

IMS Group Holdings Limited

英馬斯集團控股有限公司

(Incorporated in the Cayman Islands with limited liability)

(the “**Company**”)

(Stock Code: 8136)

SHAREHOLDERS COMMUNICATION POLICY

(Adopted on 22 December 2017)

1. PURPOSE

- 1.1 This policy aims to set out the provisions with the objective of providing shareholders of the Company (“**Shareholders**”) with information about the Company and enabling them to engage actively with the Company and exercise their rights as shareholders in an informed manner.

2. GENERAL POLICY

- 2.1 Information shall be communicated to Shareholders through the Company’s financial reports (interim reports and annual reports), annual general meetings and other general meetings that may be convened, as well as by making available all the (i) corporate communication documents including, but not limited to, copy of annual reports, interim reports, notices of meeting, circulars, proxy forms (“**Corporate Communications**”); (ii) other documents issued by the Company which are published on the website of the Growth Enterprise Market of The Stock Exchange of Hong Kong Limited (“**SEHK**”) for the information or action of holders of any of its securities, including announcements, monthly returns on movements in the Company’s securities for each month and next day disclosure returns; (iii) constitutional documents of the Company and its board committees; (iv) corporate information including list of directors of the Company (“**Directors**”); and (v) other corporate publications including the procedures for Shareholders to propose a person for election as a Director, on the Company website.
- 2.2 The Company shall ensure effective and timely dissemination of information to Shareholders at all times. Any question regarding this policy shall be directed to the company secretary of the Company or the board of Directors of the Company (“**Board**”).

3. COMMUNICATION STRATEGIES

Shareholders' Enquiries

- 3.1 Shareholders may at any time make a request for the Company's information to the extent such information is publicly available.
- 3.2 Shareholders shall be provided with designated contacts, email addresses and enquiry lines of the Company in order to enable them to make any query in respect of the Company.

Corporate Communications

- 3.3 Corporate Communications will be provided to Shareholders in plain language and in both English and Chinese versions to facilitate Shareholders' understanding.
- 3.4 Shareholders can elect to receive the Corporate Communications in the printed form or through electronic means and in the language(s) selected (either English or Chinese or both). They may change their election at any time by notifying the Company by post or by email.
- 3.5 Shareholders who have elected to receive the Corporate Communications by electronic means have the right to obtain printed copies of the Corporate Communications free of charge.

Corporate Website

- 3.6 An "Investor Relations" section is available on the Company website (www.ims512.com). Information on the Company website is updated on a regular basis.
- 3.7 Information released by the Company to SEHK is also posted on the Company website immediately thereafter. Such information includes financial statements, results announcements, announcements, circulars and notices of general meetings and associated explanatory documents, etc.

Shareholders' Meetings

- 3.8 Shareholders are encouraged to participate in general meetings or to appoint proxies to attend and vote at the general meetings for and on their behalf if they are unable to attend the general meetings.
- 3.9 Appropriate arrangements for the annual general meetings shall be in place to encourage Shareholders' participation.
- 3.10 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.

3.11 Board members (in particular, either the 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

4.1 The Company recognizes the importance of Shareholders' privacy and will not disclose Shareholders' information without their consent, unless required by the SEHK, the Securities and Futures Commission or applicable laws and regulations to do so.

Note: In case of discrepancies between the English version and Chinese version, the English version shall prevail.