

FUTURE FINTECH GROUP INC.
(and its Subsidiaries)
CORPORATE DISCLOSURE POLICY
(Policy governing public disclosure of Material
Information)

February 2011

Approved By:

Yongke Xue (Chairman & CEO)

Spring Liu (Corporate Secretary & CFO)

Norman Ko (Audit Committee Chairman and Compensation Committee Chairman)

Wang Guolin (Director)

John W. Smagula (Director)

Xiaoqing Yan (Director)

Policy Statement

Future Fintech Group, Inc. commits to providing timely, transparent, and credible information to the investing public in conformity with any and all legal and regulatory requirements. References to the "Company" or "Future Fintech," unless otherwise indicated, refer to Future Fintech Group, Inc., and its direct and indirect subsidiaries.

This Corporate Disclosure Policy (this "Disclosure Policy") is intended to prevent the selective disclosure of material, nonpublic matters, or developments related to the Company to anyone outside of Future Fintech. This Disclosure Policy identifies those persons who are authorized to speak on behalf of Future Fintech and establishes procedures associated with corporate communications. Compliance with this Disclosure Policy is critical to ensure that corporate communications are made on a consistent basis and in compliance with applicable legal and regulatory requirements. Failure to achieve this objective could result in significant liability for the Company and, in some instances, the relevant employees.

Scope of the Disclosure Policy

This Disclosure Policy covers all Company employees and members of the Company's board of directors (the "Board of Directors"). It covers disclosures in any document filed with or provided to the U.S. Securities and Exchange Commission (the "SEC"); statements made in the Company's annual and quarterly reports; news and earning releases; communications between the Company and any analysts, investors, and news media; senior management speeches and presentations; and other information provided on the Company's website to the general public. Nothing in this Policy should be construed as prohibiting an employee from complying with any local, state, or federal laws and regulations, including those dealing with reporting emergencies to appropriate non-Company agencies.

Disclosure Committee

The Board of Directors has established a Disclosure Committee (the "Committee") as suggested in Section 404 of the Sarbanes-Oxley Act to implement the internal control procedures for assessment and attestation of financial disclosures. This Committee consists of the Company's Chairman, the Chief Executive Officer (the "CEO"), the Chief Financial Officer (the "CFO"), the Corporate Secretary, and such other senior members of the finance department as determined by the CFO from time to time. The Chairman shall act as the chair of the Committee. The Committee will consult external legal counsel and the Board of Directors as necessary in discharging its duties. The Committee is responsible for all regulatory disclosure requirements and for overseeing and coordinating the Company's disclosure practices. The Committee will also be responsible for implementing the internal control procedures for assessment and attestation of financial disclosures. This Disclosure Policy will be administered by the Committee.

The Committee will systematically review the Company's prior material disclosures in SEC filings and other public statements to determine whether any updating or correcting is appropriate. The Committee will also periodically review and update this Disclosure Policy, if necessary.

It is not expected that the Committee will have formal meetings or prepare minutes of meetings. Many decisions made by the Committee will be made by those members of the Committee who are then available on a real-time basis as a result of informal meetings and consultations.

Authorized Spokespersons

To ensure that Future Fintech's corporate communications are made on a consistent basis, all public disclosures of information on behalf of Future Fintech and/or communications with financial or industry analysts or the media about Future Fintech may only be made by designated "Future Fintech Spokespersons." The following individuals are authorized as Future Fintech Spokespersons:

- a. the Chairman, or delegate;
- b. the CEO, or delegate;
- c. the CFO, or delegate; and
- d. an outside public relations and investor relations firm (the "Investor Relations Firm") or representative, engaged by the Company from time to time pursuant to the relevant engagement or consulting agreement between the Company and such firm or representative.

In addition, other Company officers may be designated by the CEO as Future Fintech Spokespersons to respond to specific inquiries from the investment community or the media.

