

SUNNY OPTICAL TECHNOLOGY (GROUP) COMPANY LIMITED
(舜 宇 光 學 科 技 (集 團) 有 限 公 司)
(the “Company”)

SHAREHOLDERS COMMUNICATION POLICY

1. General Provisions

- 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.
- 1.2 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. All corporate communication with Shareholders shall be prepared by the head of investor relations department and be approved by the Board or director(s) designated by the Board from time to time.
- 1.3 The investor relations department of the Company is a regular business organization and is responsible for the arrangement 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. Principles of Communication

- 2.1 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.
- 2.2 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.

- 2.3 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. Communication Content

Subject to the relevant applicable laws, regulations and rules (including the Listing Rules), communication with the Shareholders may include matters related to the published reports, the operation status, the strategy, and the latest developments of the Group and other matters that should be communicated to the Shareholders.

4. Communication Channels

4.1 Performance Presentations

The Company shall organize performance presentations in respect of the annual and interim results of the Group.

4.2 General Meetings

The Company holds general meetings which offer a valuable forum for 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 behalves 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.

The Company shall submit matters to be sanctioned 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 respond to questions addressed from the Shareholders. The voting results of the general meetings will be published on the Company's website.

4.3 Corporate Website

The Company maintains a Company's website: 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, in accordance with applicable laws, regulations and rules (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.

4.4 Shareholders' Enquiry

The Company has established an investor relations department to attend to enquires 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 during office hours:

Responsible Officer: Ms. Ida Hu (PRC) or Ms. Jasmine Wong (Hong Kong)

Telephone: 86-574-62530875 (PRC) or 852-35687038 (Hong Kong)

Email: ir@sunnyoptical.com

5. Supplementary Provisions

- 5.1 Matters not covered in this Policy shall be dealt with in accordance with the relevant laws, regulations and rules (including the Listing Rules).
- 5.2 The Board shall have the right to interpret and revise this Policy from time to time.
- 5.3 This Policy shall be effective from 22 December 2011 pursuant to the resolutions of the Board.

Sunny Optical Technology (Group) Company Limited
22 December 2011