

SHAREHOLDERS COMMUNICATION POLICY

Adopted by the Board of Directors pursuant to a resolution dated [insert date]

Introduction

Ventus Aqua Pty Ltd (**Ventus Aqua** or the **Company** and, together with its controlled entities, the **Group**) is in the process of converting to a public company and proposes to apply for admission to the Official List of the National Stock Exchange of Australia (NSX). The Company is committed to complying with all continuous disclosure obligations imposed by the Corporations Act 2001 (Cth) (Corporations Act) and the NSX Listing Rules (Listing Rules) upon its admission to the Official List of NSX.

The Company is committed to providing regular communications to shareholders and the market to ensure they have all available information reasonably required to make informed assessments of the Company's strategy, operations and financial performance.

Responsibilities

The Company has determined that its Board of Directors is the most appropriate forum to assume responsibility for administering this policy and may appoint the company secretary to assist the Board in the administration of this policy.

The Board, together with the company secretary, is responsible for reviewing the Company's potential disclosures and deciding what information should be disclosed.

The Board is also responsible for monitoring all company disclosure practices and for updating this policy in response to changes in internal structure, legislative and regulatory development and technology developments.

Shareholder communications

The Company's objectives in communicating with shareholders are to:

- i. comply with the Company's continuous disclosure obligations;
- ii. enforce compliance with insider trading laws;
- iii. comply with financial reporting obligations;
- iv. comply with shareholder meeting requirements;
- v. communicate with shareholders in a clear, regular, timely and transparent manner; and
- vi. respond to shareholder queries promptly and courteously.

Continuous disclosure obligations

The Company aims to comply with all relevant laws, regulations and rules in respect of the continuous disclosure regime

The Company's Continuous Disclosure Policy sets out the Company's continuous disclosure obligations and reinforces the Company's commitment to promoting investor confidence by ensuring the market is fully informed at all times and that all investors have access to material information.

Insider trading

The insider trading laws are an important complement to the continuous disclosure regime in ensuring that shareholders are given fair access to material information about listed securities.

The Company seeks to limit the opportunity for insider trading in its own securities through its adherence to continuous disclosure provisions and by requiring compliance with the Dealing Rules for Employees and Directors.

Financial reporting obligations

In accordance with the Corporations Act and the NSX Listing Rules, the Company produces half-yearly and yearly financial reports.

The Company will promptly comply with all applicable laws, regulations and accounting standards in its financial reporting, and report in a manner that is easy to understand and conveys the materiality of the matters discussed

Shareholder meetings

The Company will convene shareholder meeting in accordance with the Corporations Act and NSX Listing Rules.

The Company will prepare notices of meeting and accompanying documents in a clear and concise manner and in compliance with all applicable laws, regulations and rules and state that shareholders are encouraged to participate at the meeting.

At shareholder meetings, the Company will provide an opportunity for shareholders and other stakeholders to hear from and put questions to the Board, management and auditor of the Company.

Interaction with shareholders

The Company commits to dealing fairly, transparently and openly with both current and prospective shareholders and will respond promptly and courteously to shareholder queries and concerns.

Shareholders can register with the Company to receive email notifications of when an announcement is made by the Company to the NSX, including the release of the Annual Report and half yearly reports.

Review of the Shareholders Communication Policy

The Board will review this Shareholders Communication Policy on an annual basis, or as often as the Board deems necessary, to ensure continued compliance with the Corporations Act, the Listing Rules and best practices.

Publication

This Code of Conduct will be available on the Company's website.

Approved and adopted

This policy was approved and adopted by the Board on 05 June 2020.