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# SHAREHOLDER COMMUNICATIONS POLICY

**Melbana Energy Limited**

**ACN 066 447 952**

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<b>Approved</b>	<b>February 2024</b>
Next Review Date	February 2026

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## 1 Purpose

- 1.1 Melbana Energy Limited (**MAY** or the **Company**) recognises the value of providing current and relevant information to its existing and prospective shareholders (collectively, the **Shareholders**).
- 1.2 The Executive Chair has the primary responsibility for communication with Shareholders. The Executive Chair has overall responsibility for communication with analysts, stockbrokers, the media and major Shareholders. The Company Secretary has overall responsibility for communication with ASX and other regulatory bodies.
- 1.3 This policy is based upon compliance with the Company's disclosure obligations and, at all times, aims to achieve best practice.
- 1.4 This policy commits the Company to facilitating Shareholder participation in member meetings and to dealing promptly with Shareholder enquiries.

## 2 Information Disclosure

- 2.1 In accordance with the disclosure requirements of the Corporations Act and ASX Listing Rules, the Company follows four main forms of information disclosure:
  - (a) continuous disclosure of material or market sensitive<sup>1</sup> information which is its core disclosure obligation and primary method of informing the market and Shareholders;
  - (b) periodic disclosure in the form of full-year and half-yearly financial reporting;
  - (c) specific information disclosure as and when required of administrative and corporate details usually in the form of ASX releases;
  - (d) information not considered by the Company as market sensitive including updates on the Company's projects that are published on the "News & Broadcasts" section of the Company's website <https://www.melbana.com/site/news-events/news-and-media> and not released on the ASX.
- 2.2 Directors are committed to the promotion of investor confidence by ensuring that trading in the Company's securities takes place in an efficient and competitive market.
- 2.3 The Company will comply with the continuous disclosure obligations contained in

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<sup>1</sup> The test for determining whether information is market sensitive under ASX Listing Rule 3.1 is satisfied if "a reasonable person would expect the information to have a material effect on the price or value of the entity's securities". Section 677 of the Corporations Act (Cth) further states that the test is deemed to be met "if the information would, or would be likely to, influence persons who commonly invest in securities in deciding whether to acquire or dispose of the securities."

the applicable ASX Listing Rules and in so doing will immediately notify the market by announcing to ASX any information in relation to the business of the Company that a reasonable person would expect to have a material effect on, or lead to a substantial movement in, the price or value of the Company's securities.

- 2.4 The Company will ensure that all shareholders have the option to receive communications from, and send communications to, the Company and its security registry electronically.
- 2.5 The Company's website includes the following pages which contain relevant information for Shareholders and interested parties:
  - (a) annual reports and result announcements;
  - (b) all significant Company announcements made to ASX;
  - (c) presentations and support material given at investor conferences;
  - (d) Company profile and Company contact details;
  - (e) all written information provided to investors or stockbroking analysts;
  - (f) briefing material from any Company operating site visits;
  - (g) a section on the Company's corporate governance policies and practices.
- 2.6 The Company's website will be updated with the material released to ASX as soon as practicable after confirmation of release.
- 2.7 All website information will be regularly reviewed and updated to ensure all information is current, or appropriately dated and archived.
- 2.8 The full text of notices of meeting and explanatory material will be placed on the website.

### **3 Written Communication and Annual Report**

- 3.1 The annual report issued by the Company is the major written communication of the Company to Shareholders each year.
- 3.2 Shareholders are provided with a full statutory report, or the ability to access the report, at least 28 days in advance of the Company's annual general meeting.
- 3.3 Shareholders receive notices in relation to all meetings in which Shareholders are permitted to attend.
- 3.4 Shareholder will have the option to receive communications from, and send communications to, the Company and its share registry electronically.

### **4 Participation at General Meetings**

- 4.1 The Company recognises the rights of Shareholders and encourages the effective exercise of those rights through the following means:

- (a) notices of meeting are distributed in accordance with the Corporations Act and provide Shareholders with the opportunity to attend general meetings;
- (b) notices of meeting and other meeting material are drafted in concise and clear language;
- (c) Shareholders are encouraged to attend meetings;
- (d) Shareholders are entitled to actively participate at meetings with time being specifically set aside for Shareholder questions;
- (e) if Shareholders are unable to attend the meeting, Shareholders can participate through the appointment of a proxy;
- (f) the Company is obliged under the Corporations Act to provide the auditor with notice of a general meeting. The Company will ensure that the auditor attends the annual general meeting and is available to answer question from shareholder relevant to the audit.

## **5 Share Registry**

For all share related enquiries, Shareholders should contact the Company's share registry:

Share Registry Boardroom Pty Ltd  
Level 8 / 210 George Street  
Sydney NSW 2000

## **6 Corporate Governance**

- 6.1 In accordance with ASX Corporate Governance Council's "*Principles of Good Corporate Governance and Best Practice Recommendations*" (fourth edition), the Company has a corporate governance section on the Pilot website.
- 6.2 The annual corporate governance statement shall be prepared in accordance with ASX Listing Rules and shall be set out in the Company's annual report each year or alternatively may be included on the Company's web site each year.

## **7 Review**

This policy will be reviewed by MAY from time to time to determine its appropriateness to the needs of the Company and, if required, be amended to suit the requirements of the Company and adherence to the law.