

# SHAREHOLDER COMMUNICATIONS POLICY

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## 1. Introduction

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The Company's Board of Directors is responsible for ensuring shareholder and other stakeholder communications are adequate and appropriate and based on transparency and sound corporate governance principles. These principles form the basis of the Company's Investor Relations Policy, with the objective of providing stakeholders with important information in a timely manner through written and electronic communication.

The Company promotes direct communications with shareholders and encourages them to direct questions or requests for information to its Directors or management through its Investor Relations Representative.

## 2. Written Information

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In accordance with ASX Listing Rules, the Company adheres to the continuous disclosure requirements as specified in its Continuous Disclosure Policy, and will promptly release to the ASX all written communications of material information, including but not limited to financial results announcements, media releases, all external presentations, speeches and statements of importance.

The agenda and materials for all investor relations events must be reviewed by the Company Secretary to ensure no new material information is included, or if new information is included that it is released to the ASX Company Announcements Platform prior to the particular investor relations event.

The Company's Annual Report is the main communication document provided to shareholders following the end of each financial year. In addition to meeting all statutory requirements set by the Corporations Act and the ASX Listing Rules, the Annual Report contains information that assists shareholders to understand how the Company's operational and financial results were achieved, the nature of the industry in which it operates, and the Company's outlook in relation to its product offering and market trends.

The Annual Report will be made easily available to shareholders and other stakeholders in a timely manner in both print and on-line versions.

A half year report will be issued following the end of the financial half-year, in accordance with the requirements of the Corporations Act and ASX Listing Rules.

## 3. Electronic Communications

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The Company is aware of the efficiencies and effectiveness of communicating to shareholders electronically. With this in mind, shareholders can visit the Company's website, from which its financial reports and presentations can be freely downloaded, and which reflects information released to the ASX. Shareholders can also access the Company's share registry electronically.

## 4. Investor Relations Activities

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The Board will appoint an Investor Relations Representative, who will report to the Board regularly on investor relations activities.

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The Investor Relations Representative will be responsible for dealing with stakeholder queries and will benchmark frequency of contact with individual analysts to ensure equal access and avoid any perception of favouritism or “selective briefing”.

The Investor Relations Representative will maintain a register of contact with analysts, including the purpose and substance of discussions held.

The Managing Director (or equivalent) and at least one of the Investor Relations Representative and CFO must be present at all investor relations events, including analyst meetings and investor briefings.

The Company will, where practicable, at significant investor relations events, webcast or record proceedings so that analysts and Shareholders who cannot attend in person, can access the information discussed. Where practicable to do so, the Company will also simultaneously release a link to a recording of such webcasts to the ASX Company Announcements Platform or include in an announcement where it can be found on the website.

In the event the Company forms the view that an analyst has failed to appreciate the significance of previously released material information, the Investor Relations Representative must seek to clarify the position with the analyst. The Investor Relations Representative and at least one of the Managing Director (or equivalent) and CFO must be present at any clarifying meeting. In such circumstances, the Company should seek to ensure that there can be no perception of “selective investor relations briefings”.

In the event market consensus moves materially out of line with the Company’s assessment of significant real-time metrics, the Company will pro-actively use the ASX Company Announcements Platform to correct the misconception in favour of the investor relations function.

### **5. Investors Relations Blackout Periods**

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Investor relations activity is prohibited in the 14 days period in the lead up to significant Board meetings and material announcements. Any exception to this blackout requires the approval of both the Chair and Managing Director (or equivalent).

### **6. Access to Directors, Management and Auditors**

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Shareholders may at any time direct questions or requests for information to Directors or management by contacting the Company’s Investor Relations Representative.

At each Annual General Meeting, shareholders will be given the opportunity to ask the Company’s Directors and external auditors questions relating to the business and the conduct of the audit respectively.

The Board aims to ensure that the shareholders are informed of all major developments affecting the Company’s state of affairs.

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Information is communicated to shareholders through:

1. the Annual Report delivered by post, and which is also placed on the Company's website;
2. the half yearly report which is placed on the Company's website;
3. the quarterly reports which are placed on the Company's website;
4. disclosures and announcements made to the ASX copies of which are placed on the Company's website;
5. notices and explanatory memoranda of Annual General Meetings (**AGM**) and Extraordinary General Meetings (**EGM**) copies of which are placed on the Company's website;
6. the Chair's address and the Managing Director (or equivalent) address made at the AGMs and the EGMs, copies of which are placed on the Company's website;
7. the Company's website on which the Company posts all announcements which it makes to the ASX; and
8. the auditor's lead engagement partner being present at the AGM to answer questions from shareholders about the conduct of the audit and the preparation and content of the auditor's report.

Links are made available to the Company's website on which all information provided to the ASX is immediately posted.

Shareholders queries should be referred to the Investor Relations Representative in the first instance.



Steven Michael  
**Managing Director / Chief Executive Officer**

Flinders Mines Ltd