

Straker Translations Limited

Shareholder Communications Policy

1. Introduction

At Straker Translations Limited (**Straker**), we understand the importance of informing shareholders of all major developments affecting Straker in a timely and readily accessible manner. Straker has adopted this policy to:

- promote effective communication of Straker's board and management team with Straker's shareholders;
- facilitate participation by shareholders at Straker's annual meetings; and
- ensure that Straker deals promptly with the enquiries of its shareholders.

2. Methods of Communication to Shareholders

Information about Straker is communicated to shareholders through various methods. The methods most frequently used by Straker to communicate with shareholders include:

- market releases to the Australian Securities Exchange (**ASX**) in accordance with Straker's continuous disclosure obligations;
- the investor relations section of Straker's website;
- Straker's annual and half-yearly reports; and
- Straker's Annual Meeting.

Straker encourages its shareholders to receive information and communications from, and send communications to, Straker and its share registry electronically. Shareholders may elect to send and receive communications electronically by registering their email address online with Straker's share registry.

ASX Releases

In accordance with the ASX Listing Rules (as well as Straker's Continuous Disclosure Policy), Straker is required to make announcements to the ASX in a timely manner.

All announcements made by Straker to the ASX are available to shareholders:

- under the “investor relations” section of Straker’s website; and
- under the company announcements section of the ASX website.

Straker’s Website

The “investor relations” section of Straker’s website is the primary medium through which Straker provides information to all shareholders. The investor relations section of Straker’s website contains information relevant to shareholders and stakeholders, including but not limited to:

- statements lodged with the ASX by Straker (including all financial results, annual reports and press releases);
- board and board committee charters and corporate governance policies; and
- other material relevant to shareholders.

Annual Report

Straker’s annual report (or a link where it can be downloaded) will be emailed to shareholders (to the email address recorded on Straker’s share register) at least 20 working days prior to the Annual Meeting, in accordance with the requirements of the Companies Act, Straker’s constitution and applicable ASX Listing Rules.

Annual Meeting

All shareholders are strongly encouraged to attend Straker’s Annual Meeting, as it provides an important opportunity for Straker to provide information to its shareholders. At the Annual Meeting, shareholders are also provided with the opportunity to express their views to the board and to vote on proposals made by Straker’s board of directors.

The date, time and location of Straker’s Annual Meeting will be provided in a notice of meeting distributed to shareholders (along with the associated proxy form) at least 10 working days prior to the Annual Meeting, in accordance with the requirements of the Companies Act, Straker’s constitution and applicable ASX Listing Rules. Information about upcoming Annual Meetings of Straker will also be included in the annual report and on Straker’s website.

Straker’s external auditor will attend its Annual Meeting and will be available to answer any questions regarding the conduct of, and any issues arising from, the audit or the preparation and content of the auditor’s report.

The chairs of Straker’s various board committees (or other nominated members of these committees) will also attend the Straker Annual Meeting and will be available to answer questions from shareholders about the

activities of each of these board committees.

Shareholders are encouraged to express to the relevant Straker representatives present at the Annual Meeting any matters of concern or interest to the shareholder group, with the understanding that these views will be communicated to Straker's board of directors for consideration.

Shareholders who are not able to attend the Annual Meeting and exercise their right to ask questions about, or make comments on the management of Straker will be given the opportunity to provide questions or comments ahead of the Annual Meeting. Where appropriate, these questions will be considered and answered at the Annual Meeting.

3. Analysts and institutional investors

From time to time, Straker may conduct briefings for analysts and institutional investors in order to discuss matters concerning Straker. Straker's policy in relation to such analyst and institutional investor briefings is that:

- only the Managing Director, the Chief Financial Officer or other board-approved representative of Straker will be authorised to speak to analysts and institutional investors;
- at these briefings, Straker will not comment on price sensitive issues not already disclosed to the market; and
- any questions raised at these briefings in relation to price sensitive issues not already disclosed to the market will either not be answered or will be taken by Straker on notice. If a question is taken by Straker on notice and the answer would involve the release of price sensitive information, the relevant price sensitive information must be released through the ASX before Straker provides a response.

4. Release of half-year and full-year results

Straker's half-year and full-year results are announced to the ASX pursuant to the ASX Listing Rules and are available to shareholders in the same manner as other ASX announcements.

5. Shareholder privacy

Straker recognises that shareholder privacy is important and will not disclose details of registered shareholders unless required by law. Shareholders should be aware that certain details of holdings in a public company are publicly available by law.

Shareholder details will only be used by Straker in accordance with applicable privacy laws.

6. Shareholder queries

Shareholders with any questions related to their shareholding should contact Straker's share registry Link Market Services Limited (ACN 083 214 537).

7. Review of policy

This policy will be reviewed at least every two years and may be updated from time to time as and when determined by Straker's board of directors.

Last reviewed: September 2018