

**Pinnacle Investment Management Group Limited**

**Investor Relations Policy**

---

**Document Control**

Owner	Company Secretary
Approval	PNI Board
Version	v.1
Relates to	Investor Relations
Date last updated and reason for update	New policy
Primary Rules/Rationale	Corporations Act 2001, Chapter 7, Part 7.10 ASX Listing Rule 3.1 PNI Corporate Governance framework
Related policies	Continuous Disclosure policy Securities Trading policy
Date of Sign off	22 February 2017

## 1. Introduction

### Policy Statement

Pinnacle Investment Management Group Limited (**PNI** or the **Company**) is a publicly listed company whose shares trade on the Australian Securities Exchange (**ASX**). PNI is committed to effective communication with shareholders and the broader investment community. Accordingly, the Board has endorsed this policy as part of PNI and its related entities' compliance and corporate governance framework.

### Policy Objectives

The purpose of this policy is to:

- (a) outline PNI's approach to investor relations and its strategy for shareholder engagement;
- (b) provide guidelines for PNI's methods of communication and interaction with shareholders and the investment community.

## 2. Shareholder Engagement

PNI's key strategies for promoting effective shareholder engagement are:

- (a) ensuring that all market sensitive information and announcements are to be lodged immediately with the ASX and also published on the Company's website following confirmation of its release to the market;
- (b) having and maintaining a dedicated investor relations landing page on its website;
- (c) enabling all shareholders to receive electronic communications and important periodic publications by email, both from the Company and from its share registry;
- (d) ensuring that all key documents and policies that underpin the Company's corporate governance framework are made available on the Company's website and kept up to date;
- (e) providing on-line voting facilities for shareholders for general meetings;
- (f) conducting voting at shareholder meetings by poll rather than by a show of hands; and
- (g) ensuring that the Company's auditors attend the annual general meeting and are available to answer any questions from shareholders in relation to the audit or the Company's annual financial reports.

## 3. Interactions with the investor community

### *Role of Managing Director*

All of the Company's investor relations activities are to be undertaken by the Managing Director (in conjunction with the Chairman, as appropriate). The Managing Director is the central point of contact for all shareholder and investor queries, and should be present for

all shareholder, investor or analyst meetings, briefings, calls, conferences and investor related Company events.

The exception to this is matters relating specifically to the Managing Director, which shall be handled by the Chairman.

### ***Methods of communication***

The Company is committed to respecting the rights of existing and potential investors by providing them with appropriate and timely information to facilitate investment making decisions and providing them with an opportunity to give constructive feedback. This is achieved by:

- (a) communicating honestly with current and potential investors;
- (b) enabling access to the Managing Director and other senior executive management as appropriate;
- (c) engaging with proxy advisors and shareholder groups as appropriate.

### ***Equity of information***

The Company is committed to safeguarding equity of information between investors and ensuring that the market receives consistent and accurate information. It achieves this by:

- (a) ensuring the Managing Director or his delegate is present at all investor and analyst briefings;
- (b) lodging any investor presentations or briefing materials used or presented at such events with the ASX and on the Company's web-site (following release to the ASX) immediately prior to the event;
- (c) maintaining a register of communications and events;
- (d) ensuring that market sensitive information that is not publicly available is not discussed or revealed at individual meetings, briefings or calls;
- (e) disclosing any market sensitive information that is inadvertently discussed or revealed to the ASX immediately;
- (f) normally the Company will not engage with either buy-side or sell-side analysts in the period beginning 15 June and 15 December until the publication of its annual financial results and half yearly results respectively. However, an exception can be made to this if approved by the Managing Director and one independent Director.