



**SANY HEAVY EQUIPMENT INTERNATIONAL
HOLDINGS COMPANY LIMITED**

三一重裝國際控股有限公司

(Incorporated in the Cayman Islands with limited liability)

(Stock Code: 631)

**Shareholders Communication Policy
(the “Policy”)**

1. Purpose

1.1. This Policy aims to set out the provisions with the objective of:

1.1.1. ensuring that shareholders of Sany Heavy Equipment International Holdings Company Limited (the “**Company**”), both individual and institutional (collectively, “**Shareholders**”), and, in appropriate circumstances, the investment community at large (including but not limited to the Company’s potential investors as well as analysts reporting and analysing the Company’s performance), are provided with ready, equal and timely access to clear, accurate, balanced and understandable material information about the Company (including its financial performance, strategic goals and plans, material developments, governance and risk profile), 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; and

1.1.2. maintaining consistent disclosure levels at all times.

2. General Policy

2.1. The board of directors of the Company (the “**Board**”) shall maintain an on-going dialogue with Shareholders and the investment community, and will regularly review this Policy to ensure its effectiveness, and will amend the same (as appropriate) from time to time to reflect the current best practice in communications with shareholders.

2.2. Information shall be communicated to Shareholders and the investment community mainly through the Company’s financial reports (interim and annual reports), annual general meetings and other general meetings that may be convened, as well as by making available all the disclosures submitted to The Stock Exchange of Hong Kong Limited (“**HKSE**”) and its corporate communications and other corporate publications on the Company’s website.

- 2.3. Effective and timely dissemination of information to Shareholders and the investment community shall be ensured at all times. Any question regarding this Policy shall be directed to the head of the Investor Relations department of the Company, who shall forward communications relating to matters within the Board's direct responsibilities to the Board and communications relating to ordinary business matters, such as suggestions, inquiries and customer complaints, to the chief executive officer of the Company.

3. Communication Strategies

3.1. Shareholders' enquiries

- 3.1.1. Shareholders should direct their questions about their shareholdings to the Company's Hong Kong share registrar.
- 3.1.2. 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.
- 3.1.3. Shareholders and the investment community can contact the head of the Investor Relations department of the Company of the Company by email, fax, phone or mail via designated contacts of the Company during office hours in order to enable them to make any query in respect of the Company.

3.2. Corporate Communication

- 3.2.1. Corporate communication, namely, 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, 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). LR2.07A(3)(a)
- 3.2.2. Shareholders are encouraged to provide, amongst other things, in particular, their email addresses to the Company in order to facilitate timely and effective communications.
- 3.2.3. For efficient communication with Shareholders and in the interest of environmental preservation, Shareholders are encouraged to browse the Company's corporate communications on the Company's website, in the place of receiving printed copies of the same.

3.3. *Corporate Website*

3.3.1. A dedicated Investor Relations section is available on the Company's website www.sanyhe.com. Information on the Company's website is updated from time to time.

3.3.2. Information released by the Company to HKSE 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.

3.3.3. All presentation materials 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.

3.4. *Shareholders' Meetings*

3.4.1. 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.

3.4.2. Appropriate arrangements for the annual general meetings shall be in place to encourage Shareholders' participation.

3.4.3. The process of the Company's general meeting will be monitored and reviewed from time to time, and, if necessary, changes will be made to ensure that Shareholders' needs are best served.

3.4.4. The annual general meetings of the Company provide a useful forum for Shareholders to exchange views with the Board. Board members, in particular, chairmen of Board committees or their delegates, appropriate senior management and external auditors will attend annual general meetings to answer Shareholders' questions. A14E1.2

3.4.5. Shareholders are encouraged to attend shareholders' activities organised by the Company, where information about the Company, including its latest strategic plan, products and services etc will be communicated. A14E1

3.5. *Investment Market Communications*

3.5.1. Investor/analysts briefings and one-on-one meetings, roadshows (both domestic and international), media interviews, marketing activities for investors and specialist industry forums etc. will be available from time to time in order to facilitate communication between the Company, Shareholders and the investment community.

3.5.2. Directors and employees of the Company who have contacts or dialogues with investors, analysts, media or other interested outside parties are required to comply with the disclosure obligations and requirements under the Model Code for Securities Transactions by Directors of Listed Issuers as set out in Appendix 10 to the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited.

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.

22 March 2012