

SPROCOMM INTELLIGENCE LIMITED
(THE “COMPANY”)

SHAREHOLDERS COMMUNICATION POLICY
(THE “POLICY”)

1. PURPOSE

1.1 This Policy aims to set out the provisions with the objective of providing shareholders of the Company (“**Shareholders**”) with information about the Company and enabling them to engage actively with the Company and exercise their rights as shareholders in an informed manner.

2. GENERAL POLICY

2.1 Information shall be communicated to Shareholders through the Company’s financial reports (interim reports and annual reports), annual general meetings and other general meetings that may be convened, as well as by making available all the (i) corporate communication documents including, but not limited to, copy of annual reports, interim reports, notices of meeting, circulars, proxy forms (“**Corporate Communication**”); (ii) other documents issued by the Company which are published on the website of the Main Board of the Stock Exchange of Hong Kong Limited (“**SEHK**”) for the information or action of holders of any of its securities, including announcements, monthly returns on movements in the Company’s securities for each month and next day disclosure returns; (iii) constitutional documents of the Company and board committees; (iv) corporate information including list of directors of the Company (“**Directors**”); and (v) other corporate publications including the procedures Shareholders can use to propose a person for election as a Director on the Company’s website.

2.2 Effective and timely dissemination of information to Shareholders shall be ensured at all times. Any question regarding this Policy shall be directed to the company secretary of the Company or the board of Directors of the Company (“**Board**”).

3. COMMUNICATION STRATEGIES

Shareholders’ Enquiries

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

3.2 Shareholders shall be provided with designated contacts, email addresses and enquiry lines of the Company in order to enable them to make any query in respect of the Company.

Corporate Communication

3.3 Corporate Communication will be provided to Shareholders in plain language and in both English and Chinese versions to facilitate Shareholders' understanding.

Corporate Website

3.4 An "Investor Relations" section is available on the Company website (www.sprocomm.com). Information on the Company website is updated on a regular basis.

3.5 Information released by the Company to SEHK is also posted on the Company website immediately thereafter. Such information includes financial statements, results announcements, circulars and notices of general meetings and associated explanatory documents, etc.

Shareholders' Meetings

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

3.7 Appropriate arrangements for the annual general meetings shall be in place to encourage Shareholders' participation.

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 best served.

3.9 Board members, in particular, either the chairmen of Board committees or their delegates, appropriate management executives and external auditors will attend annual general meetings to answer Shareholders' questions.

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.

12 November 2019

NOTE: This document has been translated into Chinese. In case of discrepancies between the English version and Chinese versions, the English version shall prevail.