



China 33 Media Group Limited (the “Company”)

Shareholders’ Communication Policy (the “Policy”)

1. Purpose

- 1.1 This Policy aims to set out the provisions with the objective of ensuring that the Company’s shareholders, both individual and institutional (collectively, the “**Shareholders**”), and, in appropriate circumstances, the investment community at large, are provided with ready, equal and timely access to balanced and understandable 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 community to engage actively with the Company.
- 1.2 For the purpose of this Policy, references to the investment community is intended to include the Company’s potential investors as well as analysts reporting and analysing the Company’s performance.

2. General policy

- 2.1 The board (the “**Board**”) of directors of the Company shall maintain an on-going dialogue with Shareholders and the investment community, and will regularly review this Policy to ensure its effectiveness.
- 2.2 Information shall be communicated to Shareholders and the investment community mainly through the Company’s financial reports (quarterly, interim and annual reports), annual general meetings and other general meetings that may be convened, as well as by making available all the disclosures submitted to The Stock Exchange of Hong Kong Limited (“**SEHK**”) and its corporate communications and other corporate publications on the Company’s 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 secretary of the Company.

3. Communication strategies

Shareholders' or investment community's enquiries

- 3.1 Shareholders should direct their questions about their shareholdings, share transfer, registration and payment of dividend to the Company's branch share registrar in Hong Kong, details of which are as follows:

Tricor Investor Services Limited

Address: 26th Floor
Tesbury Centre
28 Queen's Road East
Wanchai
Hong Kong

Email: is-enquiries@hk.tricorglobal.com

Tel: (852) 2980 1333

Fax: (852) 2810 8185

- 3.2 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 at the following designated contacts, correspondence addresses, email addresses and enquiry hotlines of the Company:

Porda Havas International Finance Communications Group

Address: Units 2009–2018
20th Floor
Shui On Centre
6–8 Harbour Road
Wanchai
Hong Kong

Email: 33media@pordahavas.com

Tel: (852) 3150–6788

Fax: (852) 3150–6728

3.3 Shareholders and the investment community are provided with the following designated contacts, correspondence addresses, email addresses and enquiry hotlines of the Company in order to enable them to make any query in respect of the Company:

Attention: Stanley Leung

Address: Room 4215
Office Tower
Convention Plaza
No. 1 Harbour Road
Wanchai
Hong Kong

Email: Stanley@shanglvmedia.com

Tel: (852) 2598-5533

Corporate communication*

3.4 Corporate communication will be provided to Shareholders in plain language and in both English and Chinese versions to facilitate Shareholders' understanding.

Corporate website

3.5 An "Investor Relations" section is available on the Company's website at <http://www.china33media.com>. Information on the Company's website is updated on a regular basis.

3.6 Information released by the Company to SEHK is also posted on the Company's website immediately thereafter. Such information includes financial statements, results announcements, circulars and notices of general meetings and associated explanatory documents, etc.

Shareholders' meetings

3.7 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.

3.8 Appropriate arrangements for the annual general meetings shall be in place to encourage Shareholders' participation.

3.9 The process of the Company's general meetings will be monitored and reviewed on a regular basis, and, if necessary, changes will be made to ensure that Shareholders' needs are best served.

3.10 Board members, in particular, the chairmen of Board committees or their delegates, appropriate management executives and external auditors will attend annual general meetings to answer Shareholders' questions.

3.11 Shareholders are encouraged to attend Shareholders' activities organised by the Company, where information about the Company, including its latest strategic plan, products, and services etc will be communicated.

4. Shareholders' privacy

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

27 March 2012

* Corporate communication refers to any document issued or to be issued by the Company for the information or action of holders of any of its securities, including, but not limited to, the annual report, the interim report, the quarterly report, a notice of meeting, a circular and a proxy form.