

Shareholder Communications Strategy

Navitas Limited
ACN 109 613 309

Document

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1. Introduction

- 1.1 As a listed public company, Navitas (“the Company”) has obligations under the Corporations Act 2001 and the Listing Rules of the ASX to keep the market fully informed of all information which may have, or could be expected to have, a material effect on the price or value of its securities. These disclosure obligations are more fully described in our Continuous Disclosure Policy.
- 1.2 Our Shareholder Communication Policy is aimed at providing a clear and concise framework for communications with shareholders in relation to:
 - Company Strategy;
 - Strategy implementation; and
 - Financial results flowing from the implementation of Company Strategy.
- 1.3 This Shareholder Communication Strategy was adopted by the Board of the Company on 8 December 2005 and the Board of the Company may approve updates and amendments to this Policy from time to time.

2. Continuous Disclosure

- 2.1 The Company’s aim is to ensure that all shareholders, both individual and institutional, have simultaneous access to all information in accordance with our Continuous Disclosure Policy. Ordinarily market analysts, the ASX and industry will have access to information at the same time as shareholders. Where the Company provides briefings to analysts or media, these briefings are released to the market prior to the briefing to analysts or media.

3. Special Shareholder Communications

- 3.1 From time to time the Company will communicate other information to shareholders. This will be on a *needs* basis and may be by direct written communication with shareholders or be by way of a Company announcement to ASX which would also be published on the Company’s website.

4. Financial Reporting, Shareholder Meetings and Other Reporting

- 4.1 The Board considers transparent and prompt financial reporting to be a key element of disclosure. The Company reports operating results on a half yearly basis and produces half yearly, yearly and annual reports in accordance with the Listing Rules and the Corporations Act 2001. Those reports are released to ASX in accordance with the Company’s continuous disclosure obligations and are also published on the Company’s website.
- 4.2 The Company also recognises the importance of effective shareholder communication at Annual General Meetings and General Meetings.
- 4.3 The Annual General Meeting provides an opportunity for shareholders of the Company to hear from, and ask questions of, the Board of the Company and external auditors. The Company also provides an opportunity for shareholders to submit questions and comments prior to the Annual General Meeting by completing and returning a form attached to the Notice of Meeting.
- 4.4 At an Annual General Meeting, the Chairperson will usually be responsible for the conduct of the meeting. One of the Chairperson’s roles is to ensure that all shareholders have a

reasonable opportunity to be heard on any questions shareholders have for the Board and external auditors.

- 4.5 The Company is committed to ensuring maximum transparency at its Annual General Meeting of shareholders. A similar approach is taken at any General Meetings of shareholders.
- 4.6 The Company will require its external auditor to attend the Annual General Meeting and be available to answer shareholder questions about the conduct of the audit and the preparation and content of the auditor's report.
- 4.7 The Company will accept electronic proxies submitted using an online voting portal available to shareholders operated by its share registry.

5. Use of Electronic Communications

- 5.1 To promote broad and effective communication with shareholders, the Company uses electronic communication techniques to complement the official release of material information to the market.
- 5.2 All announcements made by the Company to ASX are posted on our website at www.navitas.com as soon as reasonably practicable after such information is released to the ASX.
- 5.3 Further information about the Company, including Governance policies, is made available via the Investor Centre at www.navitas.com.
- 5.4 Announcements, relevant news releases and investment and analyst presentations are maintained on the Company's website for at least two years from the date of the announcement or release.
- 5.5 The full text of notices and explanatory material for all Annual General Meetings and General Meetings are placed on the Company's website.
- 5.6 The Company also provides a service for shareholders and other parties to subscribe to receive all Navitas ASX and media releases upon issue via email. This service is accessed via the Investor Centre of the Navitas website at www.navitas.com.

6. Investor Relations

- 6.1 The Company implements an Investor Relations program to facilitate effective two way communication with investors and other stakeholders. This includes an Investor Relations function to manage proactive and reactive communication and queries with all shareholders. Contact information of designated Investor Relation personnel is provided via the Investor Centre at www.navitas.com.

7. Shareholder Privacy

- 7.1 The Company recognises that the privacy of its shareholders is important and will not disclose registered shareholder information unless required by law. Shareholder details will only be used in accordance with the *Privacy Act* 1988 and the National Privacy Principles.

Distribution

- Navitas Website
- Directors Manual