



# Shareholder Communication Policy

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READCLOUD LIMITED  
ACN 136 815 891

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## Document History

| Version | Summary of Amendments                | Approved by | Approval date     |
|---------|--------------------------------------|-------------|-------------------|
| 1.0     | New Shareholder Communication Policy | The Board   | 23 September 2019 |
| 2.0     | Annual Review of the Policy          | The Board   | 23 June 2020      |
| 3.0     | Annual Review of the Policy          | The Board   | 20 June 2022      |
| 4.0     | Annual Review of the Policy          | The Board   | 16 December 2024  |

## Legislative and Regulatory Framework

| Authority                        | Law, Resolution or Regulation  |
|----------------------------------|--|
| ASX Corporate Governance Council | The 4th edition ASX Corporate Governance Principles and Recommendations ("ASX Principles") |
| Australian Government            | Corporations Act 2001 (Cth) ("Corporations Act")   |

## Other Policy Details

| Key Information                   | Details   |
|-----------------------------------|---|
| Approval Body                     | ReadCloud Limited Board of Directors  |
| Key Stakeholders                  | ReadCloud Limited Board of Directors<br>ReadCloud Limited Senior Management |
| Responsibility for Implementation | Chief Executive Officer   |
| Policy Custodian                  | Company Secretary   |
| Next Review Date                  | 2027  |

## 1. Purpose

- 1.1 The purpose of this Policy is to ensure that ReadCloud Limited (“**ReadCloud**” or the “**Company**”) provides effective, transparent, and timely communication with shareholders, enabling them to remain fully informed about the Company’s business, governance, and performance.
- 1.2 The key objectives of this Policy are to;
- a. promote effective 'two-way' communication with shareholders and deal promptly with the enquiries of shareholders;
  - b. encourage and facilitate participation at general meetings of Company;
  - c. provide shareholders with timely access to information to facilitate informed decision-making (materials are maintained and updated on the Company's website ([www.readcloud.com](http://www.readcloud.com)) within a reasonable timeframe);
  - d. distribute shareholder communications in accordance with the Corporations Act 2001 (Cth) (“Corporations Act”) and ASX Listing rules (“Listing Rules”); and
  - e. use available channels and technologies to communicate widely and promptly to shareholders.
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## 2. Methods of Communication

- 2.1 The Company uses a variety of methods or channels to communicate with shareholders:
- a. the Company’s annual and half-yearly reports;
  - a. market releases to the ASX in accordance with continuous disclosure obligations;
  - b. social media;
  - c. webinars and presentations;
  - d. the Company’s website; and
  - e. the annual general meeting (“**AGM**”).
- 2.2 Shareholders will be given the option to receive communications to and from the Company and its share registry electronically.
- 2.3 The Company encourages shareholders to receive Company information electronically by registering their email addresses online with the Company’s Share Registry (details of the Share Registry are available under Section 5).
- 2.4 Shareholders may communicate with the Company by:
- a. contacting the Company by telephone or mail (contact details are available from the Company's website);
  - b. the contact page on the Company's website;
  - c. participation at the AGM; or
  - d. participation at analyst and investor briefings which may be conducted from time to time.
- 2.5 Where appropriate, a summary of the views and matters of concern or interest to shareholders may be communicated to the Board.

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### 3. ASX Announcements

- 3.1 The Company makes announcements on all information concerning the Company's operations and financial results to the ASX in accordance with the continuous disclosure obligations under ASX Listing Rule 3.1 and in accordance with the Company's **Continuous Disclosure Policy**.
- 3.2 Announcements made by the Company to the ASX, subject to applicable securities laws, are available to shareholders:
- a. on the "Investors" section of the Company's website;
  - b. under the "Company Announcements" section of the ASX website;
  - c. by email notification (when shareholders provide the Company with their email address and elect to be notified of all the Company's ASX announcements); and
  - d. under the Company's social media accounts.

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### 4. Website

- 4.1 The Company's website is an important medium to provide information to shareholders and other interested parties.
- 4.2 The Company's website will contain information relevant to shareholders, including announcements made to the market by the Company (including all financial results, annual reports, and press releases), key milestones, Board and Board Committee charters, corporate governance policies, and other material information relevant to shareholders.
- 4.3 Shareholders are encouraged to view the website on a regular basis to keep up to date with information concerning the Company.
- 4.4 The Company will also utilise social media as a key communication channel to distribute Company news that is not required to be issued through the ASX platform including notification of webinars, speaking events, sector education, and other non-price sensitive information.

