

AUB GROUP LIMITED COMMUNICATIONS POLICY

Effective 1st July 2020



1. PURPOSE

This purpose of this Communications Policy (**Policy**) is to ensure that there is an open and efficient communication channel between AUB Group Limited (**Company**) and its shareholders, and in particular, to:

- (a) provide the shareholders with timely, balanced and comprehensible information regarding the activities of the Company; and
- (b) promote the active participation of shareholders in general meetings.

2. CONFIDENTIALITY

Information that we consider private and that is not generally available outside of the Company (**Confidential Information**) and information that we own, develop, pay to have developed or to which we have an exclusive right (**Proprietary Information**) must be treated as follows:

- (a) we must ensure that Confidential Information or Proprietary Information is not disclosed to any third party or team member 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 a third party or team member for a valid business purpose, we must:
 - i) take adequate precautions to ensure that information is only used for the purpose for which it is provided and is not detrimentally misused or disseminated; and
 - ii) ensure that the information is returned or destroyed when the purpose is complete.

Such precautions may include obtaining a confidentiality agreement or other undertaking. Advice about these measures can be obtained from the Group Legal Counsel.

However, any information concerning the Company which is not generally available and which a reasonable person would expect to have a material effect on the price or value of our shares may need to be disclosed in order for the Company to comply with its continuous disclosure obligations referred to in the Continuous Disclosure Policy and in the following section of this Policy.



3. SHAREHOLDER COMMUNICATION

3.1 INVESTOR RELATIONS PROGRAM

The Company will implement a range of investor relations strategies to facilitate effective two-way communication with investors, shareholders and analysts.

The Company's investor relations program will focus both on:

- (a) professional investors (and financial market participants who service them); and
- (b) engaging with retail investors (and the organisations that represent them),

to understand the matters of concern or interest to those investors.

The Company also recognises the importance of engagement with a broad range of stakeholders beyond financial market participants, such as proxy advisers, governance advisers, government and industry groups.

Where significant comments or concerns are raised by investors or their representatives, they will be conveyed to the Company's board and relevant senior executives.

3.2 PERIODIC REPORTS TO SHAREHOLDERS

The Company produces half yearly and yearly financial reports and an annual report in accordance with the Corporations Act 2001 (Cth) (Corporations Act), the ASX Listing Rules and applicable accounting standards. It seeks to give balanced and understandable information about the Company and its proposals in its reports to shareholders.

3.3 THE COMPANY'S WEBSITE

The Company's website contains information about the Company and its governance framework including shareholder communications, announcements made to the market and related information. Information about the Company is freely and readily available online on the Company website and is kept available for a reasonable period. Investor information will be posted in a separate section on the website from other material about the Company. This part of the website will include information relating to the following of the Company¹:

- (a) corporate governance, including;
 - i) the names, photographs and brief biographical information of each of its directors and senior executives;

¹ as recommended in Recommendation 6.1 of the *ASX Corporate Governance Principles and Recommendations (4th Edition)*, February 2019.



- ii) its constitution and board charter and the charters of each of its board committees;
 - iii) a statement of the Company's values; and
 - iv) the corporate governance policies and other corporate governance materials referred to in these recommendations.
- (b) communications;
 - (c) corporate information;
 - (d) the Company's share registry contact details;
 - (e) copies of its annual directors' reports, financial statements and other corporate reports;
 - (f) copies of its announcements to ASX;
 - (g) copies of notices of meetings of security holders and any accompanying documents;
 - (h) copies of any documents tabled or otherwise made available at meetings of security holders and, if it keeps them, a recording or transcript of the meetings; and
 - (i) copies of any materials distributed at investor or analyst presentations and, if it keeps them, a recording or transcript of the presentations.

The website also provides information for shareholders to direct inquiries to the Company.

