



Shareholder Communication Policy

Reviewed/Approved by the Board	
Adopted	23 September 2019
Reviewed & Approved	23 June 2020
Reviewed & Approved	20 June 2022

1 Purpose

- 1.1. ReadCloud Limited (**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 Communications

- 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) the contact page on the Company's website;
 - (c) participation at the AGM (see clause 7 below); or
 - (d) participation at analyst and investor briefings which may be conducted from time to time (see clause 8 below).
- 2.4. Where appropriate, a summary of the views and matters of concern or interest to shareholders be communicated to the Board

3 Written Communication and Annual Report

- 3.1. The Company's Annual Report is the major written communication by the Company to shareholders each year. Shareholders are only provided with a copy of the Annual Report if they elect to receive one. The Company's Annual Report is also published on the Company's website for shareholders who have not elected to receive a hard copy.

4 Market Releases

- 4.1. The Company will make announcements to the market in accordance with the applicable listing rules (see also the Company's Continuous Disclosure Policy).
- 4.2. Announcements made by the Company to the ASX are, subject to applicable securities laws, available to shareholders:
 - (a) on the 'Investors' section of the Company's website;
 - (b) under the 'Company Announcements' section of the ASX website;
 - (c) by email notification (when shareholders provide the Company with their email address and elect to be notified of all the Company's ASX announcements); and
 - (d) under the Company's social media accounts.

5 Website

- 5.1. The Company's website is the primary medium of providing information to all shareholders.
- 5.2. 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.
- 5.3. Shareholders are encouraged to view the website on a regular basis so that they can keep up to date with information concerning the Company.
- 5.4. The Company will also utilise social media as a key communication channel to distribute Company news that is not required to be issued through the ASX platform including but not limited to notification of webinars, speaking events and other non-price sensitive information.

6 External Communications and Further Assistance

- 6.1. Any external enquiry about the Company's performance or announcements should be directed to the Managing & CEO.
- 6.2. The only persons authorised to respond on behalf of the Company, or give any official, or non-speculative information are the Managing & CEO and the Company Secretary. All other persons are prohibited from speaking or responding on behalf of the Company in relation to its performance or announcements.
- 6.3. Any employees that are approached by any shareholders, investors, members of the public or the media should direct any questions about the Company to the Company Secretary who will either respond or redirect internally.
- 6.4. The Company reserves the right at its absolute discretion not to respond to investor enquiries which are purely speculative in nature, statements of personal opinion or defamatory / offensive in nature or sent via social media only.
- 6.5. Social media posts will be released or authorised by the Managing Director and CEO only.

7 Annual General Meeting

- 7.1. The Company recognises the rights of shareholders and encourages the effective exercise of those rights through the following means:
 - (a) notices of meetings are distributed to shareholders in accordance with the provisions of the Corporations Act 2001;
 - (b) notices of meeting and other meeting material are drafted in concise and clear language;

- (c) shareholders are encouraged to use their attendance at meetings to ask questions on any relevant matter, with time being specifically set aside for shareholder questions;
- (d) notices of meetings encourage participation in voting on proposed resolutions by lodgement of proxies, if shareholders are unable to attend the meeting;
- (e) it is general practice for a presentation on the Company's activities to be made to shareholders at each Annual General Meeting; and
- (f) it is both the Company's policy and the policy of the Company's auditor for the lead engagement partner to be present at the Annual General Meeting and to answer any questions regarding the conduct of the audit and the preparation and content of the auditors' report.

8 Analyst and Investor Briefings

- 8.1. 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.

9 General

- 9.1. **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.

- 9.2. **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.

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

Boardroom Pty Limited
 Level 7, 411 Collins Street
 Melbourne Vic 3000
 Telephone: 1300 737 760
 Email: enquiries@boardroomlimited.com.au
 Web: www.boardroomlimited.com.au

- 9.4. **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.

10 Review of this Policy

- 10.1. The Company Secretary may review this policy from time to time and report to the Board any changes they consider should be made.
- 10.2. This policy may be amended from time to time by resolution of the Board.

11 Questions about the Policy and its Application

- 11.1. Employees should direct their questions about the policy and its application in the first instance to the Company Secretary.
- 11.2. Shareholders, investors and members of the public should direct their questions about this policy and its application to the Company's share registrar, the details of which are set out in clause 9.3.

12 Approved and Adopted

- 12.1. This policy was approved and adopted by the Board on 23 June 2020.