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**Golden Wheel Tiandi Holdings Company Limited**

**Shareholders Communication Policy**

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## **I. OBJECTIVE**

Golden Wheel Tiandi Holdings Company Limited (the “**Company**”) is committed to enhancing long-term shareholder value through regular communication with its shareholders (the “**Shareholders**”), both individual and institutional.

To this end, the Company strives to ensure that all Shareholders have ready, equal and timely access to all publicly available information of the Company that is accurate, comprehensible and informative. This Policy sets out the framework in place to promote effective communication with Shareholders so as to enable them to engage actively with the Company and exercise their rights as shareholders in an informed manner.

## **II. COMMUNICATION WITH SHAREHOLDERS**

### **A. Shareholders Meetings**

The annual general meetings and other general meetings of the Company are the primary avenue for communication with Shareholders and for Shareholder participation. Shareholders meetings are held at a place and time convenient to Shareholders.

The Company encourages Shareholders to attend and participate in shareholders meetings physically and in the case of hybrid shareholders meetings, physically and online through designated platforms. Shareholders may also appoint proxies to attend and vote at such meetings for and on their behalf if they are unable to attend.

The format and process of shareholders meeting are regularly reviewed and where necessary, changes will be introduced as appropriate to accommodate the needs of Shareholders, enhance their meeting experience and increase their participation at general meetings.

Notices of general meetings and the accompanying papers are provided within a prescribed period of time prior to the meetings on the websites of the Company ([www.gwtd.com.hk](http://www.gwtd.com.hk)) and Hong Kong Exchanges and Clearing Limited (“**HKEx**”) ([www.hkexnews.hk](http://www.hkexnews.hk)). These documents are also posted to those Shareholders who have elected to receive a hard copy of such communication.

The Chairman of the board of directors of the Company (the “**Board**”), directors of the Company (the “**Directors**”) and representatives from the auditor would be available at annual general meetings to answer questions relevant to the business of the meetings. Chairmen of Board committees (or in their absence, members of the Board committees or failing them, the duly appointed delegates) would also be invited to attend annual general meetings and answer questions.

## **B. Corporate Communication (Including Financial and Other Reporting)**

The Company reports operating results on half yearly and annual basis and produces interim and annual reports in accordance with the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the “**Listing Rules**”) and other applicable laws and regulations.

Further, the Company communicates with Shareholders from time to time, by way of other corporate communications, including but not limited to announcements, circulars, notices and other regulatory disclosures in compliance with the applicable regulatory requirements.

Corporate communications are published in both Chinese and English. Shareholders may, as a standing or an ad hoc request, elect to receive corporate communications from the Company by post. In the absence of any such requests, Shareholders will receive a notification letter informing them of the release of the documents on the websites of the Company and HKEx.

## **C. Corporate Website**

The website of the Company ([www.gwtd.com.hk](http://www.gwtd.com.hk)) provides information on the Company, including communication to Shareholders. In addition, financial and other reports as well as announcements are available on the Company website.

Corporate communications are posted on the Company website as soon as practicable following their publication on the website of HKEx.

A dedicated Investor Relations section is available on the Company website. Information on the Company’s website is updated on a regular basis.

#### **D. Investment Community Engagement**

To facilitate communication between the Company, Shareholders and the investment community, press meetings and one-on-one meetings with analysts and investors are arranged from time to time.

Directors and employees of the Company who have contacts with investors, analysts and media are made aware of the disclosure obligations and requirements under applicable laws and regulations, including the Listing Rules.

### **III. COMMUNICATION WITH THE COMPANY**

In addition to Shareholders meetings as described in section IIA and engagement with the investment community as described in section IID where the Company maintains ongoing and regular dialogue with Shareholders and stakeholders, there are multiple avenues for Shareholders to communicate their views on matters affecting the Company and where the Company will solicit and get feedback from Shareholders.

#### **A. The Company Secretary and Investor Relations of the Company**

Shareholders, investors and analysts may, at any time, direct questions, request for publicly available information and provide comments and suggestions to the Board. Such questions, requests and comments can be addressed to the Company Secretary by mail to 27-28/F, Golden Wheel Plaza, 68 Electric Road, Tin Hau, Hong Kong or by email to IR@gwtd.com.hk.

#### **B. The Share Registrar of the Company**

Shareholders should direct any questions about their registered shareholdings by mail to the Hong Kong Share Registrar of the Company, Computershare Hong Kong Investor Services Limited, at Rooms 1712-1716, 17/F, Hopewell Centre, 183 Queen's Road East, Wanchai, Hong Kong or by email to hkinfo@computershare.com.hk, who has been appointed by the Company to assist Shareholders with share registration and related matters.

### **C. Whistleblowing**

The Company provides a mechanism for employees and those who deal with the group to report to the Company any suspected misconduct or malpractice through confidential reporting channels. The Whistleblowing Policy of the Company sets out the available channels and procedures for anonymous reporting of improprieties.

Every report shall be made in person or in writing either by email to the ir@gwtd.com.hk (accessed by the Company Secretary) or by post to “Company Secretary, Golden Wheel Tiandi Holdings Company Limited” at 27-28/F, Golden Wheel Plaza, 68 Electric Road, Tin Hau, Hong Kong who shall report to the Chairman of the Audit Committee. The Chairman of the Audit Committee shall then determine the course of action to pursue, with power to delegate, with respect to the report received.

## **IV. SHAREHOLDER PRIVACY**

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

## **V. PUBLICATION OF THE POLICY**

This Policy is available on the website of the Company. The Policy is reviewed and updated at least annually by the Board of the Company to ensure its effectiveness in upholding high standards of communication with Shareholders and to reflect current best practice.

If there is any inconsistency or conflict between the English and Chinese versions of this Policy, the English version shall prevail.

19 December 2022