SHAREHOLDERS’ COMMUNICATION POLICY
(the “Policy”)

First adoption date: 24 June 2016
Latest amendment effective date: 23 March 2022

1. PRINCIPLES

1.1 The Company is committed to providing shareholders of the Company (the “Shareholders”) and other stakeholders (including potential investors) with timely, clear, balanced and accurate information about the Company.

1.2 The board of directors (the “Board”) of the Company should be responsible for:

1.2.1 maintaining an on-going dialogue with the Shareholders and encouraging them to communicate actively with the Company; and

1.2.2 establishing this Policy and reviewing it on a regular (not less than an annual) basis to ensure its implementation and effectiveness.

2. PURPOSE

2.1 The Policy aims to:

2.1.1 promote effective communication between (a) the Company; and (b) the Shareholders and other stakeholders; and

2.1.2 enable the Shareholders to exercise their rights as shareholders effectively in an informed manner.
3. SOURCES OF COMMUNICATION

3.1 Corporate Communications

3.1.1 “Corporate Communication” as defined under the Rules Governing the Listing of Securities of The Stock Exchange of Hong Kong Limited (the “Stock Exchange”) (the “Listing Rules”) refers to any document issued or to be issued by the Company for the information or action of holders of any of its securities or the investing public, including but not limited to the following documents of the Company:

a. directors’ report, annual accounts together with a copy of the auditors’ report and, where applicable, summary financial report;

b. the interim report and, where applicable, its summary interim report;

c. notice of meeting;

d. listing document;

e. circular; and

f. proxy form.

3.1.2 Corporate Communications of the Company will be published under the “Investors” section of the Company’s website (www.vincentmedical.com) and on the Stock Exchange’s website (www.hkexnews.hk) in a timely manner as required by the Listing Rules.

3.1.3 Corporate Communications will be provided to the Shareholders and the non-registered holders of the Company’s securities in plain language and in both English and Chinese versions or where permitted, in a single language, in a timely manner as required by the Listing Rules.

3.2 Announcements and Other Documents pursuant to the Listing Rules

The Company will publish announcements (on inside information, corporate actions and transactions etc.) and other documents (e.g. Memorandum and Articles of Association) on the Stock Exchange’s website in a timely manner in accordance with the Listing Rules.
3.3 Corporate Website

3.3.1 The Company’s website (www.vincentmedical.com) provides information on the Company.

3.3.2 In addition to a dedicated “Investors” section in which the Corporate Communications, announcements and other documents of the Company required to be published in accordance with the Listing Rules are posted on the Company’s website as soon as practicable following their release on the Stock Exchange’s website (www.hkexnews.hk), other relevant information about the Company such as the Company’s business development, corporate governance and press releases will also be made available on the Company’s website to facilitate communication between the Company, the Shareholders and the other stakeholders.

3.4 Shareholders’ Meetings

3.4.1 The annual general meeting and other general meetings of the Company are the primary forum for communication between the Company and the Shareholders.

3.4.2 The Company will provide the Shareholders with the relevant information on the resolution(s) proposed at a general meeting in a timely manner in accordance with the Listing Rules. The information provided will be reasonably necessary to enable the Shareholders to make an informed decision on the proposed resolution(s).

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

3.4.4 The process of the general meetings will be monitored and reviewed on a regular basis, and, if necessary, changes will be made to ensure that Shareholders’ needs are best served.

Where appropriate or required, the Chairman of the Board and other Board members, the chairmen of board committees or their delegates, and the external auditors should attend general meetings of the Company to answer Shareholders’ questions (if any). The Company’s management should ensure the external auditor attend the annual general meeting to answer questions about the conduct of the audit, the preparation and content of the auditors’ report, the accounting policies and auditor independence.
3.5 Shareholders’ Enquiries

3.5.1 Shareholders may at any time make a request for the Company’s information to the extent such information is publicly available.

3.5.2 Enquiries about Shareholdings: Shareholders should direct their enquiries about their shareholdings to the Company’s Hong Kong Branch Share Registrar and Transfer Office, Tricor Investor Services Limited, via its online holding enquiry service at www.tricoris.com, or send email to is-enquiries@hk.tricorglobal.com or call its hotline at (852) 2980 1333, or go in person to its public counter at Level 54, Hopewell Centre, 183 Queen’s Road East, Hong Kong (from 9:00am to 5:00pm, Monday to Friday (excluding Hong Kong public holidays)).

3.5.3 Enquiries about Corporate Governance or Other Matters to be put to the Board and the Company: The Company will not normally deal with verbal or anonymous enquiries. Shareholders may send written enquiries to the Company, for the attention of Company Secretary, by email: investors@vincentmedical.com, by fax: (852) 2155 8298, or mail: Units 1604-07A, 16/F, Two Harbourfront, 22 Tak Fung Street, Hung Hom, Kowloon, Hong Kong.

Note: Shareholders’ information may be disclosed as required by law.

3.6 Other Investor Relations Communication Platforms

Investor/analysts briefings, roadshows (both domestic and international), media interviews, marketing activities for investors and specialist industry forums etc. will be launched on an as-required basis.

4. SHAREHOLDERS’ PRIVACY

The Company recognises the importance of Shareholders’ privacy and will not disclose any Shareholders’ information without their consents unless required by law.

Note: If there is any inconsistency between the English and Chinese versions of this document, the English version shall prevail.