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**Ganfeng Lithium Co., Ltd.**  
江西赣锋锂业股份有限公司

*(A joint stock company incorporated in the People's Republic of China with limited liability)*  
**(Stock Code: 1772)**

## **PAYMENT OF THE FINAL DIVIDENDS**

Reference is made to the circular (the "**AGM Circular**") of Ganfeng Lithium Co., Ltd. (the "**Company**") dated 26 May 2020 in relation to, among others, the distribution of the 2019 final dividend and the announcement of the Company dated 24 June 2020 in relation to the poll results (the "**Poll Results Announcement**") of the 2019 annual general meeting of the Company (the "**AGM**"). The shareholders of the Company (the "**Shareholders**") approved the profit distribution proposal for the year of 2019 at the AGM.

The Company will pay a final dividend of RMB3.00 for every ten shares of the company (tax inclusive) (equivalent to HK\$3.28193 for every ten shares of the company (tax inclusive)) for the year ended 31 December 2019 (the "**2019 Final Dividends**"). For H shares of the Company ("**H Shares**"), as set out in the Poll Results Announcement, the 2019 Final Dividends will be paid to holders of H shares whose names appear on the register of members of the Company on Wednesday, 8 July 2020.

## **PAYMENT OF THE FINAL DIVIDENDS**

The board of directors of the Company (the “**Board**”) wishes to inform the Shareholders that details of the payment of the 2019 Final Dividends are as follows:

### **1. Holders of H Shares (excluding mainland investors who invest in the H Shares via the Shanghai-Hong Kong Stock Connect or Shenzhen-Hong Kong Stock Connect)**

Dividends payable to the holders of H Shares (excluding mainland investors who invest in the H Shares via the Shanghai-Hong Kong Stock Connect or Shenzhen-Hong Kong Stock Connect) shall be paid in Hong Kong dollars. The amount to be actually paid in Hong Kong dollars shall be calculated based on the average benchmark exchange rate between RMB and HKD (i.e. RMB0.914096 = HK\$1.00) as released by the People’s Bank of China for one week prior to the date of the AGM, with the cash dividends of HK\$3.28193 for every 10 H Shares (tax inclusive).

The Company has appointed CCB (Asia) Trustee Company Limited as the receiving agent in Hong Kong (the “**Receiving Agent**”) and will pay to such Receiving Agent the 2019 Final Dividends declared for payment to holders of H Shares (excluding mainland investors who invest in the H Shares via the Shanghai-Hong Kong Stock Connect or Shenzhen-Hong Kong Stock Connect). The Receiving Agent will pay the 2019 Final Dividends on 22 July 2020. Relevant cheques will be dispatched to holders of H Shares (excluding mainland investors who invest in the H Shares via the Shanghai-Hong Kong Stock Connect or Shenzhen-Hong Kong Stock Connect) entitled to receive such dividends by ordinary post at their own risk of postal errors on 22 July 2020.

### **2. Mainland investors investing in the H Shares via the Shanghai-Hong Kong Stock Connect or Shenzhen-Hong Kong Stock Connect**

Dividends payable to mainland investors who invest in the H Shares via the Shanghai-Hong Kong Stock Connect or Shenzhen-Hong Kong Stock Connect will be paid in Renminbi by China Securities Depository and Clearing Corporation Limited (the “**CSDC**”) as entrusted by the Company on 22 July 2020 for distribution.