Other helpful investor information may also be made available on the Company website, including:

- (a) an overview of the Company's current business;
- (b) a description of how the Company is structured;
- (c) a summary of the Company's history;
- (d) a key events calendar showing the expected dates in the forthcoming year for:
 - i) results presentations and other significant events for investors and analysts;
 - ii) the annual general meeting;
 - iii) book closing dates for determining entitlements to dividends or distributions; and
 - iv) ex-dividend and payment dates for dividends or distributions;



- (e) once they are known, the time, venue and other relevant details for results presentations and the annual general meeting;
- (f) if the Company has different classes of securities on issue, a brief description of those different classes and the rights attaching to them;
- (g) historical information about the market prices of the Company's securities;
- (h) a description of the Company's dividend or distribution policy;
- (i) information about the Company's dividend or distribution history;
- (j) copies of media releases the Company makes;
- (k) contact details for enquiries from security holders, analysts or the media;
- (l) contact details for its securities registry; and
- (m) links to download key security holder forms, such as transfer and transmission forms, dividend or distribution reinvestment plan forms etc.

3.4 GENERAL MEETINGS

General meetings are used to communicate with shareholders and allow an opportunity for informed shareholder participation. At the meeting shareholders can express their views to the Board and management and to vote on the Board's proposals. All shareholders are encouraged to attend or, if unable to attend, to ask questions ahead of the meeting and vote on the motions proposed by appointing a proxy or using any other means included in the notice of meeting. The Company conducts its general meetings in accordance with the Company's constitution, the Corporations Act and the ASX Listing Rules.

The Company will ensure that all substantive resolutions at a meeting of shareholders are decided by a poll rather than by a show of hands. Where practicable, the Company will consider the use of technological solutions for encouraging shareholder participation at meetings (which may include, for example, live webcasting of meetings, holding meetings across multiple venues linked by live telecommunications and hybrid meetings).

3.5 NOTICES OF MEETINGS

The Company seeks to ensure that the form, content and delivery of notices of general meetings comply with the Company's constitution, the Corporations Act and ASX Listing Rules. Notices of meeting and accompanying explanatory notes aim to clearly, concisely and accurately set out the nature of the business to be considered at the meeting. The Company will place notices of general meetings and accompanying explanatory material on the Company's website.



3.6 AUDITOR TO ATTEND AGM

The external auditor will attend the annual general meeting and be available to answer questions about the conduct of the audit and the preparation and content of the auditor's report.

3.7 USE OF ELECTRONIC COMMUNICATION AND OTHER TECHNOLOGY

Shareholders may communicate electronically with the Company's share registry as provided for on the designated website.

The Company will communicate by post with its shareholders who have not elected to receive communication electronically.

The Company may consider the use of other technologies to communicate with shareholders.

4. MARKET COMMUNICATION

4.1 COMMUNICATION OF INFORMATION

The Company will post on its website relevant announcements made to the market by the Company and related information (which may include slides and presentations used in analyst, investor, shareholder or media briefings) after they have been given to the ASX and following confirmation of release to the market by the ASX.

Market sensitive information, being information which a reasonable person would expect to have a material effect on the price or value of the Company's securities (Market Sensitive Information), will be posted on the AUB website as soon as reasonably practicable after its release to the ASX following receipt of confirmation from the ASX.

Information may also be provided from time to time to the media on behalf of the Company but not before disclosure to the ASX, even on an embargo basis.

4.2 Briefings

The Company may conduct briefings for analysts and institutional investors from time to time to discuss matters concerning the Company. This includes meetings with shareholder advisory groups in conjunction with the Annual General Meeting.

Briefings will be undertaken by the process and by the Directors and employees as outlined in the Continuous Disclosure Policy.



4.3 Media relations and public statements

Media relations and communications must be conducted by the CEO, CFO or the Chair or a person authorised by them, and only to the extent of that authorisation.

The Company's Continuous Disclosure Policy refers to, amongst other things, its approach to communication with media. The Company's Continuous Disclosure Policy is contained on its website.

5. REVIEW

This Policy will be periodically reviewed to ensure that it is operating effectively and to determine whether any changes are required to it. This Policy may be amended by resolution of the Board.

6. MATERIAL REVISIONS

Version	Approval Date	Effective Date	Details
1.0	9 February 2017	9 February 2017	Policy approved by AUB Group Board.
2.0	30 June 2020	1 July 2020	Policy approved by AUB Group Board.