

## Shareholders' Communication Policy

### **1. Introduction**

- 1.1 Swire Pacific Limited (the “**Company**”) is committed to promoting and maintaining effective communication as a way to enhance long-term shareholder value and to maintain the trust and confidence of the Company’s shareholders, both individual and institutional (collectively, the “**Shareholders**”). For purpose of this Policy, the term Shareholders refers to the registered shareholders of the Company from time to time.
- 1.2 This Policy aims to ensure that Shareholders and the investment community are provided with appropriate and timely access to material information about the Company and its subsidiaries (together, the “**Group**”) (including their financial performance, material developments, strategic goals and plans, governance and risk profile).
- 1.3 This Policy sets out the Company’s framework to promote effective communication with its Shareholders so as to enable them to exercise their rights as shareholders in an informed manner, and to allow the investment community to engage actively with the Company, whilst at the same time ensuring that the Company fulfils its reporting obligations under the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the “**Listing Rules**”).

### **2. General Policy**

- 2.1 The board of directors (the “**Board**”) and senior management of the Company recognise their responsibility to represent the interests of all Shareholders and to maximise shareholder value. Communication with Shareholders and accountability to Shareholders is a high priority of the Company. The Company shall maintain regular dialogue with the Shareholders and the investment community and will review this Policy on a regular basis to ensure its effectiveness.
- 2.2 Information on the Company will be provided to Shareholders and the investment community through the Company’s financial reports (interim and annual reports), sustainable development reports, circulars, annual general meeting(s) and other general meetings that may be convened, as well as by making regulatory disclosures as may be required or necessary through the website of Hong Kong Exchanges and Clearing Limited (“**HKEx**”) and/or the Company’s website: [www.swirepacific.com](http://www.swirepacific.com).
- 2.3 For purpose of this policy, references to the “investment community” shall include the Company’s potential investors and analysts reporting on and analysing the Company’s performance.

### **3. Communication Strategies**

#### **3.1 General meetings**

- 3.1.1 The procedures to convene a general meeting are set forth in Schedule 1 of the Corporate Governance Code of the Company which is available on the Company's website.
- 3.1.2 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. Appropriate arrangements for the annual general meetings shall be in place to encourage Shareholders' participation.
- 3.1.3 The chairman of the Board, of the audit committee, remuneration committee and nomination committee (as appropriate), or in the absence of any of them, his/her appointed delegate, are encouraged to attend the annual general meeting to answer questions from Shareholders. The external auditors will also be invited to attend the annual general meeting to answer questions about the conduct of the audit, the preparation and content of the auditors' report, the accounting policies and auditor independence. Where any director is unable to attend a general meeting in person, attendance by way of other electronic means can be arranged.
- 3.1.4 The chairman of any independent Board committee appointed to advise on any transaction requiring independent shareholders' approval is also encouraged to attend the general meeting called for such purpose.

#### **3.2 Corporate communications**

- 3.2.1 Information on the Company is available on the websites of the Company and HKEx and will be provided to the 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 these corporate communications (in hard copy or through electronic means, subject to any relevant arrangements that are put in place by the Company).
- 3.2.2 Shareholders are encouraged to elect the environmentally responsible option of receiving corporate information on the Company via email notification and/or accessing them on the Company's website. Shareholders are reminded to provide their email addresses to the Company's share registrars to receive corporate information in a timely and sustainable manner.

#### **3.3 Company's website**

- 3.3.1 A dedicated [Investor Relations section](#) is available on the Company's website. Information in that section is updated on a regular basis.

3.3.2 Information released by the Company is posted on the Company's website, including corporate information, press releases, financial reports, results announcements, sustainable development reports, circulars and notice of general meetings, constitutional documents and other disclosures.

### **3.4 Briefings**

3.4.1 The Finance Director is available for meetings with major shareholders and conducts briefings with the investment community after the announcement of the interim and final results and at certain other times during the year.

### **3.5 Shareholders' Enquiries**

3.5.1 Shareholders are, at any time, welcome to raise questions, communicate their views on various matters affecting the Group, and request information (to the extent it is publicly available) from the Company by post or email to [ir@swirepacific.com](mailto:ir@swirepacific.com). Any such letter from the Shareholders should be marked "Shareholders' Communications" on the envelope or email (as may be relevant).

3.5.2 In addition, the Company has set up different engagement channels to solicit and understand the views of its stakeholders and the investment community. Details of the channels can be found on the Company's website: <https://www.swirepacific.com/en/global/contactus.php>.

3.5.3 Shareholders with enquiries on their holdings in the Company should contact the Company's share registrars, Computershare Hong Kong Investor Services Limited: <https://www.computershare.com/hk/en/contact-us>.

## **4. Shareholder Privacy**

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

## **5. Policy Governance and Review**

5.1 This Policy has been approved by the Board of Directors of the Company.

5.2 The Swire Pacific Audit Committee is responsible for reviewing this Policy, recommending changes and addressing issues of concern.

5.3 Changes to this Policy may be made from time to time. This Policy and any changes will be posted on the website of Swire Pacific Limited (in English and Chinese). In the event of any inconsistency between the English and Chinese versions of this Policy, the English version shall prevail.

Adopted by the Board: 11 August 2022