Shougang Concord International Enterprises Company Limited

Shareholders Communication Policy

(Adopted on 22 March 2012 and updated on 31 March 2014 and 11 July 2019)

SHAREHOLDERS COMMUNICATION POLICY

1. PURPOSE

This Policy aims to set out the provisions with the objective of ensuring that the shareholders of the Company (the "**Shareholders**"), 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 and governance), in order to enable Shareholders to exercise their rights in an informed manner, and to allow Shareholders to engage actively with the Company.

2. GENERAL POLICY

The board of directors of the Company (the "**Board**") shall maintain an on-going dialogue with Shareholders, and will regularly review this Policy to ensure its effectiveness.

Information shall be communicated to Shareholders mainly through the Company's financial reports (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 website of the Company.

Effective and timely dissemination of information to Shareholders shall be ensured at all times.

3. COMMUNICATION STRATEGIES

3.1 Shareholders' enquiries

3.1.1 Shareholders should direct their questions about their shareholdings to the Company's share registrars, Tricor Tengis Limited at Level 54, Hopewell Centre, 183 Queen's Road East, Hong Kong.

3.1.2 Shareholders may at any time make a request for the Company's information to the extent such information is publicly available.

3.1.3 Shareholders shall be provided with designated email addresses and enquiry lines of the Company in order to enable them to make any query in respect of the Company.

3.2 Corporate Communication*

3.2.1 The Company's annual report to Shareholders is a central means of communicating to Shareholders the Company's activities, operations and performance over the past financial year.

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

3.2.3 Shareholders are encouraged to provide their contact particulars, in particular, their email addresses to the Company in order to facilitate timely and effective communications.

3.3 Corporate Website

3.3.1 A dedicated Investor Relations section is available on the Company's website http://www.shougang-intl.com.hk. Information on the Company's website is updated on a regular basis.

3.3.2 Information released by the Company to SEHK is also posted on the websites of Hong Kong Exchanges and Clearing Limited ("HKEx") and the Company immediately thereafter. Such information includes financial statements, results announcements, circulars and notices of general meetings and associated explanatory documents etc.

3.3.3 All press releases issued by the Company or its subsidiaries will be made available on the Company's website.

3.4 Shareholders' Meetings

3.4.1 The annual general meeting and other general meetings of the Company are the primary forum for communication by the Company with the Shareholders and for shareholder participation.

3.4.2 The Company will place all notices of general meetings and accompanying explanatory material on the Company's website.

3.4.3 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.

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

3.4.5 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.

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

4. SHAREHOLDER PRIVACY

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

5. REVIEW OF THIS POLICY

This Policy is subject to regular review by the Board and will be amended (as appropriate) to reflect current best practice in communications with Shareholders.

* 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 directors' report and annual accounts together with a copy of the auditor's report, the interim report, a notice of meeting, a circular and a proxy form.