

Ocean One Holding Ltd.

大洋環球控股有限公司

(the “Company”)

(Incorporated in the Cayman Islands with limited liability)

(Stock Code: 8476)

SHAREHOLDERS’ COMMUNICATION POLICY (the “Policy”)

*(Adopted by the Company at a meeting of
the board of directors of the Company on 21 September 2017)*

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 Shareholders and encouraging them to communicate actively with the Company; and
 - 1.2.2 establishing this Policy and reviewing it on a regular basis to ensure its 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 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 on Growth Enterprise Market (“GEM”) of The Stock Exchange of Hong Kong Limited (the “Stock Exchange”) (the “GEM 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 half-year report and, where applicable, its summary half-year report;

- c. the quarterly report;
- d. notice of meeting;
- e. listing document;
- f. circular; and
- g. proxy form.

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

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

3.3 Corporate Website

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

3.3.2 In addition to a dedicated “Investor Relations” section in which the Corporate Communications of the Company 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, Shareholders and 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 GEM Listing Rules. The information provided will be reasonably necessary to enable 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 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.
- 3.4.5 Notices of general meetings and the accompanying papers will be provided within a prescribed time prior to the meetings under the "Investor Relations" section of the Company's website (www.oceanoneholding.com) and on the Stock Exchange's website (www.hkexnews.hk).

3.5 Shareholders' Enquiries

- 3.5.1 Enquiries about Shareholdings: Shareholders should direct their enquiries about their shareholdings to the Company's branch share registrar, 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 22, Hopewell Centre, 183 Queen's Road East, Hong Kong.
- 3.5.2 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: raymond@shtcpa.com, by fax: (852) 2149 5277, or mail: Unit B, 5/F, Goodwill Industrial Building, 36 – 44 Pak Tin Par Street, Tsuen Wan, 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 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.