



19 November 2018
2018 年 11 月 19 日

Michelle Coco
Head of Compliance and Regulation
合规及监管部主管
National Stock Exchange of Australia Limited
澳大利亚国家证券交易所有限公司
1 Bligh Street
Bligh 街 1 号
Sydney NSW 2000
新南威尔士州悉尼市邮编 2000

Dear Michelle,
Michelle 女士:

With regard to the information requested by the National Stock Exchange of Australia Limited (**NSX**) in its letters of 2 October 2018 and 29 October 2018, we hereby reply as follows:

对于 NSX 在 2018 年 10 月 2 日和 2018 年 10 月 29 日的来信中所要求的信息，本公司现回复如下：

Business Name: SHKL intelligent conference system 业务名称: SHKL 智能会议系统	For Each Business 每一业务
Description of the products / services sold 对所售产品/服务的描述 <i>Market position, value to customers, growth potential, new markets and products</i> 市场地位、对顾客的价值、增长潜力、新市场及产品	SHKL intelligent conference system is a conference room multimedia solution based on large touch tablet (65-84"). It integrates hardware and software together and is an upgrade of traditional conference room projectors, screens, stereos and computers (see the main business scope described in SHKL's prospectus). Among similar products, SHKL intelligent conference system is at a high-end market position with excellent features such as fast reaction speed and no sticking. In terms of product's hardware, SHKL uses industrial-grade materials, which are strong and reliable. Therefore, its price is also higher than the general similar products. Consumers could hardly accept the high price of SHKL at the beginning, but after a period of comparison, they have gradually realized the reason of our high price. Therefore, the sales of this product is also improving. The total number of sales up to and including the year end 31 March 2018 is RMB 1,084,905.66

	<p>(AUD210,037.74).</p> <p>SHKL 智能会议系统是以大型触摸平板电脑（65 吋-84 吋）为基础的软硬件一体的会议室多媒体解决方案，是传统会议室投影仪、幕布、音响、电脑的升级换代产品（参见 SHKL 招股说明书描述的主营业务）。SHKL 的智能会议系统在同类产品市场地位上是属于高端产品，具有反应速度快、不卡机等优良特性。在产品硬件上，SHKL 使用的是工业级的材料，结实、可靠。因此，价格也比一般同类产品贵。前段时间消费者对 SHKL 的产品价格居高不下不太理解，经过一段时间的比较，消费者逐步认识到 SHKL 智能会议系统“优质优价”的原因，销售正在复苏。</p> <p>截至 2018 年 3 月 31 日的总销售额为人民币 1,084,905.66 元（210,037.74 澳元）。</p>
<p>Description of the target market 对目标市场的描述</p> <p><i>Who are you selling to? What is your market share? Why do/would they buy your products/services over others?</i> 向谁出售？贵司的市场份额有多少？为何他们购买贵司而非他家的产品/服务？</p>	<p>The conference rooms of millions of governments, institutions and enterprises in China are the target customers of SHKL intelligent conference system. At present, intelligent conference systems as a whole account for less than 3% of the entire conference room equipment market. Products of SHKL only accounts for 30% of market share of high-end intelligent conference systems.</p> <p>中国的百万计政府、机构、企业的会议室都是 SHKL 智能会议系统的目标市场。目前所有智能会议系统在整个会议室设备市场上，所占的份额不足 3%，SHKL 产品只是在高端智能会议系统市场上有 30% 的份额。</p>
<p>Goals / objectives / strategy 目标/目的/战略</p> <p>What are your short and long-term goals? What activities will you undertake to meet them? 贵司的短期和长期目标为何？为实现该等目标，贵司将着手进行哪些活动？</p>	<p>SHKL actually started the R&D of intelligent conference system products earlier than Chinese enterprises and we have richer experience. However, as we always insist on only producing high-quality products, some subsequent enterprises have quickly occupied the market. Now, our sales are picking up as consumers return. According to the current situation, SHKL has set a target of selling 4000 sets of intelligent conference systems in the next three years, thus laying a foundation for SHKL's long-term development. SHKL's long-term goal is to make the intelligent conference system not only lead the Chinese market, but also enter the international market. In the next decade, the sales volume will exceed 10,000 sets annually and the annual output value will exceed 500 million RMB. Now, SHKL is making arrangements for the Japanese market and the American market, actively supporting Japanese agents to explore the Japanese market, and American agents have also started market research work.</p> <p>SHKL 在研发智能会议系统产品的开始时间和经验上，领先于中国企业。只是我们长期坚守只做优质产品的理念，导致一些后起企业冲击了市场。现在，随着消费者逐步回归，产品销售开始有了起色。根据</p>

