

WILLAS-ARRAY ELECTRONICS (HOLDINGS) LIMITED

威雅利電子(集團)有限公司

(the “Company”)

SHAREHOLDERS’ COMMUNICATION POLICY

A. PURPOSE

This shareholders’ communication policy (the “Policy”) aims to set out the framework in place for the shareholders of the Company (the “Shareholders”) to obtain information from the Company and to communicate their views on various matters affecting the Company, as well as steps taken by the Company to solicit and understand the views of the Shareholders and stakeholders, and to allow the Shareholders to actively engage with the Company and to exercise their rights as shareholders in an informed manner.

For the purpose of this Policy, reference to the stakeholders includes the investment community at large and the Company’s potential investors (collectively “Investment Community”).

B. GENERAL POLICY

The board of the Company (the “Board”) shall maintain an on-going dialogue with the Shareholders, and will regularly review this Policy to ensure its effectiveness.

Information shall be communicated to the Shareholders mainly through the Company’s financial reports (interim and annual reports), other regulatory disclosures, annual general meetings (the “AGM”) and other general meetings that may be convened, as well as through the websites of the Company at www.willas-array.com (the “Company’s Website”), SGXNet at www.sgx.com and The Stock Exchange of Hong Kong Limited (the “SEHK”) at www.hkexnews.hk.

Effective and timely dissemination of information to the Shareholders and the Investment Community shall be ensured at all times. Any question regarding this Policy shall be directed to the company secretary of the Company, Mr. Leung Hon Shing (the “Company Secretary”) whose contact information is provided below in section C5 of this Policy.

C. COMMUNICATION STRATEGIES WITH SHAREHOLDERS

C1. SHAREHOLDERS' MEETINGS

The 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.

The format and process of general meeting are regularly reviewed and where necessary, changes will be introduced as appropriate to accommodate the needs of the Shareholders, for enhancing their meeting experience and increasing their participation at general meetings.

The Board members, in particular, chairman of the Board as well as the external auditor shall attend the annual general meetings of the Company. The chairman of the Board shall also invite the respective chairman of the audit, nomination, remuneration, and any other committees (as appropriate) (or in their absence, members of the Board committees) to attend the AGM in order to answer the Shareholders' questions.

Minutes of each AGM, which record substantial and relevant comments or queries from the Shareholders relating to the agenda of such particular AGM, and responses from the Board and management at the time, are posted on the Company's website as soon as practicable after such AGM.

C2. CORPORATE COMMUNICATION

The Company's annual reports, interim reports, circulars, announcements and other regulatory disclosures issued or to be issued with the information of the Company and its subsidiaries (collectively the "Corporate Communication") will be prepared and made available to the Shareholders in accordance with the rules governing the listing of securities on the Hong Kong Stock Exchange, the Main Board rules of the listing manual of the Singapore Exchange Securities Trading Limited and any other relevant laws and regulations, as amended, supplemented or modified from time to time.

Corporate Communication will be provided to the Shareholders in plain language and usually in both English language and Chinese language to facilitate Shareholders' understanding unless a Shareholder wishes to receive the English language version only or the Chinese language version only and to the extent permitted under applicable laws and regulations and the Company's own constitutional documents. If there is any conflict in the Corporate Communication between the meaning of Chinese words or terms in the Chinese language version and English words in the English language version, the meaning of the English words shall prevail.

C3. CORPORATE WEBSITE

Information released by the Company to SGXNet and SEHK is also posted on the Company's website within one hour thereafter so as to ensure that Shareholders can timely access to updated information about the Company and its subsidiaries. Such information includes financial reports, results announcements, circulars and notices of general meetings, other regulatory disclosures and any announcements in relation to the Company and its subsidiaries etc.

C4. THE SHARE REGISTRAR OF THE COMPANY

For Shareholders in Singapore, they should direct any questions about their shareholdings, share transfer, registration and dividend payment to the Company's Singapore share transfer agent, Boardroom Corporate & Advisory Services Pte. Ltd.

For Shareholders in Hong Kong, they should direct such questions to the Company's Hong Kong branch share registrar, Boardroom Share Registrars (HK) Limited.

The contact particulars of the Company's Singapore share transfer agent and Hong Kong branch share registrar are usually provided in the Company's annual reports, or with further updates in the form of announcements, which are available on the Company's Website.

C5. SHAREHOLDERS' ENQUIRIES AND VIEWS

Further, Shareholders may make any query in respect of the Company and the Company will respond such query in a timely manner with relevant information (to the extent such information is publicly available).

Shareholders are also encouraged to provide their views to the Directors of the Company on matters affecting the Company.

Such query and views can be addressed to the Company Secretary whose contact particulars are as follows:

Email address: ir@willas-array.com

Address: 24/F, Wyler Centre, Phase 2, 200 Tai Lin Pai Road, Kwai Chung, New Territories, Hong Kong

Tel. No.: (852) 2418 3799

Fax No.: (852) 2484 1050

or direct the enquiries to the Company's principal place of business in Hong Kong located at 24/F, Wyler Centre, Phase 2, 200 Tai Lin Pai Road, Kwai Chung, New Territories, Hong Kong.

D. SHAREHOLDER PRIVACY

The Company recognises the importance of the Shareholders' privacy and will not disclose the Shareholders' information without their consent, unless otherwise required by relevant laws.

E. INVESTMENT COMMUNITY COMMUNICATIONS

Apart from the publicly available information through the Company's Website, SGXNet and SEHK, press meetings, road shows and meetings with analysts and investor are arranged from time to time to facilitate communication between the Company and the Investment Community.

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 Company's *Inside Information Policy*.

In the case of inconsistency, the English text of this Policy shall prevail over the Chinese text.

Shareholders' Communication Policy

(Adopted by the Board written resolution passed on November 14, 2022)