None of the Company employees or members of the Board of Directors (other than the Future Fintech Spokespersons) is authorized to speak on behalf of Future Fintech with shareholders, financial or industry analysts, or the media. If any such employee or member of the Board of Directors receives an inquiry from an investor, an analyst, or the news media, the inquiry shall only be referred to the Chairman, CEO, CFO, or the Investor Relations Firm. Moreover, such Company employees and members of the Board of Directors shall not respond, directly or indirectly, to any such inquiry.

Nonpublic Material Information

Material information is any information relating to the business and affairs of the Company that would reasonably be expected to result in a significant impact on the price of a security, or a

reasonable investor would consider important in deciding whether to buy, hold, or sell Future Fintech stock. Both positive and negative information can be material, as well as information that forecasts whether an event may or may not occur. Any questions concerning the materiality of particular information should be resolved in favor of materiality. Examples of material information about the Company include, but are not limited to:

- announcements of financial results;
- an actual change in earnings or in forecasted earnings that is higher or lower than the forecast;
- a significant sale or acquisition of assets;
- a significant new contract with a customer;
- the launch of a new product or business;
- a pending or prospective merger, acquisition or tender offer;
- the gain or loss of a substantial customer or supplier;
- initiation of, or developments regarding, significant litigation or threats of litigation; and
- changes in senior management.

Material information should be considered “nonpublic” unless and until it has been disclosed by Future Fintech by means of a non-exclusionary, broad, public dissemination, such as a press release, SEC filing, or publicly accessible webcast.

Confidentiality

The maintenance of confidentiality is essential to the Company, both legally and practically. Accordingly, the Committee will take steps to ensure that material and other sensitive information will be carefully handled in order to avoid “selective disclosure.” In addition, to avoid selective disclosure, the Committee will be responsible for the timing of any release of material information.

Prohibition on Selective Disclosure of Material, Non-Public Information

Selective disclosure is the disclosure of material, nonpublic information to any individual or group prior to the broad public dissemination of that information. It is a violation of law and Future Fintech policy to selectively disclose any material, non-public information to people or groups outside of the Company at any time, unless those people or groups are covered by confidentiality or nondisclosure agreements or obligations.

In the event that material, non-public information is disclosed unintentionally, the Committee must be notified immediately. Future Fintech shall provide public disclosure of that information promptly upon discovery of the unintentional disclosure.

Communicating Material Information to the Committee

The responsible senior officers of the Company and its subsidiaries shall inform the Company’s CEO or the CFO on a timely basis of the full particulars of any transaction, development, or information that is or could reasonably be considered to be material information with respect to the Company so as to enable the members of the Committee to determine whether timely disclosure is required and otherwise to perform its duties under this Disclosure Policy.

If there is any doubt whether any particular corporate information is material, a member of the Committee should be consulted. Approval by Committee and Legal Counsel before Public Disclosure All news releases, corporate documents, and public oral statements disclosing potentially material information in circumstances in which it is reasonable to conclude that such

information will become generally disclosed must be reviewed and approved by the Company's legal counsel and the Committee before they are issued or made.

In addition to approval by the Committee, the following disclosure documents will be submitted to the Audit Committee of the Board of Directors prior to public release by the Company:

- news releases containing earnings guidance;
- quarterly earnings releases, interim and annual financial statements and management discussion and analysis of the Company's financial conditions and results of operations;
- news releases containing financial information based on or derived from the Company's financial statements; and
- any update of any of the foregoing items.

Policy on News and Earnings Releases

A news release will be issued on new material developments, unless the Committee determines that doing otherwise is appropriate and permissible under the circumstance.

Any new material information that is to be intentionally discussed or presented in any meeting or conversation with financial analysts or investors will be preceded by the issuance of a broadly disseminated news release. If new material information is unintentionally disclosed in a meeting or discussion with a member or members of the investment community, the Company will issue a news release within 24 hours containing that information. To the extent practicable, the Committee member or someone intimately familiar with the Company's disclosure record will accompany senior management officers in any meetings or discussions with the media, financial analysts, or investors in order, at a minimum, to monitor the conversation for any unintentional disclosure of new material information and to facilitate the prompt release of that information.

