



ZHONG AN REAL ESTATE LIMITED
(“Company”)

SHAREHOLDERS COMMUNICATION POLICY (“Policy”)

1. Purpose

- 1.1 The objective of this Policy is to ensure that Company’s shareholders, both individual and institutional (collectively, “Shareholders”), and, in appropriate circumstances, the investment community at large, are provided with appropriate and timely information about the Company (including its financial performance, business developments and corporate news), enabling the aforementioned parties to make their decisions in an informed manner, and to have good communication 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 analyzing the Company’s performance.

2. General Policy

- 2.1 The board of directors of the Company (the “Board”) shall maintain an ongoing communication with Shareholders and the investment community, and will regularly review this Policy to ensure its effectiveness.
- 2.2 The Company can make available relevant information 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 (the “Stock Exchange”), which posted such on Hong Kong Exchanges and Clearing Limited’s HKExnews and the Company website, www.zafc.com.
- 2.3 The Company shall ensure effective and timely dissemination of information to Shareholders and the investment community at all times. Any question regarding this Policy shall be directed to the Company Secretary or our Investor Relation Department.

3. Communication Strategies

Shareholders' enquiries

- 3.1 Shareholders should direct their questions about their shareholdings to the Company's Registrar.
- 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.
- 3.3 Shareholders and the investment community shall be provided with designated contacts, email addresses and enquiry lines of the Company in order to enable them to make any query in respect of the Company.

Corporate Communication *

- 3.4 Corporate communication will be provided to Shareholders whose names are entered as the shareholder in the Company's branch share registrar ("Registrar") in Hong Kong in both English and Chinese versions to facilitate Shareholders' understanding. Those shareholders whose names are not recorded in the Registrar, they have the right to choose the means of receipt of the corporate communications in hard copy or access the corporate communications through electronic means from the Company website.

Corporate Website

- 3.5 A dedicated Investor Relations section is available on the Company website www.zafc.com. Information on the Company website is updated on a regular basis.
- 3.6 Information released by the Company to the Stock Exchange is also posted on the Company website as soon as practicable thereafter. Such information includes financial statements, results announcements, circulars and notices of general meetings and proxy forms, etc..
- 3.7 Relevant presentation materials provided in conjunction with the Company's results announcement each year will be made available on the Company website as soon as practicable after their release.
- 3.8 All press releases, newsletters, notices, etc. issued by the Company or its subsidiaries will be made available on the Company website.

Shareholders' Meetings

- 3.9 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.
- 3.10 Appropriate arrangements for the annual general meetings shall be in place to encourage Shareholders' participation.
- 3.11 The process of the Company's general meeting will be monitored and reviewed on a regular basis, and, if necessary, changes will be made to ensure that Shareholders' needs are best served.
- 3.12 Board members, in particular, either the chairmen or deputy chairmen of Board committees or their delegates, appropriate management executives and external auditors will attend annual general meetings to answer Shareholders' questions.
- 3.13 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.

Investment Market Communications

- 3.14 Investor/analysts briefings and one-on-one meetings, roadshows (both domestic and international), media interviews and, marketing activities for investors etc. will be available on a regular basis in order to facilitate communication between the Company and the investment community.
- 3.15 Company's directors and employees 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 set by the Stock Exchange.

4. Shareholder 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.

Adopted on 2 March 2012

- * Corporate Communication refers to any document issued or to be issued by Company for the information or action of holders of any of its securities, including, but not limited to, annual report, summary financial report (where applicable), the interim report, notice of meeting, listing document, circular and proxy form.