



12. Shareholder Communication Policy

Pantoro Limited (“the Company”) recognises the importance of regular and proactive interaction with the market in order to ensure the Company’s investors remain fully informed about its activities. As well as market announcements, this interaction can be in the form of group or one-on-one briefings with investors and analysts, and presentations at industry conferences.

1. GUIDING PRINCIPLES FOR MARKET COMMUNICATIONS

At all times in these interactions, the Company adheres to its guiding principles for market communications: the Company will not disclose price sensitive information to an external party except where that information has previously been disclosed to the market.

Timely and accurate information must be provided equally to all shareholders and market participants.

Information must be disseminated by channels prescribed by laws and other channels which the Company considers to be fair, timely and cost-efficient.

2. AUTHORISED SPOKESPERSONS IN RESPECT OF MARKET COMMUNICATIONS

The only Company employees authorised to make public statements to the market on behalf of, or attributable to, the Company are the Chairman, Managing Director and other Executive Directors.

If any other employee receives a request for comment from an investor, analyst or the media in relation to any matter concerning the Company, they must advise that person that they are not authorised to speak on behalf of the Company and must refer enquiries to the authorised spokespersons.

3. COMMUNICATION OF DISCLOSABLE INFORMATION

All information disclosed to the ASX in compliance with this Policy will be placed promptly on the Company’s website, following receipt of confirmation from the ASX, and will be maintained on the website for at least three years.

The Company’s website is www.niugini.com.au

The Company Board is provided with copies of all information disclosed to the ASX.

4. SHAREHOLDER MEETINGS

The Company encourages and supports shareholder participation in general meetings. Mechanisms for enabling shareholder participation will be reviewed regularly to encourage the highest level of participation, and include:

- notices of meeting being prepared, and meetings being conducted, in accordance with industry best practice and the guidelines published by the ASX Corporate Governance Council; and

- the use of electronic communication to disseminate information relating to meetings.

5. BRIEFINGS

From time to time, the Company conducts briefings for investors, analysts and media groups to discuss information that has been released to the market.

The following protocols apply:

- There will be no discussion of price sensitive information not already disclosed to the market generally.
- Questions raised in relation to price sensitive information not previously disclosed will not be answered.
- If price sensitive information is inadvertently released during the briefing, it will immediately be released to the ASX and placed on the Company's website.
- All briefing and presentation materials will be disclosed to the market via the ASX and placed on the Company's website in advance of the briefing.

6. ANALYST REPORTS

The Company recognises the important role played by analysts in assisting the establishment of an efficient market with respect to the Company's securities.

However, the Company is not responsible for, and does not endorse, analysts' research reports on the Company.

When requested to do so, the Company may review analysts' research reports but will confine its comments to material previously disclosed by the Company or material in the public domain.

The Company may comment on analysts' earnings estimates to the extent of:

- acknowledging the current market range of estimates;
- questioning an analyst's assumptions or sensitivities if the analyst's estimate is significantly at variance from current market range estimates; and
- advising factual errors where data is already in the public domain.

Forecast information will not be provided by the Company unless it has already been disclosed to the market.

7. SHAREHOLDER COMMUNICATION

The Company gives security holders the option to receive communications from, and send communications to, the entity and its security registry electronically.