



ROTOGRO

Shareholder Communication Policy

Roto-Gro International Limited

ACN 006 569 106

1. Introduction

- 1.1 The Company recognises the value of providing current and relevant information to its shareholders.
- 1.2 The Company further recognises that its stakeholders are entitled, and expect, to be updated of relevant developments regarding the Company in a timely and accessible manner. Additionally, such stakeholders are entitled to have access to and participate in two-way discussion with the Company on relevant issues.
- 1.3 The Chief Executive Officer and Company Secretary have the primary responsibility for communication with shareholders.
- 1.4 Information is communicated to shareholders through:
- (a) continuous disclosure to relevant stock markets of all material information;
 - (b) periodic disclosure through the annual report (or concise annual report), half year financial report and quarterly reporting of exploration, production and corporate activities;
 - (c) notices of meetings and explanatory material;
 - (d) the Annual General Meeting (**AGM**);
 - (e) periodic newsletters or letters from the Chairperson or Chief Executive Officer (if any);
 - (f) the Chair's address and the Chief Executive Officer's address made at the Annual General Meeting and General Meetings (if any), copies of which are released to Australian Securities Exchange (**ASX**) and placed on the Company's website;
 - (g) the Auditor's lead engagement partner being present at the Annual General Meeting to answer questions from shareholders about the conduct of the audit and the preparation and content of the auditor's report; and
 - (h) the Company's website.
- 1.5 The Company is committed to the promotion of investor confidence by ensuring that trading in the Company's securities takes place in an efficient, competitive and informed market.

2. Electronic communication and website

- 2.1 The Company believes that communicating with shareholders by electronic means, particularly through its website, is an efficient way of distributing information in a timely and convenient manner.
- 2.2 The Company's website includes the following pages, which contain relevant information for shareholders:
- (a) an investor presentation section containing the latest investor presentation made;
 - (b) a section for the Company's corporate governance policies and practices;
 - (c) an ASX Announcements section, containing ASX Announcements and any financial reports (annual, half yearly and quarterly reports) lodged on the ASX; and
 - (d) a news and media section, containing media clippings.

- 2.3 As part of the Company's developing investor relations program, Shareholders can register with the Company to receive email notifications of when an announcement is made by the Company to the ASX, including the release of the Annual Report, half yearly reports and quarterly reports. Links are made available to the Company's website on which all information provided to the ASX is immediately posted.
 - 2.4 The Company's website will be updated with material released to the ASX as soon as practicable after confirmation of release by the ASX.
 - 2.5 All website information will be continuously reviewed and updated to ensure that information is current, or appropriately dated and archived.
 - 2.6 The Company places the full text of notices of meeting and explanatory material on the website.
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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.
 - 3.2 The contents of the Annual Report will also be the subject of discussion at the AGM.
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4. Annual General Meeting

- 4.1 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.

5. Announcement to ASX

- 5.1 The Continuous Disclosure Policy governs all aspects of dealing with price-sensitive information in a timely manner and who within the organisation has the responsibility for managing that process.
- 5.2 All announcements disclosed to the ASX will be made available to shareholders on the Company's website as soon as practicable after that announcement is released.
- 5.3 If the Board considers appropriate, certain announcements will also be distributed to shareholders through their preferred communications channels.

6. Market briefing and responses to analysts

- 6.1 After release of financial results, the Company may conduct briefings for investors and analysts.
- 6.2 At those briefings, stakeholders will be given the opportunity to ask questions of the senior management team.
- 6.3 Where possible, the Company will facilitate these via electronic means and at hours which allow the majority of stakeholders to attend.
- 6.4 Where possible the Company will take questions in advance to ensure those matters are appropriately addressed.
- 6.5 In dealing with analysts and conducting market briefings, the Company will acknowledge its Continuous Disclosure Policy and give a particular focus to the importance of ensuring material price sensitive non-public information is not disclosed.
- 6.6 The Company may clarify or correct any factual errors which analysts/media make in accordance with its Continuous Disclosure Policy.
- 6.7 All information given to analysts/media will be disclosed in accordance with the Continuous Disclosure Policy.
- 6.8 All investor, conference and other public presentations will be disclosed in accordance with the Continuous Disclosure Policy.

7. Media Policy

- 7.1 Only authorised spokespersons may make statements on behalf of the Company to the media. Any person within the Company should report media requests to the Chief Executive CEO immediately.
- 7.2 Media speculation and rumours will not be responded to except in accordance with the Continuous Disclosure Policy.

8. Employees

- 8.1 All employees are required to comply with this Policy and the Continuous Disclosure Policy. Breaches of this Policy will be viewed seriously and may lead to disciplinary action being taken against the relevant employee. In serious cases, such action may include dismissal. Employees should report all breaches of this policy by any person to the Company Secretary.

9. Further Assistance

- 9.1 All questions, comments and concerns about the operation of this Policy should be directed to the Company Secretary.

10. Approved and Adopted

- 10.1 This Policy was approved and adopted by the Board on 25 August 2020.