

HKBN LTD.
(Incorporated in the Cayman Islands with limited liability)
(the *Company*)

SHAREHOLDERS COMMUNICATION POLICY

1. PURPOSE

1.1 Following the listing of HKBN Ltd. (the *Company*) on The Stock Exchange of Hong Kong Limited (the *Stock Exchange*), the Company and its subsidiaries (together, the *Group*) must comply with the provisions set out in this Policy on communication with the Company's shareholders, both individual and institutional (collectively, *Shareholders*).

1.2 This Policy aims to set out the provisions with the objective of ensuring that the Shareholders, and, in appropriate circumstances, the investment community at large, are provided with ready, equal and timely access to balanced and understandable information about the Company (including its financial performance, strategic goals and plans, material developments, governance and risk profile), in order to enable Shareholders to exercise their rights in an informed manner, and to allow Shareholders and the investment community to engage actively with the Company.

1.3 For the purpose of this Policy, references to the investment community are intended to include the Company's potential investors as well as analysts reporting and analysing the Company's performance.

2. GENERAL POLICY

2.1 The Board shall maintain an on-going dialogue with Shareholders and the investment community, and will regularly review this Policy to ensure its effectiveness.

2.2 Information shall be communicated to Shareholders and the investment community mainly through the Company's financial reports, annual general meetings and other general meetings that may be convened, as well as by making available all the disclosures submitted to the Stock Exchange and its corporate communications and other corporate publications on the Company's website.

2.3 Effective and timely dissemination of information to Shareholders and the investment community shall be ensured at all times. Any question regarding this Policy shall be directed to the Company Secretary.

3. COMMUNICATION STRATEGIES

Shareholders' enquiries

3.1 Shareholders should direct their questions about their shareholdings to the Company's share registrar.

3.2 Shareholders and the investment community may at any time make a request for the Company's information to the extent such information is publicly available.

3.3 Shareholders and the investment community 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 Communications

3.4 *Corporate Communications* means any document issued or to be issued by the Company for the information or action of holders of any of its securities, including, but not limited to, the directors' report and annual accounts together with a copy of the auditor's report, the interim report, notices of meetings, circulars and proxy forms.

3.5 Corporate Communications will be provided to Shareholders in plain language and in both English and Chinese versions to facilitate Shareholders' understanding. Shareholders have the right to choose the language (either English or Chinese) or means of receipt of the Corporate Communications (in hard copy or through electronic means).

3.6 Shareholders are encouraged to provide, amongst other things, in particular, their email addresses to the Company in order to facilitate timely and effective communications.

Corporate Website

3.7 A dedicated investor relations section is available on the Company's website <http://www.hkbnltd.net>. Information on the Company's website is updated on a regular basis and will be provided in English and, to the extent that the Listing Rules require it to be translated, in Chinese.

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

3.9 All presentation materials provided in conjunction with the Company's annual general meeting and the press conference following the Company's financial results announcement each year will be made available on the Company's website as soon as practicable after their release.

3.10 Press releases, newsletters, market consultations, submissions and tender notices, etc. issued by the Company or its subsidiaries will be made available on the Company's website where the Company considers these to be material or relevant to Shareholders.

Shareholders' Meetings

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

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

3.13 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.

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

3.15 Shareholders are encouraged to attend shareholders' activities organised by the Company, where information about the Company, including its latest strategic plan, products and services, etc. will be communicated.

Investment Market Communications

3.16 Investor/analysts briefings and one-on-one meetings, roadshows (both domestic and international), media interviews, marketing activities for investors and specialist industry forums, etc. will be available on a regular basis in order to facilitate communication between the Company, Shareholders and the investment community.

3.17 The Company's Directors and employees who have contacts or dialogues with investors, analysts, media or other interested outside parties are required to comply with the disclosure obligations and requirements under the Company's Disclosure of Inside Information Policy.

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.

Hong Kong, 11 March 2015