	<p>目前状况, SHKL 制定了近 3 年累计销售 4000 套智能会议系统的目标, 为 SHKL 长期发展打下基础。而 SHKL 的长期目标是要让智能会议系统不仅领先中国市场, 还要进入国际市场, 在未来十年, 销售规模超过年均 10000 套。年产值超过 5 亿元人民币。现在, SHKL 已经在布局日本市场和美国市场, 积极扶持日本代理商开拓日本市场, 美国代理商也已开始市场调研。</p>
<p>Opportunity for Growth 增长机会</p> <p><i>What is the current opportunity for the Company to grow?</i> 贵司目前的成长机会为何?</p> <p><i>What are the future potential opportunities for the Company?</i> 贵司未来潜在的机遇为何?</p> <p><i>What is your competitive advantage?</i> 贵司的竞争优势为何?</p> <p><i>How will you be successful?</i> 贵司将如何实现成功?</p>	<p>While consumers have better and better understanding on SHKL products, the sales of SHKL intelligent conference system is also improving. We will introduce new means such as financial leasing in sales activities to promote sales growth.</p> <p>随着消费者对 SHKL 产品的不断理解, SHKL 智能会议系统的销售正在往好的方面发展。我们在销售活动中还会引进金融租赁等新的手段, 把握住销售增长的机遇。</p> <p>Today, it is still these low-priced low-quality products competing with SHKL. We cannot ignore the existence of them. Therefore, SHKL is constantly upgrade the product to always keep the leader position in term of technology. For example, the new product has completely realized the mobile phone screen projection function, so that users will have better and better experience. Besides, SHKL always focuses on product quality and insists on the concept of quality first. Third, SHKL makes efforts to control production cost and will properly lower the selling price after reaching a certain sales volume. By insisting on the above three actions, SHKL intelligent conference system can maintain competition advantages and achieve good results in market competition.</p> <p>现在, 与 SHKL 产品竞争的还是那些质量比较差的低价产品。我们不能忽视这些产品的存在。所以, SHKL 一是不断升级产品, 如新产品已完全实现手机投屏等, 让使用者体验越来越好, 技术上始终领先别的产品。二是保证产品质量, 坚持质量第一的产品理念。三是控制生产成本, 在产品销售量上去后, 适当降低销售价格。坚持上述三点, SHKL 的智能会议系统就能够保持竞争优势, 在市场竞争取得好成绩。</p>
<p>Business Location(s) 业务所在地</p> <p><i>Location of factories, offices, facilities</i> 工厂、办公室、设施的所在地</p>	<p>Room 401, Building A, Jiashan Guigu Science Park, Zhejiang</p> <p>浙江嘉善归谷园区科技园 A 栋 401 室</p>

