



**UPBEST GORUP LIMITED**

**美建集團有限公司\***

*(Incorporated in the Cayman Islands with limited liability)*

**(Stock Code: 335)**

**(the “Company”)**

**SHAREHOLDERS COMMUNICATION POLICY**

## **OBJECTIVE**

This Policy aims to set out the provisions to ensure that the shareholders of Upbest Group Limited (the “Company”) and its subsidiaries (collectively known as the “Group”), both individual and institutional (collectively, “Shareholders”), and in appropriate Circumstances, the general investors at large, are provided with comprehensive, equal and understandable information about the Company on a timely basis (including its financial performance, strategic goals and plans, material developments, governance and risk position), in order to enable Shareholders to exercise their rights in an informed manner, and also to allow Shareholders and the investors to strengthen the communication with the Company.

The investors include the Group’s potential investors as well as the analysts who report and analyse the Group’s performance.

## **POLICY**

The Board of Directors (the “Board”) persists to maintain an ongoing dialogue with Shareholders and the investors, and will regularly review this Policy to ensure its effectiveness and compliance with relevant regulatory requirements.

Information on the Group shall be communicated to Shareholders and the investment community mainly through the Group’s financial reports, circulars, 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”) and the Group’s Corporate Communications on the website of Hong Kong Exchanges and Clearing Limited (“HKEx”) and/or the Group’s website ([www.upbest.com](http://www.upbest.com)).

The Group will continuously ensure the effectiveness and timeliness of information disclosure to Shareholders and the investors. Any enquiries to this Policy shall be addressed to the Company Secretary.

## **COMMUNICATION WITH SHAREHOLDERS**

### **Shareholders’ meetings**

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

The Group encourages Shareholders to participate in shareholders' meetings physically or to appoint proxies to attend and vote at such meetings for and on their behalf if they are unable to attend.

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

Notices of general meetings and the accompanying papers are provided within a prescribed time prior to the meetings on the websites of the Group and HKEx, and by post to those Shareholders who have elected to receive a hard copy version of such communication.

Shareholders' meetings are held at a convenient location where the Board members and if required, Chairmen of Board Committees and representatives from the external auditors would attend and are available to answer questions from Shareholders.

### **Financial and other reporting**

The Group reports operating results on a semi-annual basis and produces interim and annual reports in accordance with the Rules Governing the Listing of Securities on the Stock Exchange and other applicable laws and regulations (the "Regulatory Requirements").

From time to time, the Group communicates other information to Shareholders by way of Group's announcement and/or circular, in compliance with the Regulatory Requirements or otherwise.

### **Corporate website**

The Group's website provides information on the Group and policies adopted by the Group from time to time, including Shareholders communication.

In addition to a dedicated "Investor Relations" section in which the annual reports, interim reports, announcements and circulars of the Group are posted as soon as practicable following their release to the Stock Exchange on the website of HKEx, relevant press releases and speeches are also made available on the Group's website to facilitate communication between the Group, Shareholders and the investment community.

Shareholders may, as a standing or an ad hoc instruction, elect to receive certain shareholder communication (such as notices of general meetings and accompanying papers, circulars, annual reports and interim reports) from the Group by post. In the absence of any such instructions, Shareholders will receive a notification letter informing them of the release of the documents on the websites of the Group and HKEx.

### **Investment market communication**

To facilitate communication between the Group, Shareholders and the investment community, results briefings and one-on-one meetings with analysts are arranged from time to time.

The Group's directors and employees who have contacts or dialogues with investors, analysts, media or other interested outside parties shall only explain information which was already published in the market, and shall avoid giving answers which may provide unpublished or potentially price sensitive information to the receiving party.

### **Shareholders' Enquiries**

Shareholders may, at any time, direct questions, request for publicly available information and provide comments and suggestions to Directors or management of the Group. Such questions, requests and comments can be addressed to the Company Secretary of the Company by mail to 2<sup>nd</sup> Floor, Wah Kit Commercial Centre, 300 Des Voeux Road Central, Hong Kong or by email to [info@upbest.com](mailto:info@upbest.com).

Shareholders should direct their questions about their shareholdings, share registration and related matters to the Company's registrar in Tricor Investor Services Limited by mail to 17/F, Far East Finance Centre, 16 Harcourt Road, Admiralty, Hong Kong or by email to [info@hk.tricorglobal.com](mailto:info@hk.tricorglobal.com).

### **SHAREHOLDERS' PRIVACY**

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

## **REVIEW OF THE POLICY**

This Policy is subject to regular review and update as may be necessary and appropriate by the Board to ensure its effectiveness in upholding high standards of communication with Shareholders and to reflect current best practice.

## **DISCLOSURE AND PUBLICATION OF POLICY**

This Policy is available on the Company's website for public information.

*In case of any inconsistency between the English version and the Chinese version, the English version shall prevail.*