In compliance with federal securities disclosure rules, an earnings release will be furnished on a Current Report on Form 8-K within four business days from its release, or within the time period required under the then effective rules and regulations governing the filing of Form 8-Ks. However, under normal circumstances, Future Fintech will furnish its earnings release on Form 8-K prior to the commencement of the earnings conference call. In compliance with Regulation G, if Future Fintech presents any non-GAAP information in its earnings release, Future Fintech will reconcile such non-GAAP measures to GAAP equivalent information in the earnings release. Similarly, if non-GAAP information is discussed in the earnings conference call, it will promptly post that information on its website, in accordance with Regulation G requirements.

Conduct of Conference Calls and Webcasts

Future Fintech typically holds investor conference calls to discuss quarterly financial results and other significant events that arise in the course of its business. These calls will be open to the public and media. A replay of the call will generally be made available for a limited time after the call. Normally, Future Fintech will issue a news release in advance, announcing the date, time of the call, and how to access the call and webcast. Future Fintech will attempt to respond to as many questions as possible in the time allowed. Following any investor call or public comment, Future Fintech will not provide new material information or elaborate in a material way beyond what was covered during the call or public comment, other than by providing further public disclosure within the meaning of Regulation FD.

Analyst and Investor Meetings

Future Fintech, through the Investor Relations Firm and Future Fintech Spokespersons, makes a practice of responding to analyst and investor inquiries in the form of phone conversations, one-on-one meetings, and group meetings of analysts and investors. The purpose of these meetings is for investors to gain a better understanding of the strategies and fundamentals of the Company, as well as to give analysts and investors the opportunity to personally meet and assess the management. Future Fintech will not disclose material, nonpublic information in these meetings. Future Fintech also participates in a number of either Companyhosted or analyst-hosted conferences and other meetings, as schedules permit. A designated member of the Investor Relations Firm or Committee member will be present at or available for participation in all meetings held with analysts and investors. In the case of conferences or Company-hosted presentations, Future Fintech (a) will ensure that any material, non-public information to be discussed during these conferences is broadly disseminated prior to or at the same time and (b) will, whenever practicable, announce publicly that the presentation will be held and webcast the presentation. The presentation materials should be reviewed by the Investor Relations Firm and external legal counsel to ensure, for example, (a) no confidential information has been mentioned, (b) no potential misleading and/or overcommitted wording has been used, and (c) any quoted data have been properly referenced to any publicly available survey, analyst reports, other qualified independent third party reports, or the Company's public filings, as applicable.

Industry Conference Presentations and Speeches

At times, Future Fintech will be called upon to make presentations at conferences sponsored by investment banks, industry and trade associations, or other groups in settings that are not open to the general public. Such presentations should be made only by Future Fintech Spokespersons and should be limited to information that is either not material or which is already publicly available. When practicable, Future Fintech will announce its participation publicly in advance of these presentations and will encourage organizers to make webcasting or teleconferencing available for formal presentations. Future Fintech will not issue new guidance, reaffirm, or otherwise update the Company's previously issued guidance, or otherwise disclose material nonpublic information, in these forums.

Responding to Rumors

The Company does not generally comment on market rumors or speculation. Should NASDAQ or another securities exchange on which the Company's stock is then listed request that Future Fintech make a definitive public statement in response to a market rumor that is causing significant volatility in the stock, the Committee will promptly address all requests for clarifying statements respecting rumors.

Rumors about the Company that are posted in Internet chat rooms are covered by this Disclosure Policy. No person (except Future Fintech Spokespersons) covered under this Disclosure Policy should respond to rumors about the Company found in Internet chat rooms, and all rumors should be referred to designated Future Fintech Spokespersons for appropriate action.

