

**Policy**

# **Communications Policy**

Corporate & Public Affairs

Version 2

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# OVERVIEW

## PURPOSE

This document sets out the communications policy of Bendigo and Adelaide Bank and its subsidiaries (the Group). The focus of this policy is to manage and regulate communications externally.

## APPLICATION

This Policy applies to Bendigo and Adelaide Bank Limited and its subsidiaries (the Group), as defined by the Group Definition. This policy also applies to employees within the Group employed to work for Community Banks as communications apply to the Group, or the Bank. It also applies to Community Bank directors and company secretaries as communications apply to the Group, or the Bank.

## INTERPRETATION

<b>Bendigo and Adelaide Bank</b>	Bendigo and Adelaide Bank Limited
<b>CEO &amp; MD</b>	Chief Executive Officer and Managing Director
<b>Group</b>	Bendigo and Adelaide Bank Limited and its wholly owned or controlled subsidiaries as provided in the Group Definition managed by the Risk Governance team.
<b>Website</b>	<a href="http://www.bendigoadelaide.com.au">www.bendigoadelaide.com.au</a>

# POLICY

## 1 SHAREHOLDER COMMUNICATIONS

### 1.1 Methods

The Group communicates with external stakeholders through.

- ASX announcements
- Emails and letters
- Investor and Trading Updates
- Annual reporting (half-year and full-year)
- Annual general meetings
- Information on the Website (see section 1.2)
- Media releases
- Speeches and presentations at a range of conferences and events
- Submissions and/or attendances at relevant hearings
- Social media posts including Twitter, Facebook, Instagram and LinkedIn
- Podcasts
- Share Registry portal managed by the external share registry provider

### 1.2 Website

The following material is made available on the Website.

- Investor and Trading Updates
- The Annual financial reporting suite including the Annual Financial Report, Sustainability Report, the Climate Report, the Corporate Governance Statement, and the Appendix 4G, and the Appendix 4G
- ASX announcements (including result announcements, regulatory disclosures, Investor Calendar, dividend payments and general investor updates that comply with the Continuous Disclosure Policy [Continuous Disclosure Policy \(bendigoandadelaide.com.au\)](https://www.bendigoandadelaide.com.au/continuous-disclosure-policy) )
- Media releases
- Notices of AGM including AGM User Guide
- Webcasts of results presentations
- Webcast and transcript of annual general meetings

In addition, there is a link from the Website to the ASX website for access to announcements that Bendigo and Adelaide Bank has made to ASX.

### 1.3 Annual General Meetings

**Notices:** The Annual General Meeting notice provides for the appointment of proxies and a shareholder's question form is included with the notice of meeting for shareholders to ask questions of the auditor and of the Board.

**Chair and CEO & MD's addresses:** The Chair's address and CEO & MD's address is released to the ASX before the Annual General Meeting starts.

**Auditors:** The auditor attends the Annual General Meeting to answer questions.

**Webcast:** The annual general meeting is webcast on the Website.

**Direct Voting:** Bendigo and Adelaide Bank shareholders may 'direct vote'.

## 2 ASX ANNOUNCEMENTS

### 2.1 What is the policy?

See Bendigo and Adelaide Bank Continuous Disclosure Policy

## 3 ANALYST, STOCKBROKER, AND INSTITUTIONAL INVESTOR BRIEFINGS

### 3.1 What is the policy?

See Bendigo and Adelaide Bank Continuous Disclosure Policy. [Continuous Disclosure Policy \(bendigoadelaide.com.au\)](https://www.bendigoadelaide.com.au/continuous-disclosure-policy)

In relation to persons who are authorised to speak with analysts, stockbrokers, and institutional shareholders on behalf of Bendigo and Adelaide Bank, see section 6.

## 4 GENERAL MEDIA RELEASES AND PUBLIC COMMENT

### 4.1 Approval for media releases and comments

All information prepared for written or oral use with media must be developed in consultation with the Head of Public Relations and approved in writing by **one of** the following.