<p>Organization Chart / Key Personnel 组织结构图/主要员工</p>  <pre> graph TD OM["[Owner/Manager] [所有人/经理]"] --> MM["[Marketing Manager] [市场部经理]"] OM --> OFM["[Office Manager] [办公室主任]"] MM --> EC["[Events Coordinator] [活动协调人]"] MM --> SP["[Salesperson] [销售人员]"] OFM --> EA["[Executive Assistant] [行政助理]"] OFM --> OP["[Operations] [运营人员]"] </pre>	<p>Project manager: Xue Ying 项目经理：薛鹰</p> <p>Marketing Manager: Qian Shuluo 市场部经理：钱树罗</p> <p>Administrative Director: Liu Li 行政主管：刘丽</p> <p>HR Director: Xu Lin 人事主管：徐琳</p> <p>External Contact Director: Wang Ying 对外联络部主管：王莹</p> <p>Financial Director: Wang Xue 财务主管：王雪</p>
<p>Suppliers 供应商</p> <p>Who are your key suppliers? What do they supply to your business? What is your outsourcing arrangement if any? 贵司的主要供应商有哪些？他们向贵司的业务提供什么？贵司有哪些外包安排（如有）？</p>	<p>SHKL intelligent conference system is produced by Shanghai Seeyoo Electronic Technology Co., Ltd. as OEM. SHKL provides technical standards and software. SHKL 智能会议系统由 SHKL 提供技术标准和软件，在中国上海信颐电子科技有限公司 OEM 生产。</p>
<p>Sales Channels 销售渠道</p> <p>e.g. Shopfront, internet, direct mail, export or wholesale 例如，店面、网络、直邮、出口或批发</p>	<p>At present, SHKL intelligent conference system is mainly sold by means of direct selling under company promotion. 目前 SHKL 智能会议系统的销售，以公司推广直销为主。</p>

<p>Material Contracts 重大合同</p> <p>Is there any material contract the Company has signed with your clients? If yes, what are they? 贵司是否与贵司客户签订了任何重大合同？如有的话，它们是？</p>	<p>1. Cooperation contract signed with Shanghai Seeyoo Electronic Technology Co., Ltd. on July 1, 2014 1、2014 年 7 月 1 日与上海信颐电子科技有限公司合作合同</p> <p>2. Sales Agency Contract signed with Shanghai Uto IOT Co., Ltd. on August 30, 2014 2、2014 年 8 月 30 日与上海佑途物联网有限公司销售代理合同</p> <p>3. Japanese Market Agency Contract signed with CHALLENGER CO., Ltd. on September 1, 2016 3、2016 年 9 月 1 日与日本 CHALLENGER CO.,LTD 日本市场代理合同</p>
<p>Intellectual Properties 知识产权</p> <p>Does the Company have any intellectual property? If yes, please provide a list of all IP rights the Company owns. 贵司是否拥有任何知识产权？如有的话，请提供一份贵司拥有的所有知识产权的清单。</p> <p>Please also list which IP is licensed from third parties. 请同时列一份第三方许可的知识产权清单。</p>	<p>PRC Computer software copyrights owned: 所持有的中国计算机软件著作权：</p> <ol style="list-style-type: none"> 1. KSRV real time electronic global business communication software (registration number: 2009SR048865; classification: 65000-6100); and KSRV 实时电子全球商务沟通软件（登记号：2009SR048865；分类：65000-6100）；以及 2. Kunlun video news player software (registration number: 2008SR02998; classification: 67500-0000) 坤伦视频新闻播放软件（登记号：2008SR02998；分类：67500-0000） <p>PRC Trademarks owned: 所持有的中国商标：</p> <ol style="list-style-type: none"> 1. PRC trademark certificate No 8092351; 中国商标注册证 编号：8092351； 2. PRC trademark certificate No 8094433; 中国商标注册证 编号：8094433； 3. PRC trademark certificate No 8092334; 中国商标注册证 编号：8092334； 4. PRC trademark certificate No 8092362; and

	<p>中国商标注册证 编号：8092362；以及</p> <p>5. PRC trademark certificate No 8092375. 中国商标注册证 编号：8092375。</p>
<p>Related Parties 关联方</p> <p>Does the Company have any related parties? If yes, please provide a list of all related parties and any investments, contracts, loans or other arrangements with these parties. 贵司是否有任何关联方？如有，请提供所有关联方的清单及与该等关联方的任何投资、合同、贷款或其他安排。</p>	<p>1. Jiaxing Kunlun Science and Technology Development Co., Ltd. (wholly owned subsidiary) 1、嘉兴坤伦科技发展有限公司（全资子公司）</p> <p>2. Zhejiang Shangshi Enterprise Management Co., Ltd. (wholly owned subsidiary) 2、浙江上势企业管理有限公司（全资子公司）</p> <p>SHKL has no dealings with the two companies in terms of loans, guarantees, contracts, etc. SHKL 与上述两公司没有贷款、担保、合同等方面的往来。</p>

