

HEADLINE GROUP LIMITED

SHAREHOLDER COMMUNICATION POLICY

1. INTRODUCTION

- 1.1 HeadLine Group Limited (“HeadLine”) recognises the right of shareholders to be informed of matters, in addition to those prescribed by law, which affect their investments in the company.

2. HEADLINE’S DISCLOSURE FRAMEWORK

- 2.1 In keeping with the objective of effectively communicating with its shareholders, HeadLine has developed this Policy which confirms its commitment to:

- dealing fairly, transparently and openly with both current and prospective shareholders;
- the use of available channels and cost effective technologies to reach shareholders who may be geographically dispersed and in order to communicate promptly with all shareholders;
- facilitating participation in shareholders meetings and dealing promptly with shareholder enquiries.

3. THE HEADLINE SHAREHOLD COMMUNICATION PRINCIPLES

- 3.1 HeadLine will ensure effective communication with its shareholders by:
- 3.1.1 complying with the continuous disclosure requirements of the law and the ASX Listing Rules;
- 3.1.2 applying best practice disclosure policy in a manner which is most suited to HeadLine;
- 3.1.3 making available relevant financial and company information on the company website at www.headlinegroup.com.au as soon as practicable following the receipt of confirmation from the ASX that the information has been released, or where it is otherwise appropriate to do so, and including:
- a copy of all announcements made to the market for the preceding three (3) years;
 - board and committee charters and other corporate governance documents;

HEADLINE GROUP LIMITED

SHAREHOLDER COMMUNICATION POLICY

- details of the company's directors and senior management;
 - five year financial highlights;
 - dividend history for the preceding three (3) years;
 - financial calendar;
 - annual reports for the preceding three (3) years.
- 3.1.4 forwarding a copy of material announcements made by the company to all shareholders and corresponding with shareholders periodically to update them on the company's activities and progress;
- 3.1.5 promoting and ensuring compliance with all applicable laws, listing rules and accounting standards in its financial reporting; and,
- 3.1.6 attending to shareholder enquiries promptly and courteously and taking measures to ensure that its appointed share registry service provider also responds to shareholders in this way.
- 3.2 HeadLine will encourage participation by investors at general meetings by:
- 3.2.1 convening general meetings of the company in a location which has the highest geographic concentration of shareholders and at a venue which is readily accessible to all shareholders;
- 3.2.2 providing shareholders with the opportunity of asking questions of the Board regarding the management of the company;
- 3.2.3 providing shareholders with the opportunity of asking questions of the company auditor regarding the conduct of, or any issues arising from, the audit or the preparation and content of the auditor's report;
- 3.2.4 lodging a copy of the Chairman's address with the ASX at the start of the meeting, and providing a copy of the address to those shareholders in attendance, prior to voting on resolutions and the conduct of general business;
- 3.2.5 examining ways of ensuring that a broad range of participants may be actively involved in the conduct of its shareholder meetings without attending in person;
- 3.2.6 conducting its meetings in accordance with the Law, the Company Constitution and the Listing Rules;

HEADLINE GROUP LIMITED

SHAREHOLDER COMMUNICATION POLICY

3.2.7 drafting notices and proxy forms to maximize the ability of shareholders to understand and vote on the issues presented including the use of best practice notices and forms where available.

4. **SHAREHOLDER PRIVACY**

4.1 HeadLine will not disclose registered shareholder details unless required by law and will only use shareholder details in accordance with applicable privacy laws and the HeadLine *Privacy Policy* which is available at www.headlinegroup.com.au