



Securityholder Communication Policy

PINCHme.com Inc.

1. Purpose

- 1.1 PINCHme.com Inc. (**Company**) has adopted this Securityholder Communication Policy (**Policy**) to ensure that securityholders are informed in a timely and readily accessible manner of all major developments affecting the Company.
- 1.2 The purpose of this policy is to promote effective communication with securityholders and to encourage and facilitate participation at the Company's general meetings and deal promptly with the enquiries of securityholders.
- 1.3 A reference in this Policy to "securityholders" includes holders of the Company's CHESSE Depository Interests.

2. Methods of communication

- 2.1 Information is provided to securityholders through, but is not limited to:
- (a) the Company's annual and half-yearly reports;
 - (b) market releases to the Australian Securities Exchange (**ASX**) in accordance with continuous disclosure obligations;
 - (c) the investor relations section of the Company's website; and
 - (d) the annual general meeting (**AGM**).
- 2.2 The Company encourages securityholders to receive company information electronically by registering their email address online with the Company's share registry.

3. ASX releases

- 3.1 The Company will make announcements to ASX in a timely manner in accordance with the ASX Listing Rules (see also the Company's Continuous Disclosure Policy).
- 3.2 All announcements made to ASX are available to securityholders:
- (a) under the investor relations section of the Company's website; and
 - (b) under the company announcements section of the ASX website.

4. Website

- 4.1 The investor relations section of the Company's website is the primary medium of providing information to all securityholders.
- 4.2 The investor relations section of the Company's website will contain information relevant to securityholders and stakeholders, including statements lodged with the ASX by the Company (including all financial results, annual reports and press releases), board and board committee charters and corporate governance policies and other material relevant to securityholders.

5. Annual general meeting (AGM)

- 5.1 The AGM provides an important opportunity for the Company to provide information to its securityholders and a reasonable opportunity for informed shareholder participation. At the AGM, securityholders can express their views to the Board and vote on the Board's proposals. All securityholders are encouraged to attend the AGM.
- 5.2 The date, time and location of the AGM will be provided in the notice of meeting, in the annual report and on the Company's website.
- 5.3 The notice of meeting and proxy form will be distributed to all securityholders prior to the AGM in the timeframe set by the Company's By-Laws (the **Constitution**), and will be available on the Company's website.
- 5.4 The Company's auditor will attend its AGM and will be 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. Analysts and institutional investors

- 6.1 The Company may conduct briefings for analysts and institutional investors from time to time to discuss matters concerning the Company. The Company's policy in relation to such briefings is that:
- (a) only the Chief Executive Officer, Chief Financial Officer or other representative of the Company approved by the Board will be authorised to speak to analysts and institutional investors;
 - (b) the Company will not comment on price sensitive issues not already disclosed to the market; and
 - (c) any questions raised in relation to price sensitive issues not already disclosed to the market will not be answered or will be taken on notice. If a question is taken on notice and the answer would involve the release of price sensitive information, the information must be released through ASX before responding.

7. General

- 7.1 **Annual report:** Unless securityholders have elected to have a hardcopy of the annual report mailed to them, the annual report (or a link where it can be downloaded) will be emailed to securityholders (to the email address recorded on the Company's share register) prior to the AGM within the timeframe set by the Constitution.
- 7.2 **Half-year and full year results:** The half-year and full-year results are announced to the ASX pursuant to the ASX Listing Rules and are available to securityholders in the same manner as other ASX announcements.
- 7.3 **Share registry:** Securityholders with any questions related to their shareholding should contact the Company's share registry, Link Market Services Limited.
- 7.4 **Shareholder privacy:** The Company recognises that privacy is important and will not disclose registered shareholder details unless required by law. However, securityholders should be aware that certain details of holdings in a public company are publicly available by law. Shareholder details will only be used by the Company in accordance with applicable privacy laws.