

moneytech

business lending simplified

Shareholder Information Sharing Policy

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Document History

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1. Introduction

The Board of Moneytech Group Limited ACN 611 393 554 (**Company**) recognises the value of providing current and relevant information to its shareholders. The Board aims to provide shareholders with sufficient information to assess the Company's performance and to inform them of the major developments affecting the Company's affairs.

The Chair and the Chief Executive Officer of the Company have the primary responsibility of communicating with the shareholders.

The Company is committed to the promotion of investor confidence by ensuring that there is no information asymmetry among shareholders and that all shareholders are provided with sufficient information to assess the Company's performance and informed of major developments affecting the Company's affairs.

2. Information Disclosure to All Shareholders

Information is communicated to shareholders through:

- (a) periodic disclosure through the annual report (**Annual Report**), the quarterly shareholder reports and other corporate reports as required or deemed necessary;
- (b) notice of meetings and explanatory material; and
- (c) the Annual General Meeting (**AGM**) and other general meetings.

3. Enhanced Disclosure to Selective Shareholders

Other than the disclosures required by law (e.g. the *Corporations Act 2001* (Cth)), the Board may by resolution approve the provision of additional information concerning the Company to one or more specific shareholders. In determining what information should be provided by the Company, the Board must take into consideration the following:

- (a) whether the business has, and will have, sufficient resources to maintain the level of reporting in the long term;
- (b) whether the disclosure will result in information asymmetry among shareholders and increase the risk of insider trading (see section 4);
- (c) if confidential information is shared, whether proper confidentiality arrangements between the Company and the relevant shareholders are entered into (see section 5);
- (d) whether the additional reporting will promote investor confidence in the Board and the Company; and
- (e) whether the provision of the information will make the relevant shareholder an "insider" for the purpose of Division 3 of Chapter 7 of the Corporations Act and as such, should be prohibited from dealing in the Company's securities.

4. Information parity

Shareholders are, subject to the Company's Securities Trading Policy, free to trade the shares in the Company. Therefore, the Company must ensure that a disclosure of information to one or more specific shareholders will not cause information asymmetry among the shareholders and lead to potential insider trading.

Therefore, the Board should exercise caution in providing some, but not all shareholders any confidential information or information that if were generally available, would be likely to influence investors in deciding whether to trade the Company's securities.

If the requested Enhanced Disclosure results in the Selective Shareholder being unable to trade shares in the Company without breaching the Insider Trading provisions of the Corporations Act, then the Company is under no obligation to proactively disclose the relevant Material Non-Public Information to facilitate the trading of shares in the Company by the relevant Selective Shareholder.

5. Confidentiality

If the communication or disclosure of Company information to shareholders involves the sharing of information which is not publicly available concerning the Company (**Confidential Information**), the Board must ensure that, prior to sharing that information, the Company and the shareholder receiving the information (**Recipient**) enter into proper confidentiality arrangements.

Prior to disclosure of the information, the Recipient should be asked to acknowledge and agree to, amongst other things, the following:

- (a) all confidential information is owned solely by the Company;
- (b) the Recipient must hold the Confidential Information in strict confidence and not disclose it to any other person;
- (c) the Recipient must not use the Confidential Information for any purpose except for its understanding of the current affairs of the Company and, in particular, the Recipient must undertake to not deal in the Company's securities until the information becomes "generally available" (as that term is defined in section 1042C of the Corporations Act); and
- (d) the Recipient must return or destroy all copies of Confidential Information in its possession or under its control as soon as it ceases to be a shareholder of the Company.

6. Compliance with this policy

The Board and the CEO of the Company must comply with and refer to this policy when sharing information with shareholders.

Prior to Enhanced Disclosure to Selective Shareholders, the Company will:

- a) Enter into an appropriate Confidentiality Agreement with the Selective Shareholder; and
- b) Receive written confirmation from the Selective Shareholder of their acceptance of the terms of this Shareholder Information Sharing Policy; and
- c) Receive written confirmation from the Selective Shareholder of their acceptance of the terms of the Share Trading Policy.

7. Amendments

This Policy may be amended from time to time by resolution of the Board.