

EXPLANATION OF DEVIATION WITH THE OSLO BØRS CODE OF PRACTICE FOR REPORTING IR INFORMATION

Followed by the release of the revised Code of Practice for Reporting IR Information of 1 March 2017 (IR Code) prepared by Oslo Børs in collaboration with the Norwegian Investor Relations Association, listed companies in Norway must comply with the IR Code with effect from the 2017 financial year or otherwise, explain any deviation.

We comply with the IR Code, except for the deviations as explained below:

Deviation with section 2.1 Interim reports which stipulated that company must publish annual reports, half-yearly reports and other interim reports at the latest by 8:00 on the following trading date of approval for publication. It also stipulated that the company must publish interim reports for the first and third quarters no later than 15th day of the second month after the end of the accounting period in question. Jinhui Shipping follows this practice to publish quarterly interim reports once they have been approved by the board of directors, within two months after each quarter end and publish the annual report within four months after each year end. This may constitute a deviation with section 2.1 of the IR Code. We consider that our current practice to publish quarterly interim reports within two months and annual report within four months adheres to existing Norwegian listing rules and regulations but may deviate with the recommended practice under the IR Code section 2.1. Nevertheless, we strive to prepare and publish quarterly interim reports within a reasonable timeframe and disseminate such information as soon as practicable.

Deviation with section 3.4 External capital in relation to the disclosure of information of financial strategy and debt financing in company's website. Jinhui Shipping has regularly disclosed the information on its capital structure, source of financing and collateral pledged, guarantees and gearing information, as well as information on the company's debt financing in its annual report or quarterly announcements. Stakeholders can obtain this information from Jinhui Shipping's annual report or quarterly announcements that had already been published in the company's website. Hence, such information is not duplicated in a separate section in the company's website.