

**HUABAO INTERNATIONAL HOLDINGS LIMITED**  
**(“Company”)**

**SHAREHOLDERS COMMUNICATION POLICY**

**1. Purpose**

- 1.1 This policy ensures shareholders and investors of the Company will have access to the most updated information of the Company in a fair, open and timely manner.
- 1.2 The Company is committed to upholding an open and proactive communications strategy with an aim at optimizing the knowledge and understanding of the investment community with respect to the Company’s corporate mission and vision, development strategies, competitive position in the industry and operating and financial performance, in order to ensure that communication with shareholders, investors and media is conducted in a fair manner and that no material non-public and price sensitive information is made available to any individual on a selective basis.

**2. General Policy**

- 2.1 The Board and Investor Relations Department of the Company shall maintain an on-going communication with its shareholders and the investment community, and will regularly review this policy to ensure its effectiveness.
- 2.2 Information shall be communicated to the Company’s shareholders and the investment community mainly through:
  - (a) the Company’s interim and annual financial reports;
  - (b) annual general meetings and other possible general meetings that may be convened; and
  - (c) announcements regarding the Company’s major acquisitions and price sensitive information, and by making all the disclosures submitted to The Stock Exchange of Hong Kong Limited (“SEHK”) be available on SEHK’s “HKEXnews” 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 Company’s Head of Investor Relations Department.

**3. Methods of Communication**

**3.1 Form of communications**

- (a) corporate communication of the Company will be provided to its shareholders in plain language and in both English and Chinese versions to ease shareholders’ understanding.
- (b) the Company welcomes shareholders and investors to inquire or make recommendation directly for mutual communication.
- (c) shareholders and investors may also obtain all of the Company’s disclosures and announcements from the website of SEHK.

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3.2 Shareholders’ enquiries

- (a) shareholders should direct their questions about their shareholdings to the Company’s registrar.
- (b) shareholders and investors may at any time make a request for the Company’s information to the extent such information is publicly available.

3.3 Communication with the investment community

The Company through hosting of regular activities, including small group and one-on-one meetings with investors and analysts, domestic and international roadshows, and participation in various investment conferences of any scale, etc, is able to facilitate communications between the Company and its shareholders and investors. Please refer to the Investor Relations Report in the Company’s annual financial reports for more details on the activities.

3.4 Company site visits and reverse roadshows

Regular site visits to the Company’s major customers, R&D centres and production bases had been arranged for investors and analysts which provided them on one hand the opportunities to have better understanding of the Company’s businesses, technology and daily operations, and to facilitate independent market surveillance on the other.

3.5 Company Website

The Company has adopted a Company website at [www.hbglobal.com](http://www.hbglobal.com), which enables the Company to publish its interim and annual financial reports, announcements and circulars, to ensure shareholders and the investment community to have timely access to its most updated information.

3.6 Other communication channels

Shareholders and the investment community are welcome to raise enquiries through the Investor Relations Department at the Company’s principal place of business in Hong Kong or via the “Enquiry Form” on the Company website. Designated personnel are assigned for this task and subject to relevant Listing Rules, of the SEHK, all data is disclosed on a fair and non-selective basis and in compliance with the Company’s policy and the relevant regulatory requirements.

3.7 Shareholders’ meetings

- (a) shareholders are encouraged to participate in the Company’s 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.

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- (b) announcements and poll results of annual general meetings and other possible general meetings will be timely published on SEHK’s “HKEXnews” website.
- (c) the process of the Company’s general meeting will be monitored and reviewed on a regular basis and changes will be made to ensure that shareholders’ needs are best served if necessary.

3.8 Shareholder privacy

The Company recognizes the importance of shareholders’ privacy and will not disclose shareholders’ information without their consent, unless required by law and information already available to public.

June, 2015