

## 1. PURPOSE

The aim of this policy is to:

- Ensure that SGH's employees, contractors and service providers are clear on the content restrictions and approval process required prior to the release to an external party or parties of any SGH branded communication or communication which may be attributed to SGH.
- Ensure that all external messaging and communication complies with SGH's Continuous Disclosure and Share Trading policies and with the stringent reporting and continuous disclosure requirements in relation to material information that SGH is bound by as a listed company on the Australian Securities Exchange (ASX) and Singapore Securities Exchange (SGX). Penalties in relation to breaches of these ASX requirements are significant.
- Minimise the risk of a regulatory breach, adverse publicity, damage to SGH's reputation or damage to stakeholder relationships by ensuring all external messaging and communication is in line with SGH's Values, Policies and Principles, and reflects the agreed position taken by SGH on the subject matter being communicated.
- Establish the protocol for handling media enquiries and for providing SGH related information to external parties.

## 2. SCOPE

SGH recognises the importance of providing its shareholders with access to up-to-date information and the ability to participate in shareholder decisions of the Group.

Communication between SGHs management, the SGH Board, shareholders, debt investors, the media and the broader investment community is encouraged, subject to compliance with the continuous disclosure obligations contained in the Listing Rules of the Australian Securities Exchange (ASX), Listing Rules of the Singapore Securities Exchange (SGX) and the Corporations Act 2001 (Cth), and the SGH Continuous Disclosure Policy.

## 3. INVESTOR ENGAGEMENT ACTIVITIES

SGH engages with shareholders, debt investors, the media and the broader investment community through the following key activities:

- a) Annual General Meeting (AGM);
- b) Annual Report;
- c) Sustainability Report;
- d) Modern Slavery Statement;
- e) Tax Transparency Report;
- f) regular releases of financial information, including half-year and full-year financial results;
- g) trading updates as required;
- h) media and analyst calls with SGH management following the release of key financial information;
- i) investor briefing days, which are typically held once a year;
- j) investor site tours of SGH operations as required;
- k) SGH website, at [www.sevengroup.com.au](http://www.sevengroup.com.au), which contains up-to-date information on the operations of the SGH Group, its Board, management and corporate governance structure, ASX announcements, the share price, dividend distribution, debt investment, information on the Group's material sustainability issues and other information;
- l) briefings with members of the domestic and international investment community, subject to the provisions of the SGH Continuous Disclosure Policy; and
- m) responding to shareholder and debt investor queries that may be raised in person, by phone, email or mail.

Reports prepared by market analysts and brokers, broker forecasts, feedback from investor engagement and other market indicators, are regularly reviewed and reported to the SGH Audit & Risk Committee and Board.

This Policy provides guidelines to ensure that any benefits given by an Employee, Contractor or Business Partner on behalf of SGH are ethically appropriate and are properly managed and disclosed. SGH is committed to an ethical environment for all employees.

## **4. POLICY STATEMENTS**

### **Background to Investor Engagement**

#### **1. Allocation of responsibility within SGH**

SGH engages with the domestic and international investment community through SGH Chairman, SGH MD&CEO, and SGH Chief Financial Officer and others in the SGH Executive Management team. Co-ordination of contact with the investment community is through SGH Investor Relations. The Investor Relations function is also responsible for reviewing publications by market analysts and brokers, media and other commentators for accuracy, and collecting and reviewing consensus data from sell-side analysts on a regular basis. Regular updates on investor engagement, market consensus and perception and other market indicators are provided to the Board.

The SGH team has primary responsibility for liaising with the media and co-ordination of SGH Annual Report, sustainability-related disclosures on the SGH website and the Annual General Meeting. Business Unit communications teams are responsible for liaising with the media in relation to their businesses, subject to the restrictions and review processes set out in the Continuous Disclosure Policy. SGH share registry, communications to shareholders, and ASX and SGX releases are co-ordinated by SGH Company Secretariat.

#### **2. Key investor engagement activities**

##### **a) Annual General Meeting**

The AGM provides shareholders with the opportunity to vote on shareholder resolutions recommended by the Board (through direct voting, by proxy, in person, online, by mail, or by fax), hear directly from the Board and SGH MD&CEO, and also to ask questions of the Board, senior management, and SGH external auditor. The AGM is made available via webcast on SGH website. The Chairman's and SGH Managing Director's addresses, and voting results are also released to the ASX and SGX, and available on SGH website.

##### **b) Annual report and sustainability pages on the SGH website**

SGH Annual Report is released to the ASX and SGX and made available on SGH website. Hard copies are mailed to shareholders on request.

The sustainability pages on the SGH website at [www.sevengroup.com.au/sustainability](http://www.sevengroup.com.au/sustainability) provides information about SGH's approach to sustainability, and includes information in relation to each of the Business Units.

