

GENTRACK GROUP LIMITED (Gentrack)

Shareholder Communications Policy

1. Policy Statement

Gentrack is committed to full, fair and timely disclosure of relevant information to its shareholders and the investment community on a broad, non-exclusive basis.

This policy should be read subject to Gentrack's Market Disclosure Policy.

2. Purpose of this policy

The policy is designed to ensure that communication with Gentrack's shareholders and the investment community is effective, consistent and adheres to the principles of continuous disclosure. The policy also encourages shareholders to communicate with Directors and management and to participate at general meetings held by Gentrack.

Gentrack is a listed company on both the NZX Main Board and the Australian Stock Exchange. As a listed company there are strict rules around the way Gentrack communicates with its shareholders and the investment community. These rules prohibit selective disclosure of information to shareholders and also require Gentrack to disclose material information on a continuous basis. Strict penalties can be imposed in the event of any breach of these rules, and will also result in a loss of public confidence in the integrity of Gentrack, its Board and management.

3. Scope and fit

This policy applies to all directors and employees (including any secondees, contractor or consultant) of Gentrack.

4. Policy implementation

4.1 Authorised spokespersons

In order to ensure the consistent delivery of information to shareholders and financial markets, only the following people (**Authorised Spokespersons**) should conduct discussions with shareholders and equity investment professionals:

- (a) the Chairman of the Board; and
- (b) Chief Executive Officer and;
- (c) Chief Financial Officer

4.2 Consistency with Gentrack's Market Disclosure Policy

To ensure consistency with Gentrack's Market Disclosure Policy, the following guidelines have been developed:

- (d) No employee, other than Authorised Spokespersons, shall communicate with market analysts or shareholders on material information unless specifically authorised by the Authorised Spokespersons.
- (e) No employee shall communicate to the media any material information that has not been the subject of an NZX/ ASX release or is not generally available. No undisclosed material information will be disclosed in any meeting or conference call with the public, media, equity investors or analysts.
- (f) One-on-one discussions with the public, media, investors or analysts shall serve only as opportunities to provide background to previously disclosed information or information not considered to be “material”.
- (g) Any material information inadvertently disclosed during media or investor meetings or calls will be immediately released to the NZX and ASX.
- (h) Earnings forecasts will only be discussed if previously issued by Gentrack by way of a public announcement or via the lodgement of a prospectus.
- (i) Gentrack may make available on its website any other relevant information made available to investors/analysts (e.g. presentation briefing materials).
- (j) To avoid inadvertent disclosure, Gentrack comment on analyst reports will be restricted to information the company has publicly issued and information that is in the public domain.
- (k) Gentrack will not generally comment on analyst forecasts. However if Gentrack becomes aware that in general the market’s earnings projections materially differ from its own estimates, Gentrack may consider it appropriate to issue a profit / warning statement.
- (l) Gentrack will not endorse, or be seen to endorse, analyst reports or the information they contain.
- (m) Gentrack staff will not disclose externally any information that has been generated for internal purposes only.

If any employee, other than Authorised Spokespersons, is approached by a shareholder, prospective shareholder or member of the equity investment community, the enquiry must be forwarded to the Commercial Manager.

4.3 Disclosure to shareholders and analysts

Any material information disclosed by Gentrack will also be published on Gentrack’s website, with further dissemination through broadcast emails to members of the investment community following receipt of an acknowledgement from the NZX and ASX that the material information has been received.

Gentrack will enable shareholders and other interested parties to register their interest to receive direct notification from the company when any releases are made.

5. Annual, interim and operational reporting

Annual, Interim and Operational Reporting will be produced and released to meet all legal and disclosure requirements and contain information to assist shareholders and members of the investment community to understand Gentrack’s operating and financial results.

Printed Annual and Interim Reports will be made available and shareholders will be encouraged to access these documents in electronic form.

6. Gentrack's website

The investor relations section of Gentrack's website will be primarily focused on the needs of shareholders and will:

- (a) Be a repository for any information released to the NZX and ASX as soon as is practical after the event.
- (b) Be a repository for relevant shareholder documents including annual, interim and operational reports, and corporate policies.
- (c) Allow shareholders and other interested parties to register their interest to receive direct notification when any releases are made.

7. Access to directors, management and auditors

Shareholders may, at any time, direct questions or requests for information to Directors or management through Gentrack's website or by contacting the Commercial manager.

At each general meeting of Gentrack, shareholders will have the opportunity to ask questions of Directors.

Senior management and Gentrack's auditors will also attend general meetings to assist in answering questions from shareholders.