

**AUSTOCK GROUP LTD**  
**POLICY IN RELATION TO**  
**SHAREHOLDER COMMUNICATIONS**

**1. BACKGROUND**

- 1.1 Austock Group Ltd (“Austock”) has adopted a corporate governance policy which complies with the requirements of *Principles of Good Corporate Governance and Best Practice Recommendations* published in March 2003 (“ASX Principles”) by the ASX Corporate Governance Council (ASX CGC).
- 1.2 In line with the ASX Principles and Austock’s Corporate Governance Policy, the board of directors of Austock (“Board”) has adopted this Shareholders Communication Policy (“Policy”) to govern how Austock will communicate with its shareholders.

**2. OUR COMMITMENT**

- 2.1 Austock’s Code of Conduct requires Austock and its employees to act with high standards of honesty, integrity, fairness and equity in all aspects of their employment with Austock.
- 2.2 With this in mind, Austock commits to dealing fairly, transparently and openly with both current and prospective shareholders using available channels and technologies to reach widely and communicate promptly. Austock commits to facilitating participation in shareholder meetings and dealing promptly with shareholder enquiries.
- 2.3 Our shareholder communication policy is built around compliance with disclosure obligations and our commitment to follow best practice in disclosure. Our framework for communicating with shareholders is to concisely and accurately communicate:
- (1) our strategy;
  - (2) how we implement that strategy; and
  - (3) the financial results consequent upon our strategy and its implementation.

**3. CONTINUOUS DISCLOSURE**

- 3.1 The continuous disclosure regime is fundamental to the rights of shareholders to receive information concerning their securities. The most important aspect of Austock’s shareholder communication policy is to comply with the continuous disclosure regime and implement best practice disclosure policy.
- 3.2 After Austock is admitted to the official list of the ASX:
- (1) Market announcements will be posted to Austock’s website immediately after release to the market.
  - (2) Where Austock provides financial results briefings to analysts or media, the material upon which the briefing is based (such as slides or presentations)

will be released to the market prior to the briefing. In any event, no material information which has not been previously released to the market will be covered in such briefings.

- 3.3 Austock will not engage in “black-listing” of analysts or commentators based on their reporting of Austock.

#### **4. INSIDER TRADING**

- 4.1 The insider trading rules are an important adjunct to the continuous disclosure regime in ensuring that shareholders are given fair access to material information regarding securities. Austock seeks to limit the opportunity for insider trading in its own securities through its continuous disclosure policies and the dealing rules applying to its employees and directors.

#### **5. FINANCIAL REPORTING**

- 5.1 Transparent and prompt financial reporting is a key element of listed company disclosure. Austock produces half yearly and yearly financial reports and an annual report in accordance with the Corporations Act and listing rules. Austock aims to report promptly, comply with all applicable laws, listing rules and accounting standards in its financial reporting and to report in a way which is easy to understand and conveys the materiality of the matters discussed.
- 5.2 Austock emails its half yearly and full year results announcements to shareholders who have provided email details to Austock.

#### **6. OTHER INFORMATION ABOUT AUSTOCK**

- 6.1 Austock makes non-material announcements about itself from time to time via media releases and other forums and makes available information of interest to shareholders and other stakeholders. These are available on Austock’s website.

#### **7. SHAREHOLDER MEETINGS**

- 7.1 Shareholder meetings are an opportunity for shareholders and other guests to hear from and question the board and management of Austock. As a national organisation, Austock endeavours to hold meetings in different venues that encourage all shareholders of the company to participate. The Chairman and Managing Director make presentations separately before attending to voting on resolutions and general business. The chair of the meeting, usually the Chairman, is responsible for the conduct of the meeting.
- 7.2 Austock’s auditor attends its annual general meeting and is available to answer any questions regarding the conduct of and any issues arising from Austock’s audit.
- 7.3 Austock accepts nominations for the board of Austock that are made to the Company Secretary in accordance with the listing rules and Austock’s constitution. Austock conducts annual and extraordinary general meetings in accordance with the Corporations Act, the ASX Listing Rules, the ASX Principles and Austock’s constitution.
- 7.4 Austock drafts notices and proxy forms to maximise the ability of readers to understand and vote on the issues presented. Austock will also investigate ways to electronically distribute material regarding meetings.

**8. CORRESPONDENCE AND REPORTS TO SHAREHOLDERS**

- 8.1 Austock corresponds periodically with all shareholders to update them on the company's activities and progress. The correspondence is signed by the Chairman and may at times accompany dividend payment advice or cheques.
- 8.2 Austock takes steps to identify and communicate with beneficial owners. Where they wish, beneficial owners may receive all materials that are sent to direct shareholders including email notifications, correspondence and notices of meeting.

**9. GENERAL INTERACTION WITH SHAREHOLDERS**

- 9.1 Austock will deal with shareholder enquiries promptly and courteously and take measures to ensure that any agent appointed to operate the Austock's securities register does so too.

**10. SHAREHOLDER PRIVACY**

- 10.1 Austock recognises that privacy is important and will not disclose registered shareholder details unless required by law. Shareholder details will only be used in accordance with applicable privacy laws.