

SHANGHAI INTERNATIONAL SHANGHAI GROWTH INVESTMENT LIMITED

(Incorporated in the Cayman Islands with limited liability)

(Stock Code: 770)

SHAREHOLDERS' COMMUNICATION POLICY

OBJECTIVE

Shanghai International Shanghai Growth Investment Limited (the "Company") is committed to enhancing long-term shareholder value through regular communication with its shareholders, both individual and institutional (the "Shareholders").

To this end, the Company strives to ensure that all Shareholders have ready and timely access to all publicly available information of the Company. The Company sets out in this Policy the framework that it has put in place to promote effective communication with Shareholders.

COMMUNICATION WITH SHAREHOLDERS

1. Shareholders' meetings

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

Notices of general meetings and relevant accompanying papers are provided within a prescribed time prior to the meetings on the websites of the Company (<http://shanghaigrowth.etnet.com.hk>) and Hong Kong Exchanges and Clearing Limited ("HKEX") (www.hkexnews.hk), 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 Company's Directors and representative from the auditor would be present and are available to answer questions from Shareholders.

2. Financial and other reportings

The Company reports operating results on a half yearly 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 ("SEHK") and other applicable laws and regulations (the "Regulatory Requirements"). From time to time, the Company communicates other information to Shareholders by way of Company announcement and/or circular, in compliance with Regulatory Requirements or otherwise.

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3. Corporate website

The Company's corporate website (<http://shanghaigrowth.etnet.com.hk>) provides information on the Company. In addition to corporate information, the Company's annual reports, interim reports, announcements and circulars are posted in respective dedicated sections in the Company's website as soon as practicable following their release to SEHK on the website of HKEX.

COMMUNICATION WITH THE COMPANY

Shareholders may direct questions, request for publicly available information and provide comments and suggestions to Directors or management of the Company. Such questions, requests and comments can be addressed to the Company Secretary of the Company by mail to Room 1501, 15/F, Shanghai Industrial Investment Building, 48-62 Hennessy Road, Wanchai, Hong Kong.

SHAREHOLDER PRIVACY

The Company recognizes the importance of Shareholders' privacy and will not disclose Shareholders' information without their consent unless required by law.

PUBLICATION OF POLICY

This Policy is available on the website of the Company.

The Chinese version of this document is for reference only. Should there be any discrepancies or inconsistencies between the English and the Chinese version, the English version shall prevail.