

Sunny Optical Technology (Group) Company Limited
(舜宇光學科技(集團)有限公司)
(the “Company”)

SHAREHOLDERS COMMUNICATION POLICY
(“Policy”)

1. PURPOSE

- 1.1 To promote effective communication with the shareholders or other stakeholders of the Company (collectively, the "**Shareholders**"), the Company adopts this Policy with the objectives (i) to provide timely, clear and reliable information about the Company and its subsidiaries (collectively, the "**Group**") to the Shareholders and the investment community at large, which allow them to make informed decisions and assessment of the performance, position and prospect of the Group; and (ii) to communicate the views of the Shareholders to the Company in assistance of the Company's development of appropriate strategies and measures that are in line with the interests of all Shareholders.

2. GENERAL POLICY AND PRINCIPLES OF COMMUNICATION

- 2.1 The board of directors of the Company (the "**Board**") shall be responsible for maintaining effective communication with the Shareholders and shall regularly review this Policy to ensure its effectiveness.
- 2.2 The investor relations department of the Company is a regular business organization and is responsible for the compilation of the content and manner of all communication with the Shareholders as well as for the preparation, keeping records, collection and maintenance of the relevant Shareholders' communication documents.
- 2.3 The Company supports open communication with the Shareholders of the Company in accordance with the provisions of the Rules Governing the Listing of Securities (the "**Listing Rules**") on the Stock Exchange of Hong Kong Limited (the "**Stock Exchange**") and other applicable laws, regulations and rules to ensure the legitimate rights and interests of the Shareholders and the Group shall be safeguarded. No Shareholder shall, by its controlling rights, take any actions that may prejudice to the legitimate rights and interests of the Company and the Shareholders.
- 2.4 The Company provides the Shareholders with equal access to information relating to the Group (including information on any major new developments in the Group or its business) and information with potential effect on the price or value of the Company's securities and is committed to provide such information in a consistent and timely manner to prevent any person from obtaining benefits, conducting insider trading or committing market manipulation by misusing such information.
- 2.5 The Company recognizes the importance of privacy of the Shareholders and will not disclose information of any Shareholders without their consent, unless such disclosure is required by law or orders of courts with competent jurisdiction.

3. CORPORATE COMMUNICATION

Corporate Communications will be provided to Shareholders in plain language and in both English and Chinese versions to facilitate Shareholders' understanding. Shareholders may change their choice of language (either English and/or Chinese) or means of receipt of the corporate communications (in hard copy or through electronic means).

4. COMMUNICATION CHANNELS

4.1 General Meetings

4.1.1 The Company holds general meetings which offer a valuable forum for Shareholders to have dialogues and interaction with the management of the Company. Shareholders are encouraged to participate in general meetings or to appoint proxies to attend and vote at general meetings for and on their behalfs if they are unable to attend the general meetings. Among them, the Company holds an annual general meeting once a year and dispatches the general meeting circular and other information to the Shareholders prior to the meeting.

4.1.2 The Company shall submit matters to be approved at the general meetings for the Shareholders' approval by way of poll. The Company shall explain the procedures of voting in details before voting so as to ensure that each Shareholder understands the relevant arrangements. The Board members, chairmen or members of the respective committees of the Board, and external auditor of the Company and such other persons as the Board deems appropriate shall attend the general meetings of the Company to answer Shareholders' questions. The poll results of the general meetings will be published on the websites of HKEXnews of the Hong Kong Stock Exchange (<https://www.hkexnews.hk>) and the Company (<https://www.sunnyoptical.com>).

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

4.2 Corporate Website

The Company maintains a Company's website: <https://www.sunnyoptical.com> which contains announcements, annual reports, interim reports, general meeting circulars, the Company's presentation materials, its latest business developments and general information of the Company and such other corporate communication documents issued by the Company in accordance with applicable laws and regulations (including the Listing Rules). Information on the Company's website is updated on a regular basis and information released by the Company to the Stock Exchange is also posted on the Company's website immediately thereafter. To be environmentally friendly, Shareholders are encouraged to access the relevant information on the Company's website.

4.3 Investment Market Communication

4.3.1 Performance presentations of the annual and interim results, investors/analysts' meetings, roadshows (both domestic and international), 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.

4.3.2 The directors and employees of the Company who have contacts with investors, analysts or other interested third parties are required to comply with the disclosure obligations and requirements under the relevant laws and regulations.

4.4 Shareholders' Enquiry

The Company has established an investor relations department to respond to enquiries from the Shareholders. Should Shareholders have any questions or would like to request for information to the extent such information is publicly available, they may consult the investor relations department (iroffice@sunnyoptical.com) during office hours.

5. **SHAREHOLDER PRIVACY**

The Company recognises the importance of Shareholders' privacy and will not disclose Shareholders' information without their consent, unless otherwise required by law.

6. **SUPPLEMENTARY PROVISIONS**

6.1 Matters not covered in this Policy shall be dealt with in accordance with the relevant laws and regulations (including the Listing Rules).

6.2 The Board shall have the right to interpret and revise this Policy from time to time.

6.3 This Policy shall be effective from 28 December 2021 pursuant to the resolutions of the Board.

**Sunny Optical Technology (Group)
Company Limited**
28 December 2021

* According to the Listing Rules, Corporate Communication 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 directors' report, its annual accounts together with a copy of the auditor's report and, where applicable, its summary financial report, the interim report and, where applicable, its summary interim report, a notice of meeting, a listing document, a circular a proxy form.