SHAREHOLDERS COMMUNICATION POLICY

Of SINOTRANS LIMITED

- 1. In accordance with the Articles of Association of Sinotrans Limited (the "Company") and the relevant regulations under the Listing Rules issued by the Stock Exchange of Hong Kong Limited, and together with the consideration of the actual situation of the Company, this Policy is hereby set up about shareholders communication affairs.
- 2. The Company sticks to the fundamental principle of fair disclosure to shareholders and frank communication with shareholders.
- 3. The board of directors shall maintain an on-going dialogue with shareholders, and will regularly review this Policy to ensure its effectiveness.
- 4. The Company shall keep the policy of frank communication, and deliver information to shareholders and investment community through various access: the financial reports of the Company (including interim report and annual report); AGMs and other EGMs that may be convened; and make available on the Company website all disclosures submitted to the Stock Exchange of Hong Kong Limited, the communication contact of the Company and other corporate publications.

SHAREHOLDERS MEETINGS

5. 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.

- 6. Appropriate arrangements for the AGMs shall be in place to encourage shareholders' participation.
- 7. 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.
- 8. Board members, in particular, either the chairmen or board committees or their delegates, appropriate management executives and external auditors will attend AGMs to answer shareholders' questions.
- 9. According to the relevant provisions of the Articles of Association, the notice of general meetings shall be send to shareholders no less than 45 days prior the meeting date. Related circular and meeting materials shall be delivered to shareholders before the meeting in accordance with the Listing Rules.

SHAREHOLDERS' ENQUIRIES

- 10. Shareholders should direct their questions about their shareholdings to the Company's Registrar.
- 11. Shareholders and investment community may at any time make a request for the Company's information to the extent that such information is publicly available. The Company provides designate contacts and enquiry line for the shareholders: telephone number +86 10 62296667, email address ir@sinotrans.com.

CORPORATE WEBSITE

12. A dedicated Investor Relations section is available on the Company website

<u>www.sinotrans.com</u>. Information on the Company website is updated on a regular basis.

13. Information released by the Company to the Stock Exchange of Hong Kong Limited is also posted on the Company website immediately thereafter. Such information includes financial statements, results announcements, circulars and notices of general meetings and associated explanatory documents, etc.

SHAREHOLDERS COMMUNICATION

- 14. In order to facilitate communication with the shareholders, the Company shall organize various activities, including:
 - a) Inviting shareholders to participate in the Company's result announce briefings and roadshows;
 - b) Organizing visiting tours on the Company's business sites;
 - c) Attending one-on-one meetings and conference calls with shareholders;
 - d) Participating in summits and conferences held by shareholders.
- 15. The Company recognizes the importance of shareholders' privacy and will not disclose shareholders' information without their consent, unless required by laws to do so.