

# Asia Pacific Data Centre Group

## SECURITYHOLDER COMMUNICATION POLICY

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### 1. Background

The Asia Pacific Data Centre Group (**APDC Group**) is committed to effective communication with its customers, securityholders, market participants, employees, suppliers, financiers, creditors, other stakeholders and the wider community. The APDC Group endeavours to make publicly available all information to ensure that trading in its shares takes place in an efficient, competitive and informed market.

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### 2. Objective of this Policy

This Policy contains the APDC Group's approach and commitment to communication with its securityholders to ensure that they are kept informed of all major developments affecting the state of affairs of the APDC Group.

The Policy is designed to ensure that the APDC Group:

- (a) provides timely and accurate information equally to all securityholders and market participants regarding the APDC Group including its financial situation, performance, ownership, strategies, activities and governance; and
  - (b) adopts channels for disseminating information that are fair, timely and cost efficient.
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### 3. Website

3.1 The APDC Group's website located at [www.asiapacificdc.com](http://www.asiapacificdc.com) is one of the cornerstones of the APDC Group's communication policy. The APDC Group endeavours to keep its website up-to-date.

3.2 Important information about the APDC Group can be found under the section marked 'Who We Are' on its website. The website contains a range of information of relevance to securityholders including corporate governance policies and codes, media and market announcements and presentations (see below). Securityholders are encouraged to view the website on a regular basis so that they can keep up to date with information concerning the APDC Group.

3.3 Specifically, the following information is available on the APDC Group website:

- (a) the APDC Group's Board and Board Committee Charters;
- (b) the APDC Group's core corporate governance policies;
- (c) press releases and ASX announcements made by the APDC Group; and
- (d) the APDC Group's financial reports and distribution, taxation information and period statement.

#### 4. Measures for Communications

Measures for communicating important aspects of the APDC Group's affairs include:

- (a) **Notice of meeting:** The APDC Group will place the full text of all notices of meetings and explanatory material on its website. The APDC Group encourages securityholders to elect to receive notices of meeting and explanatory material via email.
- (b) **Combined Annual General Meeting (AGM) and General Meeting (GM):** The APDC Group encourages attendance at and full participation of securityholders at its combined AGM and GM each year. Securityholders who are unable to attend in person are given the opportunity to submit questions and comments ahead of the combined AGM and GM, and where appropriate, those questions will be read out and answered at the combined AGM and GM. The full transcript of the Chairman's and the Chief Executive Officer's speeches will be available on the APDC Group website. Securityholders are encouraged to lodge direct votes (where applicable) or proxies electronically, subject to the adoption of satisfactory authentication procedures.

The APDC Group's external auditor will attend the AGM and be available to answer securityholder questions about the conduct of the audit and the preparation and content of the auditor's report. The external auditor will also be given a reasonable opportunity to answer written questions submitted by securityholders to the auditor as permitted under the Corporations Act.

The APDC Group will regularly review its policies and procedures that it has in place to facilitate and encourage participation in meetings including in relation to:

- (i) participation in meetings involving electronic communications; and
  - (ii) providing direct voting facilities to allow securityholders to vote ahead of the meeting without having to attend or appoint a proxy.
- (c) **Annual Report:** The APDC Group's Annual Report is made available on the APDC Group website and contains important information about the APDC Group's activities and results for the previous financial year. Securityholders can elect to receive the APDC Group's Annual Report or concise report as an electronic copy or in hard copy through the mail.
  - (d) **Announcements lodged with the Australian Securities Exchange (ASX):** All ASX announcements made to the market, including annual and half-year financial results, will be posted on the APDC Group's website as soon as practicable after the ASX has confirmed that it has received the information.
  - (e) **Briefings:** The APDC Group may from time to time conduct briefings for its securityholders. In these cases, the following protocols will apply:
    - (i) material information which is required to be disclosed under the Continuous Disclosure Policy will not be disclosed at these briefings unless it has been previously, or is simultaneously, released to the market;

- (ii) if material information which has not been disclosed is inadvertently released, the APDC Group will immediately release it to the market via the ASX and place it on the APDC Group website;
  - (iii) questions at briefings that deal with material information that has not previously been disclosed will not be answered; and
  - (iv) the APDC Group will place a copy of the presentation material on the APDC Group's website.
- (f) **Electronic communication:** The APDC Group recognises that it is often efficient to communicate electronically and accordingly:
- (i) securityholders are given the option to receive communications from, and send communications to, the APDC Group and its registry electronically; and
  - (ii) the APDC Group's email system allows securityholders to communicate simply and easily with management and staff of the APDC Group.

Securityholders have access to the APDC Group's email system via a facility on the website and are encouraged to use it to improve the flow of information and communication generally.

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## 5. Review of this Policy

- 5.1 This Policy will be reviewed regularly by the Chief Executive Officer.
- 5.2 A report will be made to the Board of Directors of the outcome of any such review and recommended changes to the Policy. The review must address generally the efficacy of the Policy. In particular, it must consider the fairness of investigations undertaken, the actual consequences for persons who report concerns and compliance with the Policy generally.
- 5.3 This Policy can only be amended with the approval of the Board.

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## 6. Further Information

- 6.1 If you have any questions regarding this policy contact:

Address: Company Secretary  
Asia Pacific Data Centre Holdings Limited  
Level 13, 135 King Street  
Sydney NSW 2000

Telephone: 02 8405 8872

Email: [info@asiapacificdc.com](mailto:info@asiapacificdc.com)

Last updated: 21 August 2018 (by resolution of the Board)