

Coffey International Limited

Shareholder Communications Policy

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1 Introduction

The Board of Coffey International Limited ("**Coffey**" or "**the Company**") supports governance practices that are designed to promote effective engagement with our shareholders, both retail and institutional.

Coffey is committed to providing shareholders and other stakeholders with balanced and understandable information about our business and performance. The Board recognises the special responsibilities of directors on behalf of our shareholders.

2 Purpose

The purpose of this Shareholder Communications Policy ("**Policy**") is to:

- promote effective communication with shareholders and other stakeholders; and
- to encourage effective participation at Coffey's General Meetings.

This Policy supplements Coffey's Continuous Disclosure Policy and Code of Conduct, which are also available on Coffey's website.

3 Communication Principles

- a) Coffey supports open communication with investors and other stakeholders. Through regular, factual, objective and balanced communication Coffey provides investors with access to information to make informed assessments of Coffey's performance and future prospects.
- b) Coffey uses clear and concise language in communications with shareholders.
- c) Coffey has implemented comprehensive policies and procedures to ensure information with the potential to affect the price or value of Coffey securities, or to influence decisions taken by investors to buy or sell Coffey Securities ("Price Sensitive Information"), is made accessible to investors in a timely and consistent manner, as outlined in Coffey's Continuous Disclosure Policy.
- d) Coffey provides investors and other stakeholders with equal access to Price Sensitive Information, and adopts practices, as outlined in Coffey's Continuous Disclosure Policy, to prevent selective disclosure of Price Sensitive Information.
- e) Coffey supports the use of electronic and other means of communicating with investors including:
 - i. Mail;
 - ii. E-mail;
 - iii. Facsimile;
 - iv. Website (coffey.com);
 - v. Webcast and conference calls;
 - vi. Telephone;
 - vii. Presentations, briefings and investor meetings.

Coffey encourages shareholders to receive company information electronically by registering their email address online with the company's Share Registry.

4 Approval of Shareholder Communications

The Board approves all shareholder communications. If in exceptional circumstances that is not possible, shareholder communications will be approved by the Board Disclosure Committee.

5 Communications with Investors

a) ASX Announcements

- i. Coffey makes announcements to the ASX in a timely manner in accordance with the ASX Listing Rules;
- ii. All announcements to the ASX are made available to investors from the Coffey website as soon as reasonably practicable following confirmation of release of the announcement by the ASX.

b) Reporting Financial Results

- i. Coffey reports financial results twice a year, in accordance with the Corporations Act and the ASX Listing Rules. The financial results for the half-year ended 31 December are reported in February each year, while the financial results for the full-year ended 30 June are reported in August each year.
- ii. On these occasions, Coffey releases to the ASX:
 - a. the relevant financial report for the period;
 - b. a Media Release; and
 - c. an Investor and Analyst Presentation.

This material is also made available to investors and other stakeholders on the Coffey website.

- iii. Where the Board determines that it is appropriate a written summary or explanation of the financial results will also be mailed to shareholders.
- iv. Following the announcement to the ASX of Coffey's financial results, investors and analysts are briefed and given an opportunity to ask questions of the Managing Director and Chief Financial Officer. This presentation is generally webcast to enable interstate and overseas participation.

The investor and analyst briefing is usually supported by an investor roadshow, including one-on-one and group meetings with key investors and analysts. Discussions in these meetings are based on the material in the Investor and Analyst Presentation.
- v. An archive copy of the most recent webcasts of Investor and Analyst Presentations is available to investors on the Coffey website.

c) Market Briefings

- i. Coffey may occasionally hold investor and analyst briefings to discuss various aspects of the company's operations. This may include formal presentations by management at industry or investment conferences.
- ii. All materials used in these briefings are released to the ASX prior to the briefing and are made available on the Coffey website.
- iii. Details of Coffey's policy with respect to investor and analyst briefings are outlined in Coffey's Continuous Disclosure Policy.

d) Annual Report

The Company's Annual Report to shareholders is a central means of communicating to shareholders the Company's activities, operations and performance over the past financial year.

- i. The Annual Financial Report is lodged with the ASX and is available to shareholders in September each year, prior to the AGM, in accordance with the Corporations Act.
- ii. Coffey encourages the use of an electronic version of the Annual Financial Report, which can be accessed from the Coffey website. Where the shareholder has elected to receive a hard copy of the Annual Financial Report, it will be mailed to the shareholder.
- iii. Shareholders can elect to receive the Annual Financial Report by mail or receive notification of availability online electronically by contacting the Share Registry.

e) General Meetings

The Annual General Meeting ("AGM") and other general meetings of the Company are the primary forum for communication by the Company with its shareholders and for shareholder participation.

