



Shareholder Communications Policy

Spirit Technology Solutions Ltd

ACN 089 224 402

Document History

Version	Summary of Amendments	Approved by	Approval date
1.0	Initial Shareholder Communications Policy	Board	17 June 2020
2.0	Review of the Policy	Board	24 September 2025

Legislative and Regulatory Framework

Authority	Law, Resolution or Regulation
ASX Corporate Governance Council	ASX Corporate Governance Principles and Recommendation (4 th Edition) (" ASX Principles ")
Australian Securities Exchange	Including, without limitation, ASX Listing Rules Chapter 3 (<i>Continuous Disclosure</i>) and ASX Guidance Notes 8 (<i>Continuous Disclosure</i>) and 35 (<i>Security Holder Meetings</i>) (collectively " Listing Rules ")
Australian Government	Corporations Act 2001 (Cth) (" Corporations Act ")
ASIC	ASIC Regulatory Guide 62

Other Policy Details

Key Information	Details
Approval Body	Board of Directors
Key Stakeholders	Board of Directors; Senior Management
Responsibility for Implementation	Managing Director and Company Secretary
Policy Custodian	Company Secretary
Next Review Date	September 2027

1. Purpose

- 1.1 Spirit Technology Solutions Ltd (ACN 089 224 402) (the “**Company**” and its subsidiaries, collectively, the “**Group**”) has adopted this Shareholder Communications Policy (“**Policy**”) to ensure that shareholders are informed in a timely and readily accessible manner of all major developments concerning the Company.
- 1.2 The purpose of this Policy is to promote effective ‘two-way’ communication with shareholders and to encourage and facilitate participation at the Company’s general meetings and deal promptly with the enquiries of shareholders.
- 1.3 This Policy ensures the Company meets its obligations under ASX Listing Rule 3.1 and section 674 of the Corporations Act to provide timely, equitable and transparent disclosure of material information to shareholders.
- 1.4 It aligns with the Company’s Continuous Disclosure Policy and is underpinned by the governance expectations set out in the Board Charter and Code of Conduct.

2. Methods of Communication

- 2.1 Information is provided to shareholders through, but is not limited to:
 - (a) the Company’s annual and half-yearly reports;
 - (b) market releases to the Australian Securities Exchange (ASX) in accordance with continuous disclosure obligations;
 - (c) the Company’s website; and
 - (d) the annual general meeting (“**AGM**”);
 - (e) investor and analyst presentations; and
 - (f) media releases and responses to queries received from time to time.
- 2.2 In accordance with section 110C of the Corporations Act, the Company encourages shareholders to receive company information electronically by registering their email address online with the Company’s share registry.
- 2.3 Shareholders may communicate with the Company by:
 - (a) contacting the Company by telephone, mail or email;
 - (b) completing the contact form on the Company’s website;
 - (c) participation at the AGM (see section 5 below); or
 - (d) participation in analyst and investor briefings which may be conducted from time to time (see section 6 below).

- 2.4 Where appropriate, shareholder feedback and material concerns will be summarised and reported to the Board, consistent with its governance oversight obligations.
- 2.5 Shareholder enquiries or communications of a material, governance or policy nature should be directed to the Company Secretary, who acts as the primary liaison between shareholders and the Board. Operational or service-related enquiries may be directed to the Company's Investor Relations team or share registry, as appropriate.

3. ASX Announcements

- 3.1 The Company will make announcements to the market in accordance with the applicable Listing Rules and the Corporations Act and in accordance with the Company's Continuous Disclosure Policy.
- 3.2 All announcements released to the market are available:
 - (a) under the "Investor Hub" section of the Company's website (or an equivalent webpage name); and
 - (b) under the company announcements section of the ASX website.

4. Website

- 4.1 The Company's website is the primary medium of providing information to all shareholders.
- 4.2 The Company's website will contain information relevant to shareholders and stakeholders, including announcements made to the market by the Company (including all financial results, annual reports and media releases), Board and Committee charters, corporate governance policies, details of general meetings, share registry contact details and other material relevant to shareholders.
- 4.3 Website information will be regularly reviewed and updated to ensure that information is current and complete.