<p>Business Name: financial and corporate services (enterprise overseas listing counseling) 业务名称：金融和公司服务（企业海外上市辅导业务）</p>	<p>For Each Business 每一业务</p>
<p>Description of the products / services sold 对所售产品/服务的描述</p> <p><i>Market position, value to customers, growth potential, new markets and products</i> 市场地位、对顾客的价值、增长潜力、新市场及产品</p>	<p>For the purpose of avoiding unnecessary confusion, as we have said in our response to NSX on 1 August 2018, we have not change our primary business, the details of which have been provided in the above table. We are exploring opportunities in enterprise overseas listing counseling, but our business has in fact not substantially changed to the point of requiring submissions as to the suitability for listing on NSX. 为避免不必要的疑义，如我们在 2018 年 8 月 1 日给 NSX 的回复中所述，我们没有改变我们的主营业务（其详细情况已在上表中提供）。我们在探索企业海外上市辅导方面的机会，但是我们的业务实际上没有实质性地变更到需要向 NSX 提交上市适当性的地步。</p> <p>Enterprise overseas listing counseling business aims at helping enterprises in China and the</p>

	<p>Asia-Pacific region be listed in security markets in the USA, Australia, Netherlands and Caribbean etc. Hundreds of thousands of Chinese enterprises need to enter the international capital market and thus the demands for overseas listing are very strong. Chinese government also vigorously supports enterprises to enter international capital market in form of overseas listing. Furthermore, the government grants financial subsidies to enterprises listed overseas. However, although there are many intermediaries in China capable of providing listing counseling services, only few of them can really provide professional and reliable services. SHKL cooperate with local governments and establish overseas listing counseling centers to build a professional, credible, convenient and reliable enterprise overseas listing platform. This platform has already started attracting enterprises to receive counseling services.</p> <p>企业海外上市辅导业务，旨在帮助中国和亚太地区的企业到美国、澳洲、荷兰加勒比等地的证券市场挂牌上市。中国有着数十万计的企业需要进入国际资本市场，到海外上市的需求非常旺盛，中国政府也大力支持企业通过海外上市进入国际资本市场，并给予到海外上市的企业资金补助。但是，中国为企业提供辅导上市服务的中介机构虽然名义上不少，但能真正做到专业、可靠的机构却很少。SHKL 与各地政府合作，设立海外上市辅导中心，打造专业可信、便捷可靠的企业海外上市平台，已开始吸引企业进入辅导服务。</p>
Description of the target market 对目标市场的描述 <i>Who are you selling to? What is your market share? Why do/would they buy your products/services over others?</i> 向谁出售？贵司的市场份额有多少？为何他们购买贵司而非他家的产品/服务？	<p>The overseas listing counseling centers established by SHKL and local governments have solved the difficulty that the enterprises cannot find professional and credible overseas listing counseling institution, which is an advantage common intermediaries does not have. Currently, SHKL has already established overseas listing counseling centers in provinces and cities like Zhejiang Province, Jiangsu Province, Hubei Province, Sichuan Province, Chongqing and Shandong through cooperation with local governments, and as a result, the market of this business is quickly expanded.</p> <p>SHKL 与各地政府联合设立的海外上市辅导中心，解决了企业找不到真正专业可信的海外上市辅导机构的难题。这是一般中介机构不具备的优势。现在 SHKL 已经在浙江、江苏、湖北、四川、重庆、山东等省市与当地政府合作设立了海外上市辅导中心，市场扩张很快。</p>
Goals / objectives / strategy 目标/目的/战略 What are your short and long-term goals? What activities will you	<p>Goals for SHKL's overseas listing counseling business: within the next 3 years, providing listing counseling services for 8 enterprises in China and the Asia-Pacific region every year; provide listing counseling services for 20 enterprises every year in the next 3-10 years.</p>

