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# OPENN NEGOTIATION LIMITED (ACN 612 329 754)

## Shareholder Communications Policy

Adopted: 10 May 2021

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### 1. Introduction

Openn Negotiation Limited (**Company**) is committed to the promotion of investor confidence by ensuring that trade in its securities takes place in an efficient, competitive and informed market.

The Company recognises the value of providing current, relevant information to its shareholders and effective communication with shareholders.

### 2. Objectives

This document outlines the processes through which the Company will endeavour to:

- ensure timely and accurate information is provided equally to all shareholders and the broader market; and
- provide reasonable means for shareholders to access and put queries to the directors and management of the Company.

### 3. Role and Responsibilities

The Company's Managing Director (or Chief Executive Officer) and Company Secretary have the responsibility for communication with shareholders and the market.

The Board of Directors of the Company (**Board**) has overall responsibility for:

- reporting to shareholders;
- overseeing all reporting and communication procedures; and
- monitoring and updating this document.

### 4. Types of Communication

#### 4.1 Full year and half year reports

The half year report and annual report are the most important media through which shareholders will be provided with a detailed review and analysis of the Company's objectives and performance.

The half year report must be reported to the Australian Securities Exchange (**ASX**) by mid-March each year.

The annual report must be lodged with the Australian Securities & Investments Commission (**ASIC**) and ASX by the end of September each year.

The annual report will be sent to shareholders, other than those who have elected not to receive it.

#### 4.2 **Quarterly reports**

Each quarter reports of the Company's activities and cash flows in accordance with the requirements of ASX listing rules will be given to ASX for disclosure to the market.

Quarterly reports will be given to ASX immediately the information is available, and in any event within 1 month after the end of each quarter of its financial year (i.e. by 30 April, 31 July, 31 October and 31 January each year).

#### 4.3 **Announcements to ASX**

The Company will immediately notify the market of, by announcing to ASX, any information or any major development related to the business of the Company which a:

- reasonable person would expect to have a material effect on the price or value of its securities; or
- reasonable investor is likely to use as part of the basis for making investment decisions (inside information).

Announcements to ASX will be made in accordance with the requirements of ASX Listing Rules and the Company's Continuous Disclosure and Market Communications Policy. The Continuous Disclosure and Market Communications Policy sets out the Company's policy for:

- the disclosure of material information on a timely basis;
- authorised spokespersons;
- procedures for making announcements; and
- investor briefings, analyst briefings and responding to analyst reports.

A copy of the Company's Continuous Disclosure and Market Communications Policy can be obtained from the Company's website <https://hello.openn.com.au/investors>.

#### 4.4 **Shareholder meetings**

The Company encourages and supports shareholder participation in general meetings. The Company will provide means of opportunity to shareholders to put questions to the directors and management at general meetings.

Mechanisms for enabling shareholder participation will be reviewed regularly to encourage the highest level of participation.

The Board will ensure that all substantive resolutions at a meeting of shareholders are decided by a poll rather than by a show of hands.

#### 4.5 **Auditor's report**

The Company will request the 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.

#### 4.6 **Access to management**

The Company will provide shareholders and potential investors with reasonable access to the Managing Director (or Chief Executive Officer) and the Company Secretary for the purposes of obtaining additional information and making enquires related to the Company and its operations.

#### 4.7 **Analyst briefings**

When analysts are briefed on the Company's activities, the material used in the presentation (if not previously released) will be released to ASX and placed on the Company's website. Procedures have been established for reviewing whether any material price sensitive information has been inadvertently disclosed, and if so, this information will also be released to the market.

#### 4.8 **Electronic communication**

The Company acknowledges that communicating with its shareholders by electronic means is an efficient way of distributing information in a timely and convenient manner, particularly through its website at <https://hello.openn.com.au/investors>.

The Company encourages shareholders to receive company information electronically by registering their email address online with the Company's share registry.

All information disclosed to ASX (except an announcement of a procedural nature that has no material effect on the Company) will be placed on the Company's website as soon as it is disclosed to and acknowledged by ASX.

All information contained on the Company's website will be maintained, continuously reviewed and updated to ensure all information is current, or appropriately dated and archived.

Whenever possible, the Company will use email to communicate with shareholders who wish to receive communications in electronic form. Shareholders may register at the Company's website to receive important information by email, such as Company reports and ASX announcements.

### **5. Questions and Further Information**

If you have any questions or need further information about this document, please contact the Company Secretary.

### **6. Corporate Group**

In this document, a reference to the Company includes any 'related body corporate' (as defined in the *Corporations Act 2001* (Cth)) of the Company, as the context requires.

### **7. Review and Publication of Policy**

The Board will review the policy set out in this document on an annual basis, and may amend the policy, to ensure that it is appropriate for the Company's stage of development and nature of its operations, and is up to date with applicable laws and regulations.

The Company will publish this document on the Company's website at <https://hello.openn.com.au/investors>.