

Shareholder Communication Policy

About this Policy

This Shareholder Communication Policy is designed to:

- Promote effective communication with both existing and potential shareholders;
 - Ensure ready access to understandable information about Australian Pharmaceutical Industries Limited (**API**) including the existence of this Policy; and
 - Encourage shareholders to participate at Annual General Meetings.
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Policy Owner

General Counsel and Company Secretary

Methods of Communications

Shareholder communication is principally undertaken via the following methods:

- ASX announcements;
- API website;
- Reports and correspondence to shareholders; and
- Registries website.

This Shareholder Communication Policy is to be read in conjunction with the following:

- API's Continuous Disclosure Policy;
 - ASX Listing Rules; and
 - Corporations Act.
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Shareholder Communication Objectives

- **Timely Communication**

In accordance with API's Continuous Disclosure Policy, API aims to ensure that all information with the potential to affect the price or value of API's securities or to influence decisions taken by investors to buy or sell API's securities is made accessible to existing and potential shareholders in a timely manner.

- **Equitable Disclosure**

This Shareholder Communication Policy complements API's Continuous Disclosure Policy.

Both policies are aimed at ensuring equitable access to company information for all stakeholders, including current and prospective shareholders.

- **Balanced Communication**

API seeks to provide balanced communication and existing and potential shareholders are provided with information to enable an informed assessment of the value of API's securities. API announcements are factual and objective.

If API discovers that a statement it has made is materially incorrect, or subsequent information renders it incorrect, an announcement to correct the statement is made via the ASX.

For details for the process followed in the production and release of ASX announcements, please refer to the company's Continuous Disclosure Policy which is available on the API's website at <http://www.api.net.au>

- **Plain Communication**

Additionally, shareholder communication is produced in plain language. Where possible specialised or technical language is avoided unless required to meet regulatory requirements.

Information Distribution

API communicates with existing and potential shareholders in the following ways:

- **ASX Announcements**

Any information with the potential to influence API's share price is released to the ASX.

All ASX announcements are made immediately available on API's website following confirmation of receipt by the ASX.

- **Website**

API's website complements the information provided to the ASX.

Website content is reviewed and updated regularly.

The website under the "Investor Relations" tab contains the following information:

- Annual Reports
- ASX Announcements
- Presentations
- Corporate Governance
- Compliance Policy
- Share Registry
- FAQ's
- Board of Directors
- Archives

This policy will also be made available on API's website.

Shareholder enquiries can be dealt with through API's website.

The website address is <http://www.api.net.au>

Information on shareholder's securities in API, can also contact API's Share Registry:

Registries Limited, Level 7, 207 Kent Street, Sydney, New South Wales 2000

T: 1300 737 760 (within Australia)
+ 61 2 9290 9600

E: registries@registries.com.au

Website: <http://www.registries.com.au>

▪ **Reports to Shareholders**

All existing shareholders are provided with the opportunity to request a printed Annual Report. The reports are available also through API's website and to potential shareholders on request.

All reports are first released to the ASX and then placed immediately onto API's website following the confirmation of receipt by the ASX.

▪ **General Meetings**

Notices of general meetings and meeting agendas are first released to the ASX and then placed on API's website immediately following confirmation of receipt by the ASX.

Where necessary, API provides shareholders with an explanatory memorandum to accompany the agenda and notice of meeting. The memorandum provides additional information on the resolutions and business of the general meeting to enable shareholders to make informed decisions at the meeting.

API understands that not all shareholders will be able to attend the meeting. All notices of meeting and accompanying information relating to the meeting is available from API's website.

Shareholders are encouraged to attend API's Annual General Meeting (**AGM**).

Questions may be asked regarding API's governance and business. The auditor also attends the AGM and is available to receive questions regarding the audit.

Questions can be submitted electronically before the meeting via API's website.