

# Shareholder Communication Policy

**Version**

1.0

**Date effective from**

14 June 2023

**Next revision required**

14 June 2024

**Policy holder**

Board of Directors

**Audience**

All site and office-based employees

**Purpose**

True North Copper Limited ACN 119 421 868 (**the Company**) and its subsidiaries (if any) (**the Group**) recognise the right of shareholders to be informed of major developments affecting their investment in the Company, in addition to those prescribed by law.

This Shareholder Communications Policy (**Policy**) has been designed to promote effective communication with shareholders and encourage shareholder participation at general meetings of the Company.

## 1. Overview

The Chairman, Managing Director and Company Secretary are primarily responsible for communication with shareholders. Information about the Group and its governance is available to shareholders via the Group's website <https://truenorthcopper.com.au/>. Shareholders queries should be referred to the Company Secretary in the first instance. Any significant comments or concerns will be conveyed to the Board and relevant senior executives.

All market sensitive disclosures are first made available on the ASX Market Announcement Platform. The Group also provides balanced and understandable information to shareholders via the following:

- continuous disclosure to the Australian Securities Exchange (ASX) of all material information;
- periodic disclosure of annual reports, half year and full year financial reports in accordance with the Corporations Act 2001 (Cth) (Corporations Act) and ASX Listing Rules. The Group reports promptly and in compliance with all applicable laws, listing rules and accounting standards in its financial reporting. The Group will also report in a way that is easy to understand and conveys the materiality of the matters discussed;
- periodic disclosure of investor presentations and quarterly reporting of exploration, production and corporate activities;
- notices of meetings and explanatory material;
- the annual general meeting; and
- periodic newsletters or letters from the Chairman or Managing Director.

As part of the Company's developing investor relations program, shareholders can register with the Company to receive email notifications of when an announcement is made by the Company to the ASX, including the release of the Annual Report, half yearly reports and quarterly reports. Links are made available to the Company's website on which all information provided to the ASX is immediately posted.

The Group is committed to promoting investor confidence by ensuring that trading in the Company's securities takes place in an efficient, competitive and informed market.

The laws that prohibit insider trading are an important complement to the continuous disclosure regime in ensuring that shareholders are given fair access to material information about listed securities. The Group limits the opportunity for insider trading in its own securities through its adherence to continuous disclosure provisions and by the application of its own Securities Dealing Policy for employees and Directors.

The Group will not hold meetings with analysts or investors within the 10 day 'blackout' period in advance of the half-year and full-year results announcements, unless authorised by the Managing Director.

## 2. Shareholder communication

### 2.1 Electronic communication and website

The Group is committed to minimising its impact on the environment, and for this reason encourages shareholders to receive communication from and send communications to, the Group and its share registry, electronically. Communicating with shareholders by electronic means, particularly through the Group's website, is an efficient way of distributing information in a timely and convenient manner.

The following information is available to shareholders via the Group's website:

- announcements lodged with the ASX;
- corporate governance policies and procedures adopted by the Company;
- financial reports, including:
  - annual;
  - half yearly; and
  - quarterly reports,
- media articles concerning the Group's operations;
- investor presentations; and
- broker research reports on the Company.

The Group's website is periodically reviewed to ensure the content is current.

## 2.2 Updating shareholder details

The Group's share registry (when listed) is Automic Group (Automic). Shareholders are encouraged to visit Automic's website to view and update shareholding details, including communication preferences.

Shareholders with any enquiries should feel free to contact Automic on:

Telephone: 1300 288 664 (within Australia)

E-mail: [hello@automic.com.au](mailto:hello@automic.com.au)

## 2.3 Meetings

The Group recognises that shareholder meetings are an opportunity for shareholders and other stakeholders to hear from and put questions to the Board, senior management and the Group's auditor. The Group encourages shareholders to attend and participate in meetings.

The Group recognises the rights of shareholders and encourages the effective exercise of those rights through the following means:

- notices of meeting and other meeting material are drafted in concise and clear language;
- notices of meetings and other meeting materials are distributed to shareholders in accordance with the provisions of the Corporations Act;
- shareholders are encouraged to attend meetings and ask questions on any relevant matter, with time being specifically set aside for shareholder questions;
- shareholders are encouraged to participate in voting on proposed resolutions by lodgement of proxies if shareholders are unable to attend meetings;
- it is general practice for the Managing Director to deliver a presentation on the Group's activities at each annual general meeting; and
- it is both Group policy and the policy of the Group's auditor for the lead engagement partner to be present at the annual general meeting of shareholders to answer any questions regarding the conduct of the audit and the preparation and content of the auditors' report.

### 3. Review

The Company Secretary will conduct an annual review of this Policy to ensure that it continues to reflect the most current guidance provided by the ASX.

The Board will approve any amendments to this policy.

### 4. Publication of the policy

This Policy is made available to all directors and staff of the Group, and published on the Group's website <https://truenorthcopper.com.au>.