

Shareholder Communications Policy

Overview Communications

1.1 Purpose

The purpose of this Shareholder Communications Policy is to promote effective communication with shareholders and encourage effective participation at general meetings of Havilah Resources Limited (**Company**).

1.2 Maintaining Shareholder Communications

The Company will ensure that:

- (a) materials detailed in this policy are maintained and updated on the Company's website https://www.havilah-resources.com.au/ within a reasonable timeframe;
- (b) shareholder communications are distributed to shareholders in accordance with the Corporations Act 2001 (Cth) (Corporations Act) and Listing Rules of the Australian Securities Exchange (ASX) (Listing Rules); and
- (c) the Shareholder Communications Policy is updated and maintained as required.

1.3 Methods of Communication

- (a) The following methods of communication are available to shareholders to communicate with the company
 - (i) telephone;
 - (ii) mail;
 - (iii) email;
 - (iv) the Company's website; and
 - (v) Social Media.
- (b) This policy details the method of communication available for various areas.

Version Control

Version	Date	Detail	Author
Draft			C Redman/ S Gray

ASX Announcements

2.1 Outline

The Company makes announcements to the ASX in accordance with the ASX Listing Rules and the Corporations Act.

2.2 Availability

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

- (a) in the Media Centre section of the Company's website;
- (b) under the Company Announcements section of the ASX website (for <u>all</u> price sensitive announcements made in the current year and previous two years);
- (c) by email notification (when shareholders provide the Company's Share Registry with their email address and elect to be notified of all Company ASX Announcements); and
- (d) via social media platforms, on a case by case basis.

3. The Company's Share Registry

3.1 General

Shareholders are able to access information relevant to their holding via the Company's Share Registry website, https://www.computershare.com/au. Shareholders who do not have access to the internet should contact the Company's Share Registry with any enquiries relating to their shareholdings.

3.2 Contact Details

Phone: +61 (0)3 9415 4088 or 1800 420 909 (within Australia)

Postal Address: Computershare Plan Managers Pty Ltd

GPO Box 658

Melbourne VIC 3001

Australia

3.3 ASX Code

The ASX Code for the Company is HAV.

Version Control

Version	Date	Detail	Author
Draft			C Redman/ S Gray

4. The Company's Share Registry Forms

4.1 Amendment of Shareholder Details

- (a) If shareholders wish to amend any of their details on the Company's Share Register, they must go to the Share Registry website, https://www.computershare.com/au or complete the appropriate form and send it to the Company's Share Registry (see the Company's Share Registry above for contact details). Forms available from the Share 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 Share Registry website, https://www-au.computershare.com/Investor/help/PrintableForms. Shareholders who do not have access to the internet should contact the Company's Share Registry above for contact details).

Annual General Meetings

- 5.1 Date and location of Annual General Meeting (AGM):
 - (a) The Company usually holds its AGM in November / December each 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 Company's website.
 - (c) Alternatively, shareholders can contact the Company's Share 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 notice period as set by the Corporations Act and the Company's Constitution. The full text of the Notice of Meeting will also be available via the 'Media Center' section of the Company's website, https://www.havilah-resources.com.au/media-center/.

- 5.3 Questions from Shareholders to the Chairman and External Auditor at the AGM At the AGM, shareholders can ask questions about or comment on:
 - (a) the management of the Company;

Version Control

Version	Date	Detail	Author
Draft			C Redman/ S Gray



- (b) 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;
- (c) the remuneration report; and
- (d) the other items of business at the AGM.

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:

- (e) 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
- (f) as many as possible of the more frequently asked questions will be answered by the Chairman (or, where appropriate, the auditor) at the AGM.

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 prior to the commencement of the AGM. It will be available to shareholders in the same manner as other ASX Announcements (see ASX Announcements above).