5. Annual General Meeting

- 5.1 The AGM provides an important opportunity for the Company to provide information to its shareholders and a reasonable opportunity for informed shareholder participation. At the AGM, shareholders can express their views to the Board and vote on the Board's proposals. All shareholders are encouraged to attend the AGM.
- 5.2 As a general approach, the notice convening the AGM will state that shareholders unable to attend the AGM are invited to submit questions in writing up to 5 business days prior to the AGM. Any questions and responses will be included in the record of the AGM.
- 5.3 The date, time and location of the AGM will be provided in the notice of meeting.

- 5.4 The notice of meeting and proxy form will be distributed to all shareholders prior to the AGM in the timeframe set by the Corporations Act and the Company's Constitution. The notice will also be available on the Company's website.
- 5.5 The Company's auditor will attend its AGM and will be available to answer any questions regarding the conduct of and any issues arising from the audit or the preparation and content of the auditor's report.
- 5.6 The Company encourages the participation of shareholders in meetings. This may include, for example, live webcasting of meetings so that security holders can view and hear proceedings online, holding meetings across multiple venues linked by live telecommunications, and hybrid meetings that allow shareholders to attend and vote in person, by proxy or online.
- 5.7 The Company encourages and affords shareholders who are not able to attend the meeting and exercise their right to ask questions about, or make comments on, the management of the entity, the opportunity to provide questions or comments ahead of the meeting. Where appropriate, these questions and comments should be addressed at the meeting, either by being read out and then responded to at the meeting.

6. Analyst and Investor Briefings

The Company may conduct briefings for analysts and investors from time to time to discuss matters concerning the Company. In these cases, the processes set out in the Company's Continuous Disclosure Policy will apply.

7. Public Statements and Media Engagement

- 7.1 Public statements (including media commentary, social media activity, conference speaking engagements and analyst interaction) must only be made by persons authorised in accordance with the Company's Continuous Disclosure Policy and any Delegations of Authority approved by the Board from time to time.
- 7.2 No Director, employee, contractor or agent may speak on behalf of the Company or disclose information externally (including to media or investors) unless they are a spokesperson authorised pursuant to 7.1.
- 7.3 All shareholder enquiries must be referred to the Managing Director or the Company Secretary and Disclosures to the ASX may only be made by the Company's "Disclosure Officers" (as defined in the Continuous Disclosure Policy).
- 7.4 Company personnel must not engage in any public activity (including online or at industry events) that could, by association, expose the Group to reputational, regulatory or commercial risk.

8. General

- 8.1 **Annual report:** Unless shareholders have elected to have a hardcopy of the annual report mailed to them, the annual report (or a link where it can be downloaded) will be emailed to shareholders (to the email address recorded on the Company's share register) prior to the AGM within the timeframe set by the Corporations Act. The Company's annual report will also be made electronically available on the Company's website.
- 8.2 **Half-year and full year financial results:** The half-year and full-year financial results are announced to the ASX pursuant to the Listing Rules and are available to shareholders in the same manner as other ASX announcements.
- 8.3 **Share registry:** Shareholders with any questions related to their shareholding should contact the Company's share registry:
- Automic Group
GPO Box 5193
SYDNEY NSW 2001
Phone: 1300 288 664 (within Australia)
Phone: +61 (0) 2 9698 5414 (International)
Email: hello@automicgroup.com.au
Web: www.automicgroup.com.au*
- 8.4 **Investor and analyst presentations:** Presentation materials provided during investor and analyst briefings as well as webcasts or transcripts, will be made available to shareholders pursuant to the Continuous Disclosure Policy.
- 8.5 **Shareholder privacy:** The Company recognises that privacy is important and will not disclose registered shareholder details unless required by law. However, shareholders should be aware that certain details of holdings in a public company are publicly available by law. Shareholder details will only be used by the Company in accordance with applicable Australian privacy laws.

9. Review of this Policy

- 9.1 This Policy will be reviewed by the Board at least once **every 2 years** to ensure it remains effective and in line with best practice, industry standards, Listing Rules and the Company's needs.
- 9.2 This Policy will be available on the Company's website within a reasonable time after any such updates or amendments have been approved.
- 9.3 This Policy cannot be amended without written approval from the Board.