# The Management Policy of Investor Relations of ADAMA Ltd.

(Revised in December, 2023)

## **Chapter I General Provisions**

Article 1 In order to strengthen the information communication between ADAMA Ltd. (hereinafter referred to as "the Company") and investors as well as potential investors (hereinafter collectively referred to as the "Investors"), to enhance their understanding and recognition of the Company, and to promote the healthy interactive relationship, the Company has adopted the following measures to improve its integrity and the corporate governance structure in accordance with the relevant provisions of the Company Law of the People's Republic of China, the Securities Law of the People's Republic of China, the Guidelines on Investor Relations Management for Listed Companies by CSRC, the Self-Regulatory Guidelines for Listed Companies No. 1 - Standardized Operation of Main Board Listed Companies of Shenzhen Stock Exchange and the Articles of Association and in light of the actual situation of itself.

Article 2 Investor Relationship Management (IRM) refers to the activities related to strengthening the communication with investors and potential investors and enhancing their understanding and recognition of the listed company through facilitating the exercise of shareholders' rights, information disclosure, interactive communication and handling of claims, so as to improve the governance of the listed company and the overall value of the enterprise, and to realize the purpose of respecting investors, rewarding investors and protecting investors.

Article 3 Basic IRM principles are as follows.

- (i) Principle of Compliance. IRM should be carried out on the basis of fulfilling the information disclosure obligations in accordance with the laws, and in compliance with laws, regulations, rules and, normative documents, industry norms and self-regulatory rules, the Company's internal rules and policies, as well as ethical norms and codes of conduct generally observed in the industry.
- (ii) Principle of Equality. In carrying out IRM activities, the Company should treat all investors equally, and in particular create opportunities for small and medium-sized

investors and facilitate their engagement.

- (iii) Principle of Proactiveness. The Company should take the initiative to carry out IRM activities, listen to investors' opinions and suggestions, and respond to their demands in a timely manner.
- (iv) Principle of Honesty and Trust. Through various IRM activities, the Company should demonstrate honesty and trustworthiness, stick to the basic rules, standardize its operations and take accountability so as to create a healthy and sound market ecology.

Article 4 The controlling shareholder, the actual controllers, as well as directors of the board, supervisors and executives of the Company should attach great importance to, actively participate in and support the management of investor relations.

#### **Chapter II Tasks and Ways of Investor Relations Management**

Article 5 The Company communicates with investors mainly regarding the following contents,

- (i) Development strategy of the Company,
- (ii) Disclosure required by laws and regulations,
- (iii) Information about the Company's operation and management,
- (iv) ESG endeavors of the Company,
- (v) Corporate culture buildup,
- (vi) Ways, means and procedures for shareholders to exercise their rights,
- (vii) Information on the handling of investor claims,
- (viii) Risks and challenges that the Company is or may be facing.
- (ix)Other relevant information about the Company.

Article 6 The Company should carry out IRM through multiple channels, platforms and methods, including its own official website (http://www.adama.com), new media platforms, telephone, fax and e-mail, etc., to communicate with investors through shareholder meetings, investor meetings, roadshows, analysts' meetings, office visits and seminars. The means of communication should be convenient for investors to participate, and the Company should timely identify and remove obstacles against investors communications.

Article 7 The Company sets up investor hotline, e-mail and fax, and assigns designated

persons familiar with the business to answer and respond to investors in a friendly and

effective manner. When its website or the telephone number changes, the Company

should make announcements in a timely manner.

Investor Relations telephone: 010-56718110

Email: IRChina@adama.com

Article 8 The Company should build and maintain online channels for investor

communication and set up special sector for investor relations on its official website

with relevant information timely released and updated.

Article 9 The Company may arrange site visits and meetings for investors, fund

managers and analysts. It should properly and carefully arrange the activities to avoid

giving the visitors the opportunity to obtain insider information and undisclosed

information on material events.

Article 10 The Company communicates on its situation, answers questions and listens

to investor concerns through roadshows and analysts' meetings.

Article 11 The Company and other information disclosure obligors should perform

information disclosure obligations in a timely and fair manner in strict accordance with

the laws and regulations, self-regulatory rules and the Articles of Association of itself,

and the information disclosed should be true, accurate, complete, concise, clear and

easy to understand, and there should be no false records, misleading statements or

material omissions

Article 12 The Company should give full consideration to the time, venue and manner

of convening the shareholders' general meeting, provide convenience for shareholders,

especially small and medium-sized shareholders, to participate in the shareholders'

general meeting, and provide the necessary time for investors to make speeches, ask

questions, and communicate with the Company's directors, supervisors and senior

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management. The general meeting of shareholders should be equipped with means for internet voting.

Article 13 In addition to fulfilling its information disclosure obligations in accordance with the laws, the Company should actively hold investor briefing meetings in accordance with the regulations of CSRC and the Shenzhen Stock Exchange to introduce the situation, answer questions and listen to concerns from investors. Investor briefing meetings include performance meetings, cash dividend meetings, and meetings on material matters. Under normal circumstances, the Chairman of the Board of Directors or the President and Chief Executive Officer should attend investor briefing meetings and the reasons should be explained when they cannot.

