

WEBFIRM GROUP LIMITED

SHAREHOLDER COMMUNICATIONS POLICY

1. Introduction

Webfirm Group Limited (**Company**) is committed to ensuring that shareholders are well-informed of all major developments affecting the state of affairs of the Company so that trade in its securities takes place in an efficient, competitive and informed market.

2. Purpose

The purpose of this Policy is to:

- reinforce the Company's commitment to the continuous disclosure obligations under both the ASX Listing Rules and the Corporations Act; and
- outline the Company's processes aimed at ensuring timely and accurate information is provided equally to all shareholders and the broader market.

This Policy sets out, among other things, key issues arising in the Company's communications with both retail and institutional investors.

3. Commitment to continuous disclosure

3.1 General rule

The Company will generally notify the market immediately, by making an announcement to the ASX, of any information or any major developments related to the business of the Company which:

- a reasonable person would expect to have a **material effect** on the price or value of its securities; or
- a reasonable investor is likely to use as part of the basis for making investment decisions

In certain circumstances, the applicable Listing Rules permit the Company not to disclose, or to delay the disclosure of inside information.

The obligation to disclose does not apply to information that is otherwise generally available.

3.2 Materiality

Information is only required to be disclosed if it would have a **material** effect on the price or value of the Company's securities. This test has both a quantitative and a qualitative component.

- **quantitative:** as a general rule of thumb disclosure should be considered where an event has the potential to impact revenue, profit, assets or liabilities (whichever is appropriate in the circumstances) of the Company by an amount of **at least 5%** of the relevant base.
- **qualitative:** the information should be assessed in the context of the Company's business activities, size and place in the market as well as potential reputational impact.

3.3 Procedure for reporting material information

As soon as you become aware of any information which is, or which may be, materially price sensitive, you must notify the Company Secretary.

If you are in doubt as to whether information you possess is materially price sensitive, you must always contact the Company Secretary.

3.4 Disclosure of information to the market

The decision of whether or not to disclose information will be made by the Chief Executive Officer in consultation with the Chairman, Chief Financial Officer and Company Secretary (as appropriate).

If it is decided that the information is materially price sensitive (and no relevant exception applies) such that a disclosure should be made, the Company Secretary is generally responsible for all continuous disclosure communications with the ASX.

No price sensitive information may be released to any person (for example, shareholders or the media) until the Company has given the information to the ASX **and** received an acknowledgement that the ASX has released the information to the market

4. Communicating with the market

4.1 Types of communication

The following list sets out common categories of information which the Company releases to the market from time to time:

- half-year and full year reports;
- quarterly reports;
- announcements to the ASX (of other significant developments affecting the Company);
- communications regarding Annual General Meetings (and other general meetings as may be held by the Company from time to time).

This information will be posted to the Company's website (www.webfirm.com) as soon as possible following its release to the market.

4.2 Authorised Spokespersons

The only Company officers and employees authorised to speak on behalf of the Company to the market (**Authorised Spokespersons**) are the persons from time to time holding the following offices:

- Chairman
- Chief Executive Officer
- Chief Financial Officer
- Company Secretary

Authorised Spokespersons may clarify information that the Company has released publicly through the ASX, but are not permitted to comment on any material price sensitive issues that have not already been disclosed to the ASX.

4.3 Responding to shareholder and media queries

The following guidelines apply in relation to responding to queries from shareholders (particularly retail shareholders) or the media:

- as a general rule, no information should be released which is not already in the public domain;
- if you are approached for information, you should obtain the person's name and contact number, the organisation they represent (if applicable), and a general outline of information required without responding to the questions or issues raised; and

- you should inform the person that arrangements will be made for someone to make contact with them, and immediately pass the matter onto the Company Secretary or an Authorised Spokesperson (listed in section 4.2).

On no account should anyone other than the Company Secretary or an Authorised Spokesperson make a comment or respond to any media enquiries, as this may give rise to a disclosure obligation.

4.4 Investor presentations

From time to time, the Company conducts broadly targeted investor briefings. In these cases the following protocols will apply:

- the Company Secretary must be informed of all information to be disclosed or discussed at the briefing in advance and, where necessary, the Company Secretary will outline the Company's disclosure history on the issues prior to the briefing;
- no material information may be disclosed at the briefing unless it has been previously released to the ASX;
- questions at briefings that deal with material information which has not previously been disclosed will not be answered;
- if material information is inadvertently released, it must immediately be released to the ASX following the briefing;
- a copy of all presentation material will be disclosed in advance of the briefing through the ASX and placed on the Company's website; and
- a record of all matters discussed at the briefing should be made and provided to the Company Secretary.

At no time will the Company or any of its directors or senior officers hold selective or one-on-one briefings with investors to discuss anything other than information which has already been released to the market.