



Shareholder Communication Policy

Vulcan Steel Limited (NZBN 9429038466052/ ARBN 652 996 015)

Adopted by the Board on 21 September 2021

Vulcan Shareholder Communication Policy

1 Purpose

- (a) Vulcan Steel Limited (NZBN 9429038466052/ARBN 652 996 015) (**Vulcan**) recognises that shareholders and other stakeholders are entitled to be informed in a timely and readily accessible manner of all major developments affecting Vulcan.
- (b) The purpose of this shareholder communications policy is to promote effective communication with shareholders and other stakeholders and to encourage and facilitate participation at Vulcan's general meetings and dealing promptly with the enquiries of shareholders and other stakeholders.

2 Methods of communication

Information is provided to shareholders and other stakeholders through, but is not limited to:

- (a) releases to the Australian Securities Exchange (**ASX**) and NZX in accordance with continuous disclosure obligations;
- (b) Vulcan's investor website;
- (c) Vulcan's annual and half-yearly reports; and
- (d) the annual general meeting (**AGM**).

Vulcan encourages shareholders to receive company information electronically by registering their email address online with Vulcan's share registry.

3 ASX and NZX releases

- (a) Vulcan will make announcements to the ASX and NZX in a timely manner in accordance with the ASX Listing Rules and the NZX Listing Rules (see also Vulcan's Disclosure Policy).
- (b) All announcements made to the ASX and/or NZX are available to shareholders:
 - (i) on Vulcan's investor website; and
 - (ii) under the relevant company announcements section of the ASX and NZX website.

4 Vulcan's website

- (a) Vulcan's investor website is the primary medium of providing information to all shareholders and stakeholders. It has been designed to enable information to be accessed in a clear and readily accessible manner.
- (b) Vulcan's investor website will provide governance-related information including details of the Board of Vulcan (**Board**) and senior management team and copies of Vulcan's board committee charters and company policies.

- (c) Vulcan's investor website will contain information relevant to shareholders and stakeholders including statements lodged with the ASX and/or NZX by Vulcan (including all financial results and annual reports), press releases and other material relevant to Vulcan shareholders.
-

5 Annual general meeting

- (a) General meetings (including the AGM) provide an important opportunity for Vulcan to provide information to its shareholders and a reasonable opportunity for informed shareholder participation. At general meetings (including the AGM), shareholders can express their views to the Board and management and to vote on the Board's proposals. All shareholders are encouraged to attend and participate at general meetings (including the AGM).
 - (b) The date, time and location of the AGM will be provided in the notice of meeting, in the annual report and on Vulcan's investor website.
 - (c) Where practicable, Vulcan will consider the use of technological solutions for encouraging shareholder participation at meetings (which may include, for example, live webcasting of meetings, holding meetings across multiple venues linked by live telecommunications and hybrid meetings).
 - (d) The notice of meeting and proxy form will be distributed to all shareholders prior to the AGM no later than the timeframe set by the Companies Act 1993 (NZ) (**Companies Act**) and will be available on Vulcan's investor website.
 - (e) Vulcan's auditor attends its AGM and is available to answer any questions regarding the conduct of and any issues arising from the audit or the preparation and content of the auditor's report.
-

6 General

- (a) **Annual report:** The annual report (or a notice as to how a shareholder may obtain a copy of the annual report by electronic means) will be provided to all shareholders prior to the AGM within the applicable statutory timeframes.
- (b) **Half-year and full-year results:** The half-year and full-year results will be announced to the ASX and NZX pursuant to the ASX Listing Rules and are available to shareholders in the same manner as other ASX and NZX announcements. Following the release of Vulcan's half-year and full-year results, Vulcan may conduct investor and analyst briefings at which the media, institutional investors, and stockbroking analysts will be briefed and given an opportunity to ask questions of Vulcan's senior management.
- (c) **Dividends:** Australian and New Zealand resident shareholders are encouraged to provide Vulcan's share registry with Australian or New Zealand bank account details respectively, to enable Vulcan to pay dividends by electronic funds transfer, rather than by cheque. New Zealand registered shareholders who do not provide a bank account will have their dividend held, pending receipt of bank account details being provided to the share registry.

- (d) **Share registry:** Shareholders with any questions related to their shareholding should contact Vulcan's share registry at:

Australian share registry contact

Address Link Market Services Limited
Locked Bag A14
Sydney South NSW 1235 Australia

Telephone number 1300 554 474

Email: registrars@linkmarketservices.com.au

New Zealand share registry contact

Address Link Market Services Limited
PO Box 91976
Victoria Street West Auckland 1142 New Zealand

Telephone number (09) 375 5998

Email: enquiries@linkmarketservices.com

- (e) **Shareholder enquiries:** Vulcan is committed to dealing with shareholder enquiries promptly and courteously and takes measures to ensure that its registry, Link Market Services Limited, also does so.

- (f) **Contacting Vulcan:** Shareholders wishing to contact Vulcan may do so by contacting:

Address: Grant Thornton New Zealand Limited,
Level 4, 152 Fanshawe Street, Auckland,
1010, New Zealand

Email: investor@vulcan.co

- (g) **Shareholder privacy:** Vulcan recognises that privacy is important and will not disclose registered shareholder details unless required by law. Shareholder details will only be used in accordance with applicable privacy laws.

- (h) **Shareholders' meetings:** Vulcan will ensure that all substantive resolutions at a meeting of shareholders are decided by a poll rather than by a show of hands.