

## **BARTON GOLD HOLDINGS LIMITED**

### **COMMUNICATIONS POLICY**

#### **BACKGROUND**

##### **Overview**

The Company is committed to open and honest communication with its shareholders, employees, suppliers, creditors, other stakeholders, and the public.

The Company recognises that investors and other interested persons may wish to obtain information that is freely and readily available. Accordingly, the Company communicates information regularly through a range of online forums and announcements which are outlined below.

The Company aims to give public access to all appropriate information so that our shareholders can exercise their rights effectively and to promote an efficient, competitive and informed market.

##### **Purpose**

The purpose of this policy is to ensure that the Company provides timely and accurate information equally to all our shareholders and market participants regarding and in relation to our financial performance, objectives, activities and governance. This policy applies alongside the Company's Continuous Disclosure Policy to ensure that information is available to the Company's stakeholders in a timely and efficient manner.

#### **WEBSITE**

The Company's website is reviewed on a regular basis to reflect all material updates in relation to the Company.

The following information is readily accessible on the Company's website:

- an overview of the Company's current business and structure;
- information on the Company's Directors and senior executives;
- the Company's key corporate governance documents, including the Constitution, Board and Committee Charters and corporate governance policies;
- copies of the Company's ASX announcements, annual reports and notices of meetings;
- key dates for investors;
- the time, venue and other details for results presentations and the Annual General Meeting (**AGM**);
- media releases made by the Company; and
- contact details for the securities registry and information relating to shareholder enquiries.

#### **COMMUNICATIONS WITH SHAREHOLDERS, EMPLOYEES AND THE MARKET**

##### **Continuous Disclosure**

As a public company listed on ASX, the Company is subject to continuous and periodic disclosure requirements under the *Corporations Act 2001* (Cth) and the ASX Listing Rules.

The Company has adopted a Continuous Disclosure Policy to ensure compliance with its continuous disclosure obligations.

In addition to continuous disclosure, the Company will make certain periodic disclosures as required by law (as well as the ASX Listing Rules) and/or contemplated by the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations.

## **Communications with ASX**

All communications with the ASX will be made in accordance with the ASX Listing Rules.

The Company Secretary or his or her representative is responsible for all communications with ASX.

## **Company meetings**

The Company recognises the importance of shareholder participation at its meetings, including the AGM and extraordinary general meetings which may be convened from time to time.

The Company seeks to maximise shareholders' ability to participate in the general meeting process by:

- (a) making Directors of the Company, members of the management team and the external auditor available to shareholders at the meeting;
- (b) allowing shareholders in attendance a reasonable opportunity to ask questions regarding the items of business, including questions to the external auditor regarding the conduct of the audit and the preparation and content of the auditor's report;
- (c) providing shareholders who are unable to attend the meeting with an opportunity to submit questions in advance of the meeting; and
- (d) allowing shareholders to lodge proxies electronically.

All substantive resolutions at a shareholders meeting will be decided by a poll rather than by a show of hands.

## **Access to public presentations**

We will provide investors and market participants copies of all presentation materials that contain market sensitive information or new and substantive information to ASX prior to delivering that presentation publicly and posting on the Company's website.

## **Electronic communication**

Technology has allowed the Company to more effectively communicate with its stakeholders. Accordingly, the Company has put in place arrangements such that:

- shareholders can elect to receive communications from, and send communications, to us and the Company's share registry electronically;
- the Company's email system allows team members and stakeholders to communicate simply and easily with management and our wider team; and
- shareholders can elect to receive the Company's annual report electronically or in hard copy through the mail.

## **WEBSITE**

The Company's website contains information relevant to stakeholders including: corporate governance policies and codes; our statement of values; media and market announcements; and presentations to shareholders and institutional investors.

The Company's website is also one of the means to actively communicate with shareholders and the market. All ASX announcements, including annual and half year financial results, will be made

available on the website promptly following ASX's confirmation that the information has been released on the ASX market announcements platform.

## **QUESTIONS**

Please contact the Company Secretary for any queries about our Communications Policy.

## **REVIEW**

This Policy will be periodically reviewed by the Board to confirm whether any changes are required to the Policy. The Company Secretary will communicate to the team members of any amendments as appropriate.

Policy adopted by the Board on 12 February 2021