- CEO & MD
- Chair, (or a delegate), if the communication is on behalf of the Board of Directors;
- Head of Public Relations (or a delegate). However, if in the case of a document prepared by the Head of Public Relations (or his delegate), the approval must be by one of the above persons.
- A person who is authorised in writing by the CEO & MD to speak with the media as an authorised spokesperson (see section 6).

If an announcement is required to be given to ASX, it must not be given to the media before confirmation of its release by ASX – see Continuous Disclosure Policy. This includes giving information to the media on an embargoed basis.

In key disclosure periods, including half year results, full year results, and the bank's AGM, the CEO in consultation with the Head of Public Relations, will approve who is to speak with media as an authorised spokesperson, to ensure streamlined and consistent message delivery.

## 4.2 Responsibilities for media releases

The Head of Public Relations (or a delegate) is responsible for:

- Preparing media releases relating to the Group.
- Making sure the information in media releases is accurate.
- Maintaining a register of all media releases and arranging for the releases to be made available on the Website.

## 4.3 Public speeches and addresses

The text of all external speeches and addresses relating to strategy and operations must be approved by the CEO & MD, the relevant Executive (or a delegate) or the Head of Public Relations before being made.

The Head of Public Relations must assess and/or approve invitations to appear on panel discussions and other public appearances including presentations at conferences.

# 5 COMMENT SOLICITED BY MEDIA

## 5.1 Group

All media enquiries, including requests for interviews, must be referred to the Head of Public Relations (or a delegate), or in their absence, the CEO & MD, before responding (and before agreeing to an interview).

The Head of Public Relations or the CEO & MD may elect to deal with the enquiry personally or with the assistance of a subject matter expert, in the event the enquiry relates to an issue where the Bank's position is already public and/or is not considered to be material.

In the event where the Bank's position is not public or there is risk of reputational impact, the Head of Public Relations will engage the CEO & MD, and/or the relevant executives where appropriate, before proceeding.

# 6 AUTHORISED PERSONS

## 6.1.1 Who is authorised to speak on behalf of the Group?

BEN limits the number of persons authorised to speak on behalf of the Group.

This limitation is to maintain control over the information that is provided and, in the case of information that is required to be disclosed to ASX, to prevent inadvertent disclosure to third parties before the information is given to, and released by, the ASX.

The limitations include disclosures to the following parties:

### Financial community

- Institutional Investors

- Retail investors
- Analysts and stockbrokers

### Media

#### Regulators and rating agencies

- Australian Securities and Investments Commission (ASIC)
- Australian Prudential Regulation Authority (APRA)
- Australian Securities Exchange (the ASX)
- Australian Competition and Consumer Commission (ACCC)
- Reserve Bank of Australia (RBA)
- AUSTRAC
- Rating agencies
- Office of the Australian Information Commissioner<sup>1</sup> (OAIC)

#### Industry

- Australian Banking Association
- Australian Financial Complaints Authority

## 6.1.2 Authorisation categories and responsibilities

For each category the Tables of Authorisations in section 7 sets out

- a Primary Contact,
- an Other Authorised Spokesperson, and
- an Authorised Spokesperson in their Area of Responsibility

If an authorised spokesperson who is not the primary contact for a particular category speaks on behalf of the Group to third parties, **that person is responsible for consulting with the relevant Primary Contact about the intended communication.**

An authorised spokesperson who is not the primary contact for a particular category, may speak on a regular basis on behalf of the Group to agreed third parties, where the relevant Primary Contact has approved a protocol in advance that outlines the intended frequency and nature of those discussions.

All authorised spokespersons must be familiar with the Continuous Disclosure Policy and, in particular, make sure that no market sensitive information is disclosed before it is given to ASX and confirmation of release is received from ASX (unless otherwise required by law).

Notwithstanding this policy, no prospective, current or former officer, employee or contractor (including professional service provider) is to be constrained or impeded from cooperating with, meeting with and disclosing information to all regulators including APRA. Regulators are to be provided with unfettered access to staff, where requested. Such persons are not to be constrained or impeded from providing information to auditors, and others, who have statutory responsibilities in relation to the Group.

