

ECI TECHNOLOGY HOLDINGS LIMITED

Shareholders' Communication Policy

1. Principles

The purpose of this policy is to set out the Company's strategies for maintaining continuous and open communication with its shareholders ("**Shareholders**") and the investment community at large and to reinforce the Company's commitment to promoting investor confidence by keeping the market fully informed at all times of material information about the Company and by ensuring that Shareholders and the investment community have simultaneous access to information relating to the Company's financial performance, strategic objectives and plans, material developments in our extra-low voltage solutions projects, corporate actions and governance issues.

2. General policy

- 2.1. The board of directors of the Company (the "**Board**") shall maintain an ongoing dialogue with Shareholders and the investment community and shall seek to establish a two-way relationship and communication between the Company and its Shareholders.
- 2.2. Information shall be communicated to Shareholders and the investment community principally through the following communication channels:-
 - (a) Company's publications such as financial reports (interim and annual financial reports), results announcements, corporate announcements, listing documents, circulars, and proxy forms ("**Corporate Communications**");
 - (b) the Company's website;
 - (c) annual general meetings and other general meetings; and
 - (d) investor /analyst briefings, media interviews, and marketing activities.
- 2.3. Effective, equal and timely dissemination of information to Shareholders and the investment community shall be ensured at all times and the effectiveness of the communication channels shall be reviewed on a regular basis.

3. Corporate Communications with Shareholders to be distributed electronically

3.1. Corporate Communications, including regulatory announcements, disclosures and notices of the Company, will be made available to Shareholders in accordance with the legal and regulatory requirements applicable to the Company to inform or act upon by holders of its securities. Corporate Communications will be written in plain language and in both English and Chinese or, where permitted, in a single language, in a timely manner as required by the Rules Governing the Listing of Securities on GEM on The Stock Exchange of Hong Kong Limited (the “**GEM Listing Rules**”) and to facilitate Shareholders' understanding.

3.2. In order to facilitate timely and effective communication and to contribute to environmental protection, the Company disseminates Corporate Communications by electronic means and has provided Shareholders with the option to receive printed copies of the Corporate Communications.

- **Shareholders' Meetings**

3.3. Shareholders are encouraged to attend the general meetings or, if they are unable to do so, to appoint proxies to attend and vote on their behalf at the meetings.

3.4. The Chairman will allow a reasonable amount of time at the general meetings for questions and comments from Shareholders. Appropriate arrangements will be made to encourage Shareholders' participation.

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

3.6. Members of the Board, appropriate senior management and external auditors will attend annual general meetings to answer questions from Shareholders.

- **Corporate Website**

3.7. The Company is committed to maintaining a corporate website containing general information about the Company and its business. The information on the Company's website will be updated on a regular basis.

3.8. Any information or documents of the Company published on The Stock Exchange of Hong Kong Limited's website will also be published on the Company's website (<http://www.ecinfohk.com>).

3.9. Other relevant corporate information about the Company's business developments, goals and strategies, and corporate governance will also be available on the Company's website.

- **Investment Market Communications**

3.10. Media interviews, marketing activities for investors and specialist industry forums etc. will be arranged from time to time to facilitate communication between the Company, the Shareholders and the investment community. Directors and employees of the Company who have contacts with investors, analysts or the media are made aware of the disclosure obligations and requirements set out in the Company's Employee Handbook.

3.11. Directors and employees of the Company who have contacts or dialogues with investors, analysts, the media or other interested parties outside the Company will only explain information that is already in the public domain or discuss in general the markets in which the Company operates and will avoid giving answers that could provide the receiving party with unpublished or potentially price-sensitive information.

- **Shareholders' Enquiries**

3.12. The Share Registrar of the Company

Shareholders should direct any queries relating to their shareholdings to the Company's Branch Registrar in Hong Kong, Tricor Investor Services Limited, at 17/F, Far East Finance Centre, 16 Harcourt Road, Hong Kong, or by email to 8013-ecom@hk.tricorglobal.com, which has been appointed by the Company to assist Shareholders with share registration and related matters.

3.13. Whistleblowing Policy

The Company established and implemented a mechanism for employees and others who deal with the Group to report any suspected misconduct or malpractice to the

Company through confidential reporting channels. The Company's Whistleblowing Policy sets out the channels and procedures available for anonymous reporting of irregularities.

Any report shall be made in person or in writing, either by email to **cs@ecinfohk.com** or by post to "The Board of Directors, ECI Technology Holdings Limited" at Factory D on 3/F of Block II of Camelpaint Buildings, Block I and Block II, No. 62 Hoi Yuen Road, Kowloon, Hong Kong, who will report to the Board. The Board shall then determine the course of action to be taken.

3.14. Shareholders' Privacy

The Company recognises that the protection of personal data is fundamental to maintaining the confidence of Shareholders. The Company is committed to protecting and safeguarding Shareholders' personal data in accordance with applicable data protection laws. Unless required to do so by law, the Company will not disclose Shareholders' information without their consent.

Shareholders may send their enquiries and concerns to the Board by addressing them to the following:

ECI Technology Holdings Limited
Factory D on 3/F of Block II of Camelpaint Buildings
Block I and Block II
No. 62 Hoi Yuen Road
Kowloon
Hong Kong
Email: cs@ecinfohk.com
Fax: 3101 0616