

# Orbx Investments Limited and Subsidiaries

## Communications Policy

### 1 Introduction

This document sets out the Communications Policy for Orbx Investments Limited (**Orbx**).

### 2 Objectives

The objectives of this Communications Policy are to:

- (a) establish the Authorised Spokespersons for Orbx and its subsidiaries (the **Group**);
- (b) outline the duty of confidentiality which applies to the Group's directors, officers, employees and contractors (**Related Persons**); and
- (c) summarise the obligations of Related Persons when using Social Media Platforms.

### 3 Authorised Spokespersons

#### 3.1 General

No Related Person is permitted to make any public statement on behalf of or in relation to the Group unless they are an Authorised Spokesperson.

The "**Authorised Spokespersons**" of the Group are the Chief Executive Officer (**CEO**), the Chairperson and any person approved by the CEO or Chairperson to be an Authorised Spokesperson for the purposes of this section 3 (each an **Authorised Delegate**).

Authorised Spokespersons are authorised to make a public statement on behalf of or in relation to the Group. Such public statements extend to all responses by the Company to enquiries by the media, analysts, shareholders or customers. All enquiries by regulators should be passed on to the Company Secretary.

#### 3.2 Authorised Delegates

Authorised Delegates who are permitted to give media interviews, speak with analysts, or make external company presentations must notify the CEO and the Chairperson of the date and time of the relevant event. A copy of any materials to be used or referred to during the event must be given to the CEO and Chairperson a reasonable time prior to the commencement of the event.

Authorised Delegates who are authorised to make posts on the Group's internet forums, any other digital media which represent the Company (for example, but not limited to, YouTube Channel, Facebook page, Twitter and Instagram accounts), or other sites where comments are publicly accepted (eg. FSElite, Threshold, MSFS Forums) must ensure that all posts comply with clause 5 of this Communications Policy and any other requirements advised by the CEO from time to time (including any restrictions on the topics and the content of such posts).

The CEO or Chairperson may, from time to time, nominate periods during which interviews, conversations or external presentations may not be given without the specific permission of the CEO or Chairperson (**Black-out Period**). Authorised Delegates will be notified in advance of any Black-out Period.

## **4 Confidentiality**

### **4.1 Confidential Information**

For the purposes of this document, “**Confidential Information**” includes any patents (actual or pending), trade secrets, formulas, designs and the like relating to the business affairs of Orbx or members of the Group, or any of their customers, clients or suppliers, or any third party whose confidential information a Related Person accesses or obtains as a result of their employment of engagement by the Group. Without limitation, this will include any information concerning the accounts, marketing plans, sales plans, prospects, research, management, financing, products, inventions, designs, suppliers, clients, customers, management information systems, computer systems, processes and any database, data surveys, client lists, customer lists, supplier lists, specifications, drawings, records, reports, software or other documents, material or other information whether in writing or otherwise concerning Orbx or any members of the Group, or any of their clients, customers or suppliers to which a Related Person has had access and also includes any confidential information which a Related Person has obtained for or from any third party pursuant to the terms of any confidentiality agreement.

### **4.2 Duty of confidentiality**

Related Persons have a duty of confidentiality to Orbx and the Group. Related Persons must keep Confidential Information acquired while they are employed or engaged by the Group, or acting on behalf of the Group, confidential, even after they leave or cease their engagement with the Group.

Related Persons must not access, request, make improper use of, transfer or disclose confidential information to anyone else except as required by their position, as authorised by an Authorised Spokesperson, or as legally required. If Confidential Information advertently comes into their possession it should be returned or destroyed immediately.

If any Related Person is required by any regulatory or governmental authority to provide Confidential Information that has not been otherwise authorised by an Authorised Spokesperson, they must immediately notify the CEO or the Chairperson.

### **4.3 Protection of Group property**

Related Persons are responsible for protecting Group property and assets (including Confidential Information) under their control and to safeguard such property and assets against loss, theft and unauthorised use.

As a general rule, Group property and assets (including documents) should not be removed from official premises without a good and proper reason. If removed, such property and assets should be stored in a secure manner and covered by appropriate insurances. This form of security also applies to digital documents and files.

## **5 Social Media Platforms**

### **5.1 Scope**

- (a) This section 5 applies to Related Persons and their use of “**Social Media Platforms**”, being online services and tools used for publishing, sharing and discussing information. Social Media Platforms include, but are not limited to, social networking sites (such as Facebook and LinkedIn), video and photo sharing websites (such as Flickr, Instagram and YouTube), micro-blogging sites (such as Twitter), weblogs (such as personal blogs), forums or discussion boards (such as Whirlpool and Yahoo!), online encyclopedias, wikis and any other websites that allow users to upload and share content.

### **5.2 Sharing content on behalf of the Group**

- (i) Only Authorised Spokespersons are authorised to share content on behalf of the Group on Social Media Platforms. All other Related Persons are restricted from sharing content on behalf of the Group or using the Group’s branding on Social Media Platforms.
- (ii) Any content shared on a Social Media Platform operated by the Group must be factual and consistent with the Group’s goals and objectives and must comply with the obligations set out in section 5.3 below.

### **5.3 General obligations of Related Persons on Social Media Platforms**

- (a) When sharing content on Social Media Platforms (including on personal Social Media Platforms), Related Persons must not:
- (i) disclose any Confidential Information (including commercially sensitive information related to the Group);
- (ii) disclose any non-public information that a reasonable person would expect to have a material effect on the price or value of Orbx’s securities for the purposes of the continuous disclosure rules set out in Chapter 3 of the ASX Listing Rules;
- (iii) endorse or cite any client, member, partner or supplier of the Group without the explicit prior permission of an Authorised Spokesperson;
- (iv) attribute personal statements, opinions or beliefs to the Group;
- (v) make deliberately false or misleading claims about the Group, or its products or services;
- (vi) make disparaging, offensive or adverse comments about the Group, Related Persons or clients, members, partners or suppliers of the Group; and
- (vii) engage in bullying or discriminatory behaviour towards Related Persons or clients, members, partners or suppliers of the Group.
- (b) In addition, the use of personal Social Media Platforms by Related Persons during work hours must:

- (i) be occasional;
- (ii) not interfere with professional responsibilities; and
- (iii) not violate this section 5.

#### 5.4 Awareness

Any Related Person who becomes aware of content shared on a Social Media Platform which might breach this section 5, or which might reasonably be thought to damage the Group's reputation, must immediately notify the CEO.

### 6 Reporting Behaviour and Breach

If a Related Person considers that a potential breach of this Communications Policy has occurred, they should promptly report it to the CEO, who may in turn report such breaches to the Board.

When it is considered that a breach of this Communications Policy has occurred, the handling of the process is to be administered by the CEO taking into account the severity of the misconduct and any applicable laws.

Any breach of the terms of this Communications Policy by a Related Person may result in disciplinary action, including, but not limited to, the issue of a warning, demotion, suspension or termination of employment (or, for the Group's contractors, the termination or non-renewal of their contract for service). In such instances the Group will act objectively, fairly and equitably and consistent with any applicable provisions or requirements in an employment contract.

The Group reserves the right to inform the appropriate authorities where it is considered that there has been criminal activity or an apparent breach of the law.

### 7 Further Information

Any person who has questions about this Communications Policy, or who requires further information, should contact the CEO.

### 8 Review

This Communications Policy may be amended by resolution of the Board, from time to time, to ensure that it is operating effectively.

Approved by the Board of Orbx Investments Limited.