

Alco Holdings Limited

(the “Company”)

(Incorporated in Bermuda with limited liability)

SHAREHOLDERS’ COMMUNICATION POLICY

(Adopted by the Company pursuant to the Board resolution passed on 28th June 2012)

1 PRINCIPLES

- 1.1 The Company is committed to providing shareholders of the Company (the “Shareholders”), other stakeholders and potential investors with balanced and understandable information about the Company.
- 1.2 The board of directors of the Company (the “Board”) should be responsible for:
 - Maintaining an on-going dialogue with Shareholders and encouraging them to communicate actively with the Company; and
 - Establishing this shareholders’ communication policy (the “Policy”) and reviewing the Policy on a regular basis to ensure its effectiveness.

2 PURPOSE

- 2.1 The Policy aims to:
 - Promote effective communication with Shareholders and other stakeholders;
 - Encourage Shareholders to actively participate at the Company’s general meetings; and
 - Enable Shareholders to exercise their rights as shareholders effectively.

3 SOURCES OF COMMUNICATION

3.1 Corporate Communication

- 3.1.1 “Corporate Communication” as defined under the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the “Stock Exchange”) (the “Listing Rules”) refers to 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 following documents of the Company: (a) the directors’ report, annual accounts together with a copy of the auditor’s report and, where applicable, its summary financial report; (b) the interim report and, where applicable, its summary interim report; (c) a notice of meeting; (d) a listing document; (e) a circular; and (f) a proxy form.
- 3.1.2 The Corporate Communication of the Company will be published on the Stock Exchange’s website (www.hkex.com.hk) in a timely manner as required by the Listing Rules.
- 3.1.3 Corporate Communication will be provided to Shareholders and non-registered holders of the Company’s securities in both English and Chinese versions or where permitted, in a single language, in a timely manner as required by the Listing Rules.
- 3.1.4 The Company shall publish announcements (on price sensitive information, corporate actions and transactions etc.) and other documents (e.g. Bye-laws) on the Stock Exchange’s website in a timely manner in accordance with the Listing Rules.

3.2 Corporate Website

3.2.1 Any information or documents of the Company posted on the Stock Exchange's website will also be published on the Company's website (www.irasia.com/listco/hk/alco/index.htm).

3.3 Shareholders' Meetings

3.3.1 The annual general meeting and other general meetings of the Company are the principal communication channels between the Company and Shareholders.

3.3.2 The Company shall provide Shareholders with relevant information on the resolutions(s) proposed at a general meeting in a timely manner in accordance with the Listing Rules. The information provided shall be reasonably necessary to enable Shareholders to make an informed decision on the proposed resolution(s).

3.3.3 Shareholders are encouraged to participate in general meetings or to appoint proxies to attend and vote at the meetings for and on their behalf.

3.3.4 Where appropriate or required, the Chairman of the Board and other Board members, the chairmen of board committees or their delegates, and the external auditors should attend general meetings of the Company to answer Shareholders' questions (if any).

3.3.5 The chairman of the independent board committee (if any) should also be available to answer questions at any general meeting to approve a connected transaction or any other transaction that is subject to independent shareholders' approval.

3.3.6 Pursuant to Listing Rules, voting by poll is mandatory at all general meetings (other than on procedural matters) and the poll results are posted on the Stock Exchange's website and the Company's website on the same day of each general meeting.

3.4 Shareholders' Enquiries

3.4.1 Enquiries about Shareholdings

Shareholders should direct their enquiries about their shareholdings to the Company's branch share registrar, Tricor Abacus Limited, via its online holding enquiry service at www.tricoris.com, or send email to is-enquiries@hk.tricorglobal.com, or call its hotline at (852)29801333, or go in person to its public counter at Level 22, Hopewell Centre, 183 Queen's Road East, Hong Kong.

3.4.2 Enquiries about Corporate Governance or Other Matters to be put to the Board and the Company

The Company will not normally deal with verbal or anonymous enquiries. Shareholders may send written enquiries to the Company, for the attention of company secretary, by email: investor.enquiry@alco.com.hk, fax: (852)25978700 or mail to 11/F., Metropole Square, 2 On Yiu Street, Sha Tin, New Territories, Hong Kong.

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SHAREHOLDERS' PRIVACY

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