- i. Coffey encourages shareholders to attend the AGM;
- ii. Coffey's AGM is usually held in October each year;
- iii. The date, time and location of the AGM will be provided:
 - a. in the Notice of AGM;
 - b. in the Annual Financial Report; and
 - c. on the Coffey website.
- iv. The AGM pack is lodged with the ASX and sent by mail to all shareholders, in accordance with the Corporations Act, and made available on the Coffey website. The AGM pack includes:
 - a. Notice of Meeting, including the Explanatory Memorandum;
 - b. proxy voting form; and
 - c. a hard copy of the Annual Financial Report, if the shareholder has elected to receive it in this format.
- v. Shareholders are encouraged to utilise proxy forms to vote on resolutions to be decided at the meeting, if they are unable to attend the AGM. Facility has been made for shareholders to lodge proxy appointments online at the company's share registry.
- vi. At the AGM, shareholders will be invited to ask questions about or comment on Coffey's operations, strategy and performance. Shareholders may also direct questions and comments to Coffey's external auditor on the conduct of the audit, preparation and content of the auditor's report, and the auditor's independence.
- vii. Shareholders are also able to submit questions prior to the AGM. The Chairman formally responds to a number of shareholder questions that are raised prior to the AGM in the Chairman's address.
- viii. In accordance with the Corporations Act, shareholders are also able to submit written questions to Coffey's external auditor on the conduct of the audit, preparation and content of the auditor's report, and the auditor's independence.
- ix. The AGM is webcast to enable interstate and overseas shareholders to view the meeting. However shareholders will not be able to vote on resolutions nor ask questions via the webcast. An archive copy of the webcast of the most recent AGM will be available to investors on the Coffey website.
- x. The Chairman's address and Managing Director's address will be lodged with the ASX just prior to the commencement of the AGM and will be available to investors from the Coffey website.
- xi. Following the AGM, the results of voting on any resolutions are released to the ASX and are also available from the Coffey website.

Notice of Meeting

- xii. The form and content of the Notice of Meeting complies with the Corporations Act 2001 and any applicable ASX Listing Rules and best practice guidelines.

Consideration is given to best practice guidelines issued by: ASX Corporate Governance Council, Chartered Secretaries Australia and the Australasian Investor Relations Association.

- xiii. The Notice of Meeting gives clear guidance on directors' recommendations on resolutions, where appropriate.

f) One-on-one Briefings

Coffey's policy on one-on-one meetings with investors and analysts is detailed in the Coffey Continuous Disclosure Policy.

g) Conference Calls

Investor conference calls are conducted in a similar manner to Market Briefings. The content of any calls is restricted to information that has been previously released to the ASX. Further details can be found in Coffey's Continuous Disclosure Policy.

h) Responding to Analyst Reports and Forecasts

Coffey's policy on responding to analyst reports and forecasts is detailed in the Coffey Continuous Disclosure Policy.

i) Coffey Website

- i. The Coffey website (at coffey.com) contains information about the Company including shareholder communications.
- ii. Coffey will place on its website all ASX announcements and relevant news releases and any other information that is an official release of material information to the market as soon as reasonably practicable after such information is released to the ASX.
- iii. Relevant news releases, Company financial announcements, investor and analyst presentations, and webcasts for the preceding three years will be available on the Company's website.
- iv. The Corporate Governance section includes information about Coffey's directors, the constitution, Board and Committee Charters, and other company policies that are likely to be of interest to investors and stakeholders.

j) Communication via e-mail

- i. Shareholders may elect to receive shareholder communications from Coffey via email.
- ii. Investors and other stakeholders may register to receive regular 'Coffey News' updates via e-mail. Registration is available by visiting www.coffey.com/our-news/subscribe-to-coffey-news.
- iii. A shareholder may change their election at any time by revisiting www.coffey.com/our-news/subscribe-to-coffey-news and following the instructions.
- iv. It is the responsibility of the shareholder to keep a current e-mail account and e-mail address and to notify the Share Registry of any changes to these details.

k) Communication via post

Coffey has in the past communicated with its shareholders via post and will continue to do so where a shareholder has not elected to use an electronic form of communication or otherwise as set out above.

l) Web-casts

At present Coffey web-casts some of its communications to shareholders and the investment community. This service is available from the Coffey website.

m) Financial Calendar

Key dates in Coffey's Financial Calendar are available to shareholders:

- i. from the Coffey website;
- ii. in the Annual Financial Report; or
- iii. by contacting Coffey.

The Financial calendar lists the dates of:

- i. the AGM;
- ii. proposed dividend record and payments; and
- iii. full year and half year results announcements.

n) Dividends

- i. Statements for any declared dividend will be mailed to shareholders on the business day prior to the date the dividend is paid.
- ii. Shareholders can obtain historical dividend information from the Coffey website. This information includes the amount of the dividend and the level of franking.
- iii. Shareholders seeking specific information regarding dividend payments, or method of payment, should contact the Coffey Share Registry.
- iv. As an alternative to receiving cash dividends, eligible shareholders may elect by notification to the share registry, in writing, to participate in the Dividend Reinvestment Plan (DRP).

6 Company Contacts

a) Shareholders

Shareholders, investors and members of the public should direct their questions about their shareholdings to the Share Registry. The contact details for the Share Registry are:

Registries Limited

Level 7, 207 Kent Street, Sydney 2000 Australia
PO Box R67 Royal Exchange Sydney 1223 Australia
Telephone +61 2 9290 9600
www.investorserve.com.au

To contact Coffey in relation to the corporate governance items on the website, please contact us at:

Group Company Secretary

Level 3 Tower 1, 495 Victoria Avenue, Chatswood NSW 2067 Australia
Telephone +61 2 8404 4300
E-mail: company_secretary@coffey.com

If your query relates to investor relations, please contact us at:

Chief Financial Officer

Level 3 Tower 1, 495 Victoria Avenue, Chatswood NSW 2067 Australia
Telephone +61 2 8404 4300
Email: investor_relations@coffey.com

b) Employees

Employees should direct their questions about this Policy and its application in the first instance to their supervisor. If further assistance is required, questions may be directed to:

- The Company Secretary; or
- If the Company Secretary is unavailable, the Chief Financial Officer.

7 Review of this Policy

This Policy is subject to regular review by the Board and will be amended (as appropriate) to reflect current best practice in communications with shareholders.

8 Access to this Policy

This Policy will be available for viewing by any employee of the Group on the Intranet and by any other person on the Coffey website.