The Company should release announcement before investor briefing meetings in accordance with the requirements of the Shenzhen Stock Exchange, and timely disclose the summary afterwards. Investor briefing meetings should be conducted in a manner that facilitates the participation of investors.

Article 14 Where the following circumstances exist, the Company should hold an investor briefing meetings in accordance with the provisions of CSRC and the Shenzhen Stock Exchange:

- (i) The Company's cash dividends for the year fails to meet the relevant regulations, and it is necessary to explain the reasons,
- (ii) The Company terminates the restructuring after disclosing the restructuring proposal or report,
- (iii) The Company's stock trading experiences abnormal fluctuations as stipulated in the relevant rules, and undisclosed material events are identified after verification,
- (iv) Relevant material events of the Company raises highly concerns or is questioned by the market,
- (v) The Company should hold annual performance briefing meeting after the disclosure of its annual report in accordance with the provisions of CSRC and the Shenzhen Stock Exchange,
- (vi) Other cases in which an investor briefing meeting should be held in accordance

with the regulations of the CSRC and the Shenzhen Stock Exchange.

Article 15 The Company should actively support and cooperate with investors in exercising their rights as shareholders in accordance with the laws, as well as with investor protection organizations in the exercise of their rights to hold shares, publicly solicit shareholders' rights, mediate disputes and conduct representative litigation and other activities to safeguard investors' legitimate rights and interests.

Article 16 When investors raise up requests to the Company, it should bear the primary responsibility for handling according to laws and regulations and give timely response to investors.

Article 17 The Company should clearly distinguish between publicity/advertisement and media coverage and should not use publicity/advertisement material as well as paid means to influence the objective and independent reports of the media.

The Company should pay timely attention to media coverage and respond appropriately when necessary.

#### **Chapter III IRM Organization and Implementation**

Article 18 The main responsibilities of the Company's IRM work include:

- (i) Drawing up IRM policies and establishing the working mechanism;
- (ii) Organizing IRM activities to communicate with investors;
- (iii) Organizing timely and proper handling of investors' enquiries, complaints and suggestions, and providing regular feedback to the Board of Directors and the executives of the Company;
- (iv) Managing, operating and maintaining IRM channels and platforms;
- (v) Ensuring that investors could exercise their rights as shareholders in accordance with the laws;
- (vi) Cooperating with and supporting investor protection organizations to carry out relevant work to safeguard the legitimate rights and interests of investors;

- (vii) Analyzing the number, composition and changes of the Company's investors;
- (viii) Carrying out other activities conducive to the improvement of investor relations.

Article 19 The Board Secretary and the Global Head of Investor Relations are responsible for organizing and coordinating IRM activities. The controlling shareholder, the actual controllers, Directors of the Board, supervisors and the executives of the Company should provide proper conditions for them to perform their duties in investor relations management.

Article 20 The Securities and Legal Affairs Department of the Company is the designated department for IRM, with designated staff to facilitate the fulfilment of responsibilities.

Article 21 The Company, its controlling shareholder, actual controllers, Directors of the Board, supervisors, the executives and staff should not engage in the following situations in IRM activities:

- (i) Disclosing or publishing information on material events that have not been made public, or information that conflicts with information disclosed in accordance with the laws;
- (ii) Disclosing or releasing information that contains misleading, false or exaggerated information;
- (iii) Disclosing or releasing information in a selective manner, or with material omissions;
- (iv) Making predictions or promises regarding the Company's share price;
- (v) Speaking on behalf of the Company without confirmed authorization;
- (vi) Discriminating, belittling or other unfair treatment of small and medium shareholders or causing unfair disclosure;
- (vii) Violation of public order and morals and damage to the public interest of the society;
- (viii) Other violations of information disclosure regulations, or illegal acts that affect normal trading of the Company's securities and their derivatives.

Article 22 IRM Staff of the Company should be required to possess the following competency and skills:

- (i) Good character and professionalism, honesty and trustworthiness;
- (ii) Sound professional knowledge, familiar with corporate governance, financial accounting and other relevant laws and regulations and the operation mechanism of the securities market;
- (iii) Strong communication and coordination skills
- (iv) Comprehensive understanding of the Company and the industry in which the Company operates.

Article 23 The Company should establish IRM archives in electronic or paper form. The Company should file and properly keep relevant records, recordings, presentations, documents provided during the activities (if any) and other documents for a period of not less than 3 years when carrying out IRM activities.

### **Chapter IV Supplementary Provisions**

Article 24 Matters that have not been covered in this policy should be implemented in accordance with relevant laws and regulations and the *Articles of Association* of the Company as well as other relevant provisions.

Article 25 The Board of Directors of the Company is responsible for the interpretation of this policy.

Article 26 This policy should be implemented as of the date of consideration by the Board of Directors. The original *Management Policy for Investors' Relations* of the Company should be repealed at the same time.

ADAMA Ltd.