



Communications Policy

Adacel Technologies Limited

ACN 079 672 281

(the Company)

Adopted by the Board on 21 July 2017

Last reviewed by the Board on 11 July 2019.

Communications Policy

Adacel Technologies Limited (the Company)

1. Background

1.1 Overview

The Company is committed to effective communication with its customers, shareholders, market participants, employees, suppliers, financiers, creditors, other stakeholders and the wider community. The Company will ensure that all stakeholders, market participants and the wider community are informed of its activities and performance.

The Company will endeavour to make publicly available all information to ensure that trading in its shares takes place in an efficient, competitive and informed market.

1.2 Purpose

This Communications Policy contains the Company's approach and commitment to communication. The Policy is designed to ensure that the Company:

- (a) provides timely and accurate information equally to all shareholders and market participants regarding the Company including its financial situation, performance, ownership, strategies, activities and governance; and
- (b) adopts channels for disseminating information that are fair, timely and cost efficient.

In addition to those policies and processes contained in the Continuous Disclosure Policy, the Company has implemented a number of processes to ensure achievement of these goals.

2. Confidentiality

Information that the Company considers private and that is not generally available outside the Company (**Confidential Information**) and information that the Company owns, develops, pays to have developed or to which it has an exclusive right (**Proprietary Information**) must be treated by the Company and all employees as follows:

- (a) the Company and all employees must ensure that they do not disclose any Confidential Information or Proprietary Information to any third party or other employee who does not have a valid business reason for receiving that information;
- (b) if Confidential Information or Proprietary Information is required to be provided to third parties or other employees for valid business purposes, the Company and its employees must:
 - (i) take adequate precautions to ensure that information is only used for those purposes for which it is provided and is not misused or disseminated to the Company's detriment; and
 - (ii) ensure that the information is returned or destroyed when the purpose is complete.

Such precautions include obtaining a confidentiality agreement or other undertaking. Advice about these measures can be obtained from the Company Secretary.

Any information concerning the Company which is not generally available and which may have a material effect on the price or value of the Company securities may need to be disclosed in

order for the Company to comply with its continuous disclosure obligations referred to in its Continuous Disclosure Policy and in section 3 of this Communications Policy.

3. Communications with shareholders, employees and the market

3.1 Continuous disclosure

The Company is a public company listed on the ASX. It is subject to continuous disclosure requirements under the Corporations Act and the ASX Listing Rules, in addition to periodic and specific disclosure requirements.

A fundamental component of the Company's Communication Policy is its continuous disclosure program. To ensure the Company complies with its continuous disclosure obligations, the Board has adopted a Continuous Disclosure Policy.

3.2 Communications with the ASX

All communication with the ASX will be in accordance with the ASX Listing Rules. The Company Secretary (or in their absence the Head of Compliance) is responsible for communications with ASX.

Information communicated to the ASX will also be placed on the Company's website.

For further information refer to the Company's Continuous Disclosure Policy.

3.3 Company Meetings

The meetings of shareholders of the Company represent an excellent opportunity for the Company to provide information to its shareholders. The Company encourages attendance at, and participation in, general meetings.

The Company will typically hold its annual general meeting in Melbourne.

A notice of a meeting will be sent to shareholders prior to meetings, including details of the time and place of the meeting, the resolutions to be considered and proxy voting procedures.

The Company will regularly review the policies and procedures that it has in place to facilitate and encourage participation in shareholder meetings including in relation to:

- (a) participation in meetings involving electronic communications; and
- (b) providing direct voting facilities to allow shareholders to vote ahead of the meeting without having to attend or appoint a proxy.

3.4 Information on the website

The Company's website is one of the cornerstones of the Company's Communication Policy with shareholders and the market. All information released to the ASX will be posted on the Company's website as soon as practicable after the ASX has confirmed that it has received the information (see section 4.3 below).

3.5 Briefings

The Company recognises the importance of the relationship between the Company and its institutional investors, brokers and analysts. The Company may from time to time conduct briefings to these groups. In these cases, the following protocols will apply:

- (a) material information which is required to be disclosed under the Continuous Disclosure Policy will not be disclosed at these briefings unless it has been

previously, or is simultaneously, released to the market;

- (b) if material information which has not been disclosed is inadvertently released, the Company will immediately release it to the market via the ASX and place it on the Company's website;
- (c) questions at briefings that deal with material information that has not previously been disclosed will not be answered; and
- (d) the Company will place a copy of the presentation material on the Company's website.

3.6 Communication with employees

The Company recognises that its employees are central to the Company's success. In order to enable staff to fulfil their role to the high standards required and to promote employee satisfaction, the Company aims to ensure effective communication with employees. Effective communication with employees starts with their direct manager and with accessibility to senior management.

3.7 Employee briefings

The Company will from time to time conduct employee briefings so that all staff are aware of activities within the Company. These briefings may be conducted by the Managing Director or an appropriate manager.

3.8 Electronic communication

The Company recognises that it is often efficient to communicate electronically and accordingly:

- (a) shareholders will be given the option to receive communications from, and send communications to, the Company and its share registry electronically; and
- (b) the Company's email system allows staff and stakeholders to communicate simply and easily with management and staff of the Company.

Employees and other stakeholders have access to this system and are encouraged to use it to improve the flow of information and communication generally.

The Company will use email to ensure a continued flow of information and to communicate effectively with staff. Staff should feel free to communicate with any member of management by email.

3.9 Website

The Company's website is an important communication tool for employees and external stakeholders, including customers, suppliers, financiers and investors.

The Company's website contains a range of information of relevance to stakeholders including relevant corporate governance policies and codes, media and market announcements and presentations to shareholders and institutional investors (see section 4.3 below). Stakeholders are encouraged to view the website on a regular basis so that they can keep up to date with information concerning the Company.

4. Other communications

4.1 Communications with the media

All communication with the media will be through the Chairperson, Managing Director or persons

authorised or appointed by the Board.

4.2 Communications with other stakeholders

The Company is committed to ensuring that all stakeholders regularly receive information about the Company and its activities. While individual briefings may be held with key stakeholders, such as financiers, the principal means of ensuring that stakeholders to have access to information will be through the Company's website.

4.3 Website

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

The following information will be available on the Company's website:

- (a) all announcements and releases to the ASX;
- (b) copies of presentations to shareholders, institutional investors, brokers and analysts where possible;
- (c) any media or other releases;
- (d) all notices of meetings and explanatory material;
- (e) a copy of the Company's most recent annual report as well as previous annual, half yearly and quarterly reports;
- (f) all of the Company' codes, policies and charters; and
- (g) any other relevant information concerning non-confidential activities of the Company including business developments.

5. Other matters

5.1 Questions

If you have any questions arising from the Company's Communications Policy, please contact the Company Secretary.

5.2 Amendment of policy

This Policy can only be amended with the approval of the Board.

5.3 Adoption of Policy and Board review

This Policy was adopted by the Board on 21 July 2017, and takes effect from that date and replaces any previous charter in this regard.

The Board will review this Policy periodically. The Company Secretary will communicate any amendments to employees as appropriate.