

VIVA CHINA HOLDINGS LIMITED (the “Company”)

SHAREHOLDERS COMMUNICATION POLICY (the “Policy”)

1. Objective

- 1.1 The Company recognizes the importance of effective communication with its shareholders (the “Shareholders”). This Policy aims to set out the provisions with the objective of ensuring that Shareholders are provided with ready, equal and timely access to understandable information about the Company in order to enable Shareholders to exercise their rights in an informed manner.

2. General Policy

- 2.1 The board (the “Board”) of directors of the Company shall, through different means, maintain an on-going communication with Shareholders, and will review this Policy on annual basis to ensure its effectiveness.
- 2.2 Information shall be communicated to Shareholders mainly through:
- (i) the Company’s financial reports;
 - (ii) annual general meetings and other general meetings of the Company that may be convened;
 - (iii) all the disclosures posted on the website of The Stock Exchange of Hong Kong Limited (the “Stock Exchange”); and
 - (iv) the Company’s website.
- 2.3 Effective and timely dissemination of information to Shareholders shall be maintained at all times.

3. Communication Strategies

Shareholders’ enquiries

- 3.1 Shareholders should direct their questions about their shareholdings to the share registrar of the Company.
- 3.2 Shareholders should direct their questions about the Company to the channel provided on the website. The Company will assign dedicated personnel to handle daily enquiries from Shareholders.
- 3.3 Shareholders may at any time make a request for the Company’s information to the extent such information is publicly available.

Shareholders’ Meetings

- 3.4 Notice of Shareholders’ meeting encourages Shareholders’ participation in the meeting or the appointment of proxies to attend and vote at the meeting for and on their behalf in case they are unable to attend the meeting.

- 3.5 The general meetings of the Company will allow Shareholders a reasonable opportunity to ask questions on any relevant matters and provide a useful forum for Shareholders to exchange views with the Board.
- 3.6 Separate resolutions are proposed at general meetings for each substantial issue.
- 3.7 An explanation of the detailed procedures of conducting a poll will be provided to Shareholders at the commencement of the general meeting of the Company, to ensure that Shareholders are familiar with such procedures.
- 3.8 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 well served.
- 3.9 The Company will facilitate Shareholders' participation in general meetings and make available of the board committees, appropriate management executives and external professional parties (if any) at general meetings to answer questions from Shareholders.

Corporate Communication

- 3.10 Any document issued or to be issued by the Company for the information or action of holders of any of its securities ("Corporate Communication") will be provided to Shareholders in both English and Chinese versions to facilitate Shareholders' understanding. The Corporate Communication includes, but not limited to, the financial reports, a notice of meeting, a circular and a proxy form.

Corporate Website

- 3.11 An Investor Relations section is available on the Company's website, in which the information is updated on a regular basis.
- 3.12 The Corporate Communication released by the Company to the Stock Exchange is also thereafter posted on the Company's website.