

# TENCENT HOLDINGS LIMITED

(the “Company”)

## SHAREHOLDERS COMMUNICATION POLICY

(the “Policy”)

### 1) Purpose

This Policy aims to ensure that the Company’s shareholders (the “Shareholders”) and other stakeholders at large are provided with ready, equal, regular and timely access to material information about the Company, in order to maintain an on-going dialogue with Shareholders and to enable Shareholders to exercise their rights in an informed manner, and to allow Shareholders and other stakeholders to engage actively with the Company through general meetings or other proper means.

### 2) General Policy

- a) The Board shall maintain an on-going dialogue with Shareholders and other stakeholders, and will regularly review this Policy to ensure its effectiveness.
- b) The Company communicates information to Shareholders and other stakeholders through, including its periodical financial announcements and reports, annual general meetings and other special general meetings (if any), all the disclosures submitted to The Stock Exchange of Hong Kong Limited (“SEHK”) and its corporate communications and other corporate publications on the Company website.

For the purpose of this Policy, “corporate communication” means 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.

- c) The Company will make equal, regular, timely and effective communication and dissemination of information to Shareholders and other stakeholders. The Company Secretary or Head of Investor Relations will answer all questions in respect of this Policy.

### 3) Communication Strategies

The Company utilizes a number of mechanisms in order to access its objectives to provide Shareholders with effective and efficient communication. Shareholders could communicate their views on various matters affecting the Company and the Company could solicit and understand the views of shareholders and other stakeholders in a number of ways, including:

- a) through Shareholders' enquiries:
  - i) the Company's Branch Registrar will answer Shareholders' questions regarding their shareholding or corporate communication; and
  - ii) Shareholders and other stakeholders may at any time make a request for the Company's information to the extent such information is publicly available through the Company's designated contacts, email addresses and enquiry lines of the Company;

- b) by corporate communication:

The Company provides corporate communications in plain language and in both English and Chinese versions to facilitate Shareholders' understanding. Shareholders have the right to choose the language or means of receipt of the corporate communications;

- c) by posting relevant information on the Company's website:

- i) the Company's website ([www.tencent.com](http://www.tencent.com)) contains a dedicated Investors section under which the relevant recent corporate communications as released by the Company to SEHK will be made available;
- ii) information on the Company's website is updated on a regular basis; and
- iii) any other material or information deemed necessary for the purpose of the Policy will be made available on the Company's website as soon as practicable;

- d) by webcasts:

Webcasts of the Company's interim and annual results briefings are available for a certain period;

- e) at the Shareholders' meetings:
  - i) the Company encourages Shareholders 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;
  - ii) appropriate arrangements for the annual general meetings shall be in place to encourage and facilitate Shareholders' participation;
  - iii) the Company will monitor and review the process of the Company's general meeting on a regular basis, and, if necessary, make changes to ensure that Shareholders' needs are best served; and
  - iv) the chairman of the Board or his delegates, the chairmen of the audit, remuneration and any other committee, appropriate management executives and external auditors will attend annual general meetings to answer Shareholders' questions; and
  
- f) Investment Market Communications:
  - i) 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 on a regular basis in order to facilitate communication between the Company, Shareholders and the investment community; and
  - ii) the Company's Directors, designated spokespersons 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 relevant laws and regulations.

#### **4) Shareholder Privacy**

The Company will not disclose Shareholders' information without their prior consent, unless required by law to do so.