

Bendigo and Adelaide Bank Group Communications policy

Overview

This document sets out the communications policy of Bendigo and Adelaide Bank and its wholly-owned subsidiaries (the Group). It deals with external communications.

Policy

Shareholder communications

- 1. Methods** Bendigo and Adelaide Bank communicates with its shareholders by the following means.
- ASX announcements
 - Shareholder newsletters
 - Annual reporting
 - Annual general meetings
 - Information on the Bendigo and Adelaide Bank website (see below)
 - “e-shareholder” service, a facility through which shareholders are provided information (e.g. annual reports, notices of meeting etc) by email
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- 2. Website** The following material is made available on the Bendigo and Adelaide Bank website (www.bendigoadelaide.com.au).
- Shareholder newsletters
 - Annual review and full financial statements
 - ASX announcements (including result announcements)
 - Media releases
 - Notices of meeting
 - Webcasting of results presentations
 - Webcasting of annual general meeting
- In addition, there is a link from the Bendigo and Adelaide Bank website to the ASX website for access to announcements that Bendigo and Adelaide Bank has made to ASX.
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- 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.
- Chairman’s and Managing Director’s addresses:* The Chairman’s address and Managing Director’s address are released to ASX before the meeting starts.
- Auditors:* The auditor attends the annual general meeting to answer questions.
- Webcast:* The annual general meeting is webcast on the Bendigo and Adelaide Bank website.
- Direct Voting:* Bendigo and Adelaide Bank shareholders may ‘direct vote’.

ASX announcements

- 4. What is the policy?** See Bendigo and Adelaide Bank *Continuous disclosure policy*: https://www.bendigoadelaide.com.au/corporate_governance/pdf/continuous-disclosure-policy.pdf.

Analyst, stockbroker and institutional investor briefings

5. What is the policy?	See Bendigo and Adelaide Bank <i>Continuous disclosure policy</i> . In relation to persons who are authorised to speak with analysts, stockbrokers and institutional shareholders on behalf of Bendigo and Adelaide Bank, see section 10 below.
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General media releases and public comment

6. Clearance for media releases and comment	<p>All information given to the media, written and oral, must first be cleared by one of the following.</p> <ul style="list-style-type: none"> • Managing Director. • Chairman. • A person who is permitted to speak with the media as an authorised spokesperson (see section 10 below) on that matter. • 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.
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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.

7. Responsibilities for media releases	<p>The Head of Public Relations (or a delegate) is responsible for the following.</p> <ul style="list-style-type: none"> • Preparation of media releases relating to Bendigo and Adelaide Bank and its subsidiaries. • 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 Bendigo and Adelaide Bank website.
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8. Public speeches or addresses	The text of all speeches and addresses relating to strategy and operations must be approved by the Managing Director or the relevant Executive (or a delegate) before they are given.
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Comment solicited by media

9. Bendigo and Adelaide Bank and subsidiaries	<p>All media enquiries, including requests for interviews, must be referred to the Head of Public Relations (or a delegate), or in their absence, the Managing Director, <i>before</i> responding (and before agreeing to an interview).</p> <p>The Head of Public Relations or the Managing Director may elect to deal with the enquiry personally or refer it to the appropriate respondent (e.g. a specialist such as Head of Investor Relations, Group Treasurer or the relevant local branch manager).</p>
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Authorised spokespersons

10. Who is authorised to speak on behalf of the Group?

Bendigo and Adelaide Bank limits the number of persons authorised to speak on behalf of the Group. This restriction applies across the categories set out below.

Financial community

- Institutional Investors
- Other investors
- Analysts and stockbrokers
- Media

Regulators and rating agencies

- Australian Securities and Investments Commission
- Australian Prudential Regulation Authority
- Australian Securities Exchange
- Australian Consumer and Competition Commission
- Reserve Bank of Australia
- Austrac
- Rating agencies

Industry

- Australian Bankers' Association
- Banking and Financial Services Ombudsman
- Conferences

This 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.

A schedule of authorised spokespersons is included at the end of this document. This identifies a primary contact and other authorised spokespersons for each category. The primary contact may sub-authorise additional authorised spokespersons to speak to external stakeholders within that category, on a case by case basis.

All authorised spokespersons must be familiar with the *Continuous Disclosure Policy* and, in particular, make sure that no price sensitive information is disclosed before it is given to ASX and confirmation of release received from ASX.

