



## ATTACHMENT D

### POLICY TO PROMOTE EFFECTIVE COMMUNICATION WITH SHAREHOLDERS

#### INTRODUCTION

The Directors of the Company ("GBG") recognise the importance of forthright communication and that in order to prosper and achieve growth, it must (among other things) earn the trust of employees, customers, suppliers, communities and shareholders by being forthright in its communications and consistently delivering on its commitments.

The Company's principal communication channel with shareholders and other stakeholders is via its website which can be found at [www.gindalbie.com.au](http://www.gindalbie.com.au). All statutory ASX releases are posted to the Company's website as soon as practicable after confirmation of receipt of the release by the ASX.

#### *Information Disclosure*

In accordance with the disclosure requirements of the Corporations Act 2001 and the Australian Stock Exchange ("ASX") Listing Rules, GBG follows the following three main forms of information disclosure:

- ♦ Continuous disclosure – which is its core disclosure obligation and primary method of informing the market and shareholders.
- ♦ Periodic disclosure – in the form of full-year and half-year reporting and the quarterly reporting of investments, major capital and operating expenditures and major funding activities proposed by management.
- ♦ Specific information disclosure – as and when required, of administrative and corporate details, usually in the form of ASX releases.

Directors are committed to the promotion of investor confidence by ensuring that trade in the Company's securities takes place in an efficient, competitive and informed market.

As such, GBG will comply with the continuous disclosure obligations contained in the applicable Listing Rules of the Australian Stock Exchange and in so doing will immediately notify the market by announcing to the ASX on which its securities are listed, any information in relation to the business of GBG that a reasonable person would expect to have a material effect on, or lead to a substantial movement in, the price or value of securities.

Further, all information made available to the ASX is immediately available to shareholders and the market on the Company's website noted above.

The Board aims to ensure that shareholders are kept informed of all major developments affecting GBG. Hence, in addition to its market disclosure, the Directors ensure shareholders are kept informed through a variety of other means:

- ♦ Shareholders can gain access to information about the Group, including the annual report, half yearly and quarterly reports, the Chairman's address delivered at the Annual General Meeting, key policies and other important information through the Company's website.
- ♦ In conducting briefings, GBG takes care to ensure that any price-sensitive information released is made available to all shareholders (institutional and private) and the market at the same time and in accordance with the requirements of the ASX on which the Group is listed.
- ♦ Information is also released by email to all persons who have requested their name to be added to the contact database. Any person wishing to be added to this database can do so by contacting the head office on (08) 9480 8700 or emailing [gbg@gindalbie.com.au](mailto:gbg@gindalbie.com.au)
- ♦ The principal communication with private investors is through the provision of the Annual Report and financial statements and the Annual General Meeting. The annual report is not only available to shareholders via the website but is mailed to the shareholders on an annual basis. Notice of the Annual General Meeting is posted to shareholders at least 28 days in advance of the meeting. Shareholders also receive notices in relation to all meetings in which shareholders are permitted to attend.

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

The Director's recognise the rights of shareholders and encourage the effective exercise of those rights through the following means:

- ♦ Notice of meetings are distributed in accordance with the Corporations Act and provides shareholders with the opportunity to attend general meetings.
- ♦ Shareholders are encouraged to use their attendance at meetings to ask questions on any matter, with time being specifically set aside for shareholder queries.
- ♦ In the event that a resolution is proposed, notices encourage shareholders participation through appointment of proxies.
- ♦ The Company is obliged under the Corporations Act to provide the auditor with notice of a general meeting and the auditor is required to be present at each meeting of shareholders to specifically address questions regarding the conduct of the audit, auditor independence and the preparation and content of the auditor's report.

### ***Provision of Information***

The Company will communicate with shareholders in three main ways:

- (a) Through releases to the market via the ASX;
- (b) Through information provided directly to shareholders; and at general meetings of the Company.
- (c) Market Releases

It is the Company's policy to comply with its continuous and periodic disclosure obligations. In accordance with the Company's continuous disclosure policy, unless exempted by the ASX Listing Rules, the Company will immediately notify the ASX of information:

- (a) Concerning the Company that a reasonable person would expect to have a material effect on the price or value of the Company's securities; and
- (b) That would, or would be likely to, influence persons who commonly invest in securities in deciding whether to acquire or dispose of the Company's securities.

### ***Company Website***

The Company is committed to developing and maintaining a Company website with general information about the Company and its operations, details of the Company's corporate governance policies and procedures and information specifically targeted at keeping the Company's shareholders informed about the Company.

In particular, where appropriate, after confirmation of receipt by the ASX, the following will be posted to the Company website once it is established:

- (a) Relevant announcements made to the market via the ASX;
- (b) Media releases;
- (c) Information provided to analysts or the media during briefings;
- (d) The full text of notices of meeting and explanatory material;
- (e) Information related to general meetings, including the Chairman's address, speeches and voting results;
- (f) Copies of press releases and announcements for the preceding three years; and
- (g) Copies of annual and half-yearly [and quarterly] reports including financial statements for the preceding three years.

Where possible, the website will also be used for web-casting or teleconferencing analyst and media briefings as well as general meetings of the Company. Where the Company does web-cast the preceding events, and even where it is not possible to do so, a transcript or summary of the information discussed will be posted to the Company's website.

### ***Direct Communications with Shareholders***

Throughout the year it may be appropriate for the Company to directly communicate with shareholders. For example, to give shareholders notice of general meetings or to update shareholders by way of a Chairman's letter.

In relation to information that is directly communicated to shareholders, all shareholders have the right to elect to receive all such information by post, facsimile or electronic mail.

### ***Meetings of the Company***

In preparing for general meetings of the Company, the Company will draft the notice of meeting and related explanatory information so that they provide all of the information that is relevant to shareholders in making decisions on matters to be voted on by them at the meeting.

This information will be presented clearly and concisely so that it is easy to understand and not ambiguous.

The Company will use general meetings as a tool to effectively communicate with shareholders and allow shareholders a reasonable opportunity to ask questions of the Board of Directors and to otherwise participate in the meeting.

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

***Other Information***

While the Company aims to provide sufficient information to shareholders about the Company and its activities, it understands that shareholders may have specific questions and require additional information. To ensure that shareholders can obtain all relevant information to assist them in exercising their rights as shareholders, the Company will make available a telephone number and email address for shareholders to make their enquiries.