
Shareholder Communications Policy

Spirit Telecom Limited

ACN 089 224 402

Version: 03

Adopted on: 17 June 2020

Next Review Date: June 2021

1. Purpose

- 1.1 Spirit Telecom Limited (ACN 089 224 402) (**Company**) has adopted this Shareholder Communications 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 and facilitate 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, email or facsimile (contact details are available from the Company's website);
 - (b) the contact page on the Company's website;
 - (c) participation at the AGM (see section 5 below); or
 - (d) 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

- 1.1. The Company will make announcements to the market in accordance with the applicable listing rules (see also the Company's Continuous Disclosure Policy).
- 1.2. All announcements released to the market are available to shareholders:

- (a) under the investors section of the Company's website; and
 - (b) under the company announcements section of the ASX website.
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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, details of general meetings, share registry contact details and other material relevant to shareholders.
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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.
- 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 will 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.
- 5.6. The Company encourages the participation of security holders in meetings. This may include, for example, live webcasting of meetings so that security holders can view and hear proceedings online, holding meetings across multiple venues linked by live telecommunications, and hybrid meetings that allow shareholders to attend and vote in person, by proxy or online.
- 5.7. The Company encourages and affords security holders who are not able to attend the meeting and exercise their right to ask questions about, or make comments on, the management of the entity, the opportunity to provide questions or comments ahead of the meeting. Where appropriate, these

questions and comments should be addressed at the meeting, either by being read out and then responded to at the meeting.

6. Analyst and Investor Briefings

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 annual report (or a link where it can be downloaded) 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 results are announced to the ASX pursuant to the ASX Listing Rules and are available to shareholders in the same manner as other ASX announcements.

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

Automic Group
GPO Box 5193
SYDNEY NSW 2001
Phone: 1300 288 664 (within Australia)
Phone: +61 (0) 2 9698 5414 (International)
Email: hello@automicgroup.com.au
Web: www.automicgroup.com.au

7.4 **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.

8. Review of this Policy

8.1 The Company Secretary may review this policy from time to time and report to the Board any changes they consider should be made.

8.2 This policy may be amended from time to time by resolution of the Board.

9. Further Assistance

- 9.1 Any questions about this policy should be referred to the Company Secretary.

10. Approved and Adopted

- 10.1 This Policy was approved and adopted by the Board on 17 June 2020.
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