



FIRST PACIFIC COMPANY LIMITED

(Incorporated with limited liability under the laws of Bermuda)

Website: <http://www.firstpacific.com>

(Stock Code: 00142)

Shareholders' Communication Policy

Adopted by the Board on

20 March 2012

1. INTRODUCTION

First Pacific Company Limited (“First Pacific” or “the Company”) places considerable importance in ensuring reliable, effective and timely communications with shareholders of the Company (“Shareholders”). The Company also recognizes that people other than shareholders, such as potential customers and investors, rating agencies and investment community generally may have an interest in information about the Company. This policy sets out clearly First Pacific’s principle of maintaining an effective ongoing dialogue with Shareholders, and the different means of two-way communication between First Pacific and its Shareholders.

First Pacific provides Shareholders, potential investors, the investment community and the general public (collectively “Stakeholders”) with equal and timely access to publicly available corporate information about First Pacific (including its financial performance, strategic directions, material developments, governance and corporate activities). The Company does not allow disclosing share price sensitive information to selected individual or group of stakeholders prior to making announcements to The Stock Exchange of Hong Kong Limited (the “Stock Exchange”) and the general public.

2. MEANS OF COMMUNICATION WITH SHAREHOLDERS

The means by which shareholders may obtain information about the Company and, where desired, communicate with the Company are detailed below.

A. Through General Meetings

First Pacific holds an Annual General Meeting (“AGM”) every year and encourages Shareholders’ participation.

A separate resolution is proposed by the chairman of the General Meeting for each substantially separate issue, and in particular on the Financial Statements and election or re-election of Directors.

First Pacific regards the AGM as an important event in the corporate year. All Directors and senior executives make a special effort to attend the AGM. The Chairman of the Board attends the AGM and arranges for the chairmen of all Board Committees to attend the AGM and answer questions. In the absence of a chairman of a Board Committee, members of the respective Board Committee, or failing them, the duly appointed delegates will attend the AGM and answer questions.

The chairman of the Independent Board Committee (if any) is available to answer questions at any General Meeting to approve a connected transaction or any other transaction that requires independent Shareholders' approval.

Management ensures the external auditor attends the AGM to answer questions, if any, about the conduct of the audit, the preparation and content of the auditor's report, the accounting policies and auditor independence.

Notices of the AGM and related papers are sent to Shareholders no less than 20 clear business days before the meeting. For any other meetings, they are sent to Shareholders no less than 10 clear business days before the meeting unless the business to be conducted at the meeting requires special notice.

B. Through Company Reports and Announcements

(i) *Financial Reporting*

First Pacific aims to present a clear and balanced assessment of its financial position and prospects. Financial results are announced as early as possible, and audited financial statements are published within four months after the end of the financial year. Interim financial statements are published within three months after the end of the half-year period.

Financial statements will be provided to Stakeholders in both English and Chinese (in most disclosures) versions to facilitate their understanding of the information. Shareholders have the right to choose their preferable language when receiving information from First Pacific (either English or Chinese, or both English and Chinese).

(ii) *Announcements*

First Pacific is aware of its obligations under the Stock Exchange's Listing Rules and the overriding principle that information which is expected to be price-sensitive should be announced immediately it is the subject of a decision. In this respect, First Pacific formalises the current practices for monitoring developments in our businesses for potentially price-sensitive information and communicating such information to our shareholders, the investment community, the media and analysts. All announcements and other information released to the Stock Exchange will be placed on both the Stock Exchange and the Company's websites as soon as practicable after release.

C. Through First Pacific Website

In order to promote effective communication, First Pacific also maintains a website www.firstpacific.com. Information on the Company's website is updated on a timely and regular basis, including information released by First Pacific to the Stock Exchange, such information are results announcements, financial results and reports, circulars and notices of general meetings, share price sensitive information etc. It also includes past and present information relating to First Pacific Group companies and its businesses.

All press releases, disclosures, etc. issued by First Pacific and disclosures made by its subsidiaries or affiliate which are price sensitive in nature will be made available on First Pacific website.

The "Corporate Governance" section of our website captures a wide range of up-to-date shareholder information including:

- Code on Corporate Governance Practices;
- Announcements and circulars made since May 2000;
- Memorandum of Association and Bye-laws;
- Terms of Reference of Board Committees;
- Procedures for Shareholders to nominate a person as a director;
- Biographical data on Directors and Senior Management;
- Whistleblowing Policy;
- Code for Securities Transactions by Directors and Employees.

We recognise that not all Stakeholders have ready access to the internet. For those who do not, hard copies of the First Pacific website information listed above are available free of charge upon request to the Company Secretary.

3. CORRESPONDENCE FROM SHAREHOLDERS

Any shareholder who wish to contact First Pacific with any comments or concerns can make use of the following shareholders' hotline and e-mail contacts:–

Address: 24th Floor, Two Exchange Square, 8 Connaught Place, Central, Hong Kong

Telephone:	(852) 2842 4332 (Shareholders' hotline)	(852) 2842 4317 (Corporate Communications' hotline)
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Facsimile:	(852) 2810 4313 (Company Secretary)	(852) 2845 9243 (Corporate Communications)
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E-mail:	companysecretary@firstpacific.com (Company Secretary)	info@firstpacific.com (Corporate Communications)
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The Company will try to respond to any inquiry or comments in a timely manner by phone, emails or written response.

4. SHAREHOLDERS' PRIVACY

The Company recognises the importance of shareholders' privacy and will not disclose shareholders' information without their consent, unless required by law to do so.

5. REVIEW OF POLICY

This policy will be reviewed by the board of directors on a regular basis to ensure its effectiveness and will be amended, as required and appropriate, to reflect the current activities of the Company with regard to shareholder communication.

6. PUBLICATION OF POLICY

This Policy will be available on the Company's website.