



SHAREHOLDER COMMUNICATION POLICY

Trajan Group Holdings Limited

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1 INTRODUCTION

1.1 Overview

Trajan Group Holdings Limited ACN 152 617 706 (**Company**) is committed to ensuring its shareholders have access to appropriate information about the Company, its governance and matters affecting the Company's performance, to allow them to effectively exercise their rights as shareholders.

1.2 Application

All Company communications with shareholders must comply with this Shareholder Communication Policy (**Policy**) and other Company policies that apply from time to time, including but not limited to the Company's Continuous Disclosure Policy.

A reference to 'shareholders' in this Policy includes holders of the Company's CHESD Depository Interests (if applicable).

1.3 Objectives

The board of directors of the Company (**Board**) has established this Policy to encourage and facilitate:

- 1.3.1 timely, effective, open and honest communication with shareholders through accessible and fair means; and
- 1.3.2 optimum attendance at and participation in shareholder meetings.

2 MEANS OF COMMUNICATION

2.1 Electronic communication

The Company conducts its business activities across geographical borders. The Company recognises that the most efficient and effective means of communicating with its shareholders will largely be via electronic means. The Company will endeavour to ensure that:

- 2.1.1 shareholders have the option to access all relevant information electronically;
- 2.1.2 shareholders have the option to communicate with the Company electronically; and
- 2.1.3 the Company circulates all electronic communications to shareholders:
 - 2.1.3.1 in a format that is easily accessible and readable through an electronic device; and
 - 2.1.3.2 with a printer-friendly option for shareholders who wish to retain a hard copy of the communication.

2.2 Website

The Company's website is one of the Company's key means of communicating with its shareholders which can be accessed at <https://www.trajanscimed.com>. The website will publish key information relevant to shareholders in the Investor Section of the website, including:

- 2.2.1 the Company's corporate governance documents, including corporate governance policies and corporate governance statement;
- 2.2.2 a copy of the Company's annual reports and financial statements;
- 2.2.3 names, photographs and brief biographical information for the Company's directors, senior executives and key team members;
- 2.2.4 copies of the Companies ASX announcements and media releases, which the Company will publish in accordance with its Continuous Disclosure Policy;
- 2.2.5 copies of notices of shareholder meetings and accompanying documents;
- 2.2.6 contact details for the Company's share registry;
- 2.2.7 if it keeps them, webcasts and/or transcripts of shareholder meetings and copies of documents tabled or otherwise made available at those meetings; and
- 2.2.8 if it keeps them, webcasts and/or transcripts of investor or analyst presentations and copies of any materials distributed at those presentations.

2.3 Annual reports

The Company will endeavour to ensure that its annual report delivers to shareholders a clear and accountable presentation of the Company's business activities and market position for the preceding financial year.

Unless Shareholders request a hard copy, the Company will distribute electronic copies of its annual report to shareholders via email. The Company's annual reports will be available on the Company's website.

2.4 Company disclosure

In accordance with the Company's Continuous Disclosure Policy, the Company will ensure:

- 2.4.1 compliance with its continuous disclosure obligations under the Australian Securities Exchange (ASX) Listing Rules; and
- 2.4.2 shareholders have access to all ASX announcements and other public disclosures by publishing them on the Investor Section of the Company's website.

2.5 Shareholder meetings

The Company will hold annual general meetings of shareholders (AGMs). AGMs and other shareholders meetings will provide a platform for:



- 2.5.1 the Company to inform shareholders of important matters, developments and areas of concern or interest to the Board;
- 2.5.2 shareholders to express their views about areas of concern or interest to the Board; and
- 2.5.3 shareholders to vote on Board proposals and recommendations.

The Company encourages all shareholders to attend and engage in AGMs, where possible. The Company will inform shareholders of the date, time and location of AGMs via the Company's website and its annual report. Prior to all Company meetings, the Company will circulate a notice of meeting and associated documents to shareholders and place a copy on the Company's website.

Given the cross-border nature of the Company's business activities, the Company recognises that shareholders may not be able to physically attend Company meetings. To enable shareholder participation in these circumstances, the Company recommends that shareholders vote by proxy where possible and forward any inquiries or concerns they have to the Company Secretary prior to the meeting.

The Company will annually review its policies and procedures for encouraging shareholder engagement in Company meetings. This will involve consideration of how technology can be used to facilitate shareholder participation, for example:

- 2.5.4 live webcasting of meetings so shareholders can view and/or hear proceedings online;
- 2.5.5 holding meetings across multiple venues linked by live telecommunications; and
- 2.5.6 providing a direct voting facility to allow security holders to vote ahead of the meeting without having to attend or appoint a proxy.

3 ADOPTION AND REVIEW OF THIS POLICY

3.1 Adoption of this Policy

The Board adopted this Policy on 23 March 2021. It takes effect from that date and replaces any previous policy in this regard.

3.2 Review and amendment of this Policy

This Policy can only be amended with the approval of the Board. The Board will review this Policy periodically and will communicate any amendments to Company directors, employees, other personnel and shareholders, as appropriate.