6. Annual Report

6.1 Timing and availability

The 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 Annual Reports is electronically via the Media Centre section of the Company's website. A printed copy of the Annual Report is only sent to shareholders who elect to receive one. Shareholders who wish to receive a printed copy of the Annual Report should complete the Communications form available on the Company's Share Registry website ()https://www.computershare.com/au or contact the Company's Share Registry (see the Company's Share Registry above for contact details). The Annual Report will be available to all shareholders prior to the AGM within the timeframe set by the Corporations Act. It is usually published in October each year.

7. Half-Year & Full-Year Results

7.1 Timing and availability

Version Control

Version	Date	Detail	Author
Draft			C Redman/ S Gray

The financial results for the half-year ended 31 January are reported by 15 April each year. The financial results for the full-year ended 31 July are reported by 31 October each year. As the Half-Year and Full-Year Results are announced to the ASX pursuant to the Listing Rules, they will be available to shareholders in the same manner as other ASX Announcements (see ASX Announcements above). In addition, the results will be accessible via the 'Media Centre' section of the Company's website (under 'Reports').

7.2 Investor and analyst presentations

Presentations that are made to investors and analysts related to the Half-Year and Full-Year Results will be available to all shareholders via the 'Media Centre' section of the Company's website (under 'Presentations') and will, where necessary, be released to the market prior to delivery.

8. Financial Calendar

8.1 Availability

The Company's financial calendar is available by contacting the Company Secretary.

9. Corporate Governance

9.1 In accordance with Recommendation 6.1 of the ASX Principles, the Company has a 'Corporate Governance' section within the Company's website https://www.havilah-resources.com.au/company/corporate-governance/.

9.2 Corporate Governance statement

The Company's Annual Corporate Governance Statement is prepared in accordance with the ASX Listing Rules. It is lodged on the ASX each year at the same time as lodging the Annual Report and is also available under the 'Corporate Governance' section of the Company's website.

9.3 Board and Committee Charters

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 Company's Board. To assist the Board in fulfilling its duties and responsibilities, it has established one Board Committee:

- (a) Audit and Risk Committee.
- (b) Nomination Committee and
- (c) Remuneration Committee.

Version Control

Version	Date	Detail	Author
Draft			C Redman/ S Gray

The Committee has a formal Charter. The Board and Committee Charters are available to shareholders under the 'Corporate Governance' section of the Company's website.

Media Releases

Access to the Company's media releases is available under the 'Media Centre' section of the Company's website (under 'Announcements') as soon as practically possible after they are released to the market via the ASX.

11. Media and Investor and Analyst Briefings

11.1 General

The Company conducts investor and analyst briefings from time to time during the year as the Company thinks appropriate.

11.2 Presentations

If and when investor & analyst briefings occur at other times during the year, any presentation materials provided will be made available to all shareholders via the 'Investors' section of the Company's website and will be released to the market via the ASX prior to delivery.

12. Information to Beneficial Owners

Beneficial owners (shareholders who get the direct benefit from the shares i.e. are not holding the shares on behalf of another person organisation or trust) of the Company's shares are encouraged to contact the Company's Share Registry to arrange the direct receipt of shareholder materials.

13. Publishing and updating the Policy

13.1 Publishing of the Policy

The Policy will be published on the Company's Intranet for the benefit of all Directors, officers, management and employees of the Company. In compliance with the ASX Corporate Governance Council Principles and Recommendations, this Policy will also be published on the Company's website https://www.havilah-resources.com.au/company/corporate-governance/ for the benefit of shareholders, the investment community, the media and members of the public.

Version Control

Version	Date	Detail	Author
Draft			C Redman/ S Gray



13.2 Updating the Policy

The Board may approve updates and amendment 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 Company's website within a reasonable time after any such updates or amendments have been approved.

14. Questions about the Policy and its application

14.1 Questions from employees

Employees should direct their questions about the Policy and its application in the first instance to the Company Secretary. Questions from shareholders, investors and public enquiries

Shareholders, investors and members of the public should direct their questions about this Policy and its application to the Company Secretary.

15. Approved and adopted

This policy was approved and adopted by the Board on 30 July 2020.

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