



# Securityholder communications policy

Ellerston Asian Investments Limited ACN 606 683 729  
(Company)

# Securityholder communications policy



## 1. Overview

### 1.1 Purpose

The purpose of this Securityholder Communications Policy (**Policy**) is to promote effective communication with securityholders and encourage effective participation at general meetings of the Company.

### 1.2 Maintaining Securityholder Communications

The Company will ensure that:

- (a) materials detailed in this Policy are maintained and updated on the website of the manager of the Company's investment portfolio, Ellerston Capital Limited ACN 110 397 674 (**Manager**) within a reasonable timeframe;
- (b) securityholder communications are distributed to shareholders in accordance with the *Corporations Act 2001 (Cth)* (**Corporations Act**) and ASX Listing Rules; and
- (c) this Policy is updated and maintained as required.

### 1.3 Methods of Communication

- (a) The following methods of communication are available to securityholders:
  - (i) telephone;
  - (ii) mail;
  - (iii) email; and
  - (iv) facsimile.
- (b) This Policy details the methods of communication available for various areas.

## 2. ASX Announcements

### 2.1 Outline

The Company makes announcements to the financial market operated by ASX Limited (**ASX**) in accordance with the ASX Listing Rules.

### 2.2 Availability

Announcements made by the Company to the ASX are available to securityholders:

- (a) via a link to the ASX website in the '**Investor Centre**' section of the Manager's website; and
- (b) under the Company Announcements section of the ASX website.

## 3. Company's Security Registry

### 3.1 General

Securityholders are able to access information relevant to their holding via the Company's Security Registry website, [www.linkmarketservices.com.au](http://www.linkmarketservices.com.au). Securityholders who do not have access to the internet should contact the Company's Security Registry with any enquiries relating to their shareholdings.

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## 3.2 Contact Details

The contact details of the Company's Security Registry are as follows:

Link Market Services Limited

*Street Address:*

Level 12, 680 George Street

SYDNEY NSW 2000

*Postal Address:*

As above

*Telephone:*

+61 2 8280 7111

*Facsimile:* +61 (0) 9287 0303 (all investor related faxes should be sent to this number)

## 3.3 ASX Code

The ASX Code for the Company is EAI.

## 4. Company Security Registry Forms

### 4.1 Amendment of Securityholder Details

- (a) If securityholders wish to amend any of their details on the Company's security register, they must go to the Security Registry website, [www.linkmarketservices.com.au](http://www.linkmarketservices.com.au), or complete the appropriate form and send it to the Company's Security Registry (see Company's Security Registry above for contact details). Forms available from the Security Registry include:
  - (i) Change of Address;
  - (ii) Direct Credit of Payments;
  - (iii) Communications; and
  - (iv) Tax File Number or Australian Business Number Notification.
- (b) These forms may be downloaded from the Security Registry website, [www.linkmarketservices.com.au](http://www.linkmarketservices.com.au). Securityholders who do not have access to the internet should contact the Company's Security Registry (see the Company's Security Registry above for contact details).

## 5. Annual General Meetings

### 5.1 Date and location of Annual General Meeting (AGM)

- (a) The Company will hold its annual general meeting (**AGM**) in accordance with the timeframe set by the Corporations Act for public companies, that is, within five months after the end of the Company's financial year (being 30 June of each calendar year).
- (b) The specific date, time and location of each AGM will be detailed:
  - (i) in the relevant notice of meeting; and
  - (ii) on the Manager's website.

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- (c) Alternatively, securityholders can contact the Company's Security Registry or Company secretary directly to obtain this information.

## 5.2 Notice of meeting

The notice of meeting will be distributed to all shareholders prior to the AGM within the timeframe set by the Corporations Act and the Company's constitution. The full text of the notice of meeting will also be available via the '**Investor Centre**' section of the Manager's website, [www.linkmarketservices.com.au](http://www.linkmarketservices.com.au).

## 5.3 Questions From Shareholders to the Chairman and External Auditor at the AGM

- (a) At the AGM, shareholders can ask questions about or comment on:
  - (i) the management of the Company;
  - (ii) the conduct of the audit, preparation and content of the auditor's report, accounting policies adopted by the Company in relation to the preparation of the financial statements, and the independence of the auditor in relation to the conduct of the audit;
  - (iii) the remuneration report; and
  - (iv) the other items of business at the AGM.
- (b) If shareholders are present at the AGM, the Chairman will provide reasonable time following the consideration of reports for questions and comments on these matters. If shareholders are not present at the AGM:
  - (i) a question form (and necessary instructions) will accompany the Notice of Meeting, giving shareholders the opportunity to forward their questions and comments to the Company prior to the AGM; and
  - (ii) as many as possible of the more frequently asked questions will be answered by the Chairman (or, where appropriate, the auditor) at the AGM.
- (c) Shareholders may attend the AGM in person or by proxy, representative or attorney. A proxy form will accompany the Notice of Meeting.

