



THORNEY

OPPORTUNITIES

TOP

COMMUNICATIONS POLICY

THORNEY OPPORTUNITIES LTD

ABN 41 080 167 264

Level 39, 55 Collins St. Melbourne VIC 3000 Australia

1. Introduction

- 1.1 The Board is accountable to its shareholders as owners of the Company. This Policy seeks to promote effective communication with shareholders; establish ways to give shareholders ready access to balanced and understandable information about Thorney Opportunities Ltd and its activities; and encourage shareholders to participate in general meetings.

2. Definitions

ASX means the Australian Securities Exchange, ASX Limited.

Board means the Board of Directors of Thorney Opportunities Ltd.

Company means Thorney Opportunities Ltd ACN: 080 167 264

Directors means the members of the Board.

Investment Manager means Thorney Management Services Pty Ltd ACN 164 880 148

Members means shareholders of Thorney Opportunities Ltd.

3. Objectives of the Communications Policy

- 3.1 The Company seeks to ensure that Members are kept fully informed of any major developments and activities of the Company. It does this in various ways:
- via letters from the Chairman;
 - uploading information, including information about the Company and governance, to our website at www.thorney.com.au/thorney-opportunities/;
 - through the Half-year result and the Annual Report;
 - by holding Annual General Meetings and dispatching the associated documentation;
 - by providing full and timely information about TOP's activities and where necessary, including compliance with ASX continuous disclosure requirements.
- 3.2 The Company seeks where practicable to take advantage of new technologies and electronic communication with its shareholders.

4. Periodic reports to ASX

- 4.1 The Company makes periodic announcements to ASX including the Half-Year report, the Annual Report and monthly Net Tangible Asset backing announcements.
- 4.2 The Annual Report is a comprehensive report on the activities and financial results of the Company. It can be accessed via the Company's website or if requested, a printed copy can be posted to Members.
- 4.3 The Annual Report includes a review of the Company's operations, details of Company directors, remuneration, financial position and performance and the Auditor's report.

5. Website: www.thorney.com.au/thorney-opportunities/

- 5.1 The Company's website is part of the "Thorney" group of entities website, and is regularly updated with important information.
- 5.2 There are different sections that are accessible from the Thorney Opportunities homepage, such as information about the Company, details for Shareholders to access their holdings, ASX Announcements and Communications & Media.
- 5.3 The Thorney Opportunities homepage has details on the Company, the nature of investments, and information about the Investment Manager. The "About" section has further details on the directors, corporate governance and access the Company's Whistleblower Policy.
- 5.4 Under the Corporate Governance section shareholders can access a variety of information about the corporate governance practices of the Company, including charters, policies and Code of Conduct.

6. General Meetings

- 6.1 The Company considers the Annual General Meeting (AGM) to be the central forum to effectively communicate with Members and provide them with access to information about the Company.
- 6.2 At an AGM or other general meeting the Chairman will allow time for questions put by shareholders.
- 6.3 The Company's Auditor will attend the AGM and be available to answer questions concerning the conduct of the audit and the preparation and content of the Auditor's report.
- 6.4 The Company considers how technology can facilitate the participation of shareholders in meetings, in line with ASIC rules and ASX Guidance.
- 6.5 Shareholders who cannot attend the AGM are invited to provide questions before the meeting, which the Company will address as part of the AGM.
- 6.6 All substantive resolutions at a meeting of shareholders are decided by a poll.

7. Notices of Meetings

- 7.1 The Company encourages shareholder participation at general meetings and has adopted ASX guidelines on notices of meetings. Where appropriate, the Company will include explanatory memoranda in respect of matters to be voted on at the meeting.
- 7.2 Any conflicts of interest of Directors will be clearly disclosed.

8. Briefings

- 8.1 From time to time the Company may hold information sessions or briefings, online (ie. Via a Webinar) or in person. The purpose of these meetings is to provide an informal forum for shareholders to raise questions and participate in general discussion about the Company with members of the Board and Investment Manager.
- 8.2 Wherever practicable, the Company will arrange advance notification of significant group briefings and will widely circulate the date, time and location and publish details on its website.
- 8.3 The Company maintains a summary record (for internal use only) of issues discussed at group and on-on-one meetings with investors and analysts, including a list of the attendees, date, time and place of meeting.

9. Electronic communications

9.1 The Company runs frequent shareholder campaigns in collaboration with the Company's share registry, Boardroom Pty Limited, to encourage all of the Company's shareholders to elect to receive Shareholder Communications via email. Doing this helps reduce the impact on the environment as well as the costs associated with printing and sending materials by post. This communications method is also secure, convenient and prompt.

10. Publication of the Policy

10.1 Key features of the policy are outlined or referenced to in the annual reports to shareholders each year.

10.2 A copy of the policy is available at www.thorney.com.au/thorney-opportunities/