

Grace Wine Holdings Limited
怡園酒業控股有限公司
(the “Company”)

(Incorporated in the Cayman Islands with limited liability)

Stock Code: 8146

SHAREHOLDERS’ COMMUNICATION POLICY

Introduction

The Company believes that effective communication with shareholders of the Company (the “**Shareholders**”) is essential for enhancing investor relations and investors’ understanding of the Company’s business performance and strategies. The Company also recognises the importance of transparency and timely disclosure of corporate information, which enables Shareholders to engage actively with the Company, make the most informed investment decisions and exercise their rights in an informed manner.

Principle

The goal of our communication activities is to provide a true and fair view of the Company. As such, the Company has leveraged various channels and platforms to ensure timely release of important messages to enable meaningful dialogues and two-way communication engagement with the Shareholders.

The board of directors of the Company (the “**Board**”) is responsible for maintaining an on-going dialogue with Shareholders and particularly for communicating with them and encouraging their participation through annual general meetings or other general meetings.

General Policy

- The Company will assign dedicated employee(s) to be in charge of ensuring effective and timely dissemination of information to Shareholders.
- The Company will provide Shareholders with ready access to understandable information about the Company.
- The Company will take steps to solicit and understand the views of Shareholders and other stakeholders.
- The Company will facilitate Shareholders’ participation in annual general meetings and make available the chairmen of the board committees and advisory panel(s) (if any), appropriate management executives, auditors at annual general meetings to answer questions from Shareholders
- Shareholders may, at any time, direct questions, communicate their views on various matters affecting the Company, request for publicly available information and provide comments and suggestions to directors or management of the Company through the prescribed channel stated in the paragraph “Communication with the Company” below.

General Meetings

The annual general meetings and other general meetings of the Company provide the best opportunity for exchange of views between the Board and the Shareholders who can exercise their right to speak and discuss the business activities of the Company if they are relevant to the resolutions under consideration. The chairlady/ chairman of the Board will allow relevant debate and questioning.

- The chairlady/ chairman of the Board will attend the Company's annual general meeting in normal circumstances.
- The chairlady/ chairman of the Board will invite the chairperson of the committees to attend the annual general meeting. These persons will, in normal circumstances, be available to answer questions at the annual general meetings.
- The chairperson of the independent board committee or, in his absence, other member(s) of the independent board committee, is/are also available to answer questions at any general meeting for approval of a connected transaction or any other transaction that is subject to independent Shareholders' approval.
- The external auditor of the Company will be requested to attend the annual general meeting to answer questions about the conduct of the audit, the preparation and content of the auditor's report, the accounting policies and auditor independence.
- For each substantially separate issue at a general meeting, a separate resolution will be proposed by the chairperson of that meeting. The Company should avoid "bundling" resolutions unless they are interdependent and linked forming one significant proposal. Where the resolutions are "bundled", the Company should explain the reasons and material implications in the notice of meeting.
- The chairperson of every general meeting will invite the Shareholders to exercise their right to speak, and question and discuss the business activities of the Company if they are relevant to the resolutions under consideration.
- The notice for every general meeting to Shareholders will be sent in accordance with the requirements of the Company's memorandum of association and the articles of association.
- The chairperson of every general meeting will ensure that an explanation is provided of the detailed procedures for conducting a poll and answer any questions from Shareholders on voting by poll.

Corporate Communication*

- Corporate communications are provided to the Shareholders in plain language and in both English and Chinese versions.
- Shareholders may, as a standing or an ad-hoc instruction, elect to receive certain shareholders communication (such as notices of general meetings and accompanying papers, circulars, annual reports, interim reports and quarterly reports) from the Company by post or through electronic means. In the absence of any such instructions, if applicable, the Shareholders will receive a notification letter informing them of the release of the documents on the websites of the Company and GEM of The Stock Exchange of Hong Kong Limited.

** Corporate Communication refers to any document issued or to be issued by the Company for the information or action of holders of any of its securities, including, but not limited to, the annual report, interim report, notice of meeting, circular and proxy form.*

Corporate Website

The Company's website (www.gracewine.com.hk) is regularly updated.

- Information released by the Company to the GEM website and the HKEXnews website is also posted on the Company's website. Such information includes but is

not limited to financial statements, results announcements, circulars, notices of general meetings and associated explanatory documents.

- All presentation materials provided in conjunction with the Company's results announcement and other significant events will be made available on the Company's website under the "Investor Relations" section as soon as practicable after their release.

Communication with the Company

Shareholders may, at any time, direct questions, communicate their views on various matters affecting the Company, 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 by mail to Unit 705, 7/F, Westlands Centre, No. 20 Westlands Road, Hong Kong or by email to contact@gracewine.com.hk.

Shareholders should direct their questions about their shareholdings by mail to the Company's Hong Kong Share Registrar, Tricor Investor Services Limited at Level 54, Hopewell Centre, 183 Queen's Road East, Hong Kong or by telephone at (852) 2980-1333, who has been appointed by the Company to deal with Shareholders for share registration and related matters.

Shareholder Privacy

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

Review of this Policy

This Board will review this Policy on an annual basis to ensure its implementation and effectiveness and detail how it arrives at its conclusion in the Corporate Governance Report.

Publication of Policy

This Policy is available on the website of the Company.

Effective date: 1 January 2022

(If there is any inconsistency between the English version and the Chinese version, the English version shall prevail.)