

Wing Lee Development Construction Holdings Limited

榮利營造控股有限公司

(Incorporated in the Cayman Islands with limited liability)

(Stock code: 9639)

SHAREHOLDERS COMMUNICATION POLICY

OBJECTIVE

Wing Lee Development Construction Holdings Limited 榮利營造控股有限公司 (the “**Company**”) is committed to enhancing long-term shareholder value through regular communication with its shareholders (the “**Shareholders**”), both individual and institutional, and in appropriate circumstances the general investing public. For the purpose of this Policy, “general investing public” include prospective investors of the Company and analysts who analyse and prepare reports with reference to the Company’s performance.

To this end, the Company strives to ensure that all Shareholders and the general investing public (where appropriate) have ready, equal and timely access to all publicly available information of the Company that is accurate, comprehensible and informative. This Policy sets out the framework in place to promote effective communication with Shareholders so as to enable them to engage actively with the Company and exercise their rights as shareholders in an informed manner.

COMMUNICATION WITH SHAREHOLDERS

1. Shareholders Meetings

The annual general meetings and other general meetings of the Company are the primary avenue for communication with Shareholders and for Shareholder participation. Shareholders meetings are held at a place and time convenient to Shareholders.

The Company encourages Shareholders to attend and participate in shareholders meetings physically and in the case of hybrid shareholders meetings, physically and online through designated platforms. Shareholders may also appoint proxies to attend and vote at such meetings for and on their behalf if they are unable to attend.

The format and process of shareholders meeting are regularly reviewed and where necessary, changes will be introduced as appropriate to accommodate the needs of Shareholders, enhance their meeting experience and increase their participation at general meetings.

Notices of general meetings and the accompanying papers are provided within a prescribed period of time prior to the meetings on the websites of the Company (www.winglee.com.hk) and Hong Kong Exchanges and Clearing Limited (“HKEx”) (www.hkexnews.hk). These documents are also posted to those Shareholders who have elected to receive a hard copy of such communication.

The Chairman of the board of directors (the “**Board**”) of the Company, Directors and representatives from the external auditor would be available at annual general meetings to answer questions relevant to the business of the meetings. Chairman of Board committees (or in their absence, members of the Board committees or failing them, the duly appointed delegates) would also be invited to attend annual general meetings and answer questions.

2. Corporate Communication (Including Financial and Other Reporting)

The Company reports operating results on half yearly and annual 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 and other applicable laws and regulations.

The annual report encompasses, among others, company information, business highlights and operations review of the Group, the corporate governance report which contains discussions on the corporate governance practices and sustainability topics relevant to the businesses of the Group, as well as the consolidated financial statements of the Group.

Further, the Company communicates with Shareholders from time to time, by way of other corporate communications, including but not limited to announcements, circulars, notices and other regulatory disclosures in compliance with the applicable regulatory requirements.

Corporate communications are published in both Chinese and English. Shareholders may, as a standing or an ad hoc request, elect to receive corporate communications from the Company by post. In the absence of any such requests, Shareholders will receive a notification letter informing them of the release of the documents on the websites of the Company and HKEx.

3. Company’s Website

The website of the Company (www.winglee.com.hk) provides information on the Company, including communication to Shareholders. In addition, financial and other reports as well as announcements are available on the Company website.

Corporate communications are posted on the Company's website as soon as practicable following their publication on the website of HKEx.

A dedicated Corporate Governance section is available on the Company's website. The Corporate Governance Report and the corporate governance policies and practices are available and updated on a regular basis including:

- Anti-Corruption Policy
- Independence Policy
- Shareholder Communication Policy
- Whistleblowing Policy

A wide range of Shareholder information is also available on the Company website.

4. Investment Community Engagement

To facilitate communication between the Company, Shareholders and the general investing public, press meetings, road shows and one-on-one meetings with analysts and investors are arranged from time to time. After every financial result is published, result briefings and press meetings with analysts are also arranged to maintain ongoing and effective communication.

COMMUNICATION WITH THE COMPANY

In addition to Shareholders meetings and engagement with the general investing public as described above where the Company maintains ongoing and regular dialogue with Shareholders and stakeholders, there are multiple avenues for Shareholders to communicate their views on matters affecting the Company and where the Company will solicit and get feedback from Shareholders.

1. The Company Secretary and Investor Relations of the Company

Shareholders may, at any time, 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 by mail to Room A6, 16th Floor, TML Tower, No. 3 Hoi Shing Road, Tsuen Wan, Hong Kong or by email to contact@winglee.com.hk.

Institutional investors and analysts can contact the Group Investor Relations of the Company by mail to Room A6, 16th Floor, TML Tower, No. 3 Hoi Shing Road, Tsuen Wan, Hong Kong or by email to contact@winglee.com.hk.

2. The Share Registrar of the Company

Shareholders should direct any questions about their registered shareholdings by mail to the Hong Kong Branch Share Registrar and Transfer Office of the Company, Tricor Investor Services Limited, at 17/F, Far East Finance Centre, 16 Harcourt Road, Hong Kong, who has been appointed by the Company to assist Shareholders with share registration and related matters.

3. Whistleblowing

The Company provides a mechanism for employees and those who deal with the group to report to the Company any suspected misconduct or malpractice through confidential reporting channels. The Whistleblowing Policy of the Company sets out the available channels and procedures for anonymous reporting of improprieties.

Every report shall be made in writing by post to Room A6, 16th Floor, TML Tower, No. 3 Hoi Shing Road, Tsuen Wan, Hong Kong, for the attention of the Chairman of the Board or the Chairman of the audit committee of the Company (the “**Audit Committee**”). The Chairman of the Board or the Chairman of the Audit Committee shall then review the report, determine the course of action to pursue, with power to delegate, with respect to the report.

SHAREHOLDER PRIVACY

The Company recognises that the protection of personal data is fundamental to preserving the trust of Shareholders. The Company is committed to safeguarding and protecting their personal data in compliance with applicable data protection laws. Unless required to do so by law, the Company will not disclose Shareholders’ information without their consent.

LANGUAGE

This Policy is available in the English and Chinese language. In case of inconsistency, the English version shall prevail.

PUBLICATION OF THE POLICY

This Policy is available on the website of the Company. The Policy is reviewed and updated at least annually by the Board to ensure its effectiveness in upholding high standards of communication with Shareholders and to reflect current best practice.

8 October 2024