

SHAREHOLDER COMMUNICATION POLICY

**EDU Holdings Limited
ACN 108 962 152**

Adopted on 27 February 2023

SHAREHOLDER COMMUNICATION POLICY

1 INTRODUCTION AND PURPOSE

EDU Holdings Limited ACN 108 962 152 (the **Company**) and its subsidiaries (**Group**) recognises the value of providing current and relevant information to its shareholders and facilitating effective two-way communication with investors. The purpose of this policy is to ensure that the Company provides timely and accurate information equally to all our shareholders and market participants regarding and in relation to the Company's financial performance, objectives, activities and governance.

This policy applies alongside the Company's Continuous Disclosure Policy to ensure that information is available to the Company's stakeholders in a timely and efficient manner.

In accordance with the Company's Continuous Disclosure Policy, all persons involved in communications on behalf of the Company should be aware that authorised spokespersons are, unless otherwise approved by the Board, the Chair, Chief Executive Officer and Chief Financial Officer/Company Secretary. No Company employee or associated party (including advisers) are permitted to comment publicly on matters confidential to the Company.

2 METHODS OF COMMUNICATION

Information is communicated to shareholders through:

- (a) publishing information on the Company's website at www.eduholdingslimited.com.au (**Company Website**);
- (b) continuous disclosure of all relevant financial and other information to the Australian Securities Exchange (ASX);
- (c) periodic disclosure through the Annual Report, half-year financial report and quarterly reports (if applicable);
- (d) notice of meetings and explanatory material; and
- (e) the Annual General Meeting (**AGM**) and other shareholder meetings.

3 WEBSITE

The Company Website is one of the means to actively communicate with shareholders and the market. Information about the Company is freely and readily available online on the Company Website and is kept available for a reasonable period, in particular, with the Company's investor communications and corporate governance information.

The following information is readily accessible on the Company's website:

- (a) the Company's key corporate governance documents, including the Constitution, Board Charter and other corporate governance policies;
- (b) information on the Company's Directors and senior management;

- (c) copy of the latest Company Annual Report, and other periodic financial statements and reports;
- (d) a link to the Company's ASX announcements page where copies of the Company's announcements to the ASX can be viewed;
- (e) copies of notices of meetings and any documents tabled or otherwise made available at meetings of security holders held during the year;
- (f) copies of any materials distributed at investor or analyst presentations held during the year;
- (g) an overview of the Company's current business and structure and a summary of the Company's history;
- (h) contact details for enquiries from security holders, analysts or the media; and
- (i) contact details for the Company's share registry.

4 CONTINUOUS DISCLOSURE AND THE ASX

4.1 Continuous disclosure

As a public company listed on ASX, the Company is subject to continuous and periodic disclosure requirements under the *Corporations Act 2001* (Cth) and the ASX Listing Rules. The Company has adopted a Continuous Disclosure Policy to ensure compliance with its continuous disclosure obligations.

In addition to continuous disclosure, the Company will make certain periodic disclosures as required by law (as well as the ASX Listing Rules) and/or contemplated by the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations which will be made available on the ASX website.

All ASX announcements will be made available on the website promptly following ASX's confirmation that the information has been released on the ASX market announcements platform.

4.2 Communications with the ASX

All communications with the ASX will be made in accordance with the ASX Listing Rules.

The Company Secretary or his or her representative is responsible for all communications with ASX.

5 WRITTEN COMMUNICATION AND ANNUAL REPORT

Shareholders have been given the opportunity to elect and receive a printed copy of the Annual Report from the Company. In addition, the Company publishes its Annual Report on the Company Website and the ASX website.

6 SHAREHOLDER MEETINGS

The Company recognises the importance of shareholder participation at its meetings, including the AGM and other shareholder meetings which may be convened from time to time. The Company seeks to maximise shareholders' ability to participate in the general meeting process by:

- (a) distributing notice of meetings to shareholders in accordance with the provisions of the *Corporations Act 2001*(Cth);
- (b) where practicable, ensuring that all directors of the Company and the external auditor (if applicable, at the AGM) are available to shareholders at the meeting;
- (c) allowing shareholders in attendance a reasonable opportunity to ask questions regarding the items of business, including questions to the external auditor regarding the conduct of the audit and the preparation and content of the Auditor's Report (if applicable, at the AGM);
- (d) providing shareholders who are unable to attend the meeting with an opportunity to submit questions in advance of the meeting;
- (e) allowing shareholders to lodge proxies electronically;
- (f) ensuring all substantive resolutions at a meeting of shareholders are decided by a poll rather than a show of hands; and
- (g) where practicable, using technology to encourage shareholder participation at meetings (which may include, for example, live webcasting of meetings, holdings meetings across multiple venues linked by live telecommunications and hybrid/virtual meetings (subject to compliance with the Constitution and *Corporations Act 2001*(Cth)).

7 ELECTRONIC COMMUNICATION

Technology has allowed the Company to more effectively communicate with its stakeholders. Accordingly, the Company has put in place arrangements such that:

- (a) shareholders can elect to receive communications from, and send communications, to us and the Company's share registry electronically;
- (b) the Company's email system allows team members and stakeholders to communicate simply and easily with management and our wider team; and
- (c) shareholders can elect to receive the Company's Annual Report electronically or in hard copy through the mail.

Pursuant to Corporations Amendment (Meetings and Documents) Act 2022 (Cth), the Company will ensure shareholders are notified of their right to elect to receive documents electronically or in physical form at least once each financial year or the Company will make the notice readily available on its website.

8 QUESTIONS

Please contact the Company Secretary for any queries about our Communications Policy.

9 REVIEW OF POLICY

This policy will be reviewed periodically and updated as required to ensure it remains consistent with current law and practice. The latest version of this policy can be found on the Company's website or obtained from the Company Secretary.

10 MATERIAL REVISIONS

VERSION	APPROVAL DATE	EFFECTIVE DATE	DETAILS
1.1	27 February 2023	27 February 2023	Policy approved by resolution of the Board.
1.0	23 February 2022	25 February 2022	Policy approved by the Board.