

WINNING TOWER GROUP

Communication Policy

Date of Policy: 30/06/2017

Issue Number: CGP-02

Approved By: Board of Directors

1. Introduction

We are aware that to maintain the trust and confidence of our Shareholders we must do our best to ensure that our Shareholders are properly informed of the performance of [Winning Tower Group Holdings Limited] (the “Group”), that there is clarity about the Group’s future direction and confidence about the stewardship of THE GROUP’S assets on behalf of its Shareholders. This policy sets out clearly the Group’s principle of maintaining an effective ongoing dialogue with Shareholders, and the different means of two-way communication between the Group and its Shareholders.

2. Means of Communication with Shareholders

A. Through General Meetings

The Group holds an Annual General Meeting (AGM) every year and encourages Shareholders’ participation.

A separate resolution is proposed by the chairman of the General Meeting for each substantially separate issue, and in particular on the Financial Statements and election or re-election of Directors.

The Group regards the AGM as an important event in the corporate year. All Directors and senior executives make a special effort to attend the AGM. The Chairman of the Board attends the AGM and arranges for the chairmen of all Board Committees to attend the AGM and answer questions. In the absence of a chairman of a Board Committee, members of the respective Board Committee, or failing them, the duly appointed delegates will attend the AGM and answer questions.

The chairman of the Independent Board Committee (if any) is available to answer questions at any General Meeting to approve a connected transaction or any other transaction that requires independent Shareholders’ approval.

Management ensures the external auditor attends the AGM to answer questions, if any, about the conduct of the audit, the preparation and content of the auditor’s report, the accounting policies and auditor independence.

Notices of the AGM and related papers are sent to Shareholders no less than 20 clear business days before the meeting. For any other meetings, they are sent to Shareholders no less than 10 clear business days before the meeting unless the business to be conducted at the meeting requires special notice. For general meetings where a Special Resolution is moved, a notice period of no less than 21 clear days will be given.

Proceedings at the AGM and its minutes are broadcast on the Group’s website as soon as practicable following the meeting.

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B. Through Company Reports and Announcements

(i) Financial Reporting

The Group aims to present a clear and balanced assessment of its financial position and prospects. Financial results are announced as early as possible, and audited financial statements are published within three months after the end of the financial year. Interim financial statements are published within two months after the end of the half-year period. Quarterly statements are issued to keep Shareholders informed of the performance and operations of the Group.

(ii) Social and Environmental Reporting

Our online Sustainability Reports aim to disclose our achievements and shortcomings in managing the social and environmental aspects of our business in a comprehensive, honest and accessible way. We shall continue to engage our stakeholders including shareholders openly and report honestly on our progress in those areas. We welcome constructive and critical feedback.

(iii) Announcements

To ensure that Shareholders are informed in a timely manner on the performance of the Group, we issue announcements of the Company's half-yearly and annual performance on both the Stock Exchange and the Group's websites.

The Group is aware of its obligations under the Listing Rules and the Securities and Futures Ordinance and the overriding principle that inside information should be announced immediately it is the subject of a decision. In this respect, the Group has published a set of Continuous Disclosure Obligation Procedures which formalize the current practices for monitoring developments in our businesses for potentially inside information and communicating such information to our Shareholders, the media and analysts. These Procedures are available on the Group's website.

C. Through the Group's Website

We make full use of the internet to make information widely available to our Shareholders. Our website captures a wide range of up-to-date shareholder information including, but not limited to, the followings:

- the Group's Corporate Governance Policy;
- the Group's Communication Policy;
- the Group's Whistleblowing Policy;
- the Group's Insider Information Policy;
- the Group's Reporting & Monitoring Policy;
- announcements made during the preceding five years;
- Terms of Reference of the Board of Directors Committees; and
- financial results during the preceding five years.

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We recognize that not all Shareholders and stakeholders have ready access to the internet. For those who do not, hard copies of the Group's website information listed above are available free of charge upon request to the Company Secretary.

3. Means of Getting Feedback from Shareholders

Our communication with Shareholders is not a monologue; it is a dialogue. The Group belongs to its Shareholders. They have the right to express their opinions and we have a duty to listen. This involved:

A. Face to face dialogue – including the “Shareholders’ Corner” at our AGM and investor meetings as described in 2D above.

B. Feedback forms sent out with our Annual Report – to obtain Shareholders’ views on the Report and on additional information that they would like to receive in the following year’s Annual Report, together with questions that they would like to have answered in the “Frequently Asked Questions” section of our website. We consider the feedback received and post answers on the website. We also send direct replies to Shareholders in response to the specific questions that they raise.

C. Comments and reports from analysts – we review research reports regarding the Group received from brokerage firms. Under normal circumstances, we make no comment on analyst’s financial projections or opinions. Where a research report contains inaccurate information, we will inform the analyst of the correct information if that information is already in the public domain and does not constitute inside information.

D. Shareholders’ hotline and e-mail contacts – any Shareholders who have questions or comments on what we are doing on his, her or their behalf, are most welcome to contact us at any time. Our contact details are:

Address: Unit 803, Riley House, 88 Lei Muk Road, Kwai Chung, N.T., Hong Kong

E-mail: info@winningtower.hk

Hotline: +852 3521 1515

E. Shareholder correspondence – our aim is to provide a substantive reply within seven days to written Shareholder queries. If those queries raise a matter of more general interest to Shareholders, we take this into account and seek to address this in subsequent corporate communications to all our Shareholders.

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4. Evolution

To ensure that this Policy continues to operate smoothly and effectively in practice, the Audit Committee will undertake regular reviews of this Policy having regard to the regulatory requirements and the expectations of our Shareholders and investors. Changes to this Policy will be posted on the Group's Website. Comments, questions or queries regarding this Policy may be addressed to the Company Secretary or by e-mail to info@winningtower.hk.