



Shareholder Communication and Investor Relations Policy

Australian Strategic Materials Ltd ACN 168 368 401 (Company)

1 Purpose

The Board recognises that it needs to engage with its shareholders and provide them with appropriate information and facilities to allow them to exercise their rights as shareholders effectively. This includes:

- giving shareholders ready access to information about the Company and its governance;
- communicating openly and honestly with shareholders; and
- encouraging and facilitating their participation in meetings of shareholders.

The purpose of this policy is to outline how the Company will provide shareholders and other investors with information about itself and its governance, and to outline the Company's investor relations program.

References in this policy to communicating and interacting with shareholders includes, where securities are held by a custodian or nominee, communicating or interacting with the beneficial owner of the securities.

2 Company website

The Company has a website which can be found at www.asm-au.com.au. The Company's website is designed to provide shareholders and other investors with helpful information about the Company including:

- (a) an overview of the Company's current business;
- (b) a description of how the Company is structured;
- (c) a summary of the Company's history;
- (d) historical information about the market prices of the Company's securities;
- (e) copies of media releases the Company makes;
- (f) contact details for enquiries from shareholders, analysts or the media;
- (g) contact details for its securities registry; and
- (h) links to the share registry website to enable download of key shareholder forms.

The Company's website has a "corporate governance" landing page from where the Company's relevant corporate governance information can be accessed. The following information is available in the corporate governance area of the Company's website:

- (a) its constitution, its Board Charter and the charters of each of its Board committees; and
- (b) its corporate governance policies and procedures.



The Company also makes available on its website the following information on a regular and up-to-date basis:

- (a) the names and brief biographical information for each of its directors and senior executives;
- (b) copies of its annual reports and financial statements for at least the previous 3 years;
- (c) copies of its announcements to ASX for at least the previous 3 years; and
- (d) copies of notices of meetings of security holders and any accompanying documents for at least the previous 3 years.

3 Electronic communication

The Company gives shareholders the option to receive communications from (at present only the annual report), and send communications to, the Company and its securities registry electronically.

Shareholders and other investors are able to register on the Company's website to receive information updates about the Company.

4 General meetings

The Company recognises that general meetings are an important forum for two-way communication between the Company and its shareholders. The meetings provide the Company with an opportunity to impart to shareholders a greater understanding of its business, governance, financial performance and prospects, as well as to discuss areas of concern or interest to the Board and management. The meetings also provide shareholders with an opportunity to express their views to the Company's Board and management about any areas of concern or interest for them.

The Company recognises that all substantive resolutions put to a meeting of security holders should be decided by a poll rather than by a show of hands. Prior to arranging a meeting of security holders, the Board will consider all resolutions being put to security holders.

The Company endeavours to actively engage with shareholders at its general meetings and encourages attendance and participation at its meetings.

The Company provides information in the notice of meeting that is presented in a clear, concise and effective manner.

In accordance with section 250S of *the Corporations Act 2001* (Cth), at the Company's annual general meetings the Chair of the meeting will allow a reasonable opportunity for members to ask questions about or make comments on the management of the Company.

5 Shareholder meetings and enquiries

The Company endeavours to meet with shareholders upon request and responds to any enquiries they may make from time to time.

The Company's interactions with institutional investors, private investors and the financial media is driven by the Company's activities at the time. The Company conducts investor presentations in Melbourne, Perth, Sydney and overseas, which are published on the Company's website.

The Company ensures that any new and substantive investor or analyst presentation is released on the ASX Market Announcements Platform ahead of the presentation and published on the Company's website.

The Company also publishes newsletters for local communities in relation to the Dubbo Zirconia Project from time to time as required and publishes these on the Company's website.