Handling Projections that are identified as Forward-Looking

Future Fintech may, from time to time, provide forward-looking information in its public disclosure to enable the investment community to better evaluate Future Fintech and its prospects for performance. This forwardlooking information may or may not include forecasted

financial measures, market conditions and profit margin information, or significant new product developments. When making such forward-looking statements, Future Fintech will use the safe harbor as prescribed in the 1995 Private Securities Litigation Reform Act. A forward-looking statement made in Future Fintech's written disclosures will be accompanied with meaningful cautionary language that warns investors that there is a risk the statement could change materially. In the case of oral forward-looking statements, Future Fintech will refer to the risk factors enumerated in other readily available public disclosure documents.

Providing Earnings Guidance to Analysts and Investors

Future Fintech may provide in its earnings release or other communications a reasonable range of earnings estimates and underlying assumptions for such guidance for the relevant period. Future Fintech may update its range of estimates should it become likely that the estimate(s) previously provided will change materially. Any such update will be accomplished by a widely disseminated news release or publicly accessible webcast. However, as the quarter progresses, once Future Fintech has a clearer picture of the financial or business related results for the quarter, Future Fintech will not confirm earlier guidance during the quarter or after the occurrence of an intervening event without first issuing a news release or conducting a webcast providing an update for the quarter.

Future Fintech will not comment on an analyst's estimate(s) in relation to Future Fintech's range of estimates, except that Future Fintech will refer the analyst to what Future Fintech has stated publicly. In the case of an analyst whose estimate is well above or below the range of current analysts' estimates, Future Fintech may call the analyst and simply suggest that he or she look at what the Company has publicly released, but will not go beyond that in terms of questioning the analyst's assumptions or engage in a substantive discussions of the analyst's estimate, except that Future Fintech may suggest corrections when assumptions have been made on the basis of factual content that is incorrect when compared to information publicly disseminated by Future Fintech.

Analysts' Draft Models or Reports

Future Fintech regards analyst reports as proprietary information belonging to the analyst's firm and will not provide such reports on the Company's website. The Company will not review, confirm, endorse, adopt, or disseminate analysts' reports or earnings models. However, in certain limited circumstances, upon request, Future Fintech may review the factual content of such documents and suggest corrections only when assumptions have been made on the basis of factual content that is incorrect when compared to information publicly disseminated by Future Fintech. Under no circumstances will Future Fintech distribute analysts' reports to the investing public. Instead, Future Fintech may post on the investor relations section of its website the names and firms of analysts who are currently covering the Company.

Analyst and Investor Access to Information and Company Officials

Future Fintech will provide fair access to corporate information and officials within the limits of its time and resources. Requests for meetings with senior management will be met as schedules permit and may be determined by such criteria as Future Fintech and its senior management determine appropriate, including the number of shares an investor holds in Future Fintech's securities, an analyst's or investor's knowledge of Future Fintech and its industry or industries in

which Future Fintech operates, and how often the analyst or investor has met with senior management members of Future Fintech. Under no circumstances will Future Fintech deny an analyst or investor access to Company information or management on the basis of a negative recommendation of Future Fintech's stock or a decision to sell Future Fintech's stock.

Providing Material Information to the Media

Future Fintech will not provide material, nonpublic information to the media prior to its public disclosure of such information. Future Fintech will not provide exclusive stories to the media concerning upcoming material events that have not been publicly announced. Quiet Period This Disclosure Policy shall work in conjunction with the Company's insider trading policy. With the exception of the disclosure of material information in accordance with this Disclosure Policy, the Company will observe quiet periods prior to the release of quarterly earnings results and when material changes are pending. During the quiet period, though it is preferable to avoid investor meetings, the Company may choose to participate in investor phone calls, meetings, or conferences, but will not discuss current operations or results of the business. Questions Any questions or inquiries regarding this Policy should be addressed to any member of the Committee.