



# Communications Policy

**Freedom Foods Group Limited**  
**ACN 002 814 235**

<b>Version</b>	<b>Document #</b>	<b>Document Owner</b>	<b>Approved By</b>	<b>Date Approved</b>	<b>Review Date</b>	<b>Distribution</b>
1.0	POL_LG_013	Justin Coss	The Board	30/09/21	30/09/22	External

## Table of Contents

Communications Policy.....	3
1. Purpose .....	3
2. Scope.....	3
3. Confidentiality.....	3
4. Shareholder Communication .....	4
5. Shareholder Communication .....	6
6. Review .....	7

## Communications Policy

### 1. Purpose

Freedom Foods Group Limited (**the Company**) is committed to ensuring that there is an open and efficient communication channel between the Company and its stakeholders including shareholders, holders of convertible debt instruments, analysts, brokers, lenders and the media.

The purpose of this Communications Policy (**the Policy**) is to:

- (a) provide stakeholders with timely, balanced and comprehensible information regarding the activities of the Company; and
- (b) promote the active engagement with shareholders in general meetings, results presentations and otherwise.

### 2. Scope

This Policy applies to Freedom Foods Group limited and should be read in the context of the Company's other policies and procedures as varied from time to time (as made available on the Company's website).

### 3. Confidentiality

Information that the Company considers private and that is not generally available outside of Freedom Foods Group Limited (**Confidential Information**) and information that the Company owns, develops, pay to have developed or to which the Company has an exclusive right (**Proprietary Information**) will be treated as follows:

- (a) The Company will ensure that Confidential Information or Proprietary Information is not disclosed to any third party or team member who does not have a valid business reason for receiving that information; and
- (b) if Confidential Information or Proprietary Information is required to be provided to a third party or team member for a valid business purpose, the Company will:
  - (i) take adequate precautions to ensure that information is only used for the purpose for which it is provided and is not detrimentally misused or disseminated; and
  - (ii) ensure, in so far as it is practicable to do so, that the information is returned or destroyed when the purpose is complete.

Such precautions may include obtaining a confidentiality agreement or other undertaking. Advice about these measures can be obtained from the Group General Counsel.

However, any information concerning Freedom Foods Group Limited which is not generally available and which a reasonable person would expect to have a material effect on the price or value of the Company's shares will be dealt with in accordance with the Company's Continuous Disclosure Policy, its obligations at law and as set out in this Policy.

## 4. Shareholder Communication

### 4.1 Investor Relations Program

The Company implements a range of investor relations strategies to facilitate effective two-way communication with investors, shareholders and analysts.

Freedom Foods Group Limited's investor relations program will focus both on:

- (a) professional investors (and financial market participants who service them);
- (b) holders of debt instruments such as secured or unsecured convertible notes;
- (c) retail investors (and the organisations that represent them), and

to understand the matters of concern or interest to those investors.

Freedom Foods Group Limited also recognises the importance of engagement with a broad range of stakeholders beyond financial market participants, such as proxy advisers, governance advisers, government and industry groups.

Where significant comments or concerns are raised by investors or their representatives, they will be conveyed to the Company's board and relevant senior executives.

### 4.2 Periodic Reports to Stakeholders

Freedom Foods Group Limited produces half yearly and yearly financial reports and an annual report in accordance with the Corporations Act 2001 (Cth) (Corporations Act), the ASX Listing Rules and applicable accounting standards. The Company seeks to give balanced and understandable information about its operations and its proposals in its reports to stakeholders including but not limited to its shareholders and lenders.

### 4.3 Freedom Foods Group Limited's Website

The Company's website contains information about Freedom Foods Group Limited and its governance framework including shareholder communications, announcements made to the market and related information. Information about the Company is freely and readily available online on Freedom Foods Group Limited's website and is kept available for a reasonable period. Investor information will be posted in a separate section on the website from other material about Freedom Foods Group Limited. This part of the website will include information relating to the following:

- (a) corporate governance;
- (b) the names, photographs and brief biographical information of each of its directors and senior executives;
- (c) its constitution and board charter and the charters of each of its board committees;
- (d) a statement of the Company's values;
- (e) other key corporate governance policies and statements adopted by the Company;

- (f) corporate information;
- (g) the Company's share registry contact details;
- (h) copies of the Company's annual directors' reports, financial statements and other corporate reports;
- (i) copies of the company's announcements to ASX;
- (j) copies of notices of meetings of security holders and any accompanying documents;
- (k) copies of any documents tabled or otherwise made available at meetings of security holders; and
- (l) copies of any materials distributed at investor or analyst presentations.