<p>undertake to meet them? 贵司的短期和长期目标为何？为实现该等目标，贵司将着手进行哪些活动？</p>	<p>SHKL 海外上市辅导业务 3 年目标：每年为 8 家中国和亚太地区企业提供上市辅导服务。未来 3--10 年，每年为 20 家企业提供上市辅导服务。</p>
<p>Opportunity for Growth 增长机会</p> <p><i>What is the current opportunity for the Company to grow?</i> 贵司目前的成长机会为何？</p> <p><i>What are the future potential opportunities for the Company?</i> 贵司未来潜在的机遇为何？</p> <p><i>What is your competitive advantage?</i> 贵司的竞争优势为何？</p> <p><i>How will you be successful?</i> 贵司将如何实现成功？</p>	<p>The huge demand for enterprise overseas listing is also an opportunity for SHKL. SHKL sticks to the service model of establishing overseas listing counseling centers through cooperation with governments in each place in order to provide a great number of enterprises with professional, credible, convenient and reliable listing counseling services, which is an advantage other listing counseling intermediary companies do not have. Therefore, SHKL's overseas listing counseling centers are bound to present good performance.</p> <p>企业海外上市的巨大的需求是，也 SHKL 的机遇。SHKL 坚持与各地政府合作开设海外上市辅导中心的服务模式，为广大企业提供专业可信、便捷可靠的上市辅导服务，这个优势是别的上市辅导中介公司不具备的。所以，SHKL 的海外上市辅导中心一定会有良好的表现。</p>
<p>Business Location(s) 业务所在地</p> <p><i>Location of factories, offices, facilities</i> 工厂、办公室、设施的所在地</p>	<p>Room 401, Building A, Jiashan Guigu Science Park, Zhejiang 浙江嘉善归谷园区科技园 A 栋 401 室</p>
<p>Organization Chart / Key Personnel 组织结构图/主要员工</p>	<p>Coordinators of SHKL's overseas listing counseling business: SHKL 海外上市辅导业务协调人：</p> <p>Zhou Xinghang 周幸航</p> <p>Xue Ying 薛鹰</p> <p>Xu Lin 徐琳</p>

Suppliers 供应商 Who are your key suppliers? What do they supply to your business? What is your outsourcing arrangement if any? 贵司的主要供应商有哪些？他们向贵司的业务提供什么？贵司有哪些外包安排（如有）？	Not applicable 不适用
Sales Channels 销售渠道 e.g. Shopfront, internet, direct mail, export or wholesale 例如，店面、网络、直邮、出口或批发	Not applicable 不适用
Material Contracts 重大合同 Is there any material contract the Company has signed with your clients? If yes, what are they? 贵司是否与贵司客户签订了任何重大合同？如有的话，它们是？	No, the Company has not signed any material contracts in relation to the enterprise overseas listing counselling. 公司没有签订任何有关企业海外上市辅导方面的重大合同。
Intellectual Properties 知识产权 Does the Company have any intellectual property? If yes, please provide a list of all IP rights the Company owns. 贵司是否拥有任何知识产权？如有的话，请提供一份贵司拥有的所有知识产权的清单。 Please also list which IP is licensed from third parties. 请同时列一份第三方许可的知识产权清单。	The Company has no intellectual property in relation to enterprise overseas listing counselling. 公司没有有关企业海外上市辅导方面的知识产权。
Related Parties 关联方 Does the Company have any related parties? If yes, please	1. Jiaxing Kunlun Science and Technology Development Co., Ltd. (wholly owned subsidiary) 嘉兴坤伦科技发展有限公司（全资子公司） 2. Zhejiang Shangshi Enterprise Management Co., Ltd. (wholly owned subsidiary) 浙江上势企业管理有限公司（全资子公司）

provide a list of all related parties and any investments, contracts, loans or other arrangements with these parties.

贵公司是否有任何关联方？如有，请提供所有关联方的清单及与该等关联方的任何投资、合同、贷款或其他安排。

SHKL has no dealings with the two companies in terms of loans, guarantees, contracts, etc.

SHKL 与上述两公司没有贷款、担保、合同等方面的往来。

Yours faithfully

谨致

Xinghang Zhou

周幸航

Chairman

董事长

Signature/签名:



SHKL Group Limited

SHKL 控股有限公司