

# **MGM CHINA HOLDINGS LIMITED**

(the “Company”)

## **Shareholders’ Communication Policy**

### **1. Purpose**

- 1.1 This Policy aims to set out the provisions with the objective of ensuring that the Company’s shareholders, both individual and institutional (collectively, “**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, 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.
- 1.2 For the purpose of this Policy, references to the investment community is 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 announcements, financial reports (interim and annual reports), corporate communications (as defined below), annual general meetings and other general meetings that may be convened, and other corporate publications through the Company’s website and the website of The Stock Exchange of Hong Kong Limited (“**SEHK**”).
- 2.3 Effective and timely dissemination of information to Shareholders and the investment community shall be ensured at all times.

### **3. Communication Strategies**

#### **Shareholders’ enquiries**

- 3.1 Shareholders should direct their questions about their shareholdings to the Company’s 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 contact and e-mail address of the Company in order to enable them to make any query in respect of the Company.

#### **Corporate Communication\***

- 3.4 Corporate communication 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).
- 3.5 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**

- 3.6 A dedicated Investor Relations section is available on the Company's website [www.mgmchinaholdings.com](http://www.mgmchinaholdings.com). Information on the Company's website is updated on a regular basis.
- 3.7 Information released by the Company to SEHK 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.
- 3.8 All presentation materials, if any, provided in conjunction with the Company's annual general meeting and results announcement each year will be made available on the Company's website as soon as practicable after their release.
- 3.9 All press releases issued by the Company or its subsidiaries will be made available on the Company's website.
- 3.10 Speeches and presentations delivered by the Chairpersons and Chief Executive will be made available on the Company's website.

## **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 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.
- 3.13 Board members, in particular, either the chairpersons of Board committees or their delegates, appropriate management executives and external auditors will attend annual general meetings to answer Shareholders' questions.
- 3.14 Shareholders are encouraged to attend shareholders' activities organised by the Company, where information about the Company will be communicated.

## **Investment Market Communications**

- 3.15 The Company participates in investor/analysts briefings, one-on-one meetings, roadshows (both domestic and international), investor conferences, media interviews etc in order to facilitate communication between the Company, Shareholders and the investor community.
- 3.16 Company's Directors and employees who have contacts or dialogues with investors, analysts, media or other interested outside parties are required to ensure that the following guiding principles are strictly followed:
- (a) Information which is expected to be price sensitive should be announced promptly after it becomes known to any director or senior management of the Company and is the subject of a decision by the Directors of the Company. Until an announcement in relation to such information is made, Directors and employees of the Company must ensure that such information is kept strictly confidential. Where it is felt that the necessary degree of security cannot be maintained or that security may have been breached, an announcement must be made.
  - (b) If price sensitive information is inadvertently divulged to outside parties or it is believed that such information may have been inadvertently divulged, the Company must immediately issue an announcement so that the relevant information is disseminated to Shareholders as a whole.

- (c) Information should be disclosed to Shareholders as a whole and the investment community simultaneously. It is important that price-sensitive information should not be divulged selectively outside the Company and its advisers in such a way as to place in a privileged dealing position any person or class or category of persons.

#### **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.

- \* 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, including, but not limited to, the directors' report and annual accounts together with a copy of the auditor's report, the interim report, a notice of meeting, a circular and a proxy form.