

Shareholder Communication Policy

Halo Technologies Holdings Limited (ACN 645 531 219)

Version 1.0

1. Introduction

Halo Technologies Holdings Limited (ACN 645 531 219) (**Company**) and its subsidiaries (**Group**) recognise the importance of effective communication with shareholders. The Company acknowledges the different circumstances of shareholders and their varying expectations and access to technology. The Company is committed to ensuring that all shareholders have equal and timely access to material information concerning the company.

The purpose of this Policy is to:

- (a) promote and facilitate effective two-way communication by the Company with shareholders; and
- (b) facilitate and encourage participation at shareholder meetings.

2. ASX announcements

The Company will make announcements to the ASX in a timely manner in accordance with the ASX Listing Rules (**Listing Rules**) and the Company's Continuous Disclosure Policy. All announcements made to the ASX are available to shareholders in the "Investor" section of the Company's website and under the "company announcements" section of the ASX website.

3. The Group website

The Group's website contains information about the Group and its governance, including:

- (a) shareholder communication and ASX announcements;
- (b) press releases;
- (c) half yearly and yearly financial reports, annual reports and other corporate reports;
- (d) notice of the Company's annual general meeting (**AGM**) and other meetings of shareholders;
- (e) documents tabled or otherwise made available at meetings of shareholders, and if kept, recordings or transcripts of the meetings;
- (f) materials distributed at investor or analyst presentations, and if kept, recordings or transcripts of the presentations;
- (g) the Company's constitution, corporate governance policies and charters;
- (h) the Company's statement of values; and
- (i) general information about each of the Company's directors and senior executives.

The website also provides information to assist shareholders in directing relevant inquiries to the Company's share registry.

4. Periodic reporting

The Group produces half yearly and yearly financial reports and an annual report in accordance with the *Corporations Act 2001* (Cth) (**Corporations Act**), the Listing Rules and applicable accounting standards. It seeks to give balanced and understandable information about the Group in its reports to shareholders.

Halo Technologies Holdings Limited – Shareholder Communication Policy

The Group's annual report will be available on the Group's website and be provided to shareholders as required under the Corporations Act.

5. **AGM**

The AGM provides an important opportunity for shareholders to express their views to the Company's board of directors (**Board**) and management. Shareholders are encouraged to attend the AGM or, if unable to attend, to vote on the motions proposed by appointing a proxy or by any other means included in the notice of AGM.

The form, content and delivery of the notices of AGM will comply with the Company's constitution, the Corporations Act and the Listing Rules. Notices of AGM and accompanying explanatory material will clearly, concisely and accurately set out the nature of the business to be considered at the AGM. Notices of AGM and accompanying explanatory material will be available on the Company's website and be provided to shareholders as required under the Corporations Act.

At the AGM, shareholders will be invited to ask the Chairperson or any member of the Board questions about or comment on the results, operations, strategy and/or management of the Company. The Chairperson will provide shareholders present with a reasonable opportunity to ask questions and discuss proposals. The external auditor will also be available at the AGM to answer questions about the conduct of the audit and preparation and content of the auditor's report.

6. **Use of electronic communication**

Shareholders may elect to receive information electronically as it is posted on the Group's website. The website provides information about how to make this election. Shareholders may also communicate electronically with the Company as provided for on the website.

The Company will communicate by post with shareholders who have not elected to receive information electronically.

The Company may consider the use of other reliable technologies as they become widely available.

7. **Share registry**

Shareholders with any questions related to their shareholding should contact the Company Secretary or the Company's share registry.

8. **Shareholder privacy**

The Group recognises that privacy is important and will not disclose individual shareholder details to third parties unless required by law. Shareholder details are only used in accordance with applicable privacy laws.

9. **Review of this Policy**

The Board will review this Policy from time to time. This Policy may be amended by resolution of the Board.