

DOCUMENT MANAGEMENT

Version	Last Reviewed / Updated	Submitted By	Position
1.0	21 June 2022	Rebecca Weir and John Larsen	Joint Company Secretary Chairman of the Board
Authorised By: Board of Directors of Sequoia Financial Group Ltd (SFG or the Company)			

1. Introduction

This Communications Policy (the **Policy**) sets out the corporate governance framework of Sequoia Financial Group Ltd in relation to communicating with its stakeholders.

An effective policy for communication with stakeholders creates and enhances a strong culture of disclosure to keep shareholders and the relevant markets informed. This Policy reflects the Board's requirement that shareholders be fully informed about the Company.

This corporate governance framework is designed to ensure that communication of market sensitive information to any external party such as analysts does not occur prior to that information being disclosed to all security holders and market participants.

2. Confidentiality

Information that the Company considers private and that is not generally available outside SFG (**Confidential Information**) must be treated by the Company and all officers and employees as follows:

- (i) SFG and all officers and employees must ensure that any material within their possession is properly and securely stored and that they do not disclose any Confidential Information to any third party or other employee who does not have a valid business reason for receiving that information;
- (ii) If Confidential Information is required to be provided to third parties or other employees for valid business purposes, SFG, its officers and its employees must:
 - a. 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 SFG's detriment; and
 - b. 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 SFG which is not generally available and may have a material effect on the price or value of SFG securities may need to be disclosed in order for SFG to comply with its continuous disclosure obligations as referred to in its Continuous Disclosure Policy and in section 3 of this Policy.

3. Continuous and Periodic Disclosure

Shares in the Company are listed on the Australian Securities Exchange (**ASX**). Therefore, the Company is subject to continuous disclosure requirements under the *Corporations Act 2001 (Cth)* and the ASX Listing Rules, in addition to periodic and specific disclosure requirements.

To ensure the Company complies with its continuous disclosure obligations, the Board has adopted a Continuous Disclosure Policy.

In addition to its continuous disclosure obligations, the Company will make other periodic disclosures as required by law, as contemplated by the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations.

Half Year and Full Year Results and Annual Report

The Half Year, Full Year Results and the Annual Report are announced to the ASX pursuant to the ASX Listing Rules and are available to shareholders in the same manner as other ASX announcements. These are also available on the Company's website (www.sequoia.com.au) (the **Website**).

Following the announcement to the ASX of Half Year and Full Year Results, stakeholders will be briefed and given an opportunity to ask questions of Senior Management.

Presentations made to stakeholders regarding the half year or full year results will be available to all shareholders via release to the ASX (and will be uploaded to the Website).

The Annual Report contains key financial, operating and corporate information about SFG.

Where a shareholder has requested to receive a copy of the Annual Report, a copy will be either emailed or posted in accordance with the shareholder's stated preference prior to the Annual General Meeting within the timeframe set by the Corporations Act.

The Annual Report for the current year and previous years is available on the Website. Shareholders can also contact the Company (using the details below) if they require a copy of the Annual Report.

4. Communications with the ASX

All communication with the ASX will be in accordance with the ASX Listing Rules. The Company Secretary is responsible for communications with the ASX. Information communicated to the ASX will also be placed on the Website.

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

5. Shareholder Meetings

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

The Company generally holds its annual general meeting (**AGM**) in November. Shareholders may participate in the AGM either in person where a physical meeting is held, or online if the AGM is held as a virtual or hybrid meeting. Shareholders may appoint a proxy or other representative to attend and vote on their behalf.

Shareholders and proxyholders will be provided a reasonable opportunity at the AGM to ask questions or comment on the results, operations, strategy and/or management of SFG and/or the conduct of the audit and preparation and content of the auditor's report. The Chairman will provide participating shareholders with a reasonable opportunity to ask questions and discuss resolutions. The auditor will be available at the meeting to answer questions and comment on matters relating to the audit. Shareholders will also be given the opportunity to submit written questions prior to the meeting.

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

Shareholders may update their communication preferences and elect to receive all shareholder communications electronically, including dividend statements, notices of meetings, explanatory material and annual reports.

The Company recognises that some shareholders will not be able to attend its meetings of shareholders. To allow for participation of such shareholders, the Company encourages shareholders to forward their questions to the Company Secretary prior to the meeting. Where appropriate, these questions will be read out and answered at the meeting.

The Company will regularly review its 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.

6. Communication with Analysts, the Media and the Public

No new market sensitive information will be provided during briefings or other conferences or meetings with analysts or investors. When answering questions during public briefings and presentations, it is permissible to clarify or correct any errors of interpretation that analysts may make concerning already publicly available information. However, questions at briefings that deal with price sensitive information not previously disclosed to the ASX will not be answered.

The Company will not selectively release information to any investors, analysts or journalists. All directors and employees involved in conducting briefings or attending conferences will take appropriate steps to ensure no selective release of information occurs.

All inquiries from shareholders, analysts and the media should be referred to the Managing Director or CFO.

7. Employee Briefings

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

8. Inadvertent Disclosure

If a director, officer, employee, or consultant becomes aware that:

- a. there may have been inadvertent disclosure of market sensitive information during any communication with external parties; or
- b. confidential information may have been leaked, whatever its source,

that person should immediately notify the Managing Director or CFO. In such a situation, the Board will consider the need to immediately issue a formal announcement to the ASX. In such circumstances it may also be necessary for the Company to request a trading halt to enable further time for consideration of an announcement to the ASX.

9. Electronic Communication

Shareholders are encouraged to elect to receive shareholder communications from the Company electronically. Shareholders may register for this service by contacting Registry Direct (refer Company Contacts section of this Policy).

Shareholders who elect to receive communications from the Company via email will not receive communications by post, unless required by law.

10. Information available on the Website

All information released to the ASX will be posted on the Website as soon as practicable after the ASX has confirmed that it has received the information.

The Website also 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. Stakeholders are encouraged to view the website on a regular basis so that they can keep up to date with information concerning the Company.

11. Review of this Policy

This Policy will be amended, as required and appropriate, to reflect the current activities of the Company with regards to shareholder communication. The Board will review this Policy as required, and at least bi-annually.

12. Company Contacts

Employees should direct their questions regarding this Policy and its application to their manager. If further assistance is required, questions should be directed to info@sequoia.com.au.

Shareholders, investors and members of the public should direct questions about their shareholdings to the share registry:

Registry Direct

PO Box 18366

Collins Street EAST VIC 8003

Phone: 1300 55 66 35

Fax: +61 39111 5652

Email: registry@registrydirect.com.au

Website: <https://www.registrydirect.com.au/investors/>