

ZG Group
(找钢产业互联集团)
(Incorporated in the Cayman Islands with limited liability)
(Stock Code: 6676)
(Warrant Code: 2572)
(the “Company”)

SHAREHOLDERS COMMUNICATION POLICY

Chapter I General Provisions

Article 1 ZG Group (the “**Company**”) has formulated this policy in accordance with the Cayman Companies Act, the Corporate Governance Code contained in Appendix C1 to the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the “**Hong Kong Listing Rules**”), the twelfth amended and restated memorandum and articles of association (the “**Memorandum and Articles of Association**”) and other laws, regulations, regulatory documents and supervision requirements.

Article 2 The Company follows the basic principles of fair disclosure of information to the Company’s shareholders (the “**Shareholders**”) and frank communication with Shareholders. The provisions contained in this policy are intended to ensure that the Shareholders and, where appropriate, the general investing public, have timely access to comprehensive, identical and understandable information about the Company (including its financial performance, strategic objectives and plans, significant developments, governance and risk profile), so that Shareholders can exercise their rights in an informed manner on the one hand, and to enhance communication between Shareholders and investing public and the Company on the other. For the purposes of this policy, the term “investors” includes prospective investors in the Company and analysts who report and analyze the performance of the Company.

Article 3 The Company’s board of directors (the “**Board**”) is responsible for maintaining ongoing communication with Shareholders and regularly reviewing the Shareholder Communication Policy to ensure its effectiveness.

Article 4 The Company maintains a policy of open communication and communicates information to Shareholders and investors through a variety of channels: the Company’s financial reports (interim and annual reports), information and notices of annual general meetings and other extraordinary general meetings that may be held, other disclosures published in accordance with relevant laws and regulatory requirements of the Hong Kong Listing Rules, as well as the Company’s communication documents and other corporate publications posted on the HKEXnews website (www.hkexnews.hk) and/or the Company’s website.

Article 5 The Company will explain the implementation and effectiveness of the Shareholders’ Communication Policy in each annual report for that year.

Chapter II Communication Channels

Article 6 General Meetings

Shareholders are encouraged to participate in general meetings, and if they are unable to attend, they may appoint proxies to attend and vote on their behalf at meetings.

The Company will make appropriate arrangements for general meetings to encourage Shareholders' participation.

The Company will review the procedures for general meetings from time to time to ensure its compliance with the provisions of the Memorandum and Articles of Association, the Hong Kong Listing Rules and the applicable laws and to follow good corporate governance practices.

Board members, appropriate management executives and external auditors of the Company and such other persons as the directors consider appropriate shall attend the general meeting to answer questions from Shareholders.

The relevant circular and meeting materials will be despatched to the Shareholders and/or published on the HKEXnews website and/or the Company's website in advance in accordance with the relevant provisions of the Hong Kong Listing Rules.

Article 7 Shareholders' Enquiries

Shareholders should direct their questions about their shareholdings, if any, to the Company's share registrar.

Shareholders and investors may at any time request for the Company's information to the extent such information is publicly available.

Shareholders may at any time direct enquiries (including any questions regarding this policy), request for the Company's information to the extent such information is publicly available, and provide comments and suggestions to the office of the Board. Such questions, requests and comments may be sent by mail to the Company's head office (No. 123, Xinpei Road, Jiading District, Shanghai, PRC) or the Company's place of business in Hong Kong (Attention: Company Secretary, Room 1918, 19/F, Lee Garden One, 33 Hysan Avenue, Causeway Bay, Hong Kong).

In order to facilitate timely and effective communication and exchange, Shareholders are encouraged to provide their contact details, in particular email addresses, to the Company's Hong Kong share registrar.

Article 8 Company's Website

A dedicated "Investor Relations" section is available on the Company's website (<https://ir.zhaogang.com/>). Information on the Company's website is updated on a regular basis.

Information published by the Company on the website of The Stock Exchange of Hong Kong Limited will also be posted on the Company's website immediately thereafter. Such information includes, but is not limited to, annual reports, interim reports, announcements, circulars, notices of general meetings and information required to be disclosed from time to time under the Hong Kong Listing Rules.

Press releases and publications published by the Company from time to time will also be available from the Company's website.

Article 9 Communication with the Capital Markets

The Company will launch various activities from time to time, such as briefing sessions, roadshows, media interviews and marketing activities for investors, to facilitate communication and exchange of views between the Company and Shareholders and investors.

The designated personnel of the Company shall comply with relevant rules and the disclosure policies of the Company regarding the disclosure obligations and provisions when contacting or communicating with investors, analysts, media or other relevant external parties.

Chapter III Supplementary Provisions

Article 10 This policy shall be considered and approved by the Board and shall take effect from the date of listing of the Company's class A shares and listed warrants on the Main Board of The Stock Exchange of Hong Kong Limited.

Article 11 For the matters which are not covered by this policy or conflict with the laws, regulations, the Hong Kong Listing Rules currently in effect or promulgated and modified from time to time after this policy takes effect or the Memorandum and Articles of Association formulated or amended through lawful procedure, the relevant laws, regulations, the Hong Kong Listing Rules or the Memorandum and Articles of Association shall be implemented, and this policy shall be amended in a timely manner and reported to the Board for consideration and approval.

Article 12 The Board shall be responsible for the interpretation of this policy.