



Shareholder Communication Policy

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1 Introduction

1.1 Obligations

As a publicly listed company, the Company has obligations under the Corporations Act 2001 and the Listing Rules of ASX Limited (**ASX**) to keep the market fully informed of all information which may have, or could be expected to have, a material effect on the price or value of its securities. These disclosure obligations are more fully described in our Continuous Disclosure Policy.

1.2 Aim

Our Shareholder Communication Policy is aimed at providing a clear and concise framework for communications with shareholders in relation to:

- (1) Company strategy;
- (2) Strategy implementation; and
- (3) Financial results flowing from the implementation of Company strategy.

1.3 Policy Adoption

This Shareholder Communication Policy has been adopted by the board of directors (**Board**) of the Company.

1.4 Application

This policy applies to all directors and employees of the Company.

2 Continuous disclosure

The Company's aim is to ensure that all shareholders have simultaneous access to all information in accordance with our Continuous Disclosure Policy. Market analysts, the ASX and industry will have access to information at the same time as shareholders. Where the Company provides briefings to analysts or media, these briefings are released to the market prior to the briefing to analysts or media.

3 Special shareholder communications

From time to time the Company will communicate other information to shareholders. This will be on a *needs* basis and may be by direct written communication with all shareholders or be by way of a Company announcement to ASX which would also be published on the Company's website.

4 Financial reporting, shareholder meetings and other reporting

4.1 Financial reporting

The Board considers transparent and prompt financial reporting to be a key element of disclosure. The Company reports operating results on a half yearly basis and produces half

yearly, yearly and annual reports in accordance with the Listing Rules and the Corporations Act 2001.

4.2 Shareholder communication

The Company also recognises the importance of effective shareholder communication at annual general meetings and general meetings.

4.3 Annual meetings

The annual general meeting provides an opportunity for shareholders of the Company to hear from, and ask questions of, the Board of the Company and external auditors. The Company will provide a Notice of Meeting within a reasonable time prior to the annual general meeting to allow for shareholders to consider questions to the Board of the Company.

4.4 Chairperson

At an annual general meeting, the chairperson will usually be responsible for the conduct of the meeting. One of the chairperson's roles is to ensure that all shareholders have a reasonable opportunity to be heard on any questions shareholders have for the Board and external auditors.

4.5 Transparency

The Company is committed to ensuring maximum transparency at all meetings of shareholders.

4.6 External Auditors

The Company will require its external auditor to attend the annual general meeting and be available to answer shareholder questions about the conduct of the audit and the preparation and content of the auditor's report.

4.7 Company Secretary

The company secretary has been appointed as the person primarily responsible for external communications with the ASX.

5 Communication Techniques

5.1 Electronic communication

To promote broad and effective communication with shareholders, the Company uses electronic communication techniques to complement the official release of material information to the market.

5.2 Website

All announcements made by the Company to ASX are posted on our website at www.scee.com.au as soon as reasonably practicable after such information is released to the ASX.

5.3 Maintenance

Announcements, relevant news releases and investment and analyst presentations are maintained on the Company's website for at least 3 years from the date of the announcement or release.

5.4 Notices and other materials

The full text of notices and explanatory material for all annual general meetings and general meetings are placed on the Company's website.

6 Shareholder Privacy

The Company recognises that the privacy of its shareholders is important and will not disclose registered shareholder information unless required by law. Shareholder details will only be used in accordance with the Privacy Act 1988 (Australia).

7 Public availability of materials

This Policy shall be made publicly available on the Company's website in a clearly marked corporate governance section.