

SMARTONE TELECOMMUNICATIONS HOLDINGS LIMITED
(“SmarTone” or “Company”)

SHAREHOLDERS COMMUNICATION POLICY

1. Purpose

- 1.1 This Policy aims to set out the provisions with the objective of ensuring that SmarTone’s shareholders, both individual and institutional (collectively, “Shareholders”), and, in appropriate circumstances, the investment community at large, are provided with ready, equal and timely access to balanced and understandable information about the Company (including its financial performance, strategic goals and plans, material developments, governance and risk profile), in order to enable Shareholders to exercise their rights in an informed manner, and to allow Shareholders and the investment community to engage actively with the Company.
- 1.2 For the purpose of this Policy, references to the investment community is intended to include the Company’s potential investors as well as analysts reporting and analysing the Company’s performance.

2. General Policy

- 2.1 The Board shall maintain an on-going dialogue with Shareholders and the investment community, and will regularly review this Policy to ensure its effectiveness.
- 2.2 Information shall be communicated to Shareholders and the investment community mainly through the Company’s financial reports (interim and annual reports), 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 (“SEHK”) and its corporate communications and other corporate publications on the websites of the Company.
- 2.3 Effective and timely dissemination of information to Shareholders and the investment community shall be ensured at all times. Any question regarding this Policy shall be directed to the Company Secretary or the head of Corporate Planning Department.

3. Communication Strategies

Shareholders’ enquiries

- 3.1 Shareholders should direct their questions about their shareholdings to the Company’s Share Registrar.

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

Corporate Communication

- 3.4 Corporate communication (referring to any document issued or to be issued by SmarTone for the information or action of holders of any of its securities, including, but not limited to, the directors' report and annual accounts together with a copy of the auditor's report, the interim report, a notice of meeting, a circular and a proxy form) will be provided to Shareholders in plain language and in both English and Chinese versions to facilitate Shareholders' understanding.

Corporate Website

- 3.5 A dedicated Investor Relations section is available on the SmarTone website www.smartoneholdings.com. Information on the SmarTone website is updated on a regular basis.
- 3.6 Information released by the Company to SEHK is also posted on the SmarTone website immediately thereafter. Such information includes financial statements, results announcements, circulars and notices of general meetings and associated explanatory documents etc.
- 3.7 Presentation materials provided in conjunction with the Company's results announcement each year will be made available on the SmarTone website as soon as practicable after their release.
- 3.8 Relevant press releases and publications etc issued by the Company or its subsidiaries will be made available on the SmarTone website.

Webcasts

- 3.9 Webcasts of the Company's interim and annual results briefings are available.

Shareholders' Meetings

- 3.10 Shareholders are encouraged to participate in general meetings or to appoint proxies to attend and vote at meetings for and on their behalf if they are unable to attend the meetings.

- 3.11 Appropriate arrangements for the annual general meetings shall be in place to encourage Shareholders' participation.
- 3.12 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.
- 3.13 Board members, in particular, either the chairmen or deputy chairmen of Board committees or their delegates, appropriate management executives and external auditors will attend annual general meetings to answer Shareholders' questions.

Investment Market Communications

- 3.14 Investor/analysts briefings and one-on-one meetings, roadshows (both domestic and international), media interviews, marketing activities for investors and specialist industry forums etc will be available on a regular basis in order to facilitate communication between the Company, Shareholders and the investment community.
- 3.15 SmarTone's Directors and employees who have contacts or dialogues with investors, analysts, media or other interested outside parties are required to comply with the obligations under relevant laws and regulations in respect of disclosure of price-sensitive information of the Company.

4. Shareholder Privacy

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

21 February 2012