



THE SECURITY REVOLUTION

SHAREHOLDER COMMUNICATIONS POLICY

Spectur Limited
ACN 140 151 579

Date Adopted: 26 April 2017

1. Preamble

- 1.1 The Board of Directors (**Board**) of Spectur Limited (ACN 140 151 579) (**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.
- 1.2 The Company recognises the value of providing current, relevant information to its shareholders and empowering its shareholders through effective communication.
- 1.3 This Shareholder Communication Policy (**Policy**) outlines the processes through which the Company will endeavour to:
 - (a) ensure timely and accurate information is provided equally to all shareholders and the broader market; and
 - (b) provide reasonable means for shareholders access and put queries to the directors and management of the Company.
- 1.4 The Managing Director and the Company Secretary have the overall responsibility for communication with shareholders.

2. Types of communication

2.1 *Full year and half year reports*

- (a) 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.
- (b) The Half Year Report must be reported to ASX by mid-March each year and the Annual Report must be lodged with 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.

2.2 *Quarterly reports*

Each quarter, an update of operational performance and any other significant items will be issued to the market. A quarterly report will be lodged with 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.

2.3 **Announcements to ASX**

- (a) 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:
 - (i) person would expect to have a material effect on the price or value of its securities; or
 - (ii) investor is likely to use as part of the basis for making investment decisions (inside information).
- (b) Announcements to ASX will be made in accordance with the requirements of the ASX Listing Rules and the Company's Continuous Disclosure Policy. The Continuous Disclosure Policy sets out the Company's policy for:
 - (i) the disclosure of material information on a timely basis;
 - (ii) authorised spokespersons;
 - (iii) procedures for making announcements; and
 - (iv) investor briefings, analyst briefings and responding to analyst reports.
- (c) A copy of the Company's Continuous Disclosure Policy can be obtained from the Company's website: www.spectur.com.au.

2.4 **Shareholder meetings**

- (a) 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. Shareholder who cannot attend general meetings will be provided the opportunity to submit written questions to the Company before the meeting.
- (b) Mechanisms for enabling shareholder participation will be reviewed regularly to encourage the highest level of participation and include:
 - (i) notices of meeting being prepared, and meetings being conducted, in accordance with industry best practice and the guidelines published by the ASX Corporate Governance Council; and
 - (ii) the use of electronic communication to disseminate information relating to meetings.

2.5 **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.

2.6 **Access to management**

The Company will provide shareholders and potential investors with reasonable access to the Managing Director and the Company Secretary for the purposes of obtaining additional information and making enquires related to the Company and its operations. All responses will be subject to the Company's Continuous Disclosure Policy.

3. Electronic communication

- 3.1 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 address: www.spectur.com.au.
- 3.2 All information disclosed to the ASX (except announcements of a procedural nature that have no material effect on the Company) will be placed on the Company's website as soon as it is disclosed to and acknowledged by the ASX, and will be maintained on the Company's website for at least three years.
- 3.3 When analysts are briefed on the Company's activities, the material used in the presentation (if not previously released) is released to the 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 is also released to the market.
- 3.4 All information contained on the Company's website will be continuously reviewed and updated to ensure all information is current, or appropriately dated and archived.
- 3.5 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 in order to receive links to important information by email, such as Company reports and ASX announcements.

4. Updating this Policy

The Board will be responsible for monitoring and updating this Policy. This Policy will be updated as and when required, including when it is appropriate to ensure that technological advances and additional features on the Company's website are utilised in the Company's communication with its shareholders and are recognised in this Policy.

5. Further information

- 5.1 The Company will publish this Policy on the Company's website: www.spectur.com.au.
- 5.2 If you have any questions or need further information in relation to this Policy, please contact the Company Secretary.