

## **COMMUNICATIONS POLICY**

### **Objective**

To ensure that stapled security holders:

- i. Are provided with information required under the law in a timely, accurate balanced manner and expressed in a clear and objective manner and
- ii. Have access to information that has been sent to all investors and information that has been lodged with the ASX and is publicly available.

### **Policy/Procedure**

ALE Property Group has the following policies and procedures in place for communications with stapled security holders.

#### **1. Stapled Security Holders Communications**

ALE Property Group has a Continuous Disclosure Policy dealing with the disclosure of matters that may have a material effect on the price or volume of securities, and other general matters required to be disclosed in accordance with the ASX listing rules.

All information provided to the ASX is posted on the ALE Property Group website promptly, [www.alegroup.com.au](http://www.alegroup.com.au)

The Company will hold an Annual General Meeting each year and the Board encourages full participation of stapled security holders at the AGM. Adequate notice and a suitable venue in Sydney will be chosen for those stapled security holders wishing to attend the AGM or any other stapled security holder meeting. The Company may also hold the AGM online via a suitable web-base meeting provider.

An Annual Report including audited financial statements is prepared each financial year, lodged with the ASX, and is provided to stapled security holders if requested. A copy of ALE Property Group's Annual appears on the ALE Property Group website.

A Half Yearly Financial Report is prepared each year for the six months ending 31 December and lodged with the ASX. A copy of ALE Property Group's Half Yearly Report also appears on the ALE Property Group website.

## 2. Communication 'Black Out' periods

ALE Property Group imposes communication 'Black Out' periods between:

- i. the end of ALE Property Group's half year and full year financial reporting periods (ie 31 December and 30 June) and
- ii. the date of ALE Property Group's announcements of half year and full year results.

During 'Black Out' periods, ALE Property Group will not hold:

- i. One-on-one briefings with institutional investors, individual investors or market analysts to discuss upcoming financial results; or
- ii. Open briefings to discuss upcoming financial results.

This does not prevent ALE Property Group from holding one-on-one or open briefings to discuss matters, which relate to an ASX announcement, market conditions generally or to obtain market relating information.

## 3. Meetings with investors and analysts

ALE Property Group hosts briefings/presentations for stapled security holders and analysts on its interim results, typically, in February and full year results in August each year. Prior to these briefings, the presentation materials are lodged with the ASX and made available on ALE Property Group's website.

At least two ALE Property Group personnel will attend all briefings. Records of matters discussed at meetings will noted and files notes maintained.

In addition, as part of ALE Property Group's commitment to keep its investor base informed, management presents at various investment conferences and conducts investor visits and meetings throughout the year. All material presentations and any other new disclosures are lodged with ASX prior to the presentation and made available on ALE Property Group's website.

## 4. Complaint Handling Policy

ALE Property Group has a Complaints Handling Policy for dealing with complaints that may be received from stapled security holders.

## 5. Share Register

ALE Property Group has appointed a share registry to maintain its Share Register. Stapled security holders may contact this registry at any time with enquiries they may have on their holdings or changes to their particular details.

ALE Property Group has an open-door approach whereby stapled security holders may call either the registry or ALE Property Group with enquiries on the ALE Property Group.

#### 6. Investor Advice

ALE Property Group has a policy in respect of providing advice, which stipulates that other than providing factual information, ALE Property Group will not provide specific advice to stapled securityholders.

#### 7. Digital communication and social media

ALE Property Group maintains a corporate company page on LinkedIn and a Twitter account, which enables it to 'push' key messages from ASX releases to its network of ALE Property Group followers.

All staff who use social media should be mindful of any comments made in a personal capacity about the ALE Property Group on social media/digital communication platforms. In particular, they should:

- remember that only the CEO is authorised to provide comments on behalf of ALE Property Group,
- be clear about who they are representing,
- take responsibility for ensuring any references to ALE Property Group are factually correct,
- be accurate and not breach confidentiality requirements, and
- show respect for the individuals and communities with which they interact.

#### 8. Authorised Spokespersons

The only personnel authorised to speak on ALE Property Group matters to the media, institutional investors or analysts are the Managing Director and the Chairman, or their authorised delegate.

#### 9. Responsible Officers

The Managing Director is responsible for ensuring that ALE Property Group complies with the Policy.

The Company Secretary is responsible for overseeing and coordinating the disclosures to the ASX, analysts, brokers, security holders, the media and the public.

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| <b>Officers Responsible</b> | Directors and staff  |
| <b>Authorising Officer</b>  | Managing Director and Directors  |
| <b>References</b>           | Continuous Disclosure Policy<br>Complaints Handling Policy<br>Providing General Advice Policy<br>Website: <a href="http://www.alegroup.com.au">www.alegroup.com.au</a> |
| <b>Date of Last Review</b>  | June 2021  |