



engineering continuous improvement

SMW Group Limited

Shareholder Communications Policy

Adopted by the Board on 4 August 2020

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1. Introduction

SMW Group Limited (the Company or SMW) recognises that shareholders and other stakeholders are entitled to be informed in a timely and readily accessible manner of all material information concerning the Company.

The purpose of this Policy is to promote effective communication with shareholders and other stakeholders by:

ensuring that all shareholders have equal and timely access to material information concerning SMW through a series of regular disclosure events during the financial year;

designing and implementing an investor relations program; and

encouraging effective shareholder participation at general meetings of the Company.

This Policy supplements the Company's Continuous Disclosure Policy which is also available on the Company's website. The purpose of the Continuous Disclosure Policy is to assist SMW to comply with its continuous disclosure obligations under the Financial Markets Conduct Act 2013 (FMCA) and the NZX Listing Rules. The Continuous Disclosure Policy sets out the Company's processes for identifying information that may have a material effect on the price or value of the Company's securities and disclosing that information to the market.

2. Disclosure events

2.1 Methods of communication

Information is provided to shareholders and other stakeholders through:

- releases to NZX in accordance with the Company's continuous disclosure obligations;
- the Company's website;
- the Company's annual and half-yearly results announcements;
- the Company's Annual Report; and
- the general meetings of the Company.

2.2 ASX releases

The Company makes announcements to NZX in accordance with the NZX Listing Rules, relevant legislation and the policies and procedures set out in the Company's Continuous Disclosure Policy. Such disclosures are to be made through the Company Secretary.

All announcements made to NZX are available to shareholders on the Company's website (www.smwgroup.com.au) or under the company announcements section of the NZX website.

2.3 Company's website

The Company's website is the primary medium for providing information to all shareholders and stakeholders. It has been designed to enable information to be accessed in a clear and readily accessible manner.

The Company's website includes, among other things:

- statements lodged with NZX;
- annual and half-yearly results announcements;
- notices of general meetings (including the Annual General Meeting (**AGM**));
- the Annual Report for the Company;
- the Chairperson and CEO's addresses to the AGM;
- notices of significant group briefings (if any);
- other presentations and briefings given to analysts;
- share price information and dividend history;
- information concerning any current dividend reinvestment plan and any share purchase plan; and
- general information on the Company and its activities.

The corporate governance section of the Company's website includes information about the Company's Directors, the constitution, board and committee charters and other policies that are likely to be of interest to shareholders and other stakeholders.

2.4 Company's annual and half-yearly results announcements

The Company announces its financial results twice a year through an announcement to NZX and briefings to media and market analysts. Results announcements provide a summary of the Company's overall performance for the period, including profit, operating revenue, earnings per share and details of investor dividends.

2.5 Annual Report

The Company's full Annual Report is released to NZX and made available on the Company's website. The Annual Report contains key financial, operating and corporate information about the Company in a concise format.

The Annual Report is emailed to all shareholders (to the email address recorded on the Company's share register). Upon request to the Company's share registry, a hard copy of the Annual Report can be mailed to shareholders.

3. Investor relations program

The Company will implement an investor relations program which may include a number of scheduled and ad hoc interactions with institutional investors, private investors, sell-side and buy-side analysts and the financial media.

At a minimum, so as to ensure that shareholders and other stakeholders have a full understanding of the Company's performance and strategies, the Company will convene analyst briefings twice a year on the financial performance and objectives of the Company.

These updates provide an opportunity for analysts to speak directly with senior management and ask questions. These briefings are governed by strict protocols that ensure comments are restricted to information previously disclosed to the market or information which is not price sensitive. For this reason, it is anticipated that for a period the management of information will be closely supervised by the board.

Supporting information, such as management presentations are made available online on the Company's website.

4. General meetings

4.1 General meetings

General meetings are an important forum for two-way communication between the Company and its shareholders. They provide an opportunity for informed shareholder participation.

Shareholders are encouraged to attend or, if they are unable to attend, to vote on the resolutions proposed by appointing a proxy or using any other means included in the notice of general meeting. The Company will seek to ensure that all non-procedural resolutions at meetings of its shareholders are decided by poll rather than a show of hands.

4.2 Annual General Meeting

The Group holds its AGM for shareholders each year.

At the meeting, shareholders will have the opportunity to hear directly from the Board and the CEO on the Company's performance and objectives, ask questions on important issues, and vote on Board proposals.

As with any general meeting, all shareholders are encouraged to attend the AGM.

The Chairperson and CEO's AGM addresses will be posted online.

4.3 External auditor to attend AGM

The Company's external auditor will attend the AGM and be available to answer questions about the conduct of the audit and the preparation and content of the auditor's report.

4.4 Notice of general meetings

The Company seeks to ensure that the form, content and delivery of notices of general meetings comply with the Company's constitution, the FMCA and the NZX Listing Rules.

The full text of any notice of general meeting will be made available on the Company's website.

5. Use of electronic communication and other technology

The Company encourages shareholders to receive Company information electronically by registering their email address online with the Company's share registry. The Company also provides shareholders with the option to send communications to the Company electronically.

Other methods of communication are also available to shareholders and other stakeholders, including telephone, mail and facsimile.

SMW may consider the use of other reliable technologies as they become widely available.

	Approved by	Date
1.0	The Board	4 August 2020