



# ALCIDION

## Shareholder Communication Policy

Alcidion Group Limited

ACN 143 142 410

**Version No:** V02

**Approved by:** Alcidion Board

**Effective from:** 25 October 2022

## Document Revision History

Approval Date	Version	Approved By	Summary of Amendments
22 August 2019	V01	Board	Policy adopted
24 September 2020	V01	Board	Routine review
25 October 2022	V02	Board	Routine review

## Other Policy Details

Key Information	Details
Approval Body	Alcidion Group Limited Board of Directors
Key Stakeholders	Alcidion Group Limited Board of Directors Audit and Risk Committee Executive Leadership Team
Responsibility for Implementation	Chief Executive Officer Company Secretary
Policy Custodian	Investor Relations Manager / Company Secretary
Next Review Date	25 October 2023
Reference Policies	Continuous Disclosure Policy

## Legislative and Regulatory Framework

Authority	Law, Resolution or Regulation
Australian Government	Corporations Act 2001 (Cth) (" <b>Corporations Act</b> ")
Australian Securities Exchange	ASX Listing Rules 3.1 – 3.1B Continuous Disclosure ASX Listing Rules Guidance Note 8 Continuous Disclosure ASX Listing Rules 4 Periodic Disclosure (collectively " <b>Listing Rules</b> ")
ASX Corporate Governance Council	ASX Corporate Governance Principles and Recommendation (2019) (" <b>ASX Principles</b> ")
ASIC	ASIC Regulatory Guide 62

## 1. Purpose

- 1.1 Alcidion Group Limited (“**Company**”) has adopted this Shareholder Communication Policy (“**Policy**”) to ensure that shareholders are informed in a timely and readily accessible manner of all major developments concerning the Company.
- 1.2 The purpose of this Policy is to promote effective 'two-way' communication with shareholders and to encourage effective participation at the Company’s general meetings and deal promptly with the enquiries of shareholders.

## 2. Methods of Communication

- 2.1 Information is provided to shareholders through, but is not limited to:
  - a) the Company’s annual and half-yearly reports;
  - b) market releases to the Australian Securities Exchange (ASX) in accordance with continuous disclosure obligations;
  - c) the Company’s website; and
  - d) the annual general meeting (AGM).
- 2.2 The Company encourages shareholders to receive company information electronically by registering their email address online with the Company’s share registry.
- 2.3 Shareholders may communicate with the Company by:
  - a) contacting the Company by telephone, mail or facsimile (contact details are available from the Company's website);
  - b) participation at the AGM (see section 5 below); or
  - c) participation at analyst and investor briefings which may be conducted from time to time (see section 6 below).
- 2.4 Where appropriate, a summary of the views and matters of concern or interest to shareholders be communicated to the Board.

## 3. Market Releases

- 3.1 The Company will make announcements to the market in accordance with the applicable Listing Rules and Corporations Act (see also the Company’s Continuous Disclosure Policy).
- 3.2 All announcements released to the market, subject to applicable securities law, are available to shareholders:
  - a) under the “ASX Announcements” section of the Company’s website;
  - b) under the “Company Announcements” section of the ASX website; and
  - c) by email notification (when shareholders provide the Company's share registry with their email address and elect to be notified of all the Company's ASX announcements).

## 4. Website

- 4.1 The Company’s website is the primary medium of providing information to all shareholders.
- 4.2 The Company’s website will contain information relevant to shareholders and stakeholders, including announcements made to the market by the Company (including all financial results,

annual reports and press releases), board and board committee charters, corporate governance policies and other material relevant to shareholders.

- 4.3 In accordance with Recommendation 6.1 of the ASX Principles, the Company has a 'Corporate Governance' section on its website.
- 4.4 The Company's annual corporate governance statement is prepared in accordance with the Listing Rules. It is contained in the annual report each year and is or will be available under the 'Corporate Governance' section of its website

## 5. Annual General Meeting

- 5.1 The AGM provides an important opportunity for the Company to provide information to its shareholders and a reasonable opportunity for informed shareholder participation. At the AGM, shareholders can express their views to the Board and vote on the Board's proposals. All shareholders are encouraged to attend the AGM.
- 5.2 As a general approach, the notice convening the AGM will state that shareholders unable to attend the AGM are invited to submit questions in writing up to 5 business days prior to the AGM. Any questions and responses will be included in the record of the AGM.
- 5.3 The date, time and location of the AGM will be provided in the notice of meeting. Alternatively, shareholders can contact the Company's share registry or the Company Secretary directly to obtain this information.
- 5.4 The notice of meeting and proxy form will be distributed to all shareholders prior to the AGM in the timeframe set by the Corporations Act and the Company's Constitution. The notice will also be available on the Company's website.
- 5.5 The Company's auditor will attend its AGM and will be available to answer any questions regarding the conduct of and any issues arising from the audit or the preparation and content of the auditor's report and accounting policies in relation to the preparation of the financial statements.

## 6. Analysts and investor briefings

- 6.1 The Company may conduct briefings for analysts and investors from time to time to discuss matters concerning the Company. In these cases, the protocols set out in the Company's Continuous Disclosure Policy will apply.

## 7. General

- 7.1 **Annual report:** Unless shareholders have elected to have a hardcopy of the annual report mailed to them, the default method of receiving the Company's annual report is electronically available on the Company's website or via a link where it can be downloaded which will be emailed to shareholders to the email address recorded on the Company's share register, prior to the AGM within the timeframe set by the Corporations Act.
- 7.2 **Half-year and full year results:** The half-year and full-year financial results are announced to the ASX pursuant to the Listing Rules and are available to shareholders in the same manner as other ASX announcements.
- 7.3 **Investor and analyst presentation:** Presentations that are made to investors and analysts will be available to all shareholders via the 'Investor Presentation' section of the Company's website

- 7.4 **Share registry:** Shareholders with any questions related to their shareholding should contact the Company's share registry:

**Computershare Investor Services Pty Limited**

Yarra Falls, 452 Johnston Street  
Abbotsford, Victoria 3067

Phone: 1300 850 505 (within Australia) or +61 3 9415 4000 (outside Australia)

Fax: +61 3 9473 2500

Email: [www.investorcentre.com/contact](http://www.investorcentre.com/contact)

Web: [www.computershare.com](http://www.computershare.com)

Postal Address: GPO Box 2975 Melbourne VIC 3001, Australia

- 7.5 **Shareholder privacy:** The Company recognises that privacy is important and will not disclose registered shareholder details unless required by law. However, shareholders should be aware that certain details of holdings in a public company are publicly available by law. Shareholder details will only be used by the Company in accordance with applicable privacy laws.
- 7.6 **Amendments:** This policy may be amended from time to time by resolution of the Board.

## 8. Review and Amendments

- 8.1 This Policy will be reviewed by the Board on an annual basis to ensure it remains effective and meets the best practice, industry standards and our needs.
- 8.2 The Policy will be available on the Company's website within a reasonable time after any such updates or amendments have been approved.