## 7 TABLES OF AUTHORISATIONS

✓ Primary Contact	✓ Other Authorised Spokesperson (only after consultation with Primary Contact)	✓ Can authorise others	✓ Authorised Spokesperson in area of responsibility (only after consultation with Primary Contact)	✓ Can authorise others in area of responsibility	✗ No Authority
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### 7.1 Management

	Institution Investors	Retail Investors	Analysts	Media	ASIC	APRA	ASX	ATO	ACCC	RBA	Austrac	Rating Agencies	ABA	AFCA	OAIC
Managing Director	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓
General Manager, Corporate and Public Affairs	✓	✓	✗	✓ ✓	✗	✗	✗	✗	✗	✗	✗	✓	✓ ✓	✗	✗
Chief Financial Officer	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓ ✓	✓ ✓	✓	✓ ✓	✓ ✓	✓ ✓	✓
Chief Risk Officer	✓	✓	✓	✓ ✓	✓ ✓	✓ ✓	✗	✓	✓ ✓	✓	✓ ✓	✓	✓ ✓	✓ ✓	✓
Other Executives	✓	✓	✓	✓ ✓	✓ ✓	✓ ✓	✗	✓	✓	✗	✗	✓	✓ ✓	✓ ✓	✓
Head of Public Relations	✗	✗	✗	✓ ✓	✗	✗	✗	✗	✗	✗	✗	✗	✓	✗	✗



	Institution Investors	Retail Investors	Analysts	Media	ASIC	APRA	ASX	ATO	ACCC	RBA	Austrac	Rating Agencies	ABA	AFCA	OAIC
Group Treasurer	✓ for debt investors ✓	✗	✗	✓	✗	✓	✗	✗	✗	✓	✗	✓	✓	✗	✗
Head of Investor Relations	✓ for equity investors ✓	✓	✓	✓	✗	✓	✗	✗	✗	✗	✗	✓	✓	✗	✗
Company Secretary	✓	✓ ✓	✗	✗	✓ ✓	✓ ✓	✓ ✓	✗	✗	✓ ✓	✗	✗	✗	✗	✓
Customer Advocate	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	✓ ✓	✗
Chief of Staff & General Counsel	✗	✓	✗	✗	✓	✓	✓	✗	✓	✓	✓	✗	✓ ✓	✓	✓
Chief Economist	✗	✗	✗	✓	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗
Head of Group Tax	✗	✗	✗	✗	✗	✗	✗	✓	✗	✗	✗	✗	✗	✗	✗

## 7.2 Directors

	Investors (Institutional and other)	Analysts Stock- brokers	Media	ASIC	APRA	ASX	ACCC	ATO	RBA	Austrac	Rating Agencies	Industry – ABA	AFCA	OAIC
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Chair



In consultation with CEO & MD and can authorise other non-executive directors (for all categories) in relation to specific matters, in particular in relation to where the director acts as Chair of a specific Board Committee

# GOVERNANCE

## RESPONSIBILITIES

Role	Responsibility
Corporate & Public Affairs	To review and maintain the policy and communicate the authority levels
Investor Relations	To be the primary contact for all communications with Institutional investors, and the secondary contact for communications with Retail investors.
Corporate Secretariat	To be the primary contact for all communications with Retail investors.

## DOCUMENT OWNER

Corporate & Public Affairs

## ACCOUNTABLE PERSON

This Policy is owned by the following Accountable Person.

Name	Title
Marnie Baker	Chief Executive Officer and Managing Director

## APPROVAL

Responsibility	Party
Reviewed by	Company Secretary
Recommended by	Corporate & Public Affairs
Approved by	BEN Board

## REVIEW

This Policy will be reviewed every two years with the next review due August 2025.

## RELATED DOCUMENTS

Related documents which should be read in conjunction with this policy include:

- [Continuous Disclosure policy](#)

## DOCUMENT CONTROL TABLE

Version No:	Approved By	Date Approved	Date Applicable	Next Review Date	Document Owner
1.0	BEN Board	30/04/19	30/04/19	04/05/20	Corporate Secretariat
2.0	BEN Board	30/01/24	30/01/24	August 2025	Corporate & Public Affairs