## **TAXATION ON THE FINAL DIVIDENDS**

### **Non-resident enterprise Shareholders**

In accordance with the “Enterprise Income Tax Law of the People’s Republic of China” (《中華人民共和國企業所得稅法》) and the “Rules for the Implementation of the Enterprise Income Tax Law of the People’s Republic of China” (《中華人民共和國企業所得稅法實施條例》), both implemented on 1 January 2008 and the “Notice of the State Administration of Taxation on Issues Relevant to the Withholding of Enterprise Income Tax on Dividends Paid by PRC Enterprises to Offshore Non-resident Enterprise Holders of H Shares” (Guo Shui Han [2008] No. 897) (《關於中國居民企業向境外H股非居民企業股東派發股息代扣代繳企業所得稅有關問題的通知》(國稅函[2008]897號)) promulgated on 6 November 2008, the Company is obliged to withhold and pay PRC enterprise income tax on behalf of non-resident enterprise Shareholders at a tax rate of 10% from 2008 onwards when the Company distributes any dividends to non-resident enterprise shareholders whose names appear on the register of members of H Shares. As such, any H Shares which are not registered in the name(s) of individual Shareholder(s) (which, for this purpose, includes shares registered in the name of HKSCC Nominees Limited, other nominees, trustees, or other organisations or groups) shall be deemed to be H Shares held by non-resident enterprise Shareholder(s), and the PRC enterprise income tax shall be withheld from any dividends payable thereon. Non-resident enterprise Shareholders may wish to apply for a tax refund (if any) in accordance with the relevant requirements, such as tax agreements (arrangements), upon receipt of any dividends.

### **Non-resident individual Shareholders**

Pursuant to the Individual Income Tax Law of the PRC (《中華人民共和國個人所得稅法》) and its implementing rules and regulations, the Company is required to withhold and pay the individual income tax at a rate of 10% for distribution of dividend to its Hong Kong resident individual Shareholders who are eligible to receive the 2019 Final Dividend. As such, the Company will distribute the 2019 Final Dividend to such Shareholders after deducting the individual income tax of 10%.

## **Investors who invest in the H Shares via the Shanghai-Hong Kong Stock Connect or Shenzhen-Hong Kong Stock Connect**

Pursuant to the “Circular on Tax Policies Concerning the Pilot Programme of the Shanghai and Hong Kong Stock Market Trading Interconnection Mechanism” (Cai Shui [2014] No. 81) 《(關於滬港股票市場交易互聯互通機制試點有關稅收政策的通知》(財稅[2014]81號)) promulgated on 31 October 2014 and the “Circular on Tax Policies Concerning the Pilot Programme of the Shenzhen and Hong Kong Stock Market Trading Interconnection Mechanism” (Cai Shui [2016] No. 127) 《(關於深港股票市場交易互聯互通機制試點有關稅收政策的通知》(財稅[2016]127號)) promulgated on 5 November 2016:

- For mainland individual investors who invest in the H Shares via the Shanghai-Hong Kong Stock Connect or Shenzhen-Hong Kong Stock Connect, the Company will withhold individual income tax at the rate of 20% in the distribution of the 2019 Final Dividends. Where individual investors have already paid foreign withholding taxes for such income, investors may apply to the competent tax authorities of CSDC for tax credit with valid tax withholding certificates. For mainland securities investment funds that invest in the H Shares via the Shanghai-Hong Kong Stock Connect or Shenzhen-Hong Kong Stock Connect, the Company will withhold individual income tax in the distribution of the 2019 Final Dividends pursuant to the foregoing provisions; and
- For mainland corporate investors that invest in the H Shares via the Shanghai-Hong Kong Stock Connect or Shenzhen-Hong Kong Stock Connect, the Company will not withhold the income tax in the distribution of the 2019 Final Dividends and the mainland corporate investors shall file the tax returns on their own.

**Shareholders are recommended to consult their tax advisors for the tax effects in Mainland China, Hong Kong and other countries (regions) regarding the ownership and disposal of H Shares.**

By order of the Board  
**GANFENG LITHIUM CO., LTD.**  
**LI Liangbin**  
*Chairman*

Jiangxi, PRC  
July 15, 2020

*As at the date of this announcement, the Board comprises Mr. LI Liangbin, Mr. WANG Xiaoshen, Ms. DENG Zhaonan and Mr. GE Zhimin as executive directors of the Company; Mr. YU Jianguo and Ms. YANG Juanjuan as non-executive directors of the Company; and Mr. LIU Jun, Ms. WONG Sze Wing, Ms. XU Yixin and Mr. XU Guanghua as independent non-executive directors of the Company.*