



TOM Group Limited

Shareholders Communication Policy



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I. OBJECTIVE

TOM Group Limited (the “Company”) is committed to enhancing long-term shareholder value through regular communication with its shareholders (the “Shareholders”), both individual and institutional.

To this end, the Company strives to ensure that all Shareholders 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.

II. COMMUNICATION WITH SHAREHOLDERS

A. 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.tomgroup.com) 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.

Director(s) of the Company and representatives from the auditor would be available at annual general meetings to answer questions relevant to the business of the meetings. Chairmen 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.

B. 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. The Company also issues a standalone sustainability report which elaborates how the group engages with stakeholders and addresses sustainability concerns of its stakeholders.

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, and are posted on the websites of the Company and HKEx. Shareholders may request to receive corporate communications in printed form. Details of the relevant arrangements for the electronic dissemination of corporate communications of the Company, including the arrangements by which shareholders can request for printed copy, are available on the website of the Company.

C. Corporate Website

The website of the Company (www.tomgroup.com) 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 website as soon as practicable following their publication on the website of HKEx.

A dedicated Sustainability section is available on the Company website. The Sustainability Report and the corporate governance and sustainability policies are available and updated on a regular basis including:

- Anti-Fraud and Anti-Bribery Policy
- Biodiversity Policy
- Board Diversity Policy
- Code of Conduct
- Corporate Communications Policy
- Director Nomination Policy
- Environmental Policy
- Health and Safety Policy

- Human Rights Policy
- Information Security Policy
- Modern Slavery and Human Trafficking Statement
- Policy on Appointment of Third Party Representatives
- Policy on Personal Data Governance
- Policy on Securities Dealings and Handling of Confidential and Price-Sensitive Inside Information
- Shareholders Communication Policy
- Supplier Code of Conduct
- Sustainability Policy
- Whistleblowing Policy

A wide range of Shareholder information is also available on the Company website including stock information and press release.

D. Investment Community Engagement

To facilitate communication between the Company, Shareholders and the investment community, requests from analysts on results briefings and one-on-one meetings can be addressed to the Group Corporate Communications & Investor Relations Department (ir@tomgroup.com).

Directors and employees of the Company who have contacts with investors, analysts and media are made aware of the disclosure obligations and requirements under the Policy on Securities Dealings and Handling of Confidential and Price-sensitive Inside Information of the Company.

III. COMMUNICATION WITH THE COMPANY

In addition to Shareholders meetings as described in section IIA and engagement with the investment community as described in section IID 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.

A. The 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 Group Corporate Communications & Investor Relations Department or the Company Secretary of the Company by mail to Rooms 1601-05, 16/F, China Resources Building, 26 Harbour Road, Wanchai, Hong Kong or by email to ir@tomgroup.com.

B. The Share Registrar of the Company

Shareholders should direct any questions about their registered shareholdings by mail to the Hong Kong Share Registrar of the Company, Computershare Hong Kong Investor Services Limited, at Rooms 1712-1716, 17/F, Hopewell Centre, 183 Queen's Road East, Hong Kong or through the website: www.computershare.com/hk/contact, who has been appointed by the Company to assist Shareholders with share registration and related matters.

C. 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 person or in writing either by email to hotline@tomgroup.com (accessed by the Head of Group Management Services Department of the Company) or by post to "Head of Group Management Services Department, TOM Group Limited" at Rooms 1601-05, 16/F, China Resources Building, 26 Harbour Road, Wanchai, Hong Kong who shall report to the Chairman of the Audit Committee. The Chairman of the Audit Committee shall then determine the course of action to pursue, with power to delegate, with respect to the report received.

IV. 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.

V. 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 of the Company to ensure its effectiveness in upholding high standards of communication with Shareholders and to reflect current best practice.

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

First adopted October 2021
First update: December 2022
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