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### 5. Company's Share Registry

- 5.1 Shareholders are able to access information relevant to their holding via the Company's share registry
- Name: **Boardroom Limited**  
Address: Level 8, 210 George Street, Sydney NSW 2000  
Phone: 02 9290 9600  
Email: [enquiries@boardroomlimited.com.au](mailto:enquiries@boardroomlimited.com.au)  
Web: [www.boardroomlimited.com.au](http://www.boardroomlimited.com.au)
- 5.2 Shareholders can alternatively contact the Company Secretary via email at [cosec@readcloud.com](mailto:cosec@readcloud.com).
- 5.3 The ASX code for the Company is 'RCL'.

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### 6. Annual General Meeting

- 6.1 The Company encourages shareholder participation in its AGM and any other shareholder meetings. The Company usually holds its AGM in February each year.
- 6.2 The specific date, time, and location of each AGM will be detailed:

- a. in the relevant notice of meeting; and
  - b. on the Company's website.
- 6.3 Alternatively, shareholders can contact the Company's share registry or the Company Secretary directly to obtain this information.
- 6.4 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 notice of the meeting will also be available via the 'Investors' section of the Company's website.
- 6.5 Shareholder meetings are an opportunity for shareholders to hear from and put questions to the Board of Directors ("**Board**"), its management, and the external auditor.
- 6.6 Shareholders may attend the meeting in person (including by any relevant technological means made available by the Company in line with the Company's constitution) or by proxy, representative or attorney.
- 6.7 The Chair will provide reasonable time following the consideration of reports for questions and comment on relevant matters (including questions or comments communicated to the Company by absent shareholders).
- 6.8 The Chair's address (and any address by the Chief Executive Officer) will be released to the market immediately prior to the commencement of the AGM. It, along with any webcast made or transcript kept, will be available to shareholders via the Company's website in the same manner as other ASX announcements.
- 6.9 The Company's auditor may attend the 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, and accounting policies in relation to the preparation of the financial statements.
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## **7. Annual Report**

- 7.1 The Annual Report, containing audited financial information, governance reports, and other relevant information, will be made available on the Company's website (via the 'Investors' section) and sent to shareholders electronically.
- 7.2 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 or contact the Company's share registry (see Section 5 for contact details).
- 7.3 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 September each year.
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## **8. Half Year and Full Year results**

- 8.1 The financial results for the 30 September full-year end are reported in November each year. The financial results for the 31 March half-year end are reported in May each year.
- 8.2 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. In addition, the results will be accessible via the 'Investors' section of the Company's website.

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## **9. Media Releases**

- 9.1 Access to the Company's media releases is available from the 'Investors' section of the Company's website (under 'News and Announcements') and they are released to the market via the ASX.

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## **10. Investor and analyst briefings**

- 10.1 At the time of announcement to the ASX of the Company's half-year, full-year results or around key developments, the Company may conduct regular investor and analyst briefings for shareholders and the investment community.
- 10.2 Investor and analyst briefings may occur at other times during the year as the Board deems appropriate.
- 10.3 If and when investor and analyst briefings occur at other times during the year, any presentation materials provided, and webcasts or transcripts (if kept) will be made available to all shareholders via the 'Investors' section of the Company's website and will be released to the market prior to delivery.

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## **11. Shareholder Privacy**

- 11.1 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 privacy laws.

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## **12. External Communications**

- 12.1 Any external inquiry about the Company's performance or announcements should be directed to the CEO.
- 12.2 The only persons authorised to respond on behalf of the Company, or give any official, or non-speculative information are the CEO and the Company Secretary. All other persons are prohibited from speaking or responding on behalf of the Company in relation to its performance or announcements.
- 12.3 Any employees that are approached by any shareholders, investors, members of the public or the media should direct any questions about the Company to the Company Secretary who will either respond or redirect internally.
- 12.4 The Company reserves the right at its absolute discretion not to respond to investor inquiries which are purely speculative in nature, statements of personal opinion or defamatory / offensive in nature, or sent via social media only.
- 12.5 Social media posts will be released or authorised by the CEO only.

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## **13. Policy Review and Amendments**

- 13.1 This Policy will be reviewed by the Board every 2 years to ensure it remains effective and meets the best practice, listing rules and the Company's needs.
- 13.2 Any changes to this Policy will be communicated by the Company to its employees, its shareholders and the market.

- 13.3 The Policy will be available on the Company's website within a reasonable time after any such updates or amendments have been approved.
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**14. Questions about the policy and its application**

- 14.1 Employees should direct their questions about the policy and its application in the first instance to the Company Secretary.
- 14.2 Shareholder feedback is welcomed and considered valuable. Shareholders, investors, and members of the public may direct their questions or feedback on this policy and its application to the Company's share registrar or the Company Secretary.