise their question (including any question to this policy), make a request for the publicly available information, and submit their opinion and suggestion, to the office of the board of directors of the Company. Such question, request and opinion can be delivered by mail to the Company (Address: Unit 1902, Floor 19, Far East Finance Centre, 16 Harcourt Road, Admiralty, Hong Kong) or by email to e-comm@e-comm.com.
- (4) In order to facilitate timely and effective communication, Shareholders shall provide their contact details, in particular email addresses, to the share registrar of the Company in Hong Kong.

## **Article 7 Company's website**

- (1) A dedicated investor relations section is available on the Company's website (<http://www.e-comm.com/en/home.aspx>). Information on the website is updated on a regular basis.
- (2) Information released by the Company to Hong Kong Stock Exchange's website for disclosure is also posted on the Company's website immediately thereafter. Such information includes but is not limited to annual reports, interim reports, announcements, circulars, notices of general meetings and other information required by the Hong Kong Listing Rules for disclosure from time to time.
- (3) Press releases and publications issued by the Company from time to time will also be available on the Company's website.

## **Article 8 Communication with the capital market**

- (1) The Company will organize various events, which include briefing sessions to and private meetings with investors/analysts, roadshows, media interviews and investor promotions, etc., to facilitate the Company's communication with Shareholders and the investment community.

**Article 9** The Company's designated personnel who have contacts or dialogues with the investment community, analysts, media or other external stakeholders are required to comply with the disclosure obligations and requirements under the relevant rules, laws and regulations.

## **Article 10 Shareholder privacy**

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

## **Chapter III Supplementary Provisions**

**Article 11** Terms used herein shall have the same meanings as those defined in the Articles of Association unless otherwise specified.

**Article 12** For the matters which are not covered by this policy or contradict the laws and regulations currently enforced, issued from time to time or revised, the Hong Kong Listing Rules or the Articles of Association being formulated or amended according to legal procedures upon this policy became effective, such laws and regulations, the Hong Kong Listing Rules or the Articles of Association shall prevail, and this policy shall be amended in a timely manner and submitted to the board of directors of the Company for consideration and approval.

**Article 13** This policy is considered and approved by the board of directors of the Company, and shall come into force from the date when the Company's foreign shares listed overseas being listed on The Stock Exchange of Hong Kong Limited for dealing.

**Article 14** The board of directors of the Company shall be responsible for the interpretation of this policy.