Other helpful investor information may also be made available on the Company's website, including:

- (a) an overview of the Company's current business;
- (b) a summary of the Company's history;
- (c) a key events calendar showing the expected dates in the forthcoming year for:
  - (i) results presentations and other significant events for investors and analysts;
  - (ii) the annual general meeting;
  - (iii) book closing dates for determining entitlements to dividends or distributions; and
  - (iv) ex-dividend and payment dates for dividends or distributions;
- (d) once they are known, the time, venue and other relevant details for results presentations and the annual general meeting;
- (e) if Freedom Foods Group Limited has different classes of securities on issue, a brief description of those different classes and the rights attaching to them;
- (f) historical information about the market prices of Freedom Foods Group Limited's securities;
- (g) a description of Freedom Foods Group Limited's dividend or distribution policy;
- (h) information about Freedom Foods Group Limited's dividend or distribution history;
- (m) copies of media releases published by the Company; and
- (n) contact details for enquiries from security holders, analysts or the media.

#### **4.4 Freedom Foods Group Limited's Website**

General meetings are used to communicate with shareholders and allow an opportunity for informed shareholder participation. At the meeting shareholders can express their views to the

Board and management and to vote on the Board's proposals. All shareholders are encouraged to attend or, if unable to attend, to ask questions ahead of the meeting and vote on the motions proposed by appointing a proxy or using any other means included in the notice of meeting. Freedom Foods Group Limited conducts its general meetings in accordance with the Company's constitution, the Corporations Act and the ASX Listing Rules.

The Company will ensure that all substantive resolutions at a meeting of shareholders are decided by a poll rather than by a show of hands. Where practicable, the Company will consider the use of technological solutions for encouraging shareholder participation at meetings (which may include, for example, live webcasting of meetings, holding meetings across multiple venues linked by live telecommunications and hybrid meetings).

#### **4.5 Notices of Meetings**

The Company seeks to ensure that the form, content and delivery of notices of general meetings comply with Freedom Foods Group Limited's constitution, the Corporations Act and ASX Listing Rules. Notices of meeting and accompanying explanatory notes aim to clearly, concisely and accurately set out the nature of the business to be considered at the meeting. Freedom Foods Group Limited will place notices of general meetings and accompanying explanatory material on Freedom Foods Group Limited's website.

#### **4.6 Auditor to Attend AGM**

The external auditor will attend the annual general meeting and be available to answer questions about the conduct of the audit and the preparation and content of the auditor's report.

#### **4.7 Use of Electronic Communication and Other Technology**

Shareholders may communicate electronically with the Company's share registry as provided for on the designated website.

Freedom Foods Group Limited will communicate by post with its shareholders who have not elected to receive communication electronically.

The Company may also consider the use of other technologies to communicate with shareholders.

## **5. Shareholder Communication**

### **5.1 Communication of Information**

The Company will post on its website relevant announcements made to the market and related information (which may include slides and presentations used in analyst, investor, shareholder or media briefings) after they have been given to the ASX and following confirmation of release to the market by the ASX.

Market sensitive information, being information which a reasonable person would expect to have a material effect on the price or value of Freedom Foods Group Limited's securities (**Market Sensitive Information**), will be posted on the Company's website as soon as reasonably practicable after receipt of confirmation from the ASX of its release.

Information may also be provided from time to time to the media on behalf of Freedom Foods Group Limited but not before disclosure to the ASX, even on an embargo basis.

## **5.2 Briefings**

The Company may conduct briefings for analysts, lenders and institutional investors from time to time to discuss matters concerning Freedom Foods Group Limited. This includes meetings with shareholder advisory groups in conjunction with the Annual General Meeting.

Briefings will be undertaken in accordance with the process and by the Directors and employees as outlined in the Continuous Disclosure Policy.

## **5.3 Media Relations and Public Statements**

Media relations and communications must be conducted by the CEO, Company Secretary or the Chair or a person authorised by the Board, and only to the extent of that authorisation.

## **6. Review**

The Company will regularly review this Policy to ensure it remains appropriate to Freedom Foods Group Limited and its ongoing effectiveness and consistency with the Company's objectives and responsibilities.

Any amendments to the Policy are to be approved by the Board.

The Group Company Secretary is responsible for the up-keep, distribution and publication of this document.