## 5.4 Chairman's Address

The Chairman's Address (and any Chief Executive Officer Address) will be released to the market just prior to the commencement of the AGM. It will be available to securityholders in the same manner as other ASX Announcements (see ASX Announcements above).

## 6. Annual Report

### 6.1 Timing and availability

The annual report of the Company (**Annual Report**) contains key financial information about the Company, as well as important operating and corporate information. As permitted by the Corporations Act, the default method of receiving the Company's Annual Report is electronically via the '**Investor Centre**' section of the Manager's website. A printed copy of the Annual Report is only sent to securityholders who elect to receive one. Securityholders who wish to receive a printed copy of the Annual Report should complete the communications form available on the Company's Security Registry website ([www.linkmarketservices.com.au](http://www.linkmarketservices.com.au)) or contact the Company's Security Registry (see the Company's Security Registry above for contact details).

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The Annual Report will be available to all securityholders prior to the AGM within the timeframe set by the Corporations Act.

## 7. Half-Year & Full-Year Results

### 7.1 Timing

The financial results for the half-year ended 31 December are reported in February each year. The financial results for the full-year ended 30 June are reported in August each year.

### 7.2 Availability

As the Half-Year and Full-Year Results are announced to the ASX pursuant to the ASX Listing Rules, they will be available to securityholders in the same manner as other ASX Announcements (see ASX Announcements above). In addition, the results will be accessible via the '**Investor Centre**' section of the Manager's website.

### 7.3 Investor and analyst presentations

Presentations that are made to investors and analysts at a group briefing will be available to all securityholders via the '**Investor Centre**' section of the Manager's website and will, where necessary, be released to the market prior to delivery.

## 8. Corporate Governance

### 8.1 Corporate Governance website

In accordance with Recommendation 6.1 of the ASX Principles, the Company has a Corporate Governance section within the Manager's website.

### 8.2 Corporate Governance statement

The Company's Annual Corporate Governance Statement is prepared in accordance with the ASX Listing Rules. It is contained in the Annual Report each year and is also available under the section of the Manager's website dealing with corporate governance.

### 8.3 Board and Committee Charters

- (a) In accordance with Recommendation 1.1 of the ASX Principles, the Company has a formal Board Charter, containing details of the functions and responsibilities of the board of directors of the Company (**Board**). To assist the Board in fulfilling its duties and responsibilities, it has established two Board Committees, which are the:
  - (i) Nomination and Remuneration Committee; and
  - (ii) Audit Committee.
- (b) Each of these Committees has a formal Charter. The Board and Committee Charters are available to Securityholders under the section of the Manager's website dealing with corporate governance.

## 9. Media Releases

Access to Company media releases is available under the '**Investor Centre**' section of the Manager's website and they are released to the market via the ASX.

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## 10. Media and Investor and Analyst Briefings

### 10.1 General

Typically at the time of announcement to the ASX of the Company's Half-Year and Full-Year Results the Company conducts investor and analyst briefings (see Half-Year and Full-Year Results above). Investor and analyst briefings may occur at other times during the year as the Company thinks appropriate.

### 10.2 Presentations

If and when investor and analyst briefings occur at other times during the year, any presentation materials provided will be made available to all securityholders via the **'Investor Centre'** section of the Manager's website and will be released to the market prior to delivery.

## 11. Dividends

### 11.1 Dividend Statements

Subject to the Corporations Act and the ASX Listing Rules, the Company will (to the extent reasonable and practicable), arrange for dividend statements to be lodged with Australia Post on the business day prior to the date the dividend is paid. These statements are mailed to securityholders at the addresses that appear on the Company's Security Register.

### 11.2 Dividend information

Securityholders can obtain historical dividend information via the **'Investor Centre'** section of the Manager's website. This information includes the amount of the dividend and the level of franking. If securityholders require specific dividend information they can obtain this via the **'Investor Centre'** section of the Security Registry website (see the Company's Security Registry above). Securityholders who do not have access to the internet should contact the Company's Security Registry with any dividend-related enquiries (requests to the Security Registry may attract an administrative charge).

## 12. Information to Beneficial Owners

Beneficial owners of Company shares are encouraged to contact the Company's Security Registry to arrange the direct receipt of securityholder materials.

## 13. Publishing and updating the Policy

### 13.1 Publishing of the Policy

The Policy will be published on the Manager's Intranet and made available by the Manager for the benefit of all directors. In compliance with the ASX Corporate Governance Council Principles of Good Corporate Governance and Best Practice Recommendations, this Policy or a summary of its main provisions will also be published on the Manager's website, for the benefit of securityholders, the investment community, the media and members of the public.

### 13.2 Updating the Policy

The Board may approve updates and amendments of this Policy from time to time. All updates and amendments, and a consolidation, of the Policy (or a summary of its main provisions) will appear on the Intranet and the Manager's website within a reasonable time after any such updates or amendments have been approved.

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## 14. Responsibilities of the Manager

Subject to any applicable laws, the Company may, in its discretion, devolve any of its responsibilities under this Policy to the Manager.

## 15. Approved and adopted

This policy was approved and adopted by the Board on 27 July 2015.