##### **c) Modern Slavery Statement and Tax Transparency Report;**

SGH Modern Slavery Statement and Tax Transparency Report are provided to the relevant Regulator and made available on SGH website.

##### **d) Regular release of financial information**

Each year, SGH announces half-year results in February and full-year results in August. Results are released to the ASX and SGX and include supplementary briefings for media and the investment community. All ASX and SGX announcements are available on SGH website and the briefings are webcast.

##### **e) Trading updates**

In addition to regular financial disclosures at the half-year results and full-year results, SGH provides additional disclosure in the form of trading updates as required under the Continuous Disclosure Policy.

##### **f) Media and analyst calls**

SGH arranges media and analyst calls with SGH management following the release of key financial information, typically following half-year and full-year results and other significant events as required.

##### **g) Investor briefing days**

To assist the broader investment community to have a full understanding of the Group's performance and strategies, SGH convenes analyst briefings once a year typically on the strategy and objectives of the Group overall and each of the divisions. The update provides an opportunity for those in the investment community to speak directly with senior management and ask questions. Detailed information is released to the ASX prior to the briefings, to ensure compliance with continuous disclosure obligations, and the Continuous Disclosure Policy.

**h) Investor site tours**

To provide a deeper understanding of the Group's activities, SGH hosts occasional operational tours of stores, distribution centres and industrial facilities. These events allow deeper engagement with divisional management teams and are attended by investors and research analysts. Detailed information is released to the ASX prior to the briefings, to ensure compliance with continuous disclosure obligations, and the Continuous Disclosure Policy.

**i) SGH website**

SGH website at [www.sevengroup.com.au](http://www.sevengroup.com.au) contains up-to-date information, including:

- details of the history and operations of the SGH Group;
- background on SGH Board and senior management;
- the Group's corporate governance structure and policies;
- ASX and SGX announcements and the share price;
- dividend distribution;
- sustainability information
- debt investor information; and
- background on SGH activities within the community.

Links to SGH businesses, the share registry, a calendar of up-coming events, an email enquiry line, and an email alert system are also available on the website. Shareholders have the ability to elect to receive communications and other shareholder information electronically.

**j) Briefings**

SGH conducts briefings with members of the domestic and international investment community and debt investors to discuss operational and financial performance and strategy in order to assist those persons to have a thorough understanding of SGH businesses, and to assist SGH to understand the portfolio management and decision-making processes of the larger registered shareholders, beneficial owners and debt investors.

These discussions are based on information that has previously been released to the ASX and SGX, and are subject to the provisions of the Continuous Disclosure Policy, to ensure there is no inadvertent disclosure of market sensitive information. These briefings are also subject to communication restriction periods from 1 January and 1 July until disclosure of the relevant half and full-year financial results to the ASX and SGX. During these times, SGH will not hold briefings, meetings or interviews with the investment community, media or others to discuss financial information, or information that may impact on financial information, subject to the limited scope of exceptions required under the Continuous Disclosure Policy.

**k) Shareholder enquiries**

Shareholders are able to raise queries directly with SGH through a dedicated phone line with SGH share registry, via an email link on SGH website, or by calling or writing to the company. Queries can be escalated to the Investor Relations team, Company Secretariat, or other senior managers, as appropriate. In particular, queries in relation to the operations of particular businesses are generally referred to the communications team or senior management within the relevant business. The Board is advised of any significant issues that are raised by shareholders.

## **5. PAPERLESS COMMUNICATIONS**

Receiving your shareholder communications electronically is the best way to stay informed and will assist Seven Group Holdings Limited with minimising paper usage.

If shareholders haven't already done so, shareholders are encouraged to make the switch to paperless communications and provide the Company's Registry with your email address. To make the change, login to [www.investorserve.com.au](http://www.investorserve.com.au), add your email address via 'My Details' on the left-hand side of the screen and click 'Communication Options' to select the communication options you would like to set to email.

Shareholders may make a standing election as to how they would like to receive certain documents including annual reports, meeting-related documents (for example notices of meeting and proxy/voting forms) and payment statements.

Shareholders may also make a one-off request to receive a document in physical or electronic form by contacting the registry on [enquiries@boardroomlimited.com.au](mailto:enquiries@boardroomlimited.com.au)

Shareholders are also able to access Shareholder Documents such as our Annual Report, Notice of Meeting and other documents relating to shareholder meetings when they are published on our website or made available on the ASX platform.

## 6. ACCOUNTABILITIES

Compliance to Policy	All Employees and Contractors
Implementation & Review	MD & CEO Group CFO
Approval of Policy	SGH Board
Monitoring	SGH Management, Internal Audit, External Audit
Interpretation and Advice	Group CFO

## 7. RELATED DOCUMENTS

This Policy should be read in conjunction with the following internal documents, procedures and forms.

Title
Code of Conduct
Whistleblower Policy
Delegation of Authority (DOA) Policy
Share Trading Policy
Continuous Disclosure Policy