

PAX GLOBAL TECHNOLOGY LIMITED

(“Pax Global” or “Company”)

(Incorporated in Bermuda with limited liability)

SHAREHOLDERS COMMUNICATION POLICY

1. Purpose

1.1 This Policy aims to set out the provisions with the objective of ensuring that Pax Global’s shareholders, --whether individual or institutional (collectively, “Shareholders”), and, in appropriate circumstances, the investment community at large, are provided with ready, equal and timely access to balanced and understandable information about the Company (including its financial performance, strategic goals and plans, material developments, corporate 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.

1.2 For the purpose of this Policy, reference to the investment community is intended to include the Company’s potential investors as well as analysts reporting and analyzing the Company’s performance.

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.

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 (“SEHK”) and its corporate communications and other corporate publications (which are required by the Rules Governing the Listing of Securities on SEHK (the “Listing Rules”) and other applicable rules and regulations) on Pax Global’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 Company Secretary.

3. Communication Strategies

Shareholders' enquiries

- 3.1 Shareholders should direct their questions about their shareholdings to the Company's Registrar.
- 3.2 Shareholders and the investment community may at any time make a verbal or written request for the Company's information to the extent such information is publicly available and the Company shall use its best endeavours to provide the requisite information.
- 3.3 Shareholders and the investment community shall be provided with designated contacts, email addresses and enquiry lines of Pax Global in order to enable them to make any query in respect of the Company.

Corporate Communication *

- 3.4 Corporate communication 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).
- 3.5 Shareholders are encouraged to provide, amongst other things, in particular, their email addresses to the Company in order to facilitate timely and effective communications.

Corporate Website

- 3.6 An Investor Relations section is available on the website of Pax Global at www.paxglobal.com.hk. Information on the website of Pax Global is updated on a regular basis.
- 3.7 Information released by the Company to SEHK will also be posted on the website of Pax Global immediately thereafter. Such information includes financial statements, results announcements, circulars and notices of general meetings and associated explanatory documents etc.

Shareholders' Meetings

- 3.8 Shareholders are encouraged to participate in general meetings or to appoint proxies to attend and vote at the meetings for and on their behalves if they are unable to attend the meetings.
- 3.9 Appropriate arrangements for the annual general meetings shall be in place to encourage Shareholders' participation.
- 3.10 The process of the Company's general meetings will be monitored and reviewed on a regular basis, and, if necessary, changes will be made to ensure that Shareholders' needs are best served.
- 3.11 Board members, in particular, the chairman of the Board, either the chairmen or deputy chairmen of Board committees or their respective delegates, appropriate management executives and external auditors should attend annual general meetings to answer Shareholders' questions.
- 3.12 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.

Investment Market Communications

- 3.13 Investor/analyst briefings and one-on-one meetings, roadshows (both domestic and international), media interviews, marketing activities for investors and specialist industry forums etc may be conducted in order to facilitate communication between the Company, Shareholders and the investment community.
- 3.14 Pax Global's Directors and employees 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 Listing Rules.

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.

28 March 2012

- * "Corporate Communication" refers to any document issued or to be issued by Pax Global 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, notice of meeting, circular and proxy form.