

Communications Strategy

1. INTRODUCTION

This Communications Strategy sets out the Company's approach and commitment to effective communication with its shareholders, other stakeholders, market participants and the wider community.

The Company will endeavour to make publicly available all information necessary to ensure that trading in its securities takes place in an efficient, competitive and informed market.

2. PURPOSE

This Communication Strategy is designed to ensure that the Company:

- (a) provides timely and accurate information equally to all shareholders, stakeholders and market participants regarding the Company including its financial position, performance, ownership, strategies, activities and governance; and
- (b) adopts channels for disseminating information that are fair, timely and cost efficient.

To achieve this, the Company communicates information regularly to shareholders, other stakeholders and market participants through a range of forums and publications.

3. COMMUNICATION WITH SHAREHOLDERS AND THE MARKET

The Company is committed to ensuring that all shareholders and market participants receive timely and accurate information about the Company and its activities. Shareholders and market participants will be provided with information in relation to the Company in the following ways.

3.1 Company Meetings

The meetings of shareholders of the Company represent an excellent opportunity for the Company to provide information to its shareholders. The Company encourages attendance at, and participation in, general meetings.

A notice of a meeting will be sent to shareholders prior to meetings, including details of the time and place of the meeting, the resolutions to be considered and proxy voting procedures.

The Company's external auditor will attend the Company's AGM and be available to answer shareholders questions about the conduct of the audit, preparation and content of the auditor's report, accounting policies adopted by the Company and the auditor's independence. The external auditor will also be allowed a reasonable opportunity to answer

written questions submitted by shareholders to the auditor as required under the Corporations Act.

3.2 **Annual Report**

The Company's Annual Report will be available on its website and contain important information about the Company's activities and results for the previous financial year.

3.3 **Website**

The Company's website is the primary means to provide information to all shareholders and other stakeholders. It has been designed to enable information to be accessed in a clear and readily accessible manner.

The following will be available on the Company's website:

- (a) all announcements and releases to the ASX;
- (b) copies of presentations to shareholders, institutional investors, brokers and analysts where possible;
- (c) any media or other releases;
- (d) all notices of meetings and explanatory material;
- (e) a copy of the Company's most recent annual report as well as previous annual, half yearly and quarterly reports;
- (f) a summary of the Company's code of conduct and charters;
- (g) a summary of some of the Company's policies; and
- (h) any other relevant information concerning non-confidential activities of the Company including business developments.

3.4 **Briefings**

The Company recognises the importance of the relationship between the Company and its institutional investors, brokers and analysts. The Company may from time to time conduct briefings to these groups. The following guidelines apply in relation to such briefings:

- (a) information which is required to be disclosed under the Company's Continuous Disclosure Policy will not be disclosed at briefings unless it has been previously, or is simultaneously, released to the market;
- (b) if such information which has not been disclosed is inadvertently released, the Company will immediately release it to the market via the ASX and place it on the Company's website;

- (c) questions at briefings that deal with such information that has not previously been disclosed will not be answered; and
- (d) the Company will place a copy of any briefing presentation material on the Company's website.

4. COMMUNICATION WITH EMPLOYEES

The Company recognises that its employees are central to the Company's success. In order to enable employees to fulfil their role to the high standards required and to promote employee satisfaction, the Company aims to ensure effective communication with employees.

Effective communication with employees starts with their direct general manager and with accessibility to senior management. Employees will also be provided with information in relation to the Company in the following ways.

4.1 Employee briefings

The Company will from time to time conduct employee briefings so that all staff are aware of activities within the Company. These briefings may be conducted by the [Human Resources Manager] or an appropriate manager.

4.2 Electronic communication

The Company's email system allows staff to communicate simply and easily with each other and with management. All employees have access to this system and are encouraged to use it to improve the flow of information and communication generally. The Company will use email to ensure a continued flow of the information and to communicate effectively with staff. Staff should feel free to communicate with any member of management by email.

4.3 Website

The Company's website is an important communication tool for employees. It contains a range of information which relates to employees including relevant policies and codes, media and market announcements and presentations to shareholders and institutional investors. Employees are encouraged to view the website on a regular basis so that they can keep up to date with information concerning the Company.

5. COMMUNICATION WITH OTHER STAKEHOLDERS

The Company is committed to ensuring that all stakeholders regularly receive information about the Company and its activities. While individual briefings may be held with key stakeholders, such as financiers, the principal means of ensuring that stakeholders to have access to information will be through the Company's website.

6. COMMUNICATION WITH ASX

All communication with ASX will be in accordance with the ASX Listing Rules.

The CEO and Chairman have been appointed as responsible for communication to ASX in relation to ASX Listing Rule matters and only the Company Secretary, or in his absence the CEO, has the authority to lodge announcements with ASX.

For further information please refer to the Company's Disclosure Policy.

7. CONTINUOUS DISCLOSURE

The Company is a public company listed on the ASX. It is subject to continuous disclosure requirements under the Corporations Act and the ASX Listing Rules, in addition to periodic and specific disclosure requirements.

A fundamental component of the Company's Communication Strategy is its continuous disclosure program. To ensure the Company complies with its continuous disclosure obligations, the Board has adopted a Disclosure Policy.

For further information please refer to the Company's Disclosure Policy. If you have any questions on the Company's Disclosure Policy, or require further information, contact the Company Secretary.

8. CONFIDENTIALITY

Information that the Company considers private and that is not generally available outside the Company (**Confidential Information**) and information that the Company owns, develops, pays to have developed or to which it has an exclusive right (**Proprietary Information**) must be treated by the Company and all employees as follows:

- (a) the Company and all employees must ensure that they do not disclose any Confidential Information or Proprietary Information to any third party or other employee who does not have a valid business reason for receiving that information; and
- (b) if Confidential Information or Proprietary Information is required to be provided to third parties or other employees for valid business purposes, the Company and its employees must:
 - (i) take adequate precautions to ensure that information is only used for those purposes for which it is provided and is not misused or disseminated to the Company's detriment; and
 - (ii) ensure that the information is returned or destroyed when the purpose is complete.

Such precautions include obtaining a confidentiality agreement or other undertaking. Advice about these measures can be obtained from the Company Secretary or General Counsel.

Any information concerning the Company which is not generally available and which may have a material effect on the price or value of the Company securities may need to be disclosed in order for the Company to comply with its continuous disclosure obligations



referred to in its Continuous Disclosure Policy and in section 7 of this Communications Strategy.

9. ADDITIONAL INFORMATION

If you have any questions arising from the Company's Communications Strategy, please contact the Company Secretary.

Adopted by the Board of Directors on the 23rd day of May 2011.