



---

# OFX Group Limited Communications Policy

---

**Updated:** February 2018  
**Author:** Company Secretary  
**Reviewed by:** OFX Group Limited Board

# OFX GROUP LIMITED (OFX)

## COMMUNICATIONS POLICY

### 1. Statement of Commitment and Purpose

OFX Group Limited (**OFX** or the **Company**) is committed to effective communication with its shareholders, market participants, customers, employees, suppliers, financiers, creditors, other stakeholders and the wider community. OFX will ensure that all stakeholders, market participants and the wider community are informed of its activities and performance.

OFX will endeavour to make publicly available, all information to ensure that trading in its shares takes place in an efficient, competitive and informed market.

This purpose of this Communications Policy is to describe OFX's approach and commitment to communication with the objective of providing stakeholders, market participants and the wider community with ready access to balanced and understandable information about OFX.

### 2. Confidentiality

Information that OFX considers private and that is not generally available outside OFX (**Confidential Information**) and information that OFX owns, develops, pays to have developed or to which it has an exclusive right (**Proprietary Information**) must be treated by OFX and all employees as follows:

- (a) OFX and all employees must ensure that they do not disclose any Confidential Information or Proprietary Information to any third party or other employee who does not have a valid business reason for receiving that information.
- (b) If Confidential Information or Proprietary Information is required to be provided to third parties or other employees for valid business purposes, OFX and its employees must:
  - (i) take adequate precautions to ensure that information is only used for those purposes for which it is provided and is not misused or disseminated to OFX's detriment; and
  - (ii) ensure that the information is returned or destroyed when the purpose is complete.

Such precautions include obtaining a confidentiality agreement or other undertaking. Advice about these measures can be obtained from the Company Secretary.

Any information concerning OFX which is not generally available and which may have a material effect on the price or value of OFX's securities may need to be disclosed in order for OFX to comply with its continuous disclosure obligations referred to in OFX's Continuous Disclosure Policy and in section 3 of this Communications Policy.

### **3. Continuous disclosure**

OFX is a public company listed on the ASX. It is subject to continuous disclosure requirements under the *Corporations Act 2001* (Cth) and the ASX Listing Rules, in addition to periodic and specific disclosure requirements.

A fundamental component of OFX's Communication Policy is its continuous disclosure program. To ensure OFX complies with its continuous disclosure obligations, the Board has adopted a Continuous Disclosure Policy.

#### **3.1 Communications with the ASX**

All communication with ASX will be in accordance with the ASX Listing Rules. The Company Secretary is responsible for all communications with ASX.

Information communicated to ASX will also be placed on OFX's website. Shareholders can also access OFX's ASX announcements via the ASX website (ASX Code: OFX).

For further information refer to OFX's Continuous Disclosure Policy a copy of which is available on OFX's website.

### **4. Communication with shareholders and the market**

This Communications Policy is designed to ensure that OFX:

- (a) provides timely and accurate information equally to all shareholders and market participants regarding OFX including its financial situation, performance, ownership, strategies, activities and governance; and
- (b) adopts channels for disseminating information that are fair, timely and cost efficient.

In addition to those policies and processes contained in the Continuous Disclosure Policy, OFX has implemented a number of processes to ensure achievement of these goals.

#### **4.1 Company Meetings**

The meetings of shareholders of OFX provides an opportunity for OFX to provide information to its shareholders as well as for shareholders to meet the Directors and senior management of OFX and ask questions about operational and financial aspects of the Company. OFX encourages attendance at, and participation in, general meetings either in person, by proxy or attorney or by other means adopted by the Board. At each Annual General Meeting (**AGM**), the Chairman will allow a reasonable opportunity for members to ask questions of the Board.

OFX typically holds its AGM in August in Sydney.

A notice of a meeting will be sent to shareholders prior to meetings, including details of the time and place of the meeting, the resolutions to be considered and proxy voting procedures.

OFX requires that its auditor attend each AGM so as to be available to answer any shareholder questions about the conduct of the audit and the preparation and content of the auditor's reports.

## **4.2 Information on the website**

OFX's website is one of the cornerstones of OFX's Communication Policy with shareholders and the market. All information released to ASX will be posted on OFX's website as soon as practicable after ASX has confirmed that it has received the information.

## **4.3 Investor and Analyst Briefings**

OFX recognises the importance of the relationship between OFX and its institutional investors, brokers and analysts. OFX may from time to time conduct briefings to these groups. In these cases, the following protocols will apply:

- (a) material information which is required to be disclosed under the Continuous Disclosure Policy will not be disclosed unless it has been previously, or is simultaneously, released to the market;
- (b) if material information which has not been disclosed is inadvertently released, OFX will immediately release the information to the market via the ASX and place it on OFX's website;
- (c) questions at briefings that deal with material information that has not previously been disclosed will not be answered; and
- (d) OFX will place a copy of the presentation material on OFX's website.

## **4.4 Communication with employees**

OFX recognises that its employees are central to OFX's success. In order to enable staff to fulfil their role to the high standards required and to promote employee satisfaction, OFX aims to ensure effective internal communication with employees. Effective internal communication with employees starts with their direct manager and with accessibility to senior management.

## **4.5 Employee briefings**

OFX will from time to time conduct employee briefings so that all staff are aware of activities within OFX. These briefings may be conducted by the Chairman, the Chief Executive Officer and Managing Director or the Chief Financial Officer.

## **4.6 Electronic communication**

OFX's email system allows staff to communicate simply and easily with each other and with management. All employees have access to this system and are encouraged to use it to improve the flow of information and communication generally. OFX will use email to ensure a continued flow of the information and to communicate effectively with staff. Staff should feel free to communicate with any member of management by email.

## **5. Communications with the media**

All communication with the media will be through the Chairman, the Chief Executive Officer and Managing Director or the Chief Financial Officer who are the authorised spokespersons in accordance with the Continuous Disclosure Policy, or persons authorised by the Board from time to time (if appropriate).

## **6. Communications with other stakeholders**

OFX is committed to ensuring that all stakeholders regularly receive information about OFX and its activities. While individual briefings may be held with key stakeholders, such as financiers, the principal means of ensuring that stakeholders to have access to information will be through OFX's website.

## **7. Website**

OFX's website is an important communication tool and is the primary means to provide information to all stakeholders including shareholders, media and employees. It contains a range of information including relevant policies and codes, media and market announcements and presentations to shareholders and institutional investors. It has been designed to enable information to be accessed in a clear and readily accessible manner.

The following will be available on OFX's website:

- (a) announcements and releases to the ASX;
- (b) copies of presentations to shareholders, institutional investors, brokers and analysts where possible;
- (c) any media or other releases;
- (d) all notices of meetings and explanatory material;
- (e) a copy of OFX's most recent annual report as well as previous annual and half yearly reports;
- (f) OFX's codes, policies and charters; and
- (g) any other relevant information concerning non-confidential activities of OFX including business developments.

## **8. Shareholder and investor queries**

Shareholders with enquiries relating to their holding of OFX shares can contact the share registry which provides a call centre to deal with all such enquiries.

Contact details for the share registry and Investor Relations including email, telephone and facsimile contacts are provided on the OFX website and is also provided in the Annual and Half Year reports to shareholders.

## **9. Additional information**

If you have any questions arising from this Communications Policy, please contact the Company Secretary.

Adopted by the Board on 19 February 2018.