

# **EMPIRE RESOURCES LTD**

## **Shareholder Communications Policy**

### **1. Introduction**

This policy applies to Empire Resources Limited (“Empire”) and all of its subsidiaries. Empire recognises the value of providing up-to-date relevant information to its shareholders and of empowering its shareholders through effective communication.

### **2. Scope**

This policy outlines the processes followed by Empire to ensure that communication with Empire shareholders and the investment community is effective, consistent and adheres to the principles of continuous disclosure.

This policy should be read together with and subject to Empire’s Continuous Disclosure and Market Communications Policy. The Continuous Disclosure and Market Communications Policy addresses matters such as:

- Empire’s continuous disclosure obligations; and
- who the persons are that are authorised to make public statements to the market on behalf of, or attributable to, Empire.

Empire’s website, its Annual General Meeting and its regular reporting to the market (i.e. financial reports and Annual Report) are considered the primary communication vehicles within the context of this policy. In addition, reasonable access to senior management and directors will be provided for shareholders and the investor community to seek information on Empire.

### **3. Electronic Communications**

Empire’s website is the key day-to-day information resource for shareholders and the investment community. All announcements made to ASX are available on a timely basis on Empire’s website or by email notification (when a shareholder provides their email address to Empire and elects to be notified of ASX announcements).

Additional information, such as presentations to industry conferences or broker presentations, may also be made available via the website.

### **4. Annual General Meetings (AGM)**

Empire’s intent is to encourage participation of shareholders at the AGM and other shareholder meetings conducted by Empire.

At each meeting, shareholders (through the Chairman) will be given the opportunity to ask general questions of directors and senior management. If shareholders are not present at the AGM,

shareholders are invited in the Notice of Meeting to forward their questions and comments to Empire prior to the AGM.

Empire will also ensure that its external auditors attend the AGM and will be available to answer questions about the conduct of the audit and the preparation of the Auditor's Report.

In addition to the lodgement of the Notice of AGM with ASX and mailing it to shareholders, Empire will also put such notices on the Company's website on the date the documents are posted to shareholders. Results of resolutions considered at shareholders' meetings will be lodged with ASX and will also be available on the Empire website as soon as practical after the relevant shareholder meeting.

Any Managing Director's and/or Chairman's AGM addresses or presentations will be announced to ASX just prior to the commencement of the AGM. It will be available to shareholders in the same manner as other ASX announcements.

## **5. Financial results**

The financial results for the half year ended 31 December are reported by Empire no later than within February each year. The financial results for the full year ended 30 June are reported by Empire no later than within September each year.

The half year and full year results announced to ASX will be available to shareholders in the same manner as other ASX announcements.

## **6. Annual Report**

The Annual Report contains key financial information about Empire as well as important operating and corporate information. The Annual Report will be available on the Empire website prior to the AGM (and within the timeframe set by the Corporations Act).

Shareholders can elect to receive an Annual Report by email or mail by completing an Annual Report Election form which is available from the Empire Share Registry.

Current and previous Annual Reports are available on the Empire website.

## **7. Access to management**

Shareholders and the investment community will have reasonable access to specific authorised senior management and directors of Empire to ask direct questions or to seek additional information on the business.

Directors and senior management must ensure they observe all requirements of Empire's Continuous Disclosure and Market Communications Policy in any communication. The authorised spokespersons for Empire are set out in the Continuous Disclosure and Market Communications

Policy. Discussion should focus on publicly announced facts regarding the business and should not in any way contain comments which could be construed as investment advice.

Requests for additional information may be made through the website, or by mail or phone to the Company's registered office.

#### **8. Share Registry**

For all share related enquiries, shareholders should contact Empire's Share Registry.

For all queries, a shareholder will need to quote their Holder Identification Number or Securityholder Reference Number (SRN) as it appears on their Holding statement, along with their current address.

#### **9. Breach of policy**

Strict compliance with this policy is mandatory. Breaches will be taken seriously and may be subject to disciplinary action, up to and including termination of a person's employment or appointment.

#### **10. Policy reviews**

This policy may be reviewed by the Board from time to time and any proposed amendments approved by the Board.