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 informing the primary contact of the communication.

No prospective, current or former officer, employee or contractor (including professional service provider) is constrained or impeded from disclosing information to APRA, from discussing issues with APRA of relevance to the management and prudential supervision of the Group, or from providing documents under their control to APRA, that may be relevant in the context of the management or prudential supervision of the regulated institution. Such persons are not constrained or impeded from providing information to auditors, and others, who have statutory responsibilities in relation to the regulated institution. This does not constitute speaking on behalf of the Group and is not prevented by the authorised spokespersons policy.

Table of authorisations

Management														
	Institutional Investors	Retail shareholders	Analysts Stock-brokers	Media	ASIC	APRA	ASX	ACCC	RBA	Austrac	Rating Agencies	Industry - ABA	Australian Financial Complaints Authority	Conferences
Managing Director	✓ and can authorize others	✓ and can authorize others	✓ and can authorize others	✓ and can authorize others	✓ and can authorize others	✓ and can authorize others	✓ and can authorize others	✓ and can authorize others	✓ and can authorize others	✓ and can authorize others	✓ and can authorize others	✓ (MD Office, primary contact) and can authorize others	✓ (MD Office, primary contact) and can authorize others	✓ and can authorize others
Executive, Corporate and Government Affairs	✓	✓	✓	✓ and can authorize others	✓ and can authorize others	✓ and can authorize others	X	✓ and can authorize others	✓ and can authorize others	X	✓ in area of responsibility	✓ and can authorize others	X	✓ Primary contact, and can authorize others
Chief Financial Officer	✓ and can authorize others	✓ and can authorize others	✓ Primary contact and can authorize others	✓ and can authorize others in relation to area of responsibility	✓ and can authorize others	✓ and can authorize others	✓	✓ and can authorize others	✓ and can authorize others	✓	✓ Primary contact and can authorize others	✓ and can authorize others	✓ and can authorize others	✓ and can authorize others
Chief Risk Officer	✓	✓	✓	✓ and can authorize others	✓ Primary contact and can authorize others	✓ and can authorize others	X	✓ and can authorize others	X	✓ Primary contact and can authorize others	✓ in area of responsibility	✓ and can authorize others	✓ and can authorize others	✓ and can authorize others
Other Executives	✓ in area of responsibility	✓ in area of responsibility	✓ in area of responsibility	✓ in area of responsibility and can authorize others in relation to specific matters in relation to	✓ in area of responsibility and can authorize others in relation to specific matters in relation to area of	✓ in area of responsibility and can authorize others in relation to specific matters in relation to area of	X	X	X	X	✓ in relation to area of responsibility	✓ in relation to area of responsibility and can authorize others in relation to specific	✓ in relation to area of responsibility and can authorize others in relation to	✓ in relation to area of responsibility, and can authorize others in relation to specific

				area of responsibility	responsibility	responsibility							matters in relation to area of responsibility	area of responsibility	matters in relation to area of responsibility
Head of Public Relations	X	X	X	✓ <u>Primary contact</u> and can authorize others	X	X	X	X	X	X	X	X	✓ in relation to area of responsibility	X	✓ with approval of Managing Director
Group Treasurer	✓ Primary contact (for debt investors) and can authorize others	x	✓	✓	X	✓	X	X	✓	X	✓	✓	X	✓	
Head of Investor Relations	✓ Primary contact (for equity investors) and can authorize others	✓	✓	✓	X	✓ in relation to area of responsibility	X	X	X	X	✓	✓ in relation to area of responsibility	X	✓	
Company Secretary	✓	✓ Primary contact and can authorize others	X	X	✓ and can authorize others	✓ Primary contact and can authorize others	✓ Primary contact and can authorize others	✓ Primary contact and can authorize others	✓ Primary contact and can authorize others	X	X	X	X	X	
Directors															
	Investors (Institutional and other)	Analysts Stock-brokers	Media	ASIC	APRA	ASX	ACCC	RBA	Austrac	Rating Agencies	Industry – ABA	Industry – Banking Ombudsman	Conferences		
Chairman	✓ (in consultation with managing director) and can authorize others in relation to specific matters														
Other non-executive directors	✓	X	✓ only in consultation with Head of Public Relations	✓	✓	X	X	X	X	X	X	X	✓ if approved by Board or Managing Director		

This policy was adopted by the Board of Bendigo and Adelaide